



Comments from Imtac on the Belfast on the Move Proposals

December 2010

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About Imtac

- 1 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.
- 2 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.
- 3 Imtac receives support from the Department for Regional Development.

General Comments

- 4 Imtac welcomes the opportunity to comment on the proposals for traffic management in Belfast City Centre. We also welcome the commitment by DRD to involve disabled people and older people in the consultation and in particular the hosting of a workshop in Belfast specifically to talk to disabled people and older people about the proposals. Some Imtac members had difficulty obtaining information about the proposals due to the reliance of consultation materials on maps. This is particularly difficult to access for people with a visual impairment. For the future Imtac would recommend that DRD develop an alternative, descriptive text version, of documents that contain maps. This should be available at the same time as other consultation materials.
- 5 We have a long-standing interest in the developments in Belfast City Centre and it is important to understand our comments within this context.
- 6 Imtac was involved in early consultation on the design of the Streets Ahead project. Key to the success of this project from the perspective of disabled people and older people is ensuring that disabled people and older people can still travel with ease into the city centre. Without this disabled

people and older people will be denied the benefits of an improved Belfast City Centre.

- 7 Key to making Belfast City Centre accessible is an understanding of the limited walking distances that can be undertaken by some disabled people and older people. Research below evidences the recommended maximum walking distances without rest for people with different impairment¹:

Impaired group	Recommended distance limit without a rest
Wheelchair users	150m
Visually impaired	150m
Mobility impaired using stick	50m
Mobility impaired without walking aid	100m

- 8 This research has been the basis of Imtac's advice around improvements in the City Centre. We were delighted during early discussion with EDAW that the City Centre Masterplan would recognise the key role walking distances played in making the city accessible and were pleased with the proposals contained in the emerging plan. However the Committee has become increasingly frustrated that during the implementation of the original proposals this crucial issue appears not to be a consideration.
- 9 This frustration is amply illustrated by the publication by DSD in August 2010 of an Access & Mobility Study for the city centre. Such a study was recommended by EDAW as a means to ensure that changes to the city delivered maximum benefit to disabled people and older people. Having waited a significant time for the Study to be published the Committee was disappointed it contained little in the way of

¹ Taken from Inclusive Mobility (Published by DfT 2003)

tangible recommendations to resolve accessibility issues created by the design of the Streets Ahead project.

Comments on the current proposals

- 10 Imtac welcomes the general rationale for making the changes to traffic management in Belfast City Centre. We agree that unnecessary traffic should be discouraged from using the streets in and around the city centre and provided with an alternative route around the city centre. We agree that more priority and road space should be given over to public transport. We agree that the city centre should be an easier place to walk and cycle in. However in making the changes it is essential that changes being made do not impact unduly on the accessibility of the city centre on disabled people and older people while making it more attractive for others.

Proposals for parking

- 11 Over 100,000 disabled people have a Blue Badge in Northern Ireland. The car has been recognised as essential to the mobility of many disabled people and Government in Northern Ireland has committed to ensure that disabled people and older people can travel safely using cars and other private transport².
- 12 In developing this response Imtac undertook a number of surveys in the City Centre to provide a snap shot of how many Blue Badges are being used in the city centre at any given time. We looked at Blue Badge use in the retail core at different times and different days of the week including a Saturday. The results of our four surveys show that there is significant use of the Blue Badge in the retail core of the city centre with people using the Badge to park in accessible bays, on-street parking bays and yellow lines. The number of Badges being used in the city centre during weekdays is consistently around 200-220 but there is a significant rise in usage on a Saturday.

² See Accessible Transport Strategy (DRD 2005) Strategic objective 4 and related policies

- 13 There are a number of private car parks in the city centre where Badge holders can park. However the usefulness of these car parks can be limited by (1) inaccessible design, (2) distance from the car park to the core of the city centre and (3) prohibitive cost.
- 14 The proposals contained in the Belfast on the Move consultation will result in a 43%³ reduction in the on-street parking opportunities for Blue Badge Holders in the city centre. Plans to pedestrianise Donegall Place will reduce these opportunities further. By way of illustration of the impact of the proposed changes on Blue Badge parking opportunities our surveys indicate that currently around 20 Badge Holders are parked at anytime on Queen Street. With the proposed changes parking opportunities for Badge Holders will be reduced to 5.
- 15 Imtac acknowledge that DRD has only limited kerb space and that there are other worthy demands for this kerb space. We also acknowledge that in the proposals additional accessible parking bays are being provided to compensate for the loss of parking opportunities. Having said this based on current demand the proposed changes will have a severe impact on how disabled people access the city centre.
- 16 We believe that the impact of the proposals on disabled people and older people can be reduced through other measures. Imtac has a number of recommendations:
 - (1) Experience from other cities indicates that without deterrent there is a significant level of misuse of the Blue Badge by non-disabled people. Imtac recommends that enforcement measures to combat Blue Badge misuse be introduced and implemented prior to reducing parking opportunities in the city centre.
 - (2) Significant accessible parking opportunities do exist in both Victoria Square and Castle Court. Cost is a

³ Statistic provided by Roads Service

major deterrent to the full utilisation of these bays. Imtac recommends that Government Departments work with retailers to examine introducing a discount scheme for Blue Badge holders in these car parks.

- (3) Imtac believes that DRD should be sending a clear message to other vehicle owners that on-street parking will be provided only for those who need this in the streets closest to the city centre. We recommend that on-street bays currently proposed for Chichester Street be allocated as dedicated accessible parking bays.
 - (4) Other services such as Shopmobility can help disabled people park and travel longer distances within city centres. Imtac recommends that DRD work with Shopmobility Belfast to look at ways to improve access to Shopmobility services in the city centre.
 - (5) Access for servicing within the pedestrian area is currently limited to 6pm to 11am and we assume this will continue. Where servicing bays have been provided in the city centre core outside the pedestrian area, we propose that these should also be subject to the same time limit and be available for accessible parking at other times.
- 17 Given the scale of current Blue Badge use in the city centre, Imtac would have concerns that implementation of proposals without the above changes will not result in the anticipated reduction in traffic movements. The potential exists for the same number of vehicles touring the city centre in the hope of obtaining vastly reduced parking opportunities. However implementing the above will send out a clear message to road users that only public transport, vehicles required for servicing and people for whom accessible parking is essential will be permitted in the core of the city centre. This will go a long way to creating traffic free zones in areas of the city centre.
- 18 Roads Service has indicated that accessible parking bays will probably be time limited. Imtac would caution against

such an approach as people will legitimately want to use bays for long periods. To ensure consistency Imtac believes that the only accessible bays that should be time limited are those currently time limited on Donegal Square North. Other parking opportunities in Castle Place and Donegal Place will continue to be time limited due to existing and proposed waiting restrictions.

Proposals for public transport

- 19 Public transport could also provide an alternative way for disabled people and older people to access the city centre. Investment by Government here has improved physical access to buses and trains. However in order for disabled people and older people to make use of public transport, this must access the city centre within acceptable walking distances. In addition research undertaken to inform the Promoting Social Inclusion Report on Disability⁴ indicates that disabled people are less likely to use public transport. The Accessible Transport Strategy has identified a number of barriers other than physical access that makes using public transport difficult for older people and disabled people. All evidence indicates despite investment much needs to be done to make public transport a realistic alternative choice for many disabled people and older people.

- 20 Current provision does enable buses to access many areas within the core of the city. The area around City Hall also acts as a hub for bus services allowing people to transfer between bus services. The proposals are likely to result in significant changes to services in the short term with the routing of some Metro routes to Upper Queen Street and Queen Street. More significant changes are likely in the longer term if and when traffic is removed from Donegal Place and Donegal Square North. People travelling from further away by coach, bus or rail (including Park & Ride passengers) face significant challenges travelling from stations/stops into the city centre because of the walking distances involved and the quality of walking routes. This is

⁴http://www.ofmdfmi.gov.uk/report_of_the_promoting_social_inclusion_working_group_on_disability_pdf_1.38mb_.pdf

illustrated by a report developed by AECOM in conjunction with Imtac and Disability Action examining walking routes to and from the City Centre to from Central Station and the Europa Buscentre. Finally we have concerns that Rapid Transit proposals do not seem to connect with other public transport in the city centre. For the provision of a stop at the Europa/Great Victoria Street interchange means people arriving in Belfast at could easily transfer to rapid transit to travel into the City Centre and beyond.

- 21 Imtac fails to see how the proposed changes can benefit disabled people and older people who currently use bus services or how they will attract others to use these services. The proposed relocation of services will mean greater walking distances for many into the core of the city centre. The spread of services will make wider use of bus services more difficult with greater walking distances between services. We believe the current proposals will make bus services more difficult to use for many disabled people and older people and will make bus travel less attractive for all in Belfast. This appears to be contrary to the stated aims of the proposals.

- 22 We would ask the Department to look again at proposals for buses in the city centre. Bus priority is to be welcomed but if services are not convenient to the key city centre destinations people will not be able to use them or choose not to do so. The Committee recommends the Department consider the following:
 - (1) Explore the option of developing a hub to enable interchange between bus services that operate in Belfast such as exists in Liverpool city centre. This interchange need not be located directly in the city centre.
 - (2) Explore the option of providing integrated bus services (similar to those that exist in Manchester) that provide links between transport interchanges and key destinations in the city centre.
 - (3) Provide better links into the core of the city centre to existing and future Park & Ride Services.

- (4) Develop clear and accessible pedestrian routes to and from the main bus and rail stations into the city centre.
- (5) Further develop the provision of services such as Shopmobility at bus and rail stations that will enable some disabled people to travel greater distances into the city centre.
- (6) Ensure best practice with regard to the design of public transport proposals in relation to accessibility for disabled people.

Rapid Transit Proposals

- 23 Imtac is broadly supportive of proposals for a rapid transit scheme in Belfast. We believe that a well-designed scheme will provide broader travel choice for older people and disabled people. Imtac would expect to be consulted on the design of any emerging schemes including for instance the design of proposed stops in the city centre.
- 24 In order to maximise the opportunity for people to use rapid transit to access the city centre it is essential that thought is given to how the services will integrate with other forms of public transport. For example people (including older people and disabled people) travelling by bus or train into Belfast should be able to access the service from the Europa Buscentre, Laganside, Central and Great Victoria Street. Similarly the service should integrate with Metro routes to allow people to switch easily between services. It is not clear from the proposals how Rapid Transit will integrate with other public transport services.

Pedestrian proposals

- 25 Imtac welcomes proposals to improve facilities for pedestrians within the city centre including improved crossings. Working with AECOM, Imtac has identified a series of barriers that currently make moving around the city centre difficult for disabled people and older people. These barriers include poorly installed dropped kerbs, incorrectly installed controlled crossings, poorly or incorrectly installed

tactile paving, worn and damaged tactile paving, street clutter and furniture and poor walking surfaces. Many of the issues identified relate to poor and incorrect installation and maintenance. When making the proposed changes it is essential that best practice is followed, that design is checked before approval, that works are correctly implemented and that there are ongoing maintenance checks to ensure the quality of walking routes is maintained. As previously stated quality walking routes are required from the main public transport stations into and from the city centre.

- 26 As well as improved design, increased pedestrian priority at crossings is an essential element of improving pedestrian access. This priority includes wider crossings, shorter waiting times and increased crossing times. Increasing crossing times is of particular importance to many older people and disabled people.

Cycling proposals

- 27 Imtac broadly supports measures to promote safe cycling as a sustainable form of transport. However great care needs to be taken to ensure that provision for cyclists does not restrict the mobility of pedestrians and particularly disabled people and older people. This is clearly an issue where shared use of pedestrian facilities is being proposed. A recent Survey undertaken by TNS BRMB⁵ on behalf of Guide Dogs has highlighted the impact of shared use on people with a visual impairment. Department for Transport⁶ guidance cautions against the use of shared use provision in areas of high pedestrian usage.
- 28 Given this we are disappointed that Belfast on the Move proposes that cycling be allowed in a pedestrianised Donegal Place at all times and in other pedestrian areas

⁵http://www.guidedogs.org.uk/sharedstreets/fileadmin/sharedsurfaces/user/documents/TNS_Impact_Report_for_Guide_Dogs_2010.pdf

⁶ <http://www.dft.gov.uk/pgr/sustainable/cycling/ltn286.pdf>

except between 11am and 4pm. In fact we are surprised that cycling is to be permitted during the morning and evening peak commuter hours when there will be significant pedestrian footfall. Imtac believes these proposals will have a negative impact on how disabled people and older people use these areas. We welcome the proposal from the Department to consult on this issue but we would remind DRD that it has a legal duty to promote equality of opportunity for disabled people and older people and to promote the participation of disabled people in public life. The Committee recommend that the proposals on cycling be subject to a full Equality Impact Assessment.

Other issues

- 29 Door2door is a service that is used by some disabled people and older people in Belfast. It is a service used by people who cannot or have major difficulties in accessing mainstream public transport. Currently door2door can only drop off and pick up passengers at two points in the city centre. Clearly for people who have significant mobility issues this limits the usefulness of the service. As part of the changes involved in Belfast on the Move Imtac recommends that the DRD should look to increase opportunities for Door2door transport to drop off in the City Centre including linkage to Shopmobility services.

- 30 Shopmobility services can address some of the issues created by the design of a future city centre for some older people and disabled people. However to do this services must be easily accessed by car, public transport, taxis and door2door transport. The location of current services makes this difficult. As the DRD currently supports Shopmobility services in Northern Ireland Imtac recommends the Department develop proposals (in conjunction with providers) to broaden the accessibility of Shopmobility services in Belfast. Some good work has already been done in this area by Shopmobility Belfast and Translink providing loan of chairs and scooters from Great Victoria Street/Europa Stations.

Next Steps

- 31 Imtac is conscious that many of the proposed changes to the City Centre are subject to Departments involved obtaining finances. We recognise that in the current economic climate the likelihood is that not all projects will be funded. The Committee has significant concerns that piecemeal funding of different aspects of the proposals could have a significant further negative impact on the mobility of disabled people and older people. For example if DSD are successful in obtaining funding for developing Donegal Place and Donegal Square North but DRD do not obtain similar funding to carry out traffic management works. This would have a massive affect on disabled people and older people who use both cars and public transport to access the city centre. Given pressures to spend public money if made available a piecemeal approach to the Belfast on the Move proposals is a real danger. In order to lessen the potential impact of this approach Imtac recommends that each individual project connected with Belfast on the Move (both DRD and DSD) be subject to an Equality Impact Assessment.
- 32 In addition to statutory processes Imtac recommends that the DRD, DSD and other stakeholders formally engage with the Committee and other organisations of and for disabled people and older people. As part of our response to the Access & Mobility Study we recommended forming a consultative group to work through and agree solutions to difficulties created for disabled people and older people by the emerging design of the City Centre. The publication of the Belfast on the Move proposals and the issues we have identified reinforce the need for such an approach. Given the pace of change Imtac recommends this happens as soon as practically possible.

Conclusion

- 33 Imtac welcomes the opportunity to comment on the Belfast on the Move proposals. We have considerable concerns that the proposed changes to parking provision, location of bus services and provision for cyclists will have a detrimental effect on the ability of older people and disabled people to access the city centre. Whilst we recognise the difficulties created for the Department by the design of the Streets Ahead project and the subsequent demand for kerb space in

the city centre we believe there is a need to look again at proposals. We welcome the commitment by the Department to consult with disabled people and older people on the proposals and would ask that this approach be broadened to discuss potential solutions to issues we have raised.

Contact us

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