# Comments from the United Kingdom on the Approval by Mail: CTF Philippines: Cebu Bus Rapid Transit Project (IBRD)

#### **General comments**

- This is a well worked up proposal that contains a lot of detail and is clearly in an advanced state of preparation.
- Cities are complex systems with many interrelated connections between systems and structures requiring complex responses. To what extent has this complexity been factored into the more generalised planning required to reduce emissions in the transport sector. In the section on Sustainability (p17) it is stated that the project supports policies that advance broad social interests over the long term, including for example developing integrated land use and transport planning. Has a comprehensive strategy been developed that goes beyond this project? For example, the proposal makes mention of urban sprawl (p5). Is there a complementary project/programme aimed at addressing urban densities and the urban planning regulations that permit urban sprawl? Do the "Urban planning improvements" mentioned on page 22 include provisions that address urban densities too? What measures are being taken to complement the BRT system with non-motorised transport? Cycling is mentioned on page 99. The proposal makes reference to Bogota (pages 10 and 90). Bogota has some 300 km of cycle highways that link to the BRT system. Are there plans to do this in Cebu and other cities in the Philippines? Could these plans (if any) not be more ambitious?
- As context, it would be useful to understand the wider plans and programmes that relate to this project, in order to understand how the full complexity is being addressed.
- We note the focus on addressing women's issues.

#### Risks

- The proposal notes the potential risk of resistance from current jeepney operators. This is also mentioned by the reviewer who states that their role is not clear. Given that this is a project that supports private sector participation (p102), would it be feasible to include current jeepney operators and drivers, through their associations, as shareholders in the operating company? This would reduce this risk as it would include them and ensure they derived financial benefit once the project was operational.
- It is unclear how the key stakeholders of other transport operators have been consulted and views taken on board
- Table 3 (p82) indicates a 15% loss of revenue related to fare collection and leakage. This seems high. What measures will be taken to mitigate this loss?

### Results framework

• We note that the Results Framework does not include any developmental indicators. We suggest that jobs created, disaggregated by gender, be included as an indicator.

## **Emissions savings**

- It is unclear how effective the intervention will be at inducing a modal shift from
  private cars and motorbikes, given private transport use is related to cultural factors
  as well. Are emission savings from modal shift included in the emission saving
  estimates?
- Is there any evidence to support the assumptions used for the emissions savings estimates?
- The project could be replicated and there is a budget for promotion but the proposal is unclear on how this will be achieved and measured
- Will the project be seeking carbon market co-financing?