



Comments from Imtac on the draft proposals & draft equality impact assessment consultation for the Sustainable Transport Enabling Measures

August 2011

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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.

General comments

- 3 Imtac welcomes the opportunity to comment on the current consultation. The Committee has been a key stakeholder throughout the development of traffic management proposals for Belfast City Centre. It is been our aim during consultations around the STEM proposals to ensure that disabled people and older people have the same opportunities as everyone else to benefit from changes being made in Belfast City Centre.
- 4 Throughout the process of change in Belfast we have sought to help develop an understanding amongst policy makers of factors that should be considered if disabled people and older people are going to be able to get to and around Belfast City Centre with relative ease in the future. Key to achieving this is an understanding of disabled people and the barriers they face undertaking day to day activities because of the design of the built environment – understanding that people have different capabilities and requirements¹. Of particular importance to access to a city centre is the widely accepted recommended walking distance limits experienced by disabled people (estimated at between 50 and 150m depending on the individual²). It

¹ For the best general summary of issues see Chapter 2 of “Inclusive Mobility” DfT 2002

² Inclusive Mobility page 24

should also be noted that many of these basic human factors affect others in society, notably people with dependents such as small children.

- 5 Ensuring a city centre is accessible to older people and disabled people is a complex issue. Making the core of the city centre pedestrian friendly, reducing the impact of buses, cars and other vehicles is a laudable aim. However large pedestrian areas pose particular difficulties for disabled people to get around with ease. These difficulties are compounded if it is also difficult to park or other accessible transport (such as buses, taxis and door2door transport) operates in the periphery of the pedestrian area. Other issues such as permitting cycling in pedestrian zones are shown to create further hazards for disabled people and older people in city centres³.
- 6 In advising the various agencies involved in the redevelopment we have sought to emphasise the complexity of ensuring that disabled people and older people have equality of opportunity in accessing the city centre. Imtac advocated an Access & Mobility Strategy for the city centre to ensure that agencies worked together to develop solutions that helped people get to the city centre and move around with relative ease. The Access & Mobility Study subsequently developed by the Department for Social Development has proved disappointing, clearly identifying the complexity of the challenges but providing overly simplistic and limited solutions.

Comments on the EQIA

- 7 We welcome the equality impact assessment of the traffic management proposals for Belfast City Centre. In general

³ See "The Impact of shared surface streets and shared use pedestrian/cycle paths on the mobility and independence of blind and partially sighted people" TNS BMRB 2010

Imtac believes the assessment is symptomatic of the overall approach to the redevelopment of Belfast in that it simplifies and underestimates the impacts of the changes on both disabled people and older people. In this response we will set out where the consultation does not fully recognise the potential for negative impact on disabled people and older people. We will also set out the further mitigating measures we believe are required to reduce these impacts.

- 8 The summary of the EQIA indicates that in relation to the disabled people and older people the STEM proposals will have both positive and negative impacts. On the negative side the restriction in parking opportunities will impact negatively on Blue Badge holders. On the positive side disabled people and older people will benefit from better provision of public transport and greater pedestrian priority including more pedestrianised streets. The Department contends that the mitigating measures to increase accessible parking in the core of the city centre lessen greatly the impact of the wider reduction of parking opportunities in the City Centre.
- 9 It is the contention of Imtac that this assessment of impact is flawed as it does not take into account basic human factors in relation to disabled people and other sources of evidence including the extensive pre-consultation with stakeholders.
- 10 With regard to the issue of parking Imtac acknowledges the efforts made by Roads Service to provide as much accessible parking as possible in the city centre given the competing priorities for kerb space but as noted on following comments this does mitigate the impact. The EQIA clearly acknowledges the negative impact changes will have on disabled people and older people who rely on the car for mobility. Imtac would disagree that the mitigating measures included in the EQIA are sufficient to lessen this impact.

- 11 Imtac welcomes the inclusion in the evidence used to assess impact a report undertaken by the Committee into Blue Badge use in Belfast . Our report indicates that at any given time around 30% of on-street parking bays in the city centre are being used by Blue Badge holders. This figure rises to almost 40% in streets around the retail core of the city. The evidence gathered by Imtac raises questions over how providing only 7% of on-street parking opportunities for disabled people will address the existing demand.
- 12 The Committee also has questions over of some of the other mitigating measures included in the EQIA. Basic human factors highlighted in paragraph 4 of this response mean that much of the on-street parking and some of the off-street parking are of limited use to disabled people and older people accessing the core of the city centre. Imtac acknowledges that there is off street parking in some locations close to the city centre but this too is limited by poor accessibility of locations and buildings.
- 13 Whilst we believe that the mitigating measures are insufficient we acknowledge that Roads Service is limited in the amount of parking provision that can be provided in the City Centre. Imtac believes that evidence from both here and Great Britain indicates that demand for Blue Badge parking is inflated by fraud and misuse of the Badge⁴. While we are concerned about the proposed level of parking provision we believe this can work more efficiently but only if increased enforcement of Blue Badge fraud and misuse is added to the mitigation measures.
- 14 The EQIA concludes that the STEM proposals will positively impact on disabled people and older people by improving public transport. Once again we believe that this assessment is based on restricted use of evidence and

⁴ A summary of evidence is provided by our paper "Enforcement of Blue Badge Fraud and Misuse"

assumption. The EQIA also ignores the fact that stakeholders, including Imtac, have been raising concerns consistently about the potential negative impact of the relocation of bus services in Belfast City Centre throughout the pre-consultation process.

- 15 The EQIA contends that statistics indicate that disabled people and older people use public transport more than others and that increasing priority for buses as well as services such as door2door on roads will lead to easier journeys by public transport. On two key points this analysis is flawed. Firstly a wealth of evidence suggests that disabled people and older people face additional barriers to using public transport and usage is less than other sections of society⁵. Secondly giving roads space over to buses does not in itself increase the accessibility of public transport. Given the human factors we have highlighted in paragraph 4 the location of where people get on and off buses as well as the ease of transfer between public transport services and other modes of travel will dictate whether public transport increases the accessibility of Belfast City Centre.
- 16 Investment in public transport vehicles and infrastructure means that many disabled people and older people have the opportunity to travel for the first time. However this will only be possible if public transport provides a barrier free experience getting people where they want to go in comfort, safety and ease. Imtac believes that current provision and the STEM proposals will not make using public transport easier for many disabled people because:
 - Many Metro services do not provide the level of access required into the core of the city centre – this issue will

⁵ For example Accessible Transport Strategy DRD 2005, Report of the Promoting Social Inclusion Working Group on Disability OFMDFM 2009, and the Policy Review of the Concessionary Fares Scheme DRD 2006

be increased with the relocation of infrastructure under STEM

- Interchange between Metro services is difficult and will be more difficult under STEM proposals
- Most Ulsterbus, Goldline, Park & Ride and NIR services do not provide acceptable access to the core of the city centre
- Rapid Transit proposals do not fully integrate the service with Metro, Ulsterbus and NIR services
- Door2door services will continue to be limited in where they drop off/pick up passengers in Belfast city centre
- Walking routes to and from major public transport interchanges are poor⁶

- 17 Given our concerns about whether STEM proposals will actually improve access to the city centre for disabled people and older people we request that the Department revisit this issue before publishing the final EQIA. We recommend that a much more in-depth analysis is undertaken into how easy it will be to access the city centre using buses, trains, rapid transit and door2door given the basic human factors highlighted in paragraph 4. We also recommend the analysis also look at how easy it will be for people to change between different bus services and other modes given the basic human factors we have highlighted in paragraph 4. Such an analysis will provide the Department with appropriate evidence to base the assessment of STEM public transport proposals and highlight any mitigating measures required to provide equality of opportunity for disabled people and older people.

⁶ See report developed by AECOM in conjunction with Disability Action and Imtac

- 18 Improved pedestrian priority is key to the STEM proposals. Imtac acknowledges that giving greater priority to pedestrians is something we should support but we disagree with the assessment that measures such as increased pedestrianisation have only positive impacts particularly for older people and disabled people. Large scale pedestrianisation creates its own problems given the basic human factors we have highlighted in paragraph 4. Pedestrian areas mean many disabled people and older people have to walk greater distances to access shops and facilities. Once again Imtac is disappointed that the EQIA does not highlight this potential negative impact especially as we have raised this issue throughout the pre-consultation process.
- 19 Imtac recognises that enhanced pedestrian measures (including pedestrianisation) have benefits for older people and disabled people. However we must also recognise that such changes can also impact negatively on disabled people and older people. Imtac recommends that the final EQIA explicitly recognises the negative impacts of pedestrian improvements under STEM and set out mitigating measures which will lessen this impact – for example improved Shopmobility services.
- 20 Another key aspect of the STEM proposals involves making cycling safer and attractive in Belfast City Centre. Imtac believes there are obvious benefits for everyone in society in measures to encourage cycling. However the Department are aware of our concerns and the concerns of other disability organisations of the impact on disabled and older pedestrians where proposals involve cyclists sharing facilities with pedestrians. Once again we are disappointed that the EQIA fails to acknowledge this potential impact. Imtac recommends the Department recognise the potential impact in the final EQIA and include any relevant mitigating

measures. Depending on the proposals Imtac believes a separate EQIA on cycling measures may be required.

Conclusion

- 21 Having reviewed the EQIA in light of all the current available data and evidence Imtac believes that we have identified a number of areas where the assessment of impact is flawed. We would ask that the Department clearly recognise all the potential negative impacts on disabled people and older people of the STEM proposals and include further mitigating measures in the final EQIA. We would also ask that the Department also acknowledge the potential negative impact of the proposals on people with dependants particularly people with young children. As always Imtac is happy to assist the Department in any way in developing solutions.

Contact us

- 22 If you have a query about this document or would like it in another format you can contact Michael Lorimer at:

Imtac
Enterprise House
55-59 Adelaide Street
Belfast
BT2 8FE

Telephone: 028 9072 6020
Textphone: 028 9072 6016
Fax: 028 9024 5500
Email: info@imtac.org.uk
Website: www.imtac.org.uk