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Campbell, Jacqui

From: Roads Eastern Srit
Sent: 10 March 2015 14:53
To: 'sleheny@fta.co.uk'
Subject: York Street Interchange Formal Consultation

Seamus

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

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

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Campbell, Jacqui

From: Seamus Leheny [sleheny@fta.co.uk]
Sent: 09 March 2015 17:22
To: Roads Eastern Srit
Subject: York Street Interchange Draft Orders - FTA Views
Attachments: York Street Interchange - FTA Response - March 2015.doc

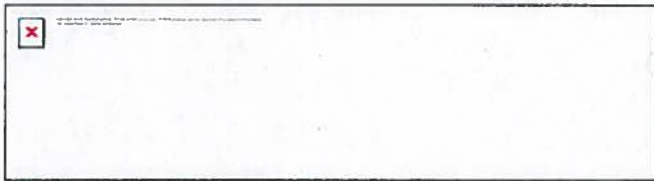
To Whom It Concerns,

Please find attached comments from the Freight Transport Association regarding the Draft Orders for proposed construction of the York Street Interchange.

Best Regards,
Seamus

Seamus Leheny
Policy & Membership Relations Manager - Northern Ireland
Freight Transport Association

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The Divisional Manager
Transport NI – Eastern Division Headquarters
Hydebank
4 Hospital Road
Belfast
BT8 8JL

9th March 2015

Dear Sir / Madam,

Reference: York Street Interchange Draft Orders

The Freight Transport Association (FTA) is one of the UK's largest trade associations and represents over 14,500 companies relying on or providing transport integration both domestically and internationally, to or from the UK. Our members include hauliers, freight forwarders, rail, sea and air freight operators, through to customers – producers, manufacturers, wholesalers and retailers. They cover all modes of transport – road, rail, air and sea. FTA members operate over 200,000 commercial goods vehicles on the roads in the UK; approximately half of the UK fleet. FTA members also consign around 90 per cent of goods moved by rail and around 70 per cent of goods moved by air and sea. The FTA represent over 300 members in Northern Ireland from right across the logistics industry and we welcome the opportunity to put forward our views regarding the draft orders concerning the upgrade of the York Street Interchange in Belfast.

The Freight Transport Association (FTA) strongly welcome and support the proposed development of the York Street Interchange as outlined in the current Environmental Statement dated January 2015.

FTA are pleased that the chosen option which was one of four initially considered has been selected.

The reasons for our support of this scheme are as follows:

- **Better connectivity of the Strategic Road Network**

The York Street Interchange is a pivotal component of the Strategic Road Network for Northern Ireland as it connects all major traffic flows and the vast majority of freight movements within Northern Ireland.

Major distribution centres that serve Northern Ireland are located in Belfast Harbour estate, Boucher and Mallusk industrial estates therefore for goods to get to final delivery points, regardless of the distribution centres location, the majority of goods are destined to transit via the York Street Interchange at some point in their journey.

- **Port Access**

Access to and from Belfast Harbour will be improved thus improving the efficiency of operators getting goods to market which is vital in growing the economy and attracting inward investment.

In 2014 Belfast Harbour moved 66% of freight traffic in Northern Ireland which was 23 million tonnes. The proposed on-slip from Duncrue Street will improve the efficiency of freight traffic exiting the Port for Southbound traffic, especially from the Southern section of the port which caters for high volume bulk goods.

Access at Fortwilliam for container and Ferry traffic will also be greatly improved both for traffic from North and South due to reduced congestion on Westlink and M2 which is currently caused by congestion at the York Street Interchange traffic signals.

9% of NI freight traffic is shipped via Larne therefore access to Larne port will be greatly improved with a better connection between the M1, M2 and the newly completed A8.

This will have a positive effect for Larne Harbour as it will mean operators from South of Belfast will have better access and improved journey times to Larne. Improving competition between both ports will ultimately lead to saving operators money and consequently end users.

- **Fuel Economy**

40% of operating costs for Haulage companies is fuel. Modern Euro 6 engines are excellent at conserving fuel in consistent moving traffic however stop start movements associated with urban traffic and traffic lights counteracts these savings. With the removal of traffic signals for traffic travelling between M1, M2 and M3, the consequence is that freight traffic will operate more efficiently and be more cost effective.

- **Air Quality**

Belfast City Council recently assessed the impact the York Street Interchange improvement would have with regards to helping achieve the EU Air Quality targets for Belfast. The test evaluated the impact of improved throughput of the junction by reducing stop start activity based on the rationale that removing existing traffic signals at the junction will in effect improve the throughput of traffic. The results indicate that the impact from smoothing the driving pattern at the two junctions would reduce concentrations of road NO₂ by ~60%. The test assumed an average speed of ~6 km/h in the congested mode and ~56 km/h in the free flow mode.

In terms of air quality, the scheme is considered as a means of reducing localised emissions on connecting roads (i.e. as a result of relieving a significant congestion hotspot) and, to a lesser extent, incremental reductions in background emissions, which of course will have a wider impact on exposure.

Modern Euro 6 LGV engines are extremely good at cutting carbon emissions when driven at a consistent speed but these benefits are hindered when the vehicle is then driven at inconsistent stop start intervals.

The FTA welcomes the opportunity to engage with TransportNI on the progress of the York Street Interchange and we appreciate any future feedback, consultation opportunities and updates in due course.

One area that we would be keen to be consulted on is the Traffic Management Plan that would be implemented during construction. It is likely that this would have a major impact on freight movements to and from ports and well as deliveries to Belfast therefore we would request any constraints put in place take into consideration the need for goods vehicles to still have adequate access to the city centre and ports. The FTA would also request that an information system is established to advise operators during the proposed scheme construction. Adequate access and reliable information will not only ensure commerce is not unduly affected by delays

in deliveries and collections but it will also protect city residents and vulnerable road users from some operators who may seek alternative routes that are unsuitable for Large Goods Vehicles.

In conclusion, the FTA fully supports the proposed plans to construct the new York Street Interchange as it will result in a more efficient road network for commercial goods vehicles and it will reduce emissions by such vehicles therefore bringing with it economic and environmental benefits for the entire community of Belfast and beyond.

Yours Sincerely,

Seamus Leheny

Policy Manager – Northern Ireland
Freight Transport Association
109 Airport Road West
Belfast
BT3 9ED