



**Comments from Imtac about Belfast Rapid  
Transit Phase 2 – Route Options Public  
Consultation**

**(October 2021)**

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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](http://www.imtac.org.uk). In addition we will provide information in a range of other formats including:

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## **About Imtac**

Imtac is a committee of disabled people and older people as well as others including carers and key transport professionals. The role of the Committee is to advise Government and others in Northern Ireland on issues that affect the mobility of Deaf people, disabled people and older people.

Imtac's aim is to ensure that Deaf people, disabled people and older people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Infrastructure (hereafter referred to as the Department).

## **General Comments**

Imtac welcomes the opportunity to comment on the current consultation as well as the opportunity to meet with officials to discuss the options. The Committee was a key stakeholder in Phase 1 of BRT. The successful delivery of BRT 1 as an accessible and inclusive service was the result of extensive engagement with Deaf people, disabled people and older people through Imtac. To be successful BRT 2 must adopt the same proactive approach to engagement at each stage of the project.

The Committee is fully supportive of the concept and objectives proposed for the development of BRT 2. We believe the project represents an opportunity to build on the clear successes of BRT 1 and as the project is developed the Committee would like to discuss potential improvements to vehicle (such as the inclusion of a second wheelchair user space), other infrastructure (such as the provision of audio announcements at interchange halts), and service, based on lessons learned from BRT 1.

Decisions are also required around ticketing. As with BRT 1 off board ticketing arrangements will be difficult or impossible for some Deaf people, disabled people and older people to use. As a reasonable adjustment BRT 1 made the half fare concession used by some disabled people a free concession on Glider. As a minimum the same reasonable adjustment in relation to ticketing must be provided on BRT 2, however, given wider ticketing changes, Imtac recommends the only sustainable, long term solution is for the Department to equalise concessions for Deaf people, disabled people and older people on all eligible services.

Imtac's advice is the delivery of BRT 2 routes must also prioritise enhanced safe and accessible infrastructure for pedestrians and cyclists. This should involve reprioritising existing road space on the routes and providing associated infrastructure that contributes to the safe movement of all walking, wheeling and cycling including dedicated cycling infrastructure separated from pedestrians and traffic and upgraded and additional crossing facilities.

One lesson from BRT 1 that we wish to highlight at this stage is the spacing between halts and the provision of feeder services. The increased distance between halts has been the most negative impact of the roll out of BRT 1, with some disabled people and older people facing longer walking distances to access services. At the same time the operation of feeder services that were designed to compensate communities for the loss of existing Metro services, has left many in these communities feeling worse off than before.

BRT 2 must learn the lessons from BRT 1 and look again at how best to maintain existing access to bus services and other local services for people living along the routes. Options that should be considered include:

- Reducing the distance between halts on BRT 2 routes
- Improving local services to both feed into BRT 2 but also provide access to local services and amenities
- Introducing demand responsive services to provide access to local services and amenities and link with BRT 2 for longer journeys

## **Comments on the route options**

### North

The Committee has no specific preference for which route is chosen for the northern route for BRT 2. We do recommend that the final choice should be made in line with the objectives for the project and be guided by the necessity to maximise opportunities to promote and support equality and social inclusion.

Where existing or new park & ride facilities are proposed as part of BRT 2, it is essential that accessible parking is provided consistent with current best practice both in terms of design and quantity. Currently the Department generally makes an under provision of accessible parking, citing low usage as a justification. Imtac has challenged this assumption, focusing on the poor accessibility of buses servicing sites as the main

barrier to disabled people and older people using park & ride. This is amply demonstrated by the under provision of accessible parking at Dundonald Park & Ride, where the accessible Glider service means demand for accessible spaces outstrips supply. The provision of accessible parking should also allow for larger vehicles used by some disabled people and charging facilities for people using electric vehicles.

### South

Imtac is broadly supportive of proposals for the southern route including termination at Cairnshill Park & Ride. We believe that the project should allow for a future extension to Carryduff if this is deemed feasible at a later date.

### G2 Extension

The Committee is broadly supportive of proposals to extend the existing G2 route to include access to Queen's University and Belfast City Hospital. We are, however, concerned about the potential impact of these changes on existing Metro 8 and 9 services and seek reassurances that people who rely on existing services beyond the G2 extension will not experience a reduction in service levels.

During the meeting with officials, we sought an explanation as to why this service could not also serve the new Transport Hub. Whilst the Committee can accept that there are practical reasons why BRT 2 cannot service the Hub, a walking distance of 200m from the Hub to access wider Belfast bus services is completely unacceptable and inaccessible to many disabled people and older people. The significant investment in a fully accessible and inclusive transport hub is rendered useless if the hub does not connect Deaf people, disabled people, older people and others to the city it serves. If the Hub is not to be served by BRT 2 Imtac seeks urgent clarification from the Department about how people using the new Hub will access both the city centre and the wider Belfast bus network.

### *City Centre routes*

Through our involvement in a number of projects Imtac has raised specific issues relating to the accessibility of Belfast City Centre. It is important these are addressed by any proposed BRT 2 routes in the city centre..

Currently interchange between Metro services in the city centre is challenging for some disabled people and older people, with often prohibitive walking distances between service departure points. As the BRT network is developed it is essential that passengers can move between services with ease and minimal walking distances. Facilitating easy interchange between services must be a priority when finalising routes and halt locations for BRT 2.

The Committee has been a key stakeholder in the development of a Bolder Vision for Belfast. We broadly support the move towards promoting sustainable travel in the city centre and prioritising space for people who walk, wheel and cycle. However, to ensure that disabled people and older people continue to benefit from an improved city centre it is essential that public transport can access the heart of the city centre and that provision is made for accessible parking for disabled people and older people who have no other option but to use a private vehicle.

The proposed routeing of BRT 2 along Donegall Place and Royal Avenue meets Imtac's recommendation that public transport accesses the heart of the city centre. The benefits of this proposal must, however, be weighed against its significant, negative impact on pedestrian priority and removal of existing accessible parking opportunities.

On balance the Committee cannot currently endorse a proposal to radically change the existing priorities on key city centre streets without an overarching strategic plan for access to the city centre being in place. Clarity is required around several issues including:

- Are there alternative routes BRT 2 could use such as via Carrick Hill and Millfield which would not impact on pedestrian priority? What impact would using these routes have on the success or otherwise of the service?
- If BRT 2 is not to use Donegall Place and Royal Avenue what are the alternative proposals to ensure that public transport accesses the heart of the city?
- What are the plans to ensure sufficient, well located accessible parking continues to be provided in the city centre, whilst prioritising access for people using sustainable travel modes?

## **Conclusion**

Imtac thanks the Department for the opportunity to comment on the current consultation. We look forward to further and more detailed engagement as the BRT 2 project progresses.