



**Comments from Imtac about the consultation
from Belfast City Council Supplementary
Planning Guidance (Transportation)**

(August 2022)

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General comments

Imtac welcomes the opportunity to comment on the draft SPG on Transportation. The Committee commends the Council for involving Imtac representatives in pre-consultation workshops during the development of the SPG. Recommendations directly made by the representative of the Committee have been included in the draft Guidance.

Given the involvement of the Committee in pre-consultation we are broadly content and supportive of the approach and content of the Transportation SPG. We do, however, have a number of specific recommendations for additions and changes which we believe would further enhance the final Guidance.

Recommendation one - Expand Existing Guidance section

Section 2.2 of the draft Guidance highlights Creating Places and Manual for Streets as key existing guidance. Whilst the Committee recognises the importance of these documents in providing sound general guidance in relation to streets and transportation, some of the technical detail contained in both documents have been superseded by subsequent guidance. For example, some of the detailed design requirements around cycling in Creating Places are inconsistent with modern design requirements set out in LTN 1/20. This should not be a great surprise given that Creating Places was published in 2000 and LTN 1/20 in 2020.

The Committee recommends that Section 2.2 be amended to reflect that both Creating Places and Manual for Streets be used as guidance around general principles for the design of streets and transportation. The section should then include specific mention of further guidance that provides up to date technical design details including:

[LTN 1/20 – Cycle Infrastructure Design](#)

[Inclusive Mobility – A Guide to best practice on access to pedestrian and transport infrastructure](#)

[Guidance on the use of tactile paving surfaces](#)

BS 8300 – Design of an accessible and inclusive built environment

Inclusive Mobility is explicitly referenced in Manual for Streets. Both it and the guidance on the use of tactile paving surfaces have recently been updated and republished by the Department for Transport. We would also draw your attention that Manual for Streets is currently under

review and the updated version is to be published shortly and this should be reflected in the guidance.

Recommendation two - Use Walk, wheel, and cycle consistently

Imtac welcomes the use of walk, wheel and cycle terminology in the draft guidance but there are a several examples, including Policy Tran 1: Active Travel – walking and cycling, where reference to wheeling has been omitted. The Committee recommends that walk(ing), wheel(ing), and cycle(ing) terminology be used consistently through the final Transportation Guidance and in references made in associated council Supplementary Planning Guidance.

The Committee also recommends that the Guidance include a short definition of the term wheel(ing):

“Wheeling is a term that includes people who use a wheelchair, a mobility scooter and in prams or buggies, who wheel rather than walk or cycle.”

Recommendation three - Include an explicit requirement about making cycling accessible to everyone

Whilst Imtac is supportive improving cycling infrastructure as part of the wider commitment to a sustainable transport hierarchy, guidance such as the SPG must make clear that infrastructure and routes must be designed for all cyclists. The draft guidance does not explicitly require this.

The Committee recommends the inclusion of a strong statement on cycling based on the first design principle of LTN 1/20:

“Cycle infrastructure and routes must be accessible to all, regardless of age, gender, ethnicity or disability and should not create hazards for vulnerable pedestrians and be designed to accommodate non-standard and accessible cycles”

Recommendation four - Include an explicit reference to providing parking for non-standard and accessible cycles

The Committee welcomes the inclusion requirements around cycle parking, recognising it is key to ensure people can make every day cycling journeys. The draft Guidance does not, however, make explicit

reference to parking for people who use non-standard or accessible cycles.

In line with LTN 1/20 Imtac recommends that the final guidance make clear that developments must provide parking for all cyclists such as:

“Cycle parking provision should consider all types of cycle vehicle and all types of cycle user and be designed to accommodate non-standard and accessible cycles.”

Recommendation five - Remove the final two sentences from 3.1.11

This section on footway proportions contains a reference to shared cycle and pedestrian facilities which appears to contradict guidance on segregation given elsewhere in the document. To ensure a consistent approach and messaging the Committee recommends the final two sentences of this section be deleted.

Recommendation six - Include reference to Inclusive Mobility in 3.1.15

This paragraph includes specific reference the accessibility of pedestrian and cycle routes and references Manual for Streets specifically around the requirements of disabled people. As Manual for Streets signposts readers to Inclusive Mobility for detailed guidance around accessibility, this section should also reference and link to Inclusive Mobility.

Recommendation seven - Reconsider the drafting of 3.2.12 Shared Surfaces

The use of shared surfaces has created significant controversy, with disabled people in particular raising concerns about their safety. Imtac has published a [statement](#) recommending that no new shared surface schemes be introduced in Northern Ireland and DfT has suspended LTN 1/11 whilst more research is undertaken into the safety of shared surfaces, with the advice to local authorities not to proceed with schemes whilst this work is undertaken. DfI has issued its own [guidance](#) recommending the retention of kerb delineation in public realm schemes

The Committee recommends that the section on Shared Surfaces be redrafted to reflect both the controversy involved in their use and widespread current advice against their use. Reference should be made

to DfI Guidance around retention of kerb delineation between pedestrians and other road users.

Brief Comments on other draft Supplementary Planning Guidance

Resources limit the extent to which Imtac can respond to the other draft Supplementary Planning Guidance. However, we recommend the following:

- The Placemaking and Urban Design SPG be amended to use walk, wheel and cycle terminology when referencing active travel
- Paragraph 4.5.6 of the Placemaking and Urban Design SPG specifically reference disabled people and their organisations as key stakeholders in collaboration on inclusive design
- Unauthorised footway advertising boards are a ubiquitous blight on many of the retail streets in Belfast. They cause obstructions and hazards for many people walking and wheeling in the city. The Advertising and Signage SPG should make clear that street A Boards are unauthorised, outside of the current planning system and should not be used on our streets.
- The Sensitive Uses SPG references outdoor seating on pavements. It should be noted that the Council has still temporary licensing guidance introduced during the COVID-19 pandemic. Work is required to agree long term and permanent outdoor seating licensing, which is consistent with the other SPGs including footway width requirements set out in the Transportation SPG.