



## **Comments from Imtac on the Draft Belfast Parking Strategy and Action Plan**

**November 2016**

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## **Making our information accessible**

As an organisation of and for disabled people and older people 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](http://www.imtac.org.uk). In addition we will provide information in a range of other formats. These formats include:

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## **About Imtac**

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 contribute to the current consultation on the Draft Belfast Parking Strategy. Parking provision and policies are key issues for the Committee reflecting both positive and negative impacts on disabled people and older people. It useful to highlight these issues as it will inform Imtac's response to the Strategy and actions.

### The Blue Badge Scheme

The Blue Badge Scheme is hugely important to disabled people and older people. The Scheme recognises that other forms of transport have traditionally not been designed to be accessible to disabled people and the concessions offered by the Scheme have allowed disabled people to park closer to their destination.

There are currently over 120,000 Blue Badge Holders in Northern Ireland. Imtac has undertaken a number of surveys of Blue Badge use in Belfast City Centre, including a recent survey to inform this response. These surveys have demonstrated that Blue Badge use is a substantial part of overall on-street parking activity in the core of Belfast City Centre. Over 300 Blue Badge Holders are parked each day in the streets surveyed each day with around 30% of on-street bays used by holders, rising to over 40% in key retail areas. The Parking Strategy must reflect both current usage and the importance of the Blue Badge to disabled people.

## The impact of illegal and inconsiderate parking

Disabled people and older people are disproportionately affected by the behaviour of other motorists. Illegal use of accessible parking bays and fraudulent use of Blue Badges by non-disabled people reduces the benefits of the scheme to genuine users. Parking at bus stops prevents buses accessing kerbs and makes it difficult or impossible for some disabled people to get on or off vehicles. Parking across dropped kerbs prevents disabled people crossing roads, making many pedestrian journeys difficult or impossible. Finally parking on pavements not only blights whole communities, it makes every day journeys for individual disabled people and older people very difficult.

Imtac views the behaviour outlined above as unacceptable and something that should not be tolerated by society as a whole. The Parking Strategy must bring forward measures to address the parking behaviour of some motorists.

## Enhancing alternatives to car usage

Significant research<sup>1</sup> has been undertaken demonstrating the links between car ownership (or lack of it) and inequality. This research has clearly demonstrated that planning policy based around an assumption of car ownership has had a hugely negative impact on people with limited or no access to the car. Despite the benefits of the Blue Badge Scheme, many disabled people and older people are disadvantaged through having no access to a car. Difficulties for disabled people have been compounded by barriers created by the inaccessible design of transport services and other infrastructure including the pedestrian environment.

Wider transport and planning policies need to balance between the needs of all users, the viability of the city, the impact transport has on the living environment and the contribution it makes to a fairer society. Parking policy has a significant role in delivering these objectives. The Parking Strategy needs to demonstrate that it will benefit both those with access to car and those who have not, assisting in delivering and vibrant and inclusive city for all.

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<sup>1</sup> See for example [Making the Connections: The Final Report on Transport and Social Exclusion](#)

## Comments on the Draft Strategy

Imtac broadly supports the key issues, challenges, opportunities and objectives set out in the draft Strategy. The Committee believes these are broadly in line with the key issues outlined above. Imtac does, however, have comments on the suggested actions and believe there is the need for some additional actions and for other actions to be strengthened. Comments have been structured under the headings of the Strategy Actions.

### Parking Provision

Imtac agrees with the proposed actions under on-street parking provision and welcomes in particular the commitment to maintain on-street concessions for Blue Badge holders. The Committee does have concerns about the cumulative impact of all the changes on Blue Badge usage. It is the Committee's belief that the concessions will become much more valuable if all changes are introduced and that fraudulent use may become more attractive. This will have a negative impact on genuine users and potentially damage the public credibility of the scheme. **Imtac strongly recommends that in addition to commitments around maintaining existing concessions further commitments are also required to better enforcement against potential fraud and misuse of Blue Badges.**

The Committee also broadly agrees with the actions in relation to off-street car parks. The Committee welcomes proposals designed to improve accessible off street parking, providing a realistic alternative to for disabled people to parking on-street. Connected to this issue the Council must lead by example. **Imtac recommends that the Council take immediate steps to improve accessible parking on its own sites. Whilst welcoming a proposal to look at free concessions in off-street car parks for Blue Badge holders Imtac recommends that improving accessibility should be the priority.**

Imtac welcomes other proposed initiatives including the parking app and a shuttle bus that connects car parks. It is essential that these services are designed to be inclusive and accessible to everyone. Accessible bus transfer to the City Centre is particularly important if all parking is migrated to multi-storey car parks adjacent to the Inner Ring Road given the prohibitive walking distances involved for some disabled and older people. Engagement with disabled people and older people in their design is essential. **Imtac recommends that disabled people and**

**older people be included, through Imtac, on the proposed Parking Forum.**

### Parking in residential areas

Imtac recognises the impact of commuter parking on residential communities in Belfast. Many older and disabled people have told the Committee that this type of behaviour has a major impact on their lives, in some cases making people a prisoner in their own homes. However there are other parking behaviours that have a major impact on people's lives. Pavement parking, parking on bus stops and parking across dropped kerbs and crossings makes life extremely difficult for many older and disabled people in the city. **Whilst Imtac welcomes any commitment to tackle the issues experienced by communities in Belfast, the Committee recommends that Strategy contain broader commitments to tackle inconsiderate and illegal parking behaviour across the city. Recent enforcement of bus lanes shows that if there is a will enforcement can be used to change behaviour.**

With specific regard to parking in residential areas the Committee would like to query whether there alternative solutions other than resident parking schemes. The Committee is aware of initiatives run by councils in GB<sup>2</sup> where they work directly with affected communities to redesign their streets to reduce the impact of traffic and parking.

### Parking Information

Imtac broadly supports the proposals to improve parking information in the city. **The Committee recommends that any initiatives are designed to be accessible to all users including disabled people and include information, such as details about accessible parking, relevant to disabled people.**

### Complementary actions

The Committee broadly supports the need for complementary actions not directly associated with parking in the city. In particular the Committee is very supportive of promoting *sustainable commuter travel*, particularly in relation to people who do not have the choice of using a car.

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<sup>2</sup> See <https://www.newcastle.gov.uk/parking-roads-and-transport/cycling/streets-people-1>

Whilst the Committee has no particular issues with the proposed actions listed in the draft Strategy, there are two major omissions. Firstly the Strategy makes much of improved access for cyclists but at no point in is the importance of the pedestrian environment acknowledged. Any journey, but particularly journeys by public transport, involves use of the pedestrian environment. In too many areas of Belfast City Centre the pedestrian environment is poor and inaccessible. If sustainable transport is to be an attractive and accessible alternative to the car, work is also required to make the city more accessible to pedestrians. Secondly to make bus travel in particular attractive and accessible major improvements are required to infrastructure in the city centre. By way of example Bedford Street is a major arrival point in the city centre for bus passengers. However there is little bus stop infrastructure in the area with passengers frequently required to disembark onto the road rather than the pavement. It maybe outside the scope of the Parking Strategy but promoting sustainable alternatives to the car maybe difficult if the infrastructure for these alternatives in inadequate.

The Committee acknowledges and supports initiatives to promote cycling in the city including the provision of safe parking. To reinforce our previous comments equal status and resources should be given over to improving pedestrian infrastructure within the city and the final strategy should reflect the value of pedestrian journeys.

The Committee recognises the importance of taxi services and recognise the particular importance of these services to disabled people and older people. Imtac believes more discussion is required about parking provision for taxis in the city centre. Questions do need to be asked whether demand for further ranks is being driven by taxi users or by taxi operators.

## **Conclusion**

Imtac thanks the Council for the opportunity to respond to the consultation on the draft Parking Strategy. In this response the Committee has tried to highlight the varied impact parking issues have on older people and disabled people living in and visiting Belfast. Imtac looks forward to working with the Council and others in finalising and implementing the Strategy.