

**Objection number** .....OBJ31  
**Objector's Name** ..... Arthur Acheson  
**Date submitted**..... 10 March 2015  
**NIMVO plot number** .....N/A

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TransportNI has considered the correspondence in the above objection and responds as follows:

## **1. 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.**

## **2. 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.**

#### Alternatives/Pilot Projects

- a) The completed Stage 1 Scheme Assessment process, reported in the Preliminary Options Report, considered the merits of alternative schemes similar to the concept of pilot projects which you have described. Our assessment considered the merits of investment in other public transport alternatives, such as the provision of additional bus provision and Park & Ride facilities.
- b) It was considered that alternative public transport options which require connection through the junction would therefore still be subject to the same conflict with the strategic traffic movements. Therefore, the existing delays for road users on both these routes would remain. It was therefore considered that this conflict could only be addressed through the provision of grade separation, as included in the Proposed Scheme.
- c) The five Government objectives for transport of Environment, Safety, Economy, Accessibility and Integration are the defined high level objectives for the Proposed Scheme. At each stage in the Design Manual for Roads and Bridges (DMRB) Scheme Assessment process, the Proposed Scheme has been assessed against these objectives and the findings published in the associated Assessment Summary Tables.
- d) As illustrated in these Assessment Summary Tables, the benefits presented by the Proposed Scheme are consistent with the Government's objectives for transport and therefore considered compatible with the guidance of the Green Book.

### **3. ENVIRONMENT**

**The Environmental Statement describes the local environment as a "degraded urban landscape" whose "main characteristic is the legacy of 20<sup>th</sup> 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 21<sup>st</sup> 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.**

#### Environment

- a) As stated in sub-section 5.1.5 (Local context) in Volume 1 of the Environmental Statement, it is accepted that the existing study area is a "*degraded urban landscape*". As also stated in this section, "*the area is dominated by large-scale physical infrastructure features, such as the Lagan and Dargan bridges which have caused a certain degree of severance*".
- b) A Landscape & Visual Effects assessment has been undertaken for the scheme and reported in Chapter 11 in Volume 1 of the Environmental Statement. Based on this assessment, appropriate mitigation & enhancement measures have been developed and reported in Section 11.7 of the ES, and a set of Landscape Mitigation drawings are included as Figure 11.7 (7 sheets) in Volume 3 of the ES.

#### Strategic Advisory Group (SAG)

- a) Since finalising the Proposed Scheme Report, including the Environmental Statement, TransportNI has established a Strategic Advisory Group (SAG) comprising representatives from a variety of government and non-government bodies, including the Forum for Alternative Belfast. The purpose of the group, amongst other things, is to review scheme aesthetics and enhance user appreciation through the improvement of its finishes and open spaces.
- c) As stated in Section 11.9 in Volume 1 of the Environmental Statement, the development offers the opportunity to re-design the spaces between the road infrastructure and at the site periphery, to create a more positive interface and contribution to the Belfast cityscape. The impact on the cityscape around the periphery of the site would be limited, due to the relatively enclosed nature of the site setting. Therefore, on a Belfast City scale, the development would be generally blended into the site with appropriate mitigation.

## **4. 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.**

#### Safety

- a) Road safety is not an area considered by the Environmental Statement, in accordance with the requirements of the DMRB. Instead, the Road Safety Audit process established by Standard HD 19 of the DMRB, has been followed in the development of the Proposed

Scheme. This has required the completion of a Stage 1 Road Safety Audit by an independent audit team, led by a qualified and experienced Road Safety Auditor. This audit included a review of all reported road traffic collision data within the vicinity of the scheme to identify associated trends. From the available data, it appeared that a significant number of road traffic collisions were located in the vicinity of the existing signalised junctions on the gyratory system (rear-end shunt type collisions). We would note that the Proposed Scheme would remove these junctions in their current form.

## 5. 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.**

### Economy

- a) The Traffic and Economic assessment of the Proposed Scheme is presented in the published Engineering, Traffic and Economic Assessment Report.
- b) A detailed Traffic and Economic assessment has been undertaken using industry standard techniques and computer models to quantify the effects of the Proposed Scheme. Detailed costs have been prepared and included in the assessment to determine the economic value of the scheme. A range of sensitivity tests has also been undertaken to examine the extent to which results from the computer models vary under different scenarios.
- c) The results of the economic assessments indicate that the Proposed Scheme represents good value for money, with an overall Net Present Value of £99.780m and a Benefit to Cost Ratio of 2.334.
- d) The results of the various sensitivity tests indicate that the Proposed Scheme would generate a positive Net Present Value over a range of test scenarios where the overall benefits exceed the cost of the scheme. It is concluded that the Proposed Scheme would improve operating conditions in the York Street area and represents good value for money.

## 6. 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.**

### Accessibility

- a) The completed environmental impact assessment has concluded that the Proposed Scheme would, through the removal of significant volumes of strategic traffic from local streets, improve the amenity for pedestrians on York Street and improve accessibility from North Belfast to the City Centre. The proposed implementation of additional cycling and public transport infrastructure on York Street is also considered to enhance accessibility from North Belfast to the City Centre for these modes of transport.
- b) A Pedestrians, Cyclists and Community Effects assessment has been undertaken for the scheme and reported in Chapter 14 in Volume 1 of the Environmental Statement. This included an assessment of predicted impacts on Pedestrians (sub-section 14.6.1.12) and Cyclists (sub-section 14.6.1.13). Based on this assessment, appropriate mitigation & enhancement measures have been developed and reported in Section 14.7 of the ES.
- c) As stated previously, a Landscape & Visual Effects assessment has been undertaken for the scheme and reported in Chapter 11 in Volume 1 of the Environmental Statement. Based on this assessment, appropriate mitigation & enhancement measures have been developed and reported in Section 11.7 of the ES, and a set of Landscape Mitigation drawings are included as Figure 11.7 (7 sheets) in Volume 3 of the ES.

### Strategic Advisory Group (SAG)

- d) Since finalising the Proposed Scheme Report, including the Environmental Statement, TransportNI has established a Strategic Advisory Group (SAG) comprising representatives from a variety of government and non-government bodies, including the Forum for Alternative Belfast. The purpose of the group, amongst other things, is to review scheme aesthetics and enhance user appreciation through the improvement of its finishes and open spaces.

## 7. 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.**

### Integration

- a) The completed Environmental Impact Assessment has concluded that the Proposed Scheme integrates with land use planning and other government policies, specifically, the Regional Development Strategy, the Regional Transportation Strategy and the Belfast Metropolitan Transport Plan. The improvements for public transport and non-motorised users on York Street have also been assessed as beneficial to transport interchange.
- b) A Pedestrians, Cyclists and Community Effects assessment has been undertaken for the scheme and reported in Chapter 14 in Volume 1 of the Environmental Statement. This

included an assessment of predicted impacts on the Public Rail Network (sub-section 14.6.1.7) and Public Bus Network (sub-section 14.6.1.8). Based on this assessment, appropriate mitigation & enhancement measures have been developed and reported in Section 14.7 of the ES.

## **8. 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.**

### Emergency Situations

- a) TransportNI undertook a public consultation on the Proposed Scheme in June 2011. As part of this consultation, a questionnaire was used to invite the public's views on the problems with the existing junction and their preference on the way to resolve these problems. Of the responses received, 78% agreed with the need to improve connections between the Westlink, M2 and M3. Furthermore, the public considered that the key objectives for the Proposed Scheme, in descending order of importance, should be to reduce traffic congestion, improve journey time reliability, and improve road safety.
- b) Although space is restricted within the site due to the constraints formed by existing built infrastructure, the various road links within the interchange have been designed to the current standards of the DMRB, with hard shoulders provided, in addition to Intelligent Transport Systems, to assist in the incident management responses. The Proposed Scheme has been developed in consultation with the emergency services, in particular the Police Service of Northern Ireland, who would attend any reported incident and direct traffic as appropriate.

## **9. 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 20<sup>th</sup> 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.
- a) Under the provisions of The Roads (Northern Ireland) Order 1993 (as amended), TransportNI remains the relevant statutory body for the development of strategic road improvement schemes in Northern Ireland, in consultation as appropriate with the other government departments.
- b) The statutory public consultation process has been conducted in accordance with the relevant statutory requirements. Any members of the public who wish to comment upon the Proposed Scheme outside this period are free to make representation to TransportNI at any time. The

announced Public Inquiry for the Proposed Scheme will provide a further opportunity for members of the public to make representation in this respect.

DRD TransportNI  
Eastern Division  
02 October 2015