

## Respondent's Details

**Name:**

**Professor Jack Pearce**

**Please Return by 19 February 2010**

**Organisation (if applicable):**

**To:**

**Department for Regional Development,**

**Rapid Transit Division,**

**Clarence Court,**

**Belfast,**

**BT2 8GB.**

**Address:**

**Telephone:**

**E-mail: [Brtdrdni.gov.uk](mailto:Brtdrdni.gov.uk)**

**Fax:**

**Fax: (028) 9054 1129**

**E-mail:**

**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").**

**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:** It is not clear that the Department has made the case for these proposals. If public transport use was increasing and reaching saturation point then there would be a clear need for a new system but when public transport (bus) use is falling, how will what is proposed make things better? It is not going to make people give up the car, when the evidence is that car use is increasing, unless there are swingeing increases in the cost of parking and a lack of parking facilities.

The proposals are to “deliver” people into the centre of Belfast. Unless they can then walk to work, or their destination, then another journey is needed.

The key would seem to be:

- Orbital bus routes as well as ones which radiate from the city centre.
- Clearways that are enforced, especially at rush-hours.
- Enforcement of no parking on single yellow and double yellow lines.
- Better bus location information, especially when the bus timetables are not adhered to.
- Improved ticketing to speed up journey times, ie bring some of the ticketing proposals for Rapid Transit into use of the bus network.

The case for the proposals must be crystal clear, ie more than just “nice to do”.

### 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:** Without clear information on what is proposed and is not available in any of the relevant reports there can be no definitive response.

This cannot be a blanket “yes” if the Rapid Transit system is progressed. Where it is proposed to follow the track of a former two line railway there will be no need to vest any more land because the vacant land would be sufficient for any future work.

**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:** Why does a Government Department have to purchase, lease and dispose of items for a Rapid Transit system?

If this is a viable commercial venture then the cost of any vehicles should be borne by the operator. There must be many examples from the UK mainland rail and other systems that could be operated here. On the rail network different companies have the franchise to operate certain routes; this could happen here for Rapid Transit. Why should the costs fall on the tax payer or Belfast rate payer?

**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:** This is a “no-brainer”. If it is covered by an EU Regulation then it has to be done.

It is presumed that the contract will include penalties for under performance.

**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:** If a Rapid Transit system is put in place then the above are obviously “yes” because they follow on from Q 4.

**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:** The first point is that the operator must deliver effectively on the contract before “growing” the market

Q 6 indicates that the Department would be willing to pay the operator to improve the system. In a commercial world, if the operator grew the business, and maintained the quality of service, then there would be more customers providing greater income to the operator through an increase in the number of fares. Surely that should be the incentive to the operator especially when the operating contract will be time-bounded.

**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:** The response is obviously “yes”. It is a shame that discipline in modern society has broken down to the extent that this is a foreseeable problem. It is one thing to have such bye-laws, another is their enforcement; how would it be envisaged that they would be enforced? It is also presumed that there will be a duality of enforcement, by the operator on vehicles and the Department on premises. This seems a messy arrangement.

**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:**

The answer should be “yes” but if a road-type system is put on the former rail bed this will not be enforceable and will be an accident waiting to happen. Currently motor bikes and cars are driven along the Greenway and this will continue, and possibly be “encouraged” by a road-type surface. In addition it can clearly be envisaged as an attractive and adventurous play area for children.

A light-rail system from the start could obviate many of the obvious problems.

**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:** If the system is operated as a commercial enterprise and not a subsidised one then all of the above falls to the operator.

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

There are no references to the use of the Lagan and Belfast Lough to improve public transport. There are many northern cities across the world that make good use of the seafronts and rivers for commuting.

The Policy Proposals are confused; a Bus Rapid Transit is referred to at para 1.3, p. 3, and previous reports on Transportation Strategy state that Light Rail has had its day and new initiatives are focussing on buses. Why then, in para 1.8, p. 5, does it say that the BMTP “notes that flexibility should be provided to allow the potential migration of the system to Light Rail at some point in the future”. This seems like “good money being thrown after bad” and seems to imply that Light Rail would be the better of the two systems.

The case for Bus Rapid Transit is poorly and unconvincingly made. Four cities are cited (Amsterdam, Las Vegas, Nantes & Adelaide) as places that have implemented Bus systems. This is not convincing compared with the very many cities in the British Isles and across the world that have put in place Light Rail systems (this is relevant to Q 1).

The adoption of the proposal to use a former rail bed in East Belfast will destroy the Comber Greenway. This is an award-winning development which attracts large numbers on people, young and old, who cycle and walk along it. It provides a traffic-free haven with the peace of the countryside within the Belfast area. It is greatly used by family groups on bicycle and on foot, other cyclists, dog-walkers, joggers and walkers. It provides children with a safe environment to learn to cycle and it provides all users the opportunity for exercise in these days when there is so much interest the lack of exercise by

many in the population and the related increase in the incidence of obesity. All of these advantages will be lost if the Greenway is destroyed and made part of a Rapid Transit system (this is relevant to Q 2).

## 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 X No**

**Comments:** It is noted that environmental impacts have been discounted as not requiring a full assessment/appraisal. This is clearly incorrect. The effects of changing the environment along the Comber Greenway in terms of its effects on wild life and the quality of life of its current users clearly needs to be taken into account. Similarly, the effects of the proposal on the quality of life of residents in the immediate area needs to be assessed.

### 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 X No**

**Comments:** The ones cited in response to Q 1 above.

## **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:**