



Comments from Imtac on the Bolder Vision – Reimagining Our City Centre consultation

(January 2022)

Imtac is committed to making information about our work accessible. Details of how to obtain information in your preferred format are included on the next page.

Making our information accessible

As an organisation of Deaf people, disabled people, older people and carers Imtac recognises that the way information is provided can be a barrier to accessing services and participation in public life. We are committed to providing information about our work in formats that best suit the needs of individuals.

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 including:

- Large print
- Audio versions
- Braille
- Electronic copies
- Easy read
- Information about our work in other languages

If you would like this publication in any of the formats listed above or if you have any other information requirements please contact:

Michael Lorimer
Imtac
Titanic Suites
55-59 Adelaide Street
Belfast BT2 8FE

Telephone/Textphone: 028 9072 6020

Email: info@imtac.org.uk

Website: www.imtac.org.uk

Twitter: @ImtacNI

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).

Background

Imtac welcomes the opportunity to comment on the next stage of the development of the Bolder Vision for Belfast including the proposals for several key moves designed to create a more people focused city centre.

The Committee is supportive of the vision and principles that underpin the Bolder Vision. The key moves detailed in the consultation have the potential to deliver a better city centre for all if backed up with measures which fully consider inclusion and accessibility for all. However, if measures are implemented without such consideration, it is likely the city centre will become a place where Deaf people, disabled people, older people and carers do not feel welcome either as residents or visitors.

Comments on the consultation process

There have been significant difficulties with the accessibility of the consultation process. Whilst Imtac acknowledges and welcomes the efforts of Council officials to resolve these difficulties, the failure to make the consultation accessible and inclusive from the start has the potential to undermine confidence in the entire Bolder Vision process. It is essential that all stakeholders involved in delivering Bolder Vision learn lessons from mistakes made around the current consultation. Moving forward the project must explicitly demonstrate a clear commitment to deliver on accessibility and inclusion.

Key considerations

Disabled people make up over 20% of the population of Northern Ireland. There is a strong correlation between age and impairment and with the numbers of older people projected to increase substantially in the future it is essential that Bolder Vision fully considers the impact of any changes on Deaf people, disabled people, and older people. Imtac recommends the following key considerations be incorporated into the delivery of the Key Moves:

- Basic human factors¹ should influence the design of public realm and the built environment. Chief amongst these factors is limitations on the distances older people and disabled people with particular impairments can walk or wheel. A city centre that contains large expanses of pedestrianised areas is likely to be inaccessible to significant numbers of disabled people and older people.
- Due to a lack of inclusive and accessible alternatives many disabled people and older people continue to rely on private cars / vehicles as their only option for mobility. Key moves designed to reduce the impact of cars, without recognising some disabled people and older people as essential car users are likely to make the city centre inaccessible to these users.
- Conversely disabled people and older people are amongst groups in society least likely to have access to a private car / vehicle and to be more reliant on public transport and other services including taxis. Rather than restricting, enhanced access to more accessible public transport is an essential component of making the city centre inclusive and accessible for all in the future.
- Barriers in the pedestrian environment too often make our towns and cities inaccessible to Deaf people, disabled people, and older people. It is essential that key moves associated with Bolder Vision place people who walk and wheel at the top of a road user hierarchy, through the provision of inclusive, accessible, and uncluttered footways with greater priority at crossings and junctions.

¹ The recently revised Inclusive Mobility contains a useful section on human factors and the design of the built environment - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1044542/inclusive-mobility-a-guide-to-best-practice-on-access-to-pedestrian-and-transport-infrastructure.pdf

- Improving cycling infrastructure must be a priority. In line with LTN 1/20² cyclists should be treated as vehicles and not as pedestrians or their equivalents. Cycle infrastructure improvements must focus on the provision of segregated cycling infrastructure with pedestrians prioritised where interaction between both users is unavoidable.
- Disabled people and older people face additional barriers to cycling including inaccessible infrastructure and additional costs associated with adapted and non-standard cycles. Changes delivered by Bolder Vision must ensure that cycling is accessible and a genuine travel option for all.
- The design of the wider built environment including housing, shops, culture and leisure facilities and services more generally have excluded disabled people and older people in the past. Although this situation has improved, too often disabled people and older people still must put up with facilities and services designed to a minimum rather than the optimum standard. Bolder Vision must ensure that both public and private investment in the city centre are required to meet the highest inclusive design standards when improvements are being made, recognising that inclusive and accessible design benefits more than just disabled people and older people.
- Finally, and most importantly, Deaf people, disabled people, older people, and carers are the experts in the issues that affect our lives. Learning the lessons from the process to date it is essential that meaningful and inclusive engagement with us becomes the norm at each stage of the implementation of Bolder Vision.

Comments on the Key Moves

Creation of a Civic Spine with a Focus on People

In principle the proposal for a civic spine that prioritises people is welcome. However, there are practical issues that need to be considered if the opportunity of a civic spine is to deliver for all in society.

²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/951074/cycle-infrastructure-design-ltn-1-20.pdf

The Committee recommends further consideration and detailed design are required on the following:

- The proposals for public transport access along the civic spine – Imtac believes the removal of public transport services along this route will have detrimental impact on the accessibility of these streets for older people and disabled people (including people living in residential areas adjacent to the civic spine) and some form of public transport access must be retained. Perhaps a Bolder Vision should take the opportunity to radically review and rethink public transport access to and around the city centre (including core streets), looking at innovation that enhances connections to the city centre and beyond.
- The proposals for car parking along the civic spine – whilst Imtac is broadly supportive of the reallocation of space used for existing on-street parking to provide space for people, this cannot be done without considering how people who have no other choice but to use their car for mobility can access the streets and facilities along the civic spine. For the Committee it is essential that the provision of accessible parking close to or along the civic spine is prioritised if everyone in society is benefit from the changes envisaged.
- As Blue Badge holders are likely to have priority access to a future centre, the potential for misuse and fraudulent use of badges will increase. It essential prioritised accessible parking is supported by enhancements to Blue Badge enforcement in the city centre.
- In addition to the provision for public transport and accessible parking, consideration must also be given to the provision of taxi ranks and accessible drop off facilities for people travelling by taxi and car along the civic spine and in other city centre locations, minimising walking distances and potentially reducing the overall requirements for on-street parking.
- Imtac supports a civic spine where people walking and wheeling have priority over other road users. For Deaf people, disabled people, and older people to benefit from such changes there will need to be significant upgrades to existing footways and much greater pedestrian priority given to crossings than is currently the

case. Any changes must meet the highest standard in inclusive design³.

- A mix of inclusive seating is an essential component of people friendly street and should be provided at regular intervals along a civic spine and elsewhere on key pedestrian links and places.
- The Committee supports the provision of accessible and inclusive cycling infrastructure along the civic spine but it must be segregated from both people walking and wheeling and other road users. Care is required at locations such as bus stops and crossings to minimise potential conflict between cyclists and pedestrians – pedestrians should always have priority at these locations.
- More broadly Bolder Vision should be proactive in promoting cycling as a realistic option for disabled people and older people. Imtac would like further discussion with all the partners in the project about initiatives which could encourage more disabled people and older people to cycle including broadening access to accessible and non-standard cycles.
- Specific interventions such as parklets and green space must be designed in conjunction with disabled people and older people and to inclusive design standards to ensure they are fully accessible and inclusive. Where play facilities are provided for children, these should be fully inclusive including the provision of specialised equipment such as wheelchair swings.
- Consideration should be given to the provision of inclusive public toilet facilities (including the provision of Changing Places facilities) at key locations along the civic spine and other locations around the city centre.

Reimagine the Inner Ring Road and End Car Dominance

Imtac broadly welcomes and supports this key move. Previous comments about walking, wheeling, cycling and provision of green space are also relevant to this key move. Accessible parking is also a consideration in certain locations such as Great Victoria Street.

³ In line with Inclusive Mobility and BS8300

The junctions along the inner ring road are currently designed to promote vehicle movements and represent major accessibility issues for many disabled people and older people particularly people accessing the city centre from communities nearby. Reprioritising these junctions must be a priority in any key move to end car dominance.

Enhanced public transport is essential if people are to be encouraged to travel to and from the city centre by more sustainable means.

Considering the proposed siting of the new Belfast Transport Hub, the main stations for people coming into Belfast are all located well in excess of acceptable walking distances to the wider city for many older people and disabled people. If Bolder Vision is to be successful, the Committee believes it is vital that we look at the provision of bus linkages between our main stations, the central city area and the wider city as part of the review of public transport access in the city centre highlighted above.

Promote City Centre Living

Imtac supports the key move to promote city centre living. If the city centre is to be a genuinely inclusive places for all it is essential that city centre living is an option for everyone, people of all ages and backgrounds, non-disabled people and disabled people alike. A city centre designed around the specific needs of only a section of wider community is unlikely to be welcoming to all. The following are key issues that need to be considered to ensure city centre living is available to all:

- The provision of housing that is accessible to all in our community.
- Easy access to key local services such as schools and GP services.
- Easy access to accessible public transport into and out of the city centre (essential for access to wider services such as education and hospitals).
- A recognition that some older and / or disabled residents will need essential car / vehicle access both for their own personal mobility and to allow access for key services such as domiciliary care.
- Ensuring that that public and private investment in streets, public space and parks delivers inclusive environments, accessible to disabled people (including disabled children) and non-disabled people and people of all ages.

Embrace the River Lagan and Waterfront

The Committee broadly welcomes the key move to better connect the city with the River Lagan and waterfront. Proposed river crossings are also welcome but detailed work is required to ensure the river and waterfront become a destination attractive to all. Further information and discussion are required around:

- The development of inclusive and accessible and sustainable travel linkages between the city centre to and across the river to the east and south of the city.
- Improvements/ upgrades required to the current public realm along the waterfront to ensure it is inclusive and accessible to all.
- Ensuring all recreational activities, events and experiences are fully inclusive including river activities. Full access and inclusion principles and objectives should be maintained in the experiential provision around the river and waterfront.
- The provision of inclusive and accessible facilities on the waterfront to ensure it is welcoming for all sections of the community (examples should include accessible parking, inclusive play facilities and inclusive toilet facilities including Changing Places provision).