

Campbell, Jacqui

From: Roads Eastern Srit
Sent: 11 March 2015 09:27
To: 'Anne.Madden@sustrans.org.uk'
Subject: York Street Interchange Formal Consultation

Anne

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.

Campbell, Jacqui

From: Anne Madden [Anne.Madden@sustrans.org.uk]
Sent: 10 March 2015 16:34
To: Roads Eastern Srit
Subject: York Street Interchange Proposals
Attachments: York St Interchange Letter of Objection. Signature. Final 10.3.15.docx; Appendix 1 - York St letter March 2014.pdf; Appendix II Fig. 8.4 - Belfast City Centre Cycle Routes.pdf; Appendix III Fig. 8.3 - Belfast City - Quality Walking Route Network.pdf

Dear Divisional Manager,

Please find Sustrans Northern Ireland’s response to the York Street Interchange proposals attached. Also attached are appendices mentioned in the letter. A hard copy of all this is in the post.

Best wishes

Anne

Anne Madden
Policy & Media Advisor
Sustrans, Ground Floor, Premier Business Centres, 20 Adelaide Street, Belfast, BT2 8GD

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[Redacted]
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9 March 2015

Dear Sir

YORK STREET INTERCHANGE PROPOSALS

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

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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.

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).
- (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).
- (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.

- (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.

- (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.

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.

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.

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.

(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.

(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.

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.

Yours sincerely,



Steven Patterson
Deputy Director Sustrans Northern Ireland

Enc.

Our ref: SP6016
Your ref: 47037827/GC/YSI

Gareth Coughlin
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28 March 2014

Dear Gareth

Re: York Street Interchange EIA

Thank you for your letter of 24th February about the Yorkgate Interchange and the opportunity to comment upon it with particular reference to cycling and walking.

Our comments relate primarily to the impact on the existing walking and cycling network and the opportunity that this development has to significantly improve the network. We think this scheme presents a great opportunity to improve access for pedestrians and cyclists in an area of Belfast where they are poorly provided for at present. We note the interest from the DRD in cycling matters including the recent establishment of a new Cycling Unit. We recommend early involvement of the Cycling Unit in discussions about this scheme.

The current at-grade M3/M2 junction and the associated linking roads provide a hazardous environment for cycling and an unpleasant environment for walking.

Below are some comments we would ask you to consider:-

- Cycling commuter levels in north Belfast are not high compared with south and east Belfast where the infrastructure is much better, through the provision of greenways and bus lanes. However the topography of the York Street Corridor is favourable to future development. We suspect one of the main reasons for low commuting numbers is the barrier created by the current M3/M2 junction. That said, at Currie Primary School on the Limestone Road there is an emerging cycling culture. Here 48% of pupils cycle or scoot to school.
- Certain areas of Belfast in the vicinity of Queens University have commuting cycling levels of 5 and 6% of adults commuting by bike, according to the NI Census. However 17% are female and 83% male. We recommend the highest quality infrastructure is incorporated into the scheme and this should be segregated from traffic where possible. This is needed to ensure those who feel vulnerable cycling on the road, including women and children, can use high quality safe provision.
- While it is welcome that thought has been given to cycling, the quality of the current provision shown is very disappointing. There is no evidence that the sort of provision shown i.e. green boxes without feeder lanes at traffic lights is proving beneficial to existing cyclists or resulting in new cyclists. It is likely that cycle lanes alongside busy roads are only of use to the most confident of cyclists. Given the



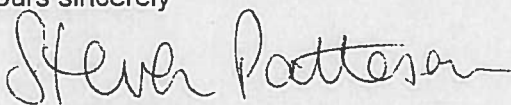
wide roads and new bridges this scheme should provide the highest quality cycle ways segregated from cars and pedestrians.

- The University of Ulster will have some 13,000 students and 2,000 staff located at York Street by 2017. Access for cycling to the site should be of the highest quality. The plans currently show cyclists having to use very busy multi-lane roads from the west, south and east with a bus lane coming close to the site from the north. It is anticipated that some students will continue to live in the Holylands/Ormeau area but that the residential areas to the north and west of the university will, in time, become student residential areas. Segregated cycle tracks should be developed to the north, south, east and western approaches to the site leading, without gaps, to the front entrance and other cycle parking sites. This provision should link to other cycle routes including the National Cycle Network at Queens Quay – the Big Fish sculpture - with the most likely corridor along the western side of Dunbar Link.
- The scheme offers significant potential to reconnect north Belfast to the City Centre. There is significant residential housing to the north and west of the Yorkgate shopping area. Indeed the Yorkgate centre is also a key destination and should be connected to the network. A segregated continuous north-south cycle route should be incorporated into this scheme from the University to Dock Street.
- The underpass at Whitla Street provides a useful link to those wishing to access the riverside and docks area on both sides of the river from North Belfast. A high quality link from the Whitla Street Underpass to Clarendon Dock using Corporation Street should be included.
- The plans should show the proposed pedestrian bridge indicated in Belfast Metropolitan Transport Plan across the Lagan at Corporation Square leading to Titanic Quarter and East Belfast. This link will give access to jobs for the people of North Belfast. Links to this proposed pedestrian/cycle bridge should be indicated including links to Corporation Street, Great Georges Street and York Road.
- It is of the utmost importance that walking and cycling links to public transport nodes are provided. A high quality link to Yorkgate Railway Station should be provided in coordination with Translink to ensure cycle parking and good access. Corridors should be protected to the proposed new rail station at Dunbar link.

A cycling Masterplan for Belfast is currently being considered and this proposed road scheme should have regard to the emerging plans. This offers the opportunity to make a significant contribution to the development of cycling and walking in our city with new safer segregated routes linking communities to the City Centre and Titanic Quarter and providing access to the new University creating a University City environment with cycling and walking links between the two universities being developed.




When considering the cost of the scheme, our suggestions will be relatively inexpensive to construct and the benefits could be significant. We would be very pleased to discuss these ideas with you in order to reach agreement on appropriate cycle provision.

Yours sincerely

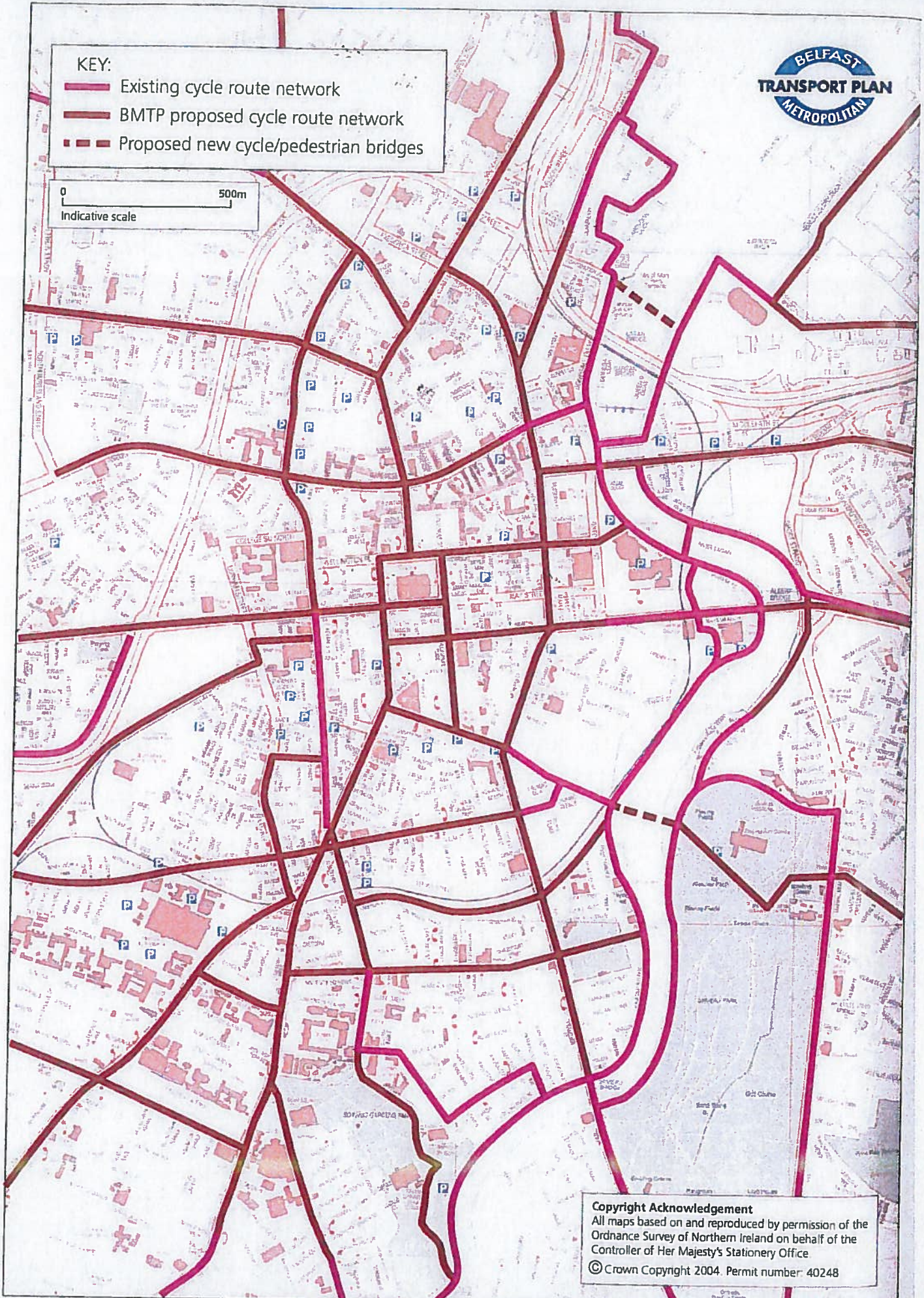


Steven Patterson
Deputy Director for Northern Ireland

KEY:

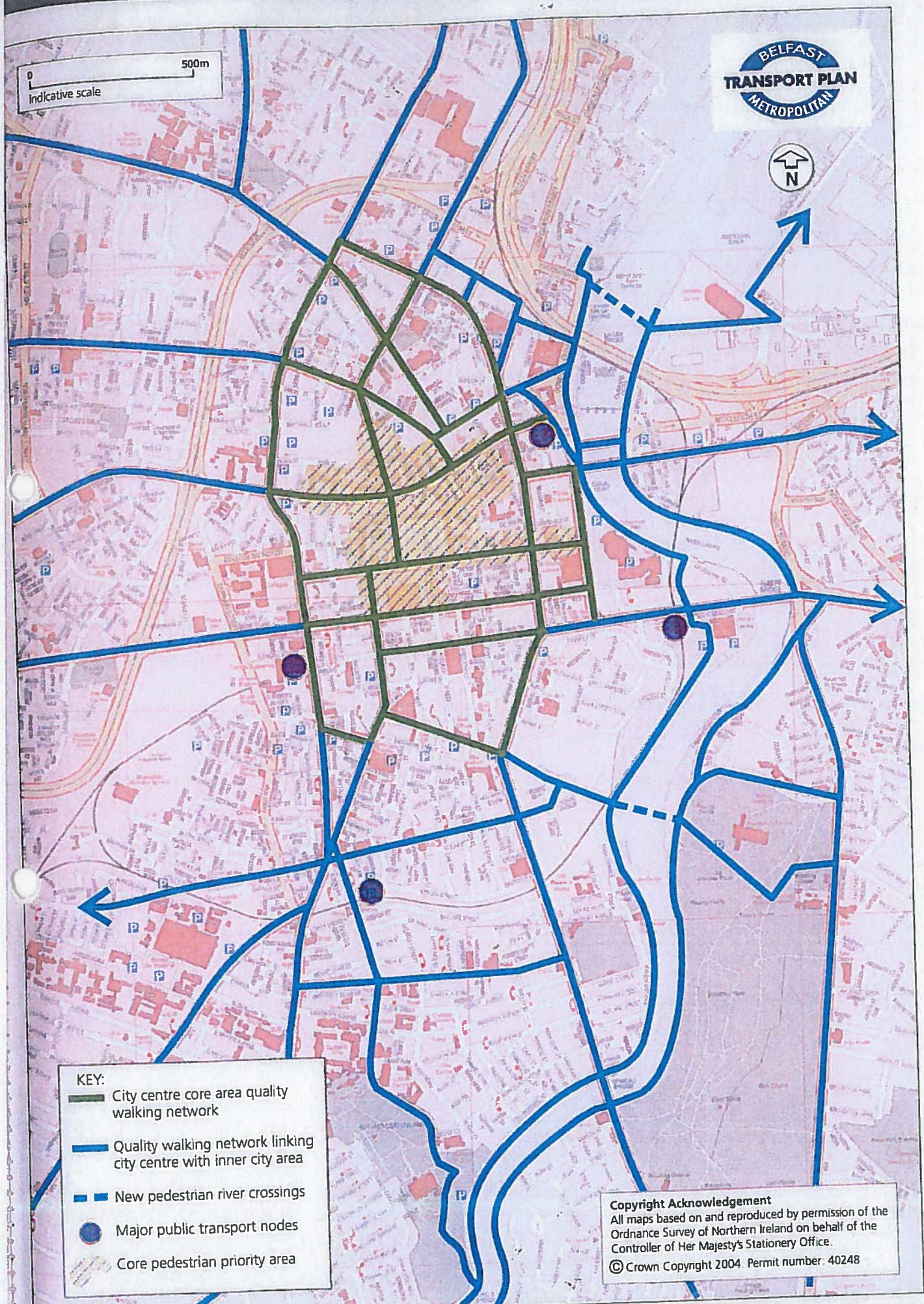
-  Existing cycle route network
-  BMTTP proposed cycle route network
-  Proposed new cycle/pedestrian bridges

0 500m
 Indicative scale



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Figure 8.4 - Belfast City Centre Cycle Routes



0 500m
Indicative scale



- KEY:**
- City centre core area quality walking network
 - Quality walking network linking city centre with inner city area
 - New pedestrian river crossings
 - Major public transport nodes
 - Core pedestrian priority area

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Figure 8.3 - Belfast City - Quality Walking Route Network