



# Response of the Green Party in Northern Ireland to schemes entitled: Experimental Traffic Control Scheme (Taxis in Bus Lanes) 2018

## Introduction

The Green Party in Northern Ireland (GPNI) is grateful to have the opportunity to respond to the above consultation.

We note that this consultation was opened on 13<sup>th</sup> June 2018 and closes on 6<sup>th</sup> July 2018. Although this is compliant with the minimum period required by statute, it is regrettable that more time was not given, which would have encouraged a wider number and improved quality of responses to this consultation.

In summary, we vigorously object to this scheme and in the following text, set out our rationale, under the following headings:

1. Absence of a comprehensive transport strategy for Belfast within which to situate decision making on future infrastructure for each mode.
2. Impact upon other road users, principally the Glider bus users, 'standard' bus users and cyclists.
3. Air quality deterioration.

### **1. Absence of Strategy**

Transport and access issues are incredibly complex. No decision regarding improving one mode can be taken in the absence of understanding its impact upon others. Decisions can only be taken when the probable impact upon overall impact, pollution levels, land use, special needs groups etc, are understood.

A trial is not a method to obtain such information. Current transport modelling systems, standard social and market research, quantitative and qualitative assessments can all be used to provide an indication of likely outcomes and impacts. So, it follows that a trial should only proceed when enough is understood about likely impacts to allow the risk to be taken. There is no indication from the Department that such an analysis has shown that this is the case.



It is very unclear what objective is hoped to be achieved by allowing taxis in bus lanes. There is a rapidly increasing understanding of the severity around air pollution problems and of the more general, but nonetheless critical issue of climate change on transport and planning. Urban authorities around the world simply cannot advance using old assumptions and hope all will be well. An up-to-date and comprehensive transport strategy is required for Belfast, and Northern Ireland more generally.

We are fully aware that the Belfast Metropolitan Transport Plan, launched in 2004 is now extremely outdated (being developed on the basis of strategic initiatives set out in the Regional Transport Strategy - RTS - for Northern Ireland 2002-2012). Transport planning decision making has moved on in the intervening period, to the extent that issues of health, air quality and new considerations of sustainable modes are diametrically different now, compared with then, in all forward-thinking agencies globally. Indeed, policy priorities outlined in the most recent Programme for Government and the Belfast Agenda highlight that this shift has occurred in Northern Ireland too.

Best practice dictates that significant road use changes should be made in line with a well-defined and consulted upon transport strategy. It simply makes no sense to proceed with this trial in the absence of this, especially as it appears to be out of step with current policy objectives. In the next section, we address the likely impact upon other road users, of the proposed scheme.

### 3. Impact upon other road users

First, we address the likely impact upon users of other modes who are currently bus lane users, including the particular impact upon BRT ('Glider') services, and finally upon 'adjacent' road users.

#### Impact upon bus lane users

All of the comments below are summary in nature and relate to *likely general* impacts.

##### a) Buses/bus passengers/drivers

The addition of taxis to bus lanes where there is a high frequency can only be negative. Bus bunching is a serious problem on high volume routes and, in the absence of smart card and off-bus/cashless payments, will be worsened by taxis appearing in bus lanes. Ridership will decrease with lengthened journey times and further increased unreliability.

This is the diametric opposite to the trajectory that should be being introduced based on current policy objectives.



As a side note, bus driving is a stressful job. Interaction with taxi drivers could become problematic when competing for space.

*b) BRT Glider services*

In addition to the above general comments in relation to 'standard' bus services, it is simply inconceivable for planners to be thinking about introducing taxis into Glider routes, even on a trial basis, before they have even become operational. A significant amount of public funds has been expended on the infrastructure (on-road, roadside and vehicle). The aim is to enhance services for existing users on high volume corridors and to attract current car users through the journey time reductions, reliability increases, real time information availability, enhanced (off vehicle) ticketing and image development that comprise the key elements of 'Glider'.

The £90million investment in the Belfast Rapid Transport system seeks to prioritise this mode of transport in our city's infrastructure, allowing taxis to use the dedicated bus lanes for this system seriously compromises the project and its ability to meet its objectives.

We would also question the utility of running a trial during *any* project when in its infancy as it would be extremely difficult to gather reliable data under this particular set of circumstances. This further compounds the issue that there is no discernible policy objective to be achieved through this trial.

It is simply unacceptable to risk the efficacy of a vitally-needed £90million investment in our public transport infrastructure in this manner. The glider service is a priority and should be treated as such.

*c) Cyclists*

It is obvious to all that catering for enhanced infrastructure for cyclists is a priority for the future. Cities which have a serious interest in sustainability are looking at 30% of cordon crossing trips to be made by bike, in some cases more (Utrecht as a prime example). Administrations that are forward thinking, even in 'non-traditional' cycling cities (see particularly Seville) have increased cycling mode splits extravagantly. It is noteworthy that what we see as a traditional cycling culture (e.g. in Amsterdam, Copenhagen etc.) is not traditional at all - these cities have worked hard to reduce excess car usage and increase cycle usage for over forty years or more.



In Belfast, we are way down the scale. Around two to three percent of trips in Belfast are made by bike. Very few radial corridors have a significant cycle usage. A sustainable transport policy needs to reflect the fact that cycling is a mainstream and vital mode of transport, not simply a leisure activity for a minority. This requires segregated infrastructure on a massive scale (see Manchester's 'Beeline' plans), with the attendant challenges that it provides. Recent implementation in the city centre, the opening of the Connswater Greenway and improvements to the Comber Greenway are of course very welcome steps.

On most radial routes, cyclists use the bus lanes, noting the refuge that this gives them from other traffic. The average speed of a bus in urban areas is about 12mph, which is exactly the same as an average cyclist, so buses and cyclists can share the same road space (although such an arrangement is far from optimal for either and such sharing discourages many cycle users...).

The introduction of taxis changes all that. The safety refuge for cyclists is gone, and taxi drivers will be looking for far higher speeds than the 12mph just mentioned. Most taxi drivers have never received cycle awareness training, unlike the training bus drivers receive, and there is a general perception that the relationship between taxi drivers and cyclists is a poor one. The number of cyclists being killed or seriously injured will undoubtedly increase and this is not a risk that should be entertained, even on a trial basis.

The impact on the feeling of safety for cyclists creates a significant possibility of the number of people cycling plummeting. This is exactly the opposite of what our transport policy should be seeking to do. The impact upon cyclists alone should be sufficient to stop these trials going forward.

#### *d) Emergency Services*

Emergency service vehicles use bus lanes where the adjacent lane is stopped, at a traffic light queue and where congestion has built up. Having taxis in bus lanes will slow these vehicles and cause unsafe driving behaviours as taxis take avoiding action to let these vehicles pass.

#### *e) Taxi passengers and drivers*

Results of the previous 12-week trial of a similar nature in 2017 indicate that there is little to be gained from this proposal. Almost 50% of Class A taxis actively avoided using the bus lanes in this period. Although the results were generally classified as 'inconclusive', this is a pretty sizeable figure that calls into question the appetite for this move based on actual data available on usage.

The inclusion of private-hire taxis also presents an equity issue that should be given consideration. In general terms, taxi users have a higher income profile than public transport users, this, coupled with the fact that current sustainable transport policy should prioritise public transport and other active modes of transportation over car usage, indicates that this trial would in effect grant higher speeds to those who can afford taxis, at the cost of lower speeds for those users already allowed to use the bus lane infrastructure. It is worth noting at this juncture that wheelchair-accessible taxis are among the 10% of current taxis in Belfast that are already permitted to use bus lanes.

#### Impact on Users of Adjacent Lanes

There would be a reduction in vehicles using adjacent traffic lane/s as taxis divert into bus lanes. However, in the absence of a coherent plan to reduce car use, any space so released will almost certainly be swallowed by generated traffic and any benefit of journey time reductions and possible pollution reduction lost.

#### 4. Air Quality and Health

Belfast, like many other urban centres, suffers from congestion problems and is regarded as one of the most congested in the UK. We have four Air Quality Management Areas across Belfast and two of our main radials are known to be amongst the worst for air quality on these isles. It is estimated that around 500 people a year die from air quality issues in Northern Ireland, largely from traffic fumes.

As such, there has been a marked shift in public policy over recent years to take these issues into consideration. The previous Programme for Government has placed an emphasis on increasing the use of public transport and active travel, improving air quality and increasing environmental sustainability. Likewise, the Belfast Agenda sets out that there should be a 15% increase in the use of sustainable transport by 2035 and promotes the implementation of Belfast City Council's Air Quality Action Plan.

It is difficult to see how this proposal to trial taxis in bus lanes contributes to achieving any of these policy objectives and in many respects, actively works against them. At the moment, as the taxi fleet is largely comprised of diesel powered vehicles, they make a significant contribution to the very worrying air quality problems we have here in Belfast, and, providing for enhanced infrastructure for them impacts upon equity significantly. Any forward step in provision of infrastructure must be accompanied by regulation on engine type, accessibility etc.

This measure:

- a. does not directly encourage the use of more sustainable transport modes
- b. Has potential to negatively impact the attractiveness of more sustainable transport modes, namely cycling and bus/BRT-use; and
- c. Could indirectly encourage the use of private cars to fill space vacated by taxis.

The potential reduction in the number of cyclists and bus users and the generation of traffic to fill space vacated by taxis is likely to have a further negative impact upon air quality in Belfast. Given the clear policy objectives set out above, any change to the balance of road users which does not improve the situation is unacceptable.

## 6. Conclusions and Recommendations

It is absolutely vital that a new transport strategy for Belfast is commissioned and completed as soon as possible. The current piecemeal approach is inadequate and will result in the failure to achieve the overarching objectives of a more sustainable environment. A transport strategy outputs should include a package of measures which support economic and leisure activities in Belfast, while significantly changing mode use to green modes and improving air quality hugely.

It should have a costed and objective driver plan to include:

- a comprehensive segregated cycle network
- high quality bus corridors (as used for the BRT system)
- taxi fleet must be hybrid/electric and accessible within x years and all drivers should have and retain a certification in cycle awareness.
- comprehensive actions to reduce car use into the city to below X% (probably 40% max) in YY years, centred upon reducing the availability of, and increasing the real price of, private parking.

**In the meantime, and for the purposes of this consultation, Class A taxis must not be permitted in bus lanes at any time until a comprehensive transport plan is made and agreed which:**



- centres upon reducing car use to/from and in central Belfast.
- facilitates walk, cycle and public transport (including appropriate taxi) facilities and infrastructure.
- provides for economic development.
- facilitates significantly enhanced health and contentment outcomes.

As outlined throughout this response, there is no clear policy objective that would be achieved by allowing taxis in bus lanes, beyond those already permitted to do so. To that end, a trial should not be pursued as a means of 'fact-finding' and evaluating the potential impact of a proposal that goes against the clear stated policy of relevant statutory authorities to encourage more sustainable transport modes and to improve air quality. The potential risk to the safety of cyclists from this trial is significant and it jeopardises one of the most transformative public transport projects in Northern Ireland in recent times. This experimental traffic control scheme must not be allowed to progress.

**Note for readers:**

This consultation response was drafted by Áine Groogan, Green Party Rep for Botanic DEA and Peter Ryan<sup>1</sup>, Secretary of the Green Party in Northern Ireland.

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<sup>1</sup> Peter has an MSc in Transport Planning and Engineering from Imperial College, London and twenty years' experience working with public transport providers, local government, central government and consultancies. He was the project manager of the Dublin Transportation Initiative which led to the implementation of the Luas, the Port Tunnel, DART extensions, Quality Bus Corridors, enhanced traffic calming and urban realm enhancements in Temple Bar and other city centre locations. He worked on numerous urban multi-modal transport strategies, was the lead demand forecasting expert on CrossRail in London, led the economic and financial forecasts for the Hong Kong Airport Access developments, and led numerous British (and Asian) rail and rapid transit schemes including bus priority schemes for Belfast's radial routes.