

**Comments from Imtac on the Draft Bicycle Strategy for Northern Ireland**

 **November 2014**

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**About Imtac**

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 Regional Development.

**General comments**

Imtac welcomes the opportunity to contribute to the consultation on the draft Bicycle Strategy for Northern Ireland. The Committee commends the Cycling Unit for being proactive in seeking our views about the draft Strategy. In particular we would like to thank officials for attending a meeting of our Personal Mobility Group to discuss the draft Strategy.

The Committee is broadly supportive of the draft Strategy. The document articulates well the clear benefits to society in Northern Ireland of encouraging more people to make journeys by bicycle. However as Imtac indicated in our submission to the Issues Paper around developing the Bicycle Strategy the Department has an equal, if not greater responsibility to promote and encourage pedestrian journeys. As the Department has set out a broader strategic framework through the Active Travel Strategy to promote both modes of travel, it is highly unsatisfactory to Imtac to seemingly give greater policy priority to journeys made by bicycle.

For many people and disabled and older people in particular pedestrian journeys are a necessity. Yet work undertaken by Imtac and others indicates that unnecessary barriers in the pedestrian environment make every day journeys difficult or impossible. Whilst the Committee believes there is a need for a Bicycle Strategy in Northern Ireland we also believe there is a compelling case for a Pedestrian’s Strategy. The current Cycling Unit should also be renamed the Pedestrian and Cycling Unit to fully reflect a balanced approach to encouraging active travel.

**Comments on the draft Strategy**

The draft Strategy sets out clearly the benefits of developing a cycling culture in Northern Ireland. The Committee supports and agrees with this analysis and the connections between cycling and other areas of Government.

Imtac agrees with the three-pillar approach set out in section 3 of the draft Strategy. Clearly infrastructure improvements alone will not deliver the change required, changing perceptions and promotion will also play a major part. As an aside Imtac has advocated a similar approach to improving access to public transport for disabled people and older people. Simply providing modern, accessible infrastructure is not enough. Measures are also required to make the overall service accessible and to promote public transport as a realistic option for older and disabled people.

Imtac welcomes the inclusion of reference to the Hierarchy of Road Users in Section 4 of the draft Strategy. This acknowledges that pedestrians should be given greatest priority when planning and designing new developments. However the wording of paragraph 4.2.2 goes on to imply that equal weight will be given to the requirements of pedestrians and cycling in new highway schemes. This is a concern to Imtac in that any measures including dedicated cycling infrastructure should first and foremost consider the impact on pedestrians. Imtac recommends that the paragraph be reworded to strengthen the primacy of pedestrians within the hierarchy. The Committee also believes many other sections of the draft Strategy should be strengthened, recognising the need to ensure interventions do not impact negatively on pedestrians.

The Committee recognises the need for improved and safe cycling infrastructure to create a comprehensive cycle network. Ideally both cyclists and pedestrians benefit most from separate provision for each, segregated from vehicular traffic. However the Committee acknowledges that some shared footway use between cyclists and pedestrians is unavoidable. However, the design of current shared footways in Northern Ireland is often highly unsatisfactory from the pedestrian perspective. Cycle routes are often left obstacle free while furniture such as bins, lighting and signage columns are located on pedestrian routes. There are numerous examples of such provision across Northern Ireland. However officials should look at a very recent example of a new shared use footway provided at the LiDL store in Lisburn. Here clutter completely obstructs sections of the pedestrian portion of the path. This type of provision reinforces a perception that cyclists are the priority and pedestrians are an inconvenience. Much work is needed to improve design that balances better and safe provision for cyclists with protection for pedestrians. This balance should be explicit in the final Strategy in relation to developing future design guidance (section 4.2.1).

The draft Strategy rightly identifies shared facilities such as Greenways as routes that are attractive to cyclists. However nowhere in the draft Strategy is there an acknowledgement of other users of Greenways and in particular that such facilities are widely used and enjoyed by pedestrians. None of the images used in the draft Strategy contain pedestrians. It is essential that the final Strategy reflect the shared nature of facilities such as Greenways and that there explicit recognition given to minimising conflict between pedestrian and cyclists. Paragraphs 4.2 (Safe spaces for bicycles), 4.2.1 (Design Guidance) and 4.4 (Inviting places for all) would also benefit from acknowledging the need to ensure design considers pedestrians as well as cyclists.

The draft Strategy is correct to point out the importance of developing respect and understanding (section 4.2.4). However there is little specific acknowledgement of the potential negative impact the behaviour of cyclists and other road users can have on pedestrians. Rather the focus of this section is primarily the interaction between cyclists and drivers of different vehicles. As with previous comments the measures listed should be broadened to include heightening awareness of both pedestrians and cyclists.

Imtac notes that the Strategy does not mention enforcement of illegal activity by roads users including activities that inconvenience cyclists. Cycling by adults on pavements is both anti-social and a real danger to pedestrians. Whilst Imtac is supportive of trying to change attitudes the Committee believes there is also a role for enforcement measures, particularly where measures to promote respect and understanding fail. The final Strategy should acknowledge a role for enforcement in tackling behaviour of a minority of cyclists that discredits the majority of considerate cyclists.

In our response to the Issues Paper Imtac asked the Department to include recognition of the need to encourage more older and disabled people to cycle. The Committee repeat this recommendation and would recommend it be included in Section 4.3 (Greater Numbers of people travelling by bicycle). This could be included in a wider commitment to make cycling more inclusive targeting groups where historically there is low uptake – not only older people and disabled people but to a lesser extent women.

The Committee notes and broadly agrees that traffic calming measures can make spaces more inviting for both pedestrians and cyclists. However the Committee would like the Department to note that Imtac does not support the use shared space / surface schemes such as used in Exhibition Road in Kensington and Chelsea. It is the position of Imtac that a clear delineation is required, by way of a kerb, between pedestrian space and space used by vehicles. Similarly Imtac cannot support any proposals to allow cycling in streets that are currently designed for pedestrians only.

Imtac recognises that the draft Strategy contains a vision and the broad direction of travel rather than detailed proposals. The Committee notes the intention to publish the Bicycle Strategy Delivery Plan and to continue to engage with key stakeholders. Imtac is unsure of how the Delivery Plan will be developed. However we recommend that the Department remain proactive in engaging with disabled people and older people during the implementation of the Delivery Plan. As an advisory Committee to the Department Imtac is ideally positioned to provide the Department with advice and support. We would ask that the Department make Imtac a stakeholder in the development of the Delivery Plan.

**Conclusion**

Imtac would like to thank the Department for the opportunity to contribute to the development of the Bicycle Strategy. Whilst the Committee supports the desire to promote cycling as a sustainable and healthy mode of travel in our society, we do have reservations that the Department’s current policy approach is not balanced, not giving at least equal priority to making pedestrian journeys easier. The Committee has concerns that the Bicycle Strategy could reinforce this policy imbalance. Without appropriate balance some of the proposed measures in the draft Strategy could potentially impact negatively on pedestrians. The Committee looks forward to working with the Department to ensure the Bicycle Strategy brings benefits to all.