

Objection number**OBJ32**
Objector's Name Steven Patterson, Sustrans
Date submitted..... 10 March 2015
NIMVO plot numberN/A

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

1. **We wish to object to the draft Orders for the York Street Interchange. We object on the following basis:**
 - i. **The Proposed Scheme fails to meet the requirements for the provision of walking and cycling, as set out in the Belfast Metropolitan Transport Plan 2015.**
 - ii. **The Proposed Scheme fails to meet the aspirations/objectives for cycling, as set out in the Department for Regional Development's Draft Bicycle Strategy 2014.**
 - iii. **The Proposed Scheme fails to give due recognition to the significant impact on walking and cycling that the current relocation of the University of Ulster will have.**

We are extremely disappointed with the proposals. We previously engaged in the design development process when we responded to the consultation with the designers last year (see Appendix 1, letter dated 28/3/2014 sent to URS). There is little evidence that our comments and the advice given then have been incorporated into the Proposed Scheme.

2. THE BELFAST METROPOLITAN TRANSPORT PLAN 2015

The justification for and design of the Proposed Scheme refers to a number of strategies and plans, including the Belfast Metropolitan Transport Plan 2015 (BMTP).

We would contend that the proposals fail to take on board the objectives and design standards for walking and cycling set out in this document.

- i. **The Proposed Scheme fails to recognise and provide for the cycling network illustrated in Figure 8.4, Belfast City Centre Cycle Paths (Appendix II).**

Fails to meet requirements of BMTP (Belfast City Centre Cycle Paths)

- a) As shown in Figure 8.4 of the BMTP, York Street is identified as part of the proposed cycle route network. TransportNI considers that the Proposed Scheme is consistent with the principles of BMTP in this regard, as it proposes mandatory cycle lanes in both northbound and southbound directions along York Street between its junctions with Frederick Street and Dock Street.
- b) As you will be aware, following the statutory consultation period, TransportNI has further engaged with Sustrans and DRD Cycling Unit to review provision for all non-motorised users on York Street. All aspects raised by your response have been considered in developing a revised proposal.
- c) We enclose two drawings illustrating the revised proposal for your information. The revised proposal will be available for discussion at the upcoming Public Inquiry.

ii. The Proposed Scheme fails to recognise and provide for quality walking routes, as illustrated in Figure 8.3, Belfast City Quality Walking Route Network (Appendix III).

Fails to meet requirements of BMTP (Belfast City Quality Walking Route Network)

a) The Proposed Scheme would remove significant volumes of traffic from York Street, identified as a Quality Walking Route within the BMTP, improving its amenity for pedestrians. With reference to paragraph 4.7 of the BMTP, which identifies the key design features for such routes, it is noted that the Proposed Scheme would:

- maximise footway widths on York Street and North Queen Street within the constraints of existing built infrastructure;
- increase accessibility with pavement construction and surfacing in accordance with the Design Manual for Roads and Bridges, along with the provision of dropped kerbs and tactile paving;
- provide improved pedestrian crossing facilities with lower traffic flows, reduced crossing widths and a replacement road lighting system, in accordance with current lighting standards;
- provide clear signage on defined pedestrian routes;
- improve walking routes along York Street, with the introduction of a continuous footway link on its eastern side between Dock Street (Yorkgate train station) and the new university campus; and
- remain consistent with TransportNI requirements and standards for pedestrian provision within Belfast City Centre.

iii. The Belfast Metropolitan Transport Plan goes on to set out key design features of the Cycle Network.

Coherence: the cycling infrastructure should form a coherent entity, linking all trip origins and destinations; with a continuous level of provision;

Directness: Routes should be as direct as possible, based on desire lines, since detours and delays will deter use;

Attractiveness: Routes must be attractive to cyclists on subjective as well as objective criteria. Lighting, personal safety, aesthetics, noise and integration with the surrounding area are important;

Safety: Designs should minimise the danger for cyclists and other road users; and

Comfort: Cycle routes need smooth, well-maintained surfaces, regular sweeping and gentle gradients. Routes must be convenient to use and avoid complicated manoeuvres and interruptions.

We would contend that the cycling proposals in the scheme fail on most accounts to achieve these key design features.

- a) TransportNI is content that the Proposed Scheme is consistent with the principles of the BMTP.
 - b) As you will be aware, following the statutory consultation period, TransportNI has further engaged with Sustrans and DRD Cycling Unit to review provision for all non-motorised users on York Street. All aspects raised by your response have been considered in developing a revised proposal.
 - c) We enclose two drawings illustrating the revised proposal for your information. The revised proposal will be available for discussion at the upcoming Public Inquiry.
- iv. The BMTP goes on to state 'On heavily trafficked roads cycle routes would be expected to be provided as fully segregated facilities'.**

Cycling provision in both directions along York Street and the inner ring road must meet this requirement.

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- c) We enclose two drawings illustrating the revised proposal for your information. The revised proposal will be available for discussion at the upcoming Public Inquiry.

v. The Plan states:

'Current provision for pedestrians and cyclists is poor by the standards of some other metropolitan areas - and poorer still when compared to towns and cities in continental Europe. Walking and cycling in the BMA are unattractive because of conflicts with road traffic. The BMTP provides a significant opportunity to redress this by identifying improvements that have considered walking and cycling as integral elements of an overall transport system. This will support the changes made to development control traffic assessment procedures, which require measures to encourage greater levels of walking and cycling to be factored into the planning of new development'.

The Proposed Scheme fails to demonstrate a commitment to this statement.

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3. THE DRAFT BICYCLE STRATEGY AUGUST 2014 - DEPARTMENT OF REGIONAL DEVELOPMENT (DRD)

The Draft Bicycle Strategy, which was recently consulted on, sets out a 25 year vision for a cycling revolution. Key objectives include:

- i. **"We are committed to creating a network of high quality, direct, joined up routes. We envisage a series of 'arterial routes' in our urban areas, which will largely mirror our arterial road network and be in a radial form."**
- ii. **"Going forward we will ensure that provision is more integrated and coherent in nature, by providing a 'whole of route' treatment. Where 'opportunities' arise, i.e. provision of bicycle infrastructure as part of road maintenance or upgrade schemes we will seize these opportunities, whilst emphasising how these improvements fit into the wider vision for Northern Ireland."**
- iii. **"In urban areas we will develop masterplans which will build on the 'comprehensive network for the bicycle' connecting where people want to travel from / get to."**
- iv. **"We plan to develop new, best practice design guidance which will be used by those designing for cycling. This guidance will identify ways that junctions, roundabouts and cycle lanes can be made safer and made to feel safer."**

The Draft Bicycle Strategy also set out a road user hierarchy which it adapted from the Department for Transport (2007), Manual for Streets which sets out how the most vulnerable road users i.e. pedestrians and cyclists should be considered first in urban highway schemes, although not necessarily giving them priority at all locations.

We would contend that while this DRD document is still in draft format the Proposed Scheme should recognise and respond to it. This should include new updated design standards for cycle routes, road junctions and bus stops for cycling infrastructure.

- a) The layout of the Proposed Scheme was subject to consultation with DRD Cycling Unit in February 2014. A response was received in May 2014 prior to publication of their draft Bicycle Strategy. In their response, Cycling Unit was promoting the provision of cycling routes to and from north Belfast via North Queen Street and Nelson Street rather than York Street.
- b) It was recognised that DRD Cycling Unit were developing their strategy for Belfast at that time and TransportNI is content that our proposals are now consistent with their Bicycle Strategy for Northern Ireland.
- c) As you will be aware, following the statutory consultation period, TransportNI has further engaged with Sustrans and DRD Cycling Unit to review provision for all non-motorised users

on York Street. All aspects raised by your response have been considered in developing a revised proposal.

- d) We enclose two drawings illustrating the revised proposal for your information. The revised proposal will be available for discussion at the upcoming Public Inquiry.

4. RELOCATION OF THE UNIVERSITY OF ULSTER

This is perhaps the most significant regeneration project in the recent history of the City. The chosen site for the University, while adjacent to the Proposed Scheme, will have a significant impact on the wider area around it.

Some 13,000 students and 2,000 staff will be located at the campus, potentially generating some 30,000 local journeys per day, most likely by walking, cycling and public transport.

We understand that there are planning applications already being prepared or lodged to provide significant student accommodation around and close to the Proposed Scheme.

High quality walking and cycling links to public transport such as Belfast Rapid Transit, Yorkgate Railway Station and the proposed station at Dunbar Link will need to be provided in addition to links to Laganside, Titanic Quarter and NCN 93.

These linkages will also enable local communities around the project area, where car ownership may be low, to access opportunities for employment at the University, in Titanic Quarter and the City Centre.

We contend that the Proposed Scheme does not adequately provide for this substantial increase in local journeys in and through this area, which the University will generate.

- a) The Proposed Scheme is considered to address the potential future demand for pedestrians and cyclists along York Street, following the relocation of the Ulster University campus. This is evident in the provision of cycle lanes in both the northbound and southbound directions and the provision of continuous pedestrian links, including controlled crossings, along the proposed footways on each side of York Street. The proposed southbound bus lane also provides an opportunity to improve direct bus links to the new campus from North Belfast and the strategic road network.
- b) As you will be aware, following the statutory consultation period, TransportNI has further engaged with Sustrans and DRD Cycling Unit to review provision for all non-motorised users on York Street. All aspects raised by your response have been considered in developing a revised proposal.
- c) We enclose two drawings illustrating the revised proposal for your information. The revised proposal will be available for discussion at the upcoming Public Inquiry.

5. THE PROPOSED SCHEME

These comments relate to specific aspects of the Scheme:

i. Scheme-Specific Objectives

- 'To maintain access for pedestrians and cyclists'

The current provision is particularly poor in what is a shattered urban environment dominated in the most part by roads/vehicle movements. Effectively what exists is a major barrier to pedestrians and cyclists and is preventing the development of active travel to the north of the City. The redevelopment of the York Street Interchange offers the potential to connect the City Centre with the Shore Road/Antrim Road segment of the City. As we previously pointed out in our earlier letter where good infrastructure is provided sustainable transport increases, for example in south Belfast. This would be in line with the BMTP objectives and the Draft Bicycle Strategy.

In the context of the existing inadequate level of provision, the objectives in the BMTP, the draft Bicycle Strategy and the impact of the new University Campus, this Scheme-Specific Objective is effectively redundant.

Improve access for Pedestrians/Cyclists

- a) The Proposed Scheme has been developed to optimise provision for non-motorised users within the physical constraints of the existing built environment, and the competing engineering constraints of the proposed road links.
- b) The grade separation provided by the Proposed Scheme would remove significant volumes of road traffic from the existing local streets, including York Street and Great George's Street. It is considered that these changes, and additional improvements to each of the remaining signalised junctions would benefit non-motorised road users through improved amenity on these routes.
- c) For pedestrians, the Proposed Scheme provides full pedestrian connection along both sides of York Street with controlled crossings at appropriate points. This is an improvement from the existing layout and would provide an improvement for access for pedestrians to the City Centre. Crossing widths are also reduced at signalised junctions, through either carriageway narrowing or the use of refuge islands. All improved pedestrian routes would be suitably surfaced in accordance with the requirements of the Design Manual for Roads and Bridges and provided with dropped kerbs and tactile paving.
- d) For cyclists, it is noted that no dedicated cycling facilities currently exist on York Street. The Proposed Scheme improves access to the City Centre for cyclists by providing mandatory cycle lanes in each direction.
- e) As you will be aware, following the statutory consultation period, TransportNI has further engaged with Sustrans and DRD Cycling Unit to review provision for all non-motorised users on York Street. All aspects raised by your response have been considered in developing a revised proposal.
- f) We enclose two drawings illustrating the revised proposal for your information. The revised proposal will be available for discussion at the upcoming Public Inquiry.

- g) TransportNI is content that the Proposed Scheme is consistent with the principles of the BMTF and the Bicycle Strategy for Northern Ireland.

ii. Typical Carriageway Detail York Street Overbridges (looking North)

Out of a total width of 27.2m only 1.5m has been allocated specifically for cycling, while 3.2m are allocated for separation strips and 6m for footway.

We would contend that the total space available could be reallocated to provide two 2m wide segregated cycle lanes and meet all the other spatial requirements.

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iii. Junctions

Cyclists are at their most vulnerable at road junctions and the proposals which include advance stop lines up to 5 lanes wide are impractical. Much more thought needs to be given to the design of all junctions, including Danish style two phase turning for cyclists.

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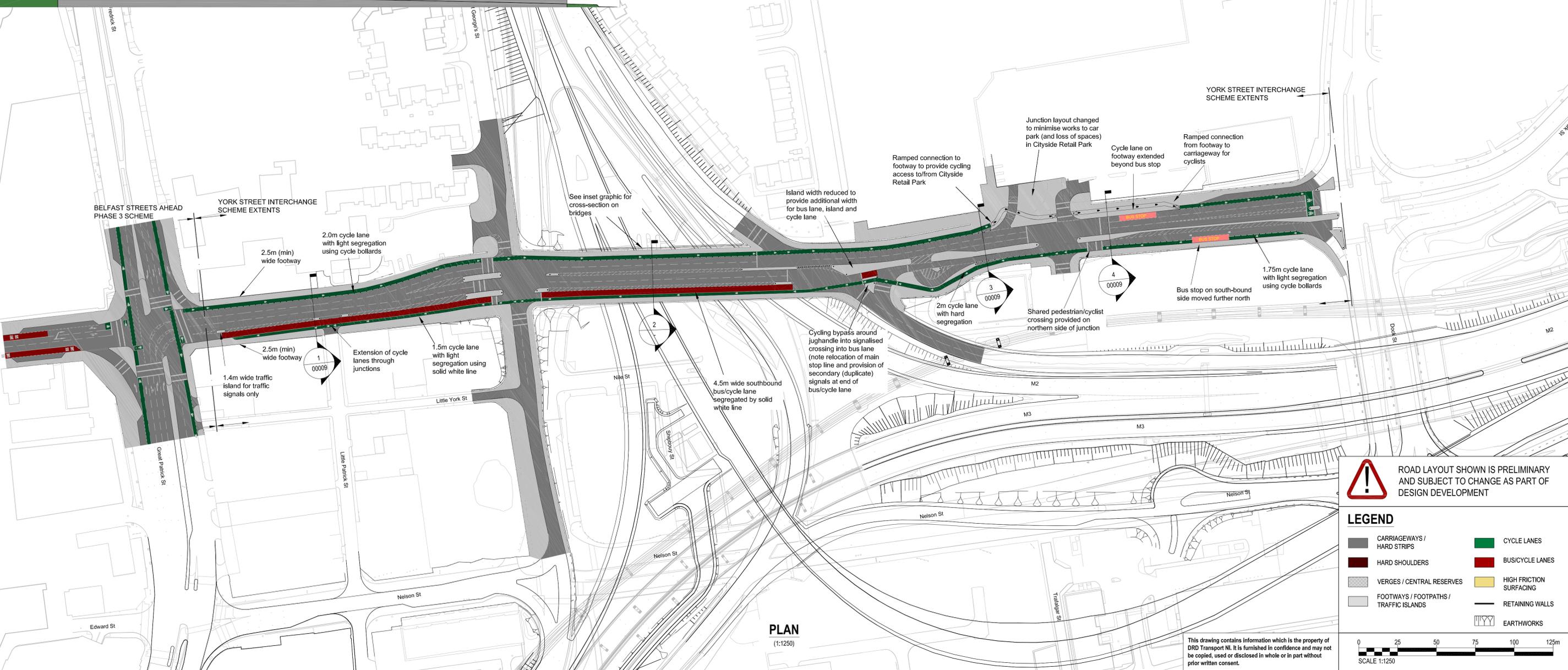
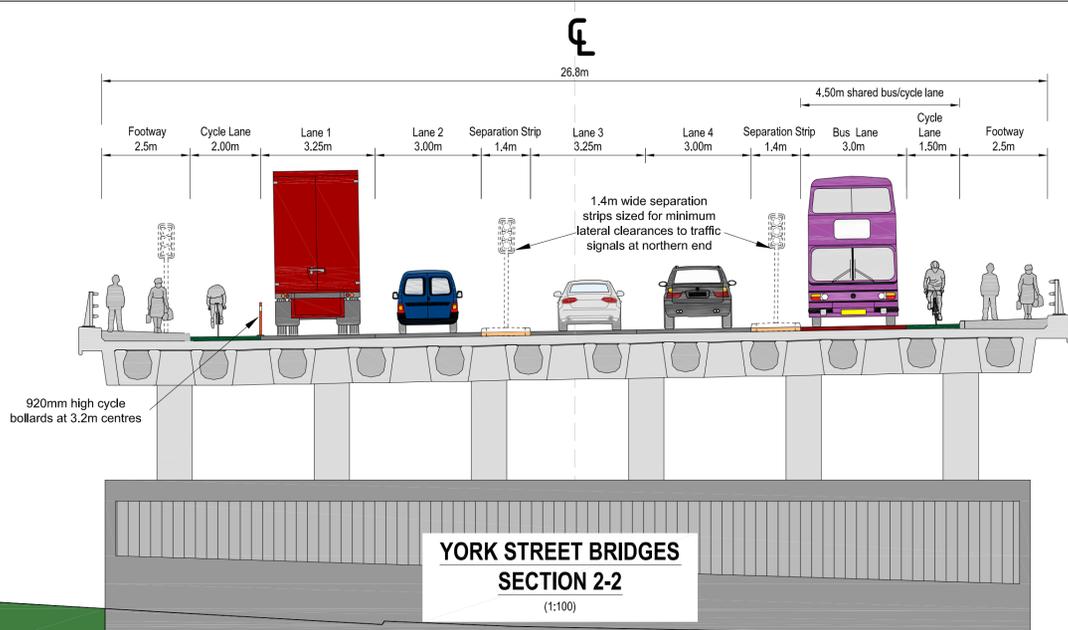
CONCLUSION

We are extremely disappointed with the cycling and walking infrastructure being proposed and we have set out our rationale for objecting. We are, however, convinced that the situation can be rectified through the redistribution of road space and redesign of junctions. These changes can, we believe, be accommodated within the general layout of the proposed scheme, for example, without the need to widen the York Street Bridge.

We would welcome an early opportunity to discuss our concerns with the Department.

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- b) The revised proposal will be available for discussion at the upcoming Public Inquiry.

DRD TransportNI
Eastern Division
02 October 2015



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LEGEND

	CARRIAGEWAYS / HARD STRIPS		CYCLE LANES
	HARD SHOULDERS		BUS/CYCLE LANES
	VERGES / CENTRAL RESERVES		HIGH FRICTION SURFACING
	FOOTWAYS / FOOTPATHS / TRAFFIC ISLANDS		RETAINING WALLS
	EARTHWORKS		



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General Revisions	By	Date	Check	Suffix
	EB	02/10/15	JM	P02

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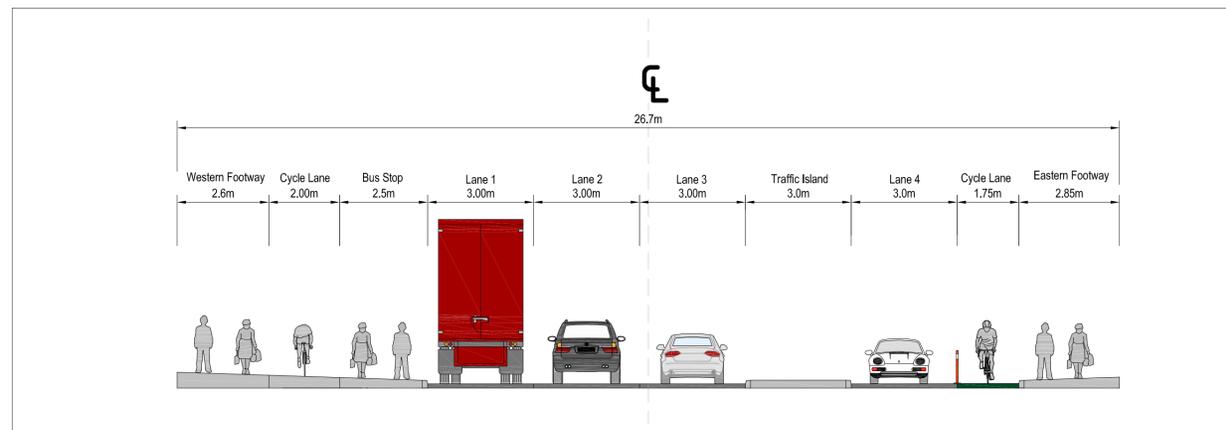
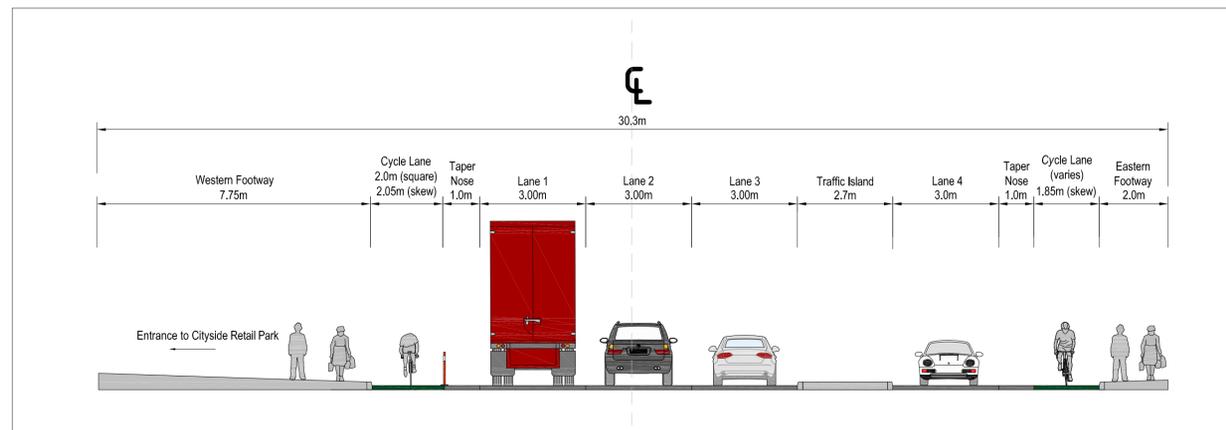
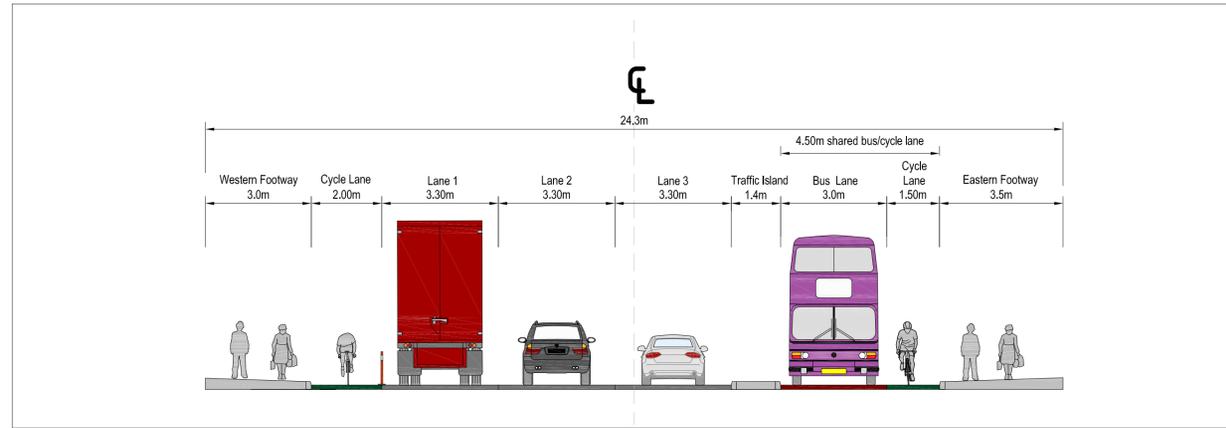
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Purpose of Issue	INFORMATION

Client

TRANSPORT NI

Project Title
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Drawing Title
YORK STREET INTERCHANGE
TYPICAL SECTION
REVISED NMU PROVISION
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