

Draft Response

The Council welcomes the proposals to develop a pilot rapid transit system in Titanic Quarter, east and west Belfast linking to city centre as the first step towards the introduction of rapid transit in Belfast. However the omission of pilot route proposals for north and south Belfast is of concern. The Council would request commitment from DRD to take forward the planning and design for the extension of the rapid transit network to ensure an equitable high quality public transport system is implemented throughout the city.

The consultation report states that BRT will be *'a key driver for the regeneration of Belfast, providing high quality access and connectivity between the different parts of the city. It will link communities to key employment locations, shopping facilities, leisure, health and education services'*. The Council would emphasis that North Belfast contains some of the most socially deprived areas in the city and it is unlikely they will directly benefit from the pilot proposals. The Mater Hospital is a large trip generator which could benefit from improvements in public transport provision along with a number of regeneration opportunities such as the proposed new University of Ulster campus on York Street and the development of the Girdwood site. In the longer term opportunities could be developed to link Belfast Rapid Transit through North Belfast to the wider region and the International Airport as part of any roll out of the system.

The Council would also request consideration is given to a bus rapid transit network serving the south of the city where large volumes of commuters use the southern approach. In addition Queens University and the large student population living in the Ormeau Road area would benefit from improvements in public transport and connectivity.

There is a need to ensure rapid transit is a driver for regeneration throughout Belfast, providing high quality access to and linkages between jobs, hospitals, schools and colleges in different parts of the city and where possible supporting the regeneration of areas along the proposed alignments.

The Council supports the rapid transit proposal for Titanic Quarter as a crucial element to developing a sustainable transport system serving the city. The Council would request consideration is given to extending the CITI route to serve the George Best City Airport.

In relation to Westway, the Council supports the route serving the Royal Victoria Hospital which is a large trip generator in the city. The Council would emphasis the need to link with and maximise potential regeneration opportunities along the route alignment. Integration with land use planning along the route alignment is essential to allow higher density development and identification of regeneration opportunities.

The Council would recommend a sustainable corridor approach to ensure Bus Rapid Transit proposals fit into the existing public transport network. In particular further clarification on how the Metro corridors on the Upper Newtownards Road and the Falls Road could change to integrate with the proposed system. This should also ensure integration with Black taxis services to align with the proposed BRT routes. The Council would also request additional marketing of the existing rail network, highlighting the integration of the services to promote increased use of all public transport options.

To support integration and journey planning the Council would welcome an integrated ticketing system across different public transport operators which are affordable.

The Council recommends close engagement with local businesses along the proposed routes to ensure that servicing and parking requirements are addressed.

The Council would request commitment from DRD that resources will be made available to implement a high quality, effective bus rapid transit system in Belfast. Consideration should be given to the use of developer's contributions to fund the rapid transit infrastructure in recognition of the potential for new transport infrastructure to increase the value of development and land along the route.

The Council would request clarification on the future role of the Council in developing Local Transport Plans. The Council would like to support local people and communities by ensuring a community planning approach that integrates transportation and enhances connectivity for local neighbourhoods by making them safer, healthier and more inclusive.

Open Space

EWAY

The following Council maintained open spaces are located adjacent to the proposed EWAY preferred route: Dundonald Cemetery; Manderson Street Walkway and Short Strand Walkway & Ravenhill Rest Garden. Under draft BMAP these sites are designated as Areas of Existing Open Space and are protected under Planning Policy Statement 8 – Open Space, Sport & Recreation. Proposals for the transport corridor should take account of planning protections for these sites and ensure that the amenity is protected.

The Council would request consideration given to the potential to enhance public accessibility to Dundonald Cemetery with the inclusion of a stop. In general, the Council would encourage the retention and enhancement of pedestrian crossing points close to Council maintained open space.

The EWAY route proposal will also cross the proposed Connswater Community Greenway at Manderson Street/Newtownards Rd. As the greenway has been designed to increase public access along the Connswater River it is recommended that EWAY proposals for this intersection take into account the increased numbers of pedestrians and cyclists in the location.

WWAY

Council maintained open spaces adjacent to the WWAY preferred route are Dunville Park, Grosvenor Recreation Centre, City Cemetery and Falls Park. Under draft BMAP these sites are designated as Areas of Existing Open Space and protected under Planning Policy Statement 8 – Open Space, Sport & Recreation.

The rapid transit proposals should take account of the key public spaces and amenities along the alignment to protect the amenity value of the parks and further enhance access where possible.

Air Quality

The Council has reviewed both the Belfast Rapid Transit 'Integrated Impact Assessment' and 'Routes Options' public consultation documents and wish to submit the following comments in relation to air quality.

Integrated Impact Assessment:

With regard to the Integrated Impact Assessment document, it is noted that the assessment process has been informed by the principles of sustainable development, which require an optimum balance to be achieved between the social, economic and environmental aspects of a proposal. In addition, the Department for Regional Development has acknowledged that a fundamental component of good policy development involves ensuring that emerging policies comply with all statutory obligations.

Referring to the 2010 Sustainable Development Strategy for Northern Ireland, it is noted that strategic objective four of the Strategy includes a commitment to deliver statutory environmental standards with regard to air and other environmental pollution. Moreover, the supporting Sustainable Development Implementation Plan 2011- 2014 includes a metric of achieving the health-based objectives for seven key air pollutants by relevant dates as prescribed within the Air Quality Strategy for England, Scotland, Wales and Northern Ireland.

The Department will be aware that Part III of the Environment (Northern Ireland) Order 2002 places a statutory duty upon district councils to periodically review and assess air quality within their districts against the above-mentioned seven key air pollutants. Where the outcome of the assessment process indicates that an air quality strategy objective is unlikely to be achieved by the relevant compliance date, then the district council is required to declare an Air Quality Management Area which, at the least, covers the spatial extent of the exceedence. The Council must then work with other competent authorities, as prescribed latterly within the Air Quality Standards Regulations (Northern Ireland) 2010, including the Department for Regional Development, in order to develop and implement an Air Quality Action Plan in pursuit of the air quality standards.

Belfast City Council published its initial review and assessment of air quality across the city in 2004 which identified exceedences of particulate matter (PM₁₀) and nitrogen dioxide (NO₂) air quality objectives along a number of arterial road routes. As a result, the Council subsequently declared four Air Quality Management Areas (AQMAs) to include the M1 Motorway / A12 Westlink corridor, the Ormeau Road, the Upper Newtownards Road and from Cromac Street towards Short Strand and the Albertbridge Road. A source apportionment study confirmed the principal source of air pollution within the AQMAs to be road vehicles. It is anticipated that the proposed emerging preferred Rapid Transit routes will impact directly upon the Upper Newtownards Road and Cromac Street towards Short Strand and the Albertbridge Road Air Quality Management Areas and may also have an effect on air quality across the city as a whole due to the redistribution of arterial traffic.

In 2006, the Council published an Air Quality Action Plan for Belfast in collaboration with the Department for Regional Development and its Agencies, which made mention of the introduction of a bus-based Rapid Transit network. This Action Plan has delivered welcome improvements in air quality within the Ormeau Road Air Quality Management Area however, during 2010, levels of nitrogen dioxide continued to significantly exceed both national and European health-based air quality standards in the other three Air Quality Management Areas. As a result, the Department for

Environment, Food and Rural Affairs (DEFRA) and Northern Ireland Department of Environment (DoENI) have recently jointly consulted upon an application to the European Commission for a time extension to 1 January 2015 for achieving nitrogen dioxide air quality standards. In its consultation response to the Departments, the Council highlighted that government assumptions regarding future air quality improvements across the city are conservative in nature and on that basis, it is unlikely that limit values for nitrogen dioxide will be achieved in all locations by the proposed time extension deadline. In addition, Elected Members raised concerns regarding the health impacts of road transport based air pollution upon residents living in the vicinity of Air Quality Management Areas.

Failure to achieve air quality standards for nitrogen dioxide by the revised deadline could leave Northern Ireland open to infraction proceedings by the European Commission. In order to try to safeguard against this situation, and in accordance with the provisions of Article 13 of the Environment (Northern Ireland) Order 2002, the Council has given an undertaking to DoENI and to the Northern Ireland Assembly Environment Committee that it will convene meetings with representatives from Department of the Environment, Department for Regional Development and other relevant authorities in order to consider what additional air quality control measures may be required for the city. It is considered that the Rapid Transit system will form a key component of these additional measures.

Given the above-mentioned issues relating to air quality, the Cocunil is concerned that the Department has concluded that the environmental impacts of the Rapid Transit proposals are not considered significant enough to warrant a full assessment as part of the Integrated Impact Assessment process. The Cocunil recommends that air quality should be considered as a distinct issue within the Integrated Impact Assessment process in order that statutory, environmental and health-based impacts can be afforded due consideration.

Route Options.

With regard to the route options, it is acknowledged that the proposed bus-based rapid transit system has the capacity to deliver a wide range of social, economic and environmental benefits for the city. From an air quality point of view, specific benefits could occur as commuters' reliance upon the private car is reduced, thereby helping to cut levels of road congestion and emissions of ambient pollution. For these reasons, the proposals for a Belfast Rapid Transit system are welcomed.

The Council is concerned, however, that in the short term, the Rapid Transit may actually result in deterioration of local air quality due to a reduction in road capacity for general traffic. The Department acknowledges that increased delays for general traffic are anticipated as part of the 'trade off' for providing an enhanced public transport system. However, it is these delays that typically can give rise to increased road congestion, displacement of traffic onto adjacent routes and localised poor air quality. This may be of particular concern within the Upper Newtownards Road and Cromac Street towards Short Strand and the Albertbridge Road Air Quality Management Areas, which are likely to be impacted upon directly by the emerging preferred E-Way and Citi routes. Unfortunately, by excluding air quality from the environment section of the Integrated Impact Assessment, it is unclear whether the Department has considered this issue in detail.

By way of mitigation, the Department has stated that a reduction in capacity of the Upper Newtownards Road, Albertbridge Road and East Bridge Street for private cars will be offset by the provision of park and ride facilities and the availability of other public transport services. It is noted, however, that the proposed Park and Ride

facility at Quarry Corner has capacity for up to 500 vehicles. Allowing for a reasonable rate of parking churn, it is considered that a Park and Ride of this capacity is unlikely to have a significant impact upon daily traffic flows along the Upper Newtownards and Albertbridge Roads.

In the case of the W-Way, the Department has suggested that the emerging preferred route option will commence with a 400 space Park and Ride facility at McKinsty Road and then make use of the Stewartstown, Andersonstown and Falls Roads before finally entering the city centre via the Grosvenor Road. As previously, the Department acknowledges that there will be a reduction in road capacity and parking provision along the route for private cars but, in addition, the W-Way will have to integrate with an existing Metro Quality Bus Corridor, regional Ulsterbus services and local taxis. Air quality monitoring has revealed ambient pollution levels to be reasonably low in West Belfast and consequently, the Council has not yet had to declare Air Quality Management Areas in this part of the city. The Department is advised that Article 9 of European Council Directive 2008/50/EC on ambient air quality and cleaner air for Europe, which has informed development of the UK Air Quality Strategy, requires member states to maintain or improve air quality where it is already good. For this reason, the Council is concerned that introduction of the Rapid Transit system could lead to a displacement of traffic onto adjacent routes and a deterioration in local air quality along the emerging preferred W-Way route and adjacent roads.

In order to understand these issues more completely, the Department is encouraged to undertake a quantitative assessment of the predicted environmental impact of the Rapid Transit along its emerging preferred routes as part of the Integrated Impact Assessment process. As part of this process, the Department may wish to evaluate the cumulative environmental impact of the Rapid Transit system and other supporting sustainable transport enabling measures such as 'Belfast on the Move'. The Council is prepared to assist the Department in this regard. By completing such an assessment, it is anticipated that air quality impacts of the Rapid Transit proposals can be better understood and, as a consequence, a system introduced that delivers a truly sustainable outcome for the city. Finally, the Department may wish to reflect upon the experiences of other cities that have successfully introduced Rapid Transit systems.

Emerging Proposed BRT Network

