

Respondent's Details

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I am responding: as an individual on behalf of an organisation

Is your response confidential? If so, please explain why (see Appendix 1 "Confidentiality of Consultations – Freedom of Information Act 2000").
It is not confidential

Provision is made throughout this questionnaire for you to provide additional comments. If, however, you wish to provide more detailed comments on any aspect of the consultation, please feel free to append additional materials and supplementary documents, clearly marked and cross-referenced to the relevant questions, as necessary.

Questions on Detailed Policy Proposals

Question 1 (page 15)

Do you agree that the Department should have the necessary authority to implement the Rapid Transit proposals?

Yes No

Comments:

Question 2 (page 16)

Do you agree that the Department should take land acquisition powers for the implementation of the Rapid Transit system?

Yes No

Comments:

The Forest of Belfast agrees that land acquisition powers may be required. However, we have very strong concerns that the routes shown in BMAP were decided without consultation and although there are commitments for consultation and impact assessments at a later date, once lines are drawn on maps final plans rarely deviate from these.

In particular we are concerned that if the former Comber railway line is to be used for a transport route it must be designed to also provide a welcoming, attractive environment for cyclists and pedestrians and it must also retain a continuous belt of green open space with trees and grassland habitats to attract wildlife.

The Forest of Belfast also has very great concerns about the proposal in BMAP for a transport route through the former Belvoir Park demesne, roughly along the boundary of the golf course and Forest Service land. The former Belvoir Park demesne contains the largest concentration of veteran trees in the Belfast region and includes trees that date from the 17th century, including the oldest oak trees dated anywhere in Ireland.

Question 3 (page 16)

Do you agree that the Department should have the power to purchase, lease and dispose of goods, services and facilities for the Rapid Transit system?

Yes **No**

Comments:

Question 4 (page 17)

Do you agree that a performance-based contract should be introduced for the operation of the Rapid Transit system?

Yes **No**

Comments:

Question 5 (page 18)

Do you agree that the Department should be responsible for:

- specifying Rapid Transit service requirements, quality-of-service and the fare levels;
- awarding the Rapid Transit contract; and
- monitoring and reporting on Rapid Transit operator performance?

Yes **No**

Comments:

Question 6 (page 18)

What are your views on the proposal to offer financial incentives to the Rapid Transit operator to grow the Rapid Transit market, introduce innovation and improve services?

Comments: Any plans to grow a Rapid Transport system must include detailed discussion and impact assessments and the consultation must be initiated BEFORE routes are decided.

Question 7 (page 20)

Do you agree with the proposed powers to regulate passenger conduct on Rapid Transit Vehicles and in/on Rapid Transit premises?

Yes ✓ **No**

Comments:

Question 8 (page 21)

Do you agree that the dedicated public transport corridors on which Rapid Transit operates should be strictly enforced?

Yes ✓ **No**

Comments:

Question 9 (page 21)

Do you agree with the proposed powers for the Department to install, operate and maintain off-board ticketing machines?

Yes **No**

Comments:

Please make any further comments on the Detailed Policy Proposals here, ensuring that you clearly refer to any relevant questions or responses submitted above.

Questions on Integrated Impact Assessment

In considering these questions you should bear in mind that it is proposed that a further Integrated Impact Assessment screening exercise will be undertaken prior to the implementation phase of the Rapid Transit project.

Question 1

Do you have any views on the Integrated Impact Assessment Screening conclusion reached by the Department?

Yes **No**

Comments:

Any scoping study of urban rapid transport routes along roads would instantly identify environmental impacts (for example impacts on gardens, open space, street trees). There are also clearly major environmental impacts concerning sections of the rapid transport routes suggested in BMAP including the route along the former Comber railway line where any development would result in the loss of green space and impacts on wildlife habitat. The rapid transport route shown in BMAP that runs through Belvoir Park would impact on habitats including parkland and woodland that contain veteran oaks some of which are over 300 years old. Parkland is considered to be a priority habitat in the Northern Ireland Habitat Action Plan.

Given these environmental impacts it is extraordinary that the screening exercise in your document 'Integrated Impact Assessment' states (page 8) that no immediate environmental impacts have been identified. The screening exercise statement suggesting that no full environmental assessment will be required can not be justified and needs to be altered to state that a full environmental assessment will be carried out.

We are also concerned that the 'Integrated Impact Assessment' document states (page 6) that no immediate health impacts have been identified. The link between exercise and health is well known and providing local opportunities for the quiet enjoyment of open space and the countryside is considered to have positive health benefits. The rapid transport routes suggested in BMAP at sites like Belvoir Park and the Comber Greenway will clearly impact on public open space and will therefore have health impacts. The screening exercise statement suggesting that no full health assessment will be required can not be justified and needs to be altered to state that a full health assessment will be carried out.

Question 2

Are there any particular equality issues that need to be considered in relation to the policy proposals contained in the Detailed Policy Proposals booklet?

Yes **No**

Comments: We have no views on this issue.

Comments on Equality Screening

We welcome your comments on any aspect of the draft equality screening document. Please bear in mind that it is proposed that a further screening exercise will be undertaken prior to the implementation phase of the Rapid Transit project.

Comments: We have no views on this issue.