



**Detailed comments from Intac around proposals for the
Belfast Transport Hub –**

(March 2017)

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Making our information accessible

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All our documents are available in hard copy in 14pt type size as standard. We also provide word and pdf versions of our documents on our website – www.imtac.org.uk. In addition we will provide information in a range of other formats. These formats include:

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About us

The Inclusive Mobility and Transport Advisory Committee (Imtac) is a committee of disabled people and older people as well as others including key transport professionals. Our role is to advise Government and others in Northern Ireland on issues that affect the mobility of older people and disabled people.

Our aim is to ensure that older people and disabled people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Infrastructure.

General Comments

Imtac welcomes the opportunity to comment on the latest consultation on the development of a new Transport Hub for Belfast. The Committee broadly supports the project, recognising the huge opportunity the development of major, new transport infrastructure presents. In developing and refining proposals Imtac recommends that the project be underpinned by four main principles:

- (1) It delivers on high level commitments from both Translink and the Department for Infrastructure (DfI) to make transport services accessible to all
- (2) It reflects domestic and European rights legislation and more broadly obligations under the UN Convention on Rights of People with Disabilities (UNCRPD)
- (3) It is based on the principle of inclusive design, ensuring the Hub benefits all members of our society including disabled people and older people
- (4) It offers the opportunity to “future proof” our infrastructure, in particular recognising that the numbers of older people and disabled people will grow in the future

To deliver on these main principles Imtac believes it is essential that the Hub project incorporate two key elements – (1) the

adoption of clear standards in relation to inclusive design and (2) continued and sustained engagement with disabled people, older people and associated organisations throughout the delivery of the project.

In relation to standards, Imtac recommends the project be informed by current best practice guidance. In relation to inclusive design it is essential that the following guidance is fully reflected in the design of the Hub and associated public realm:

- (1) [Inclusive Mobility: A guide to best practice on access to pedestrian and transport infrastructure \(DfT 2005\)](#)
- (2) [Design standards for accessible railway stations \(DfT 2015\)](#)
- (3) BS 8300 Design of buildings and their approaches to meet the needs of disabled people (Code of practice BSI 2009)

The Committee also suggests the project utilise other resources to supplement and enhance the three publications mentioned above. These resources include detailed guidance on aspects of accessibility such as signage, referenced in the above guidance, but could also include resources such as Age Friendly or Dementia Friendly toolkits.

Imtac welcomes the engagement with the Hub Project team that has taken place to date. This engagement included a meeting with representatives of Imtac and a broader meeting with Imtac members, other older people and disabled people and associated organisations. Engagement has not only provided an opportunity for disabled people and older people to gain a greater understanding of the developing proposals but has also provided an opportunity for the Hub Project Team to better understand the concerns and requirements of older people and disabled people. It is essential that this level of engagement continues during the duration of the project.

Detailed comments on the Hub proposals

In responding to the current consultation Imtac has divided comments in to three key areas. The first are comments on the Hub building, the second the connectivity (or otherwise) of the Hub and the third specific proposals for public realm improvements associated with the Hub. Comments from the Committee are based on the principles outlined in the previous section of this

response, best practice guidance and issues raised by older and disabled people during engagement to date.

The Hub building

Imtac broadly supports the proposals for the internal layout of the Hub building including the proposals for enhanced bus stands and rail platforms. The Committee does, however, have some specific comments it recommends are incorporated in the final design.

Imtac recommends that fully automatic **doors** be used at the main entrances to the Hub and at key access points within the station including access to the bus stands. If doors are fully glazed appropriate strong marking must be used to improve visibility. The Committee recommends that other internal doors within the Hub, such as doors to toilet facilities, include, as a minimum, semi-automatic doors. Any controls associated with automatic doors must be designed to be clearly visible and easy to operate.

All facilities within the Hub, including proposed retail areas, must be designed to **optimum accessibility standards**. Imtac welcomes the fact that the majority of the Hubs facilities, including bus stands and rail platforms are on the same level. **Lifts and stairs** designed to optimum accessibility standards must be provided to the facilities on the upper levels.

All **furniture** within the Hub building, around bus stands and on rail platforms must be located in an orderly way so as not to cause obstruction, maintaining clear, easily identifiable routes. Furniture must be designed to contrast with its surroundings and be easily identifiable to people using a long cane.

A mix of **seating** must be provided inside the station, at bus stands and on rail platforms. In line with guidance this must include at least a third of seating with armrests and backrests and include a section of standing rest bar of at least 1400mm in length. During the recent meeting Imtac members requested that seating be provided on the concourse both bus and rail sides of the Hub. Consideration should be given to creating a quiet space within the Hub.

Clear **signage** must be provided within the station, designed to comply with accessibility standards. Signage must detail facilities

within the Hub as well as directional signage to exits, car parks, taxi ranks and pick up/drop off. Embossed tactile signage at the appropriate level should be provided to indicate important facilities such as toilets.

Consideration must be given to **wayfinding** within the Hub, particularly for people with a visual impairment. This should include using colour-contrasting materials on the flooring between main pedestrian routes and areas used for furniture and seating. Consideration should also be given to providing a tactile differential between these areas. **Flooring** used inside the Hub should be non-reflective and slip resistant.

Good and consistent **lighting** should be provided in all areas of the Hub consistent with optimum design standards. The plans for the Hub indicate an extensive use of natural lighting that is to be welcomed. However steps should be taken within the design to minimise the potential for glare from the extensive use of glazing.

Audible **passenger information** must be provided at the station and this should be linked to an induction loop system. Electronic visual passenger information systems must be provided at the station. Care must be taken to ensure that these systems are readable and accessible in relation to text size, font and contrast between lettering and background.

Imtac welcomes the inclusion of an **Information Point** close to the main entrance of the Hub. This should be staffed at all times and must be designed to optimum levels of accessibility. The Committee strongly recommends that in addition to the Information Point, Translink ensure that there are other members of staff in the public areas of the Hub, including around the approaches to the Hub, bus stands and rail platforms, whose role is to provide support and assistance to passengers. Staff should be clearly visible and identifiable, be proactive and trained to provide appropriate assistance.

Ticket offices must be designed to be accessible and include an induction loop, a section of low-level counter and use non-reflective glass. Payment devices should be detachable. Self-service ticket machines must be designed to optimise accessibility. Disabled people and older people who have difficulties using the

machines or queuing must have the option of purchasing tickets on trains or buses.

In line with DfT guidance a **Changing Places toilet** facility must be provided at the Hub. This should be in addition to, not instead of, other **unisex accessible toilets** at the Hub. Features such as handrails must be provided in both male and female toilets to improve accessibility for ambulant disabled people. Colour contrasting should be used in every toilet to improve accessibility for people with a visual impairment. Separate **Baby Changing Facilities** must also be provided at the Hub, designed to optimum accessibility standards.

Bus stands must be designed to optimise accessibility, providing sufficient width for easy access by wheelchair users and sufficient height for level access to the entrance of low-floor vehicles reducing the need for ramp operations. Consideration should also be given to the inclusion of a tactile surface on bus stands to indicate the kerbed edge of the stand. The design of bus stands should also facilitate the easy operation of other vehicle types including the operation of passenger lifts in high-floor vehicles. With reference to future proofing consideration should be given to ensuring that bus stands can be adapted as the number of low-floor vehicles increase.

Rail platforms should be designed to be of sufficient height to minimise the gradient of ramps used on current rolling stock, and of sufficient width to provide easy access for wheelchair users and include tactile surfaces in line with best practice. As with bus stands, platforms should be designed with future developments in mind. In particular platforms should be easily adapted to enable the use of future rolling stock that provides level access between train and platform. Staff should continue to be available on trains and on platforms to provide appropriate assistance when required.

The Hub should include provision for a spending area for assistance dogs. This should be located close to the entrance of the Hub and should be designed in partnership with assistance dog owners.

Hub Connectivity

Many disabled people and older people rely on the **private car** for mobility and on the provision of well-designed accessible parking close to their destination. With the proposal to relocate services such as the Enterprise to the Hub it is essential that **accessible parking** be provided close to the entrance to the Hub. Whilst the Committee acknowledges that the Great Northern Mall multi-storey will remain available until such time as redevelopment takes place, it welcomes the proposed provision of a car park on the Hub site, including accessible parking bays.

Accessible bays should be located closest to the entrance of the Hub and be designed to BS 8300 standards. If included, barriers and payment facilities associated with the car park must be designed to be accessible. Consideration should also be given to providing a help point in the car park, which connects to staff within the Hub. Translink must develop policies to ensure that accessible parking bays are only used by vehicles displaying a valid Blue Badge. There must be a clear, unobstructed pedestrian route to and from the car park and Hub entrances.

Imtac welcomes the provision of **set down and pick up** facilities in a number of locations across the Hub site. The design of set down and pick up facilities must reflect the differing requirements of people using this space. For some people a section of flush access between the set down and footway is essential. For others, including people who use wheelchair accessible vehicles and taxis, a kerb is required to get in and out of vehicles. Set down and pick up points must provide sufficient, unobstructed pavement width for the deployment of ramps (recommended total width a minimum of 4040mm). Barrier free pedestrian routes should be provided to and from these points to the Hub, preferably including protection from the weather.

The Committee welcomes the provision of **taxi ranks** at the Hub. Most wheelchair accessible taxis require near side access and must be accessed using a kerb. Other design requirements, including pavement widths, are identical to those for set down and pick up.

Imtac welcomes measures to promote access to the Hub by active travel, including **walking and cycling**. The Committee has no

objections to proposed shared use pedestrian cycle paths along the busway route to the Westlink because of low numbers of pedestrians using this route. The Committee objects strongly to proposals to extend shared usage to the main station square and the main pedestrian route to and from the Hub along Glengall Street. Given the very high numbers of pedestrians using these areas Imtac believes that conflict between cyclists and pedestrians will be inevitable and that disabled people and older people will be deterred from using the area. The Committee also believes that such an approach contradicts current DfI policy as set out in the Bicycle Strategy and the draft proposals for a Belfast Bicycle Network. Imtac recommends that provision for cyclists are reconsidered, prioritising safe, segregated, dedicated routes for cyclists to and from the Hub.

The Committee welcomes the proposal to include an **Active Travel Centre** as part of the development of the Hub. Based on the principles outlined previously the Active Travel Centre must offer a range of inclusive services including offering opportunities for disabled people and older people to get involved in active travel. Imtac would welcome the opportunity to be involved in the development of the Centre at an early stage.

On a related issue Imtac recommends that Translink work directly with **Shopmobility** schemes to providing integration between services as part of the development of the Hub. The Committee envisage an arrangement where passengers could access the loan of mobility equipment at the Hub enabling them to travel into the city centre. People could also access Shopmobility services in the City Centre, leave equipment at the Hub and travel further afield using bus and train services. Such an arrangement would help overcome the distance to the City Centre for some, but not all, older people and disabled people.

The major weakness of the Belfast Transport Hub proposal is the **walking distance** from the Hub to the core of the City Centre and to the wider Belfast public transport network, including the Metro bus network and the proposed Belfast Rapid Transport network. Based on figures provided by the design team the new Hub entrance will be at least 250-350m from the nearest public transport stop and a much greater distance from the city centre. Figures around acceptable walking distances provided in Inclusive Mobility illustrate that these walking distances are impossible for

many older people and disabled people. If the Hub is to work for everyone in society it is essential that this gap be bridged. For Imtac it is essential that a **connecting bus service** be provided to and from the Hub and the City Centre and wider Belfast public transport network with appropriate infrastructure to support such as service included in final Hub proposals.

Public Realm Improvements

Imtac is broadly supportive of proposals to improve and upgrade the public realm in the vicinity of the Hub. The Committee particularly welcomes the decision to **retain kerbs** to delineate between pedestrians and vehicles on Durham Street and Glengall Street.

Generally Imtac recommends that the public realm improvements follow best practice in terms of inclusive design including:

- Providing step-free, wide, unobstructed pedestrian routes
- Locating all street furniture, including seating, bins and lighting columns, in a consistent line away from pedestrian routes
- All furniture should include design elements to make it more visible, including strong contrasting visibility strips and should be easily detectable to someone using a long cane
- Seating is an important requirement for some older and disabled people. It is essential that there is a mixed provision of seating including some seating with armrests and backrests in all areas.
- Using contrasting paving materials to differentiate between the pedestrian routes and other areas
- Providing frequent opportunities to cross streets, using dropped kerbs and tactile paving. Controlled and uncontrolled crossings compliant with current designs standards.

- Ensuring that tactile paving is used correctly throughout the area and that it provides a strong contrast with surrounding paving
- Adequate and uniform lighting should be provided in all areas in line with optimum design standards

Imtac welcomes the development of a **landmark public space** in front of the new Hub. The Committee also welcomes proposals to provide a covered walkway from the Hub to Durham Street. Further engagement is required with Imtac and others on the detailed design of this space to ensure it is inclusive and accessible to all. The same principles apply to proposed pedestrian only streets linking to the Great Northern Mall.

The Committee welcomes proposals to broaden the footway along **Glengall Street**. Imtac members have concerns about current issues on Glengall Street including congestion and pavement parking usually associated with servicing the Europa Hotel and Grand Opera House. Steps must be taken to ensure that footways are not unobstructed in future.

A consequence of broadening the footpath on Glengall Street will be the loss of two on-street accessible parking bays. These bays are important not least for disabled people visiting the Opera House. Imtac recommend that if it is not practical to locate these bays on Glengall Street, the bays be relocated to Great Victoria Street as close as possible to the Opera House.

Consideration should be given to location of proposed **cycling infrastructure** including cycle stands, parking and docking stations associated with Belfast Bikes. These must not cause any obstructions for pedestrians.

Imtac welcomes the proposals for controlled crossings across Durham Street to Glengall Street and across Great Victoria Street at the eastern end of Glengall Street. Members have some concern about the proposal to make these “**super crossings**” particularly with regard to accessibility for people with a visual impairment. The Committee recommends that further consultation take place with Imtac and others on the detailed design of these crossings.

Wayfinding signage should be provided with directional information to locations such as the city centre. This signage needs to be accessible. Imtac believes current city centre wayfinding signage provided by Belfast City Council could be improved and that lessons could be learned by looking at examples from elsewhere including “legible London” signage used by Transport for London.

Finally Imtac recommends that consideration be given as to how the design of the public realm could assist people who may find unfamiliar environments difficult or stressful. The Committee would welcome the opportunity to facilitate discussions between the design team and people who experience these issues.

Managing the change

The construction of the new Hub will inevitably involve some disruption, which is likely to have a greater impact on disabled people and older people. As part of any contract there must be requirements to make any temporary routes associated with construction accessible and safe to all pedestrians. If necessary arrangements must be in place for contractors to provide appropriate assistance to disabled people and older people around any obstacles. Contractors should be required to undertake training in how to do this. This training should be delivered by disabled people.