



**Comments from Imtac about the consultation about
the Active Travel Delivery Plan**

(February 2025)

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About Imtac

The Inclusive Mobility and Transport Advisory Committee (Imtac) is a committee of disabled people and older people as well as others including carers and key transport professionals. Its role is to advise Government and others in Northern Ireland on issues that affect the mobility of Deaf people, disabled people and older people.

The aim of Imtac 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 (herein after referred to as the Department).

Introduction

Imtac welcomes the opportunity to comment on the Active Travel Delivery Plan. The Committee commends the Department for the proactive and positive approach it has taken to engagement during the consultation period, including a workshop with Imtac members and Deaf, disabled and older people and their organisations more generally.

In responding to the consultation Imtac will use the four key principles set out in our New Approach paper with which the Department is familiar and which the Committee views as essential to ensuring that transport and travel is inclusive and accessible to everyone. These principles are:

1. Putting Deaf people, disabled people, and older people at the centre of every stage of decision making
2. Ensuring a shift in our cultures
3. Ensuring public and private investment contributes to an accessible and inclusive society
4. Ensuring end to end journeys are straightforward and accessible

Imtac's approach to Active Travel

Imtac supports the greater focus and proposed investment in active travel. The Committee believe improving walking, wheeling and cycling journeys is essential in ensuring Deaf, disabled and older people have the same right to travel as everyone else. Nearly every journey we make

involves walking or wheeling but Imtac has demonstrated frequently through our work the significant barriers disabled people, older people and others encounter when even making the simplest of pedestrian journeys. Imtac has also previously published a statement on cycling¹, a mode of travel everyone should have a right to use but a mode that many in society are currently excluded from, including many Deaf, disabled people and older people.

Viewed through the lens of our New Approach framework, the focus on active travel presents an opportunity to shift cultures, moving us further from the historic approach of a transport system and built environment that prioritised vehicles over people, towards a society that values and promotes walk, wheel and cycle journeys for everyone. The focus on building new infrastructure provides the opportunity to remove existing physical barriers and to make walking, wheeling and cycling an accessible option for many more people in our society. Increased opportunities to make active travel journeys has huge potential to improve end to end connectivity and to link more people to key local services and to wider travel opportunities.

Many of these issues and benefits have been recognised in the consultation. Improving opportunities to walk, wheel and cycle have clear environmental, economic, and importantly, health and social benefits, particularly for people with limited or no access to a car. The Committee also recognises that increased active travel is a key part of the societal change needed to combat climate change and meet Net Zero targets.

The Committee has three overarching recommendations about the broad approach to Active Travel proposed in the consultation which we believe will strengthen the outcomes of the Delivery Plan.

We recommend that a clear commitment is made to ensure ongoing and early engagement with Deaf, disabled, and older people (including carers) during the development of active travel policies and plans (including delivery at the local level), consistent with the first principle of our New Approach paper.

We recommend that Active Travel policy makes clear that whilst active travel includes walking, wheeling and cycling, walking and wheeling is a mode of travel distinct from cycling. Active travel

¹ See <https://www.imtac.org.uk/imtac-statement-cycling>

design and delivery must take this into account providing appropriate segregation. This is consistent with the principles of LTN 1/20².

We recommend that active travel policy and delivery makes clear that the road users' hierarchy will be used. This places walking and wheeling first, meaning design should promote access for pedestrians before other road users. This is consistent with the Department's own policy statement "Time for Change"³.

Prioritisation

Imtac agrees that active travel has the greatest potential to deliver for short journeys and in urban areas. The Committee agrees that connections to local schools (including special schools and adult day centres), public transport and town and community centres should be considerations in deciding which routes to improve first.

In addition to these places of interest, Imtac recommends the following should also be important considerations – health facilities including GP Surgeries and local hospitals, places where employment opportunities are concentrated and supermarkets and other retail opportunities (where people can access cheaper food). The Committee recognises that there may be some overlap between the places of interest thereby increasing the priority for that location.

Delivering the Network

The Committee does not propose to comment on the details of each of the delivery plans or the prioritisation of delivery. Much of our interest lies in the design of what is being delivered. Inclusive engagement and consultation around the detailed design of schemes will be essential in ensuring that the network delivers for all.

We recognise that delivery will take time and prioritisation is required. We welcome commitments to develop rural active travel networks

² See <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>

³ See <https://www.infrastructure-ni.gov.uk/publications/planning-future-transport-time-change#:~:text=Planning%20for%20the%20Future%20of%20Transport%20%E2%80%93%20Time,networks%20over%20the%20next%2010%20to%2015%20years.>

including greenways and other strategic inter-urban routes. The Committee does have three comments / recommendations relevant to this section to ensure that we deliver more active travel networks.

Every year the Department undertakes small schemes resurfacing carriageways and footways. These schemes are excellent opportunities to improve active travel, upgrading existing footways and crossings to inclusive design standards and potentially connecting these to the wider active travel improvements envisaged by the Delivery Plan. Unfortunately, it is our experience that too often these opportunities are not always maximised. We recommend that the Department introduces policy guidance to ensure that any investment in our road network maximises active travel opportunities.

The Department has a major role in other road and street improvements, either as funder or as the agency that will eventually adopt and maintain streets. This includes, for example, public realm schemes and greenway projects developed by local councils or large private developments. As with small roads improvements it is essential that other public and private developments are required to provide the same high quality active travel provision as envisaged under the Delivery Plan.

Much of our existing traffic free active travel infrastructure is not accessible to Deaf, disabled, older and other users because of poor design and disabling barriers. As part of the overall increased spend on Active Travel, Imtac recommends that funding be provided to improve accessibility on existing routes, including widening paths, resurfacing paths, the provision of lighting and seating and the removal of any physical barriers that make access impossible for people who use mobility scooters or non-standard or accessible cycles.

Designing the network

For the Committee the key element of delivering inclusive and accessible travel is design. Imtac welcomes the commitment to inclusive design and safety in the draft Delivery Plan and the “aim of creating places that are welcoming and accessible to all.”

From an Imtac perspective there are some key elements that must be incorporated into designing active travel infrastructure:

- Pedestrian infrastructure should be physically segregated from cycling infrastructure
- Cycling infrastructure should be physically segregated from motorised traffic
- Pedestrian infrastructure should be designed to inclusive design standards⁴, ensuring that everyone can make walk and wheel journey
- Cycling infrastructure should be designed to inclusive design standards, ensuring that cycle journeys become an option for people of all ages, disabled and non-disabled people alike
- In limited cases where segregation is not possible, for example traffic free routes such as Greenways, there must be strict design standards, specifying issues including minimum widths (minimum 4m), requiring a compacted surface and the provision of lighting and inclusive seating.

To ensure that the delivery of active travel meets the aims of the delivery plan, we recommend that the Department engages and consults with Imtac and Deaf, disabled and older people more generally before finalising design guidance for active travel.

The Committee recognises that there will always be instances where cyclists and pedestrians must interact including around bus stops and crossings. Infrastructure at these points is likely to generate significant debate and if poorly designed will lead to conflict between pedestrians and cyclists and potentially deter some disabled people from using certain streets in our towns and cities.

It is essential that the Department continues to engage with Imtac and others when designing this type of infrastructure to reduce the potential of conflict between users.

The Department has provided some pictorial examples of different types of infrastructure. The Committee would make the following comments on these images:

⁴ See <https://www.gov.uk/government/publications/inclusive-mobility-making-transport-accessible-for-passengers-and-pedestrians> and also <https://www.gov.uk/government/publications/inclusive-mobility-using-tactile-paving-surfaces>

- Traffic free routes are important; where space allows segregation should be used. Where not possible a minimum suitable width (4m) must be applied, as well as strict requirements around surfacing. Lighting is important as is the provision of well-designed seating.
- Shared surfaces and paths should not be used on streets in urban areas including mixed traffic streets.
- Mandatory cycle lanes with only white lines for delineation should not be used as these do not provide the safe separated space required by many cyclists classed by society as vulnerable. This includes disabled cyclists, older cyclists and children.

Imtac recognises the need to rebalance our streets in favour of moving people rather than vehicles and to prioritise the investment in walk, wheel and cycle journeys. The Committee also recognises that rethinking traffic management is a key part of making active travel journeys safe and accessible. Imtac is broadly supportive of both approaches. As the document indicates there are important considerations connected to other essential road users when making these changes.

It is essential that provision for users of public transport and Blue Badge parking must be prioritised when making any changes. Neither user should be disadvantaged when making any changes to streets, whether the street be a residential area or key streets in our towns and cities. Key to achieving this is early high level and local engagement with Deaf, disabled and older people and our organisations including Imtac.

Inclusive and accessible cycle parking is an essential component of enabling people to make routine cycle journeys. Developing a plan to develop cycle networks is welcome, but in the opinion of the Committee not including cycle parking provision as part of infrastructure improvements is a mistake. People, including disabled people and older people, will not cycle if there is nowhere to park their cycle at the end of a journey.

Other issues

Although not addressed within the scope of the current consultation there are a series of other issues that need to be considered if we are to

make walking, wheeling and cycling a genuine sustainable active travel choice for everyone, including Deaf, disabled and older people.

The Committee notes that the consultation does not include micromobility and the growing use of e-scooters for making local journeys. Currently the unregulated use of e-scooters predominantly on footways is creating increasing conflict with pedestrians. As the use of this mode of movement appears to have some potential if appropriately regulated for travel including for some disabled and older people, it would seem remiss of the Department not to refer to this in the ATDP.

There are changes to legislation and regulation that Government could and should make that will make active travel journeys easier. These include:

- Replicating changes to Highway Code introduced in Great Britain which give pedestrians greater priority over other road users.
- Introducing legalisation, similar to Scotland, that makes parking on pavements and across dropped kerbs illegal by default.
- Introducing changes to traffic regulations to allow for the use of infrastructure such as mini zebra crossings
- Regulating to ban the use of A Boards on pavements similar to a scheme that has been operating in Edinburgh
- Regulating the growing use of E Scooters

Many Deaf, disabled and older people face wider barriers to making active travel journeys which need to be addressed including issues around affordability and the attitudes of other members of the public. Interventions that need to be considered include:

- Schemes that provide financial support for people to buy adapted accessible cycles which are significantly more expensive than standard bicycles
- Schemes that provide loan / hire of cycles including non-standard and accessible cycles
- Education campaigns that promote respect between road users, emphasising that pedestrians should have right of way in many circumstances

Finally, there are issues around maintenance and enforcement. These include:

- Ensuring the maintenance of our active travel infrastructure is prioritised
- Ensuring standards are strengthened and enforced for the reinstatement of active travel infrastructure after street works
- Enforcing existing regulations around E Bikes and the future regulation of E Scooters
- Enforcement of existing and future parking restrictions

Conclusion

Imtac welcomes the opportunity to respond to the current consultation. The Committee looks forward to building on good working relationships with the Active Travel Team and to contributing to finalisation of design guidance and detailed implementation of schemes in the future.