



**Comments from Imtac on the EQIA on Belfast City
Centre West Side Regeneration District Draft
Regeneration Plan**

March 2009

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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 responded to the previous consultation on the West Side proposals in September 2008. In our response we raised concerns about the overall accessibility of the consultation process. We are pleased that DSD has made efforts to resolve some of the issues in the current consultation document including advertising the availability of the document in alternative formats. However the process still falls short of good practice and what the Committee would expect from a major Government Department. In particular type size in the main document and Annexes should be 14pt. Also whilst the Department does advertise the availability of accessible formats the document should also include a fax contact number and a textphone contact number for the use of people who are deaf or hard of hearing.
- 5 Imtac has developed guidelines for organisations on how to develop inclusive consultation that is accessible to disabled people and older people. This is available on our website at www.imtac.org.uk/publications.php?pid=120.

- 6 In our previous response we reminded the Department that as well as Section 75 duties all public bodies here have additional statutory duties to promote positive attitudes to disabled people and to promote the participation of disabled people in public life. It is of the utmost concern to Imtac that the DSD appear to be unaware of these duties. Annex B appears to suggest that in making this request we have asked the Department to “go beyond their statutory equality duty.” The Committee formally request that the Department make clear in the final report on the EQIA that they understand their statutory disability duties and make clear what steps have been taken to date around the West Side proposals to meet these duties.
- 7 The term “the disabled” appears a number of times in Annex B. This term is not viewed as acceptable by disabled people as it implies that disabled people are homogeneous group with similar beliefs, aspirations and needs rather than individuals. This term should not be used by the Department in future. Imtac uses the term disabled people.
- 8 Imtac has been involved for a number of years with DSD in the development and implementation of the wider Streets Ahead project. Whilst there has been differences of opinion between the Department and the Committee at various stages of the process the fact that there has been an ongoing engagement with disabled people and older people during the project is very positive. The Committee would also like to commend the Department for the changes made to the project resulting from this engagement. Comments made about the current consultation reflect the experiences of the Committee drawn from the wider “Streets Ahead” project.

Comments on the EQIA

Aim of the policy

- 9 The Department has clearly indicated the aim of the policy in the EQIA. Imtac notes that there is some detail on the key features and potential benefits of the proposals. Imtac is disappointed that aims of

the policy does not include creating an environment that is accessible to all including disabled people and older people. In our response to the previous consultation we raised concerns about this point. We believe the absence of this aim for the project reflects the absence of consultation at an early stage with older people and disabled people during the development of the original masterplan. In our experience accessibility must be factored into plans from the earliest stage as making changes at a later stage can be difficult or impossible.

- 10 It is recommendation of Imtac that the aim of the policy be amended to reflect the need to create an environment accessible to all including disabled people and older people.

Consideration of available data

- 11 Imtac is concerned about the use of data by the Department in making an assessment of impact. We do not believe that the Department has used the full range of data available and question the value of using data from areas outside the West Side district.
- 12 The overall aspiration for the area is to create an area to attract people from across the region to shop, work and live. Imtac cannot therefore see the value in basing an assessment of impact on a ward adjacent to the area concerned. NISRA has begun to produce better quantitative data on disabled people in Northern Ireland as well as some qualitative data on the barriers disabled people face. This data could have been used in the assessment of impact.
- 13 Over the past number of years the DSD itself has developed invaluable qualitative data from disabled people during the development of the overall "Streets Ahead" project. The DSD has engaged with Imtac and others through a series of meetings, they have held a workshop event to look at issues specifically for disabled people and the city centre and have commissioned an Access and Mobility Study to look at barriers in the city centre for disabled people. The Committee is concerned that the Department has so much valuable data available yet has not used it in this process. Imtac

believes that failure to use this data will have diminished any assessment of impact of the policy on disabled people and older people.

Assessment of impact

- 14 The assessment of impact outlined in the draft EQIA does acknowledge that responses to the previous consultation have indicated a potential negative impact for disabled people. As previously stated the DSD has a wealth of additional qualitative data gathered over a number of years that illustrate the real concerns of disabled people that if the regeneration of Belfast City Centre is handled wrongly it will effectively make the city a “no go area” for disabled people. For this reason Imtac cannot agree with the overall assessment by the DSD that there is no adverse impact on disabled people from the proposals.
- 15 Imtac believes that the Department must acknowledge all these concerns in the final EQIA report and must take these concerns more seriously. The Committee does not feel it is sufficient only to note these concerns and give them consideration during redevelopment as outlined in the draft EQIA. The Department must also commit to engage with disabled people and their organisations during the implementation of the plan to ensure that the changes made genuinely benefit disabled people.

Conclusion

- 16 Imtac welcomes the opportunity to respond to the current consultation. The Committee acknowledges that there are difficulties making an assessment of impact on what is essence a masterplan that may evolve over time. However we do believe that the proposals as outlined in the previous consultation document do have the potential to negatively impact on disabled people in particular. We believe that DSD has substantial qualitative evidence gathered from the Streets Ahead project to back up this point. Our concerns are heightened by the fact that there has been no meaningful

engagement with disabled people or their organisation during the development of the masterplan. This plainly illustrated in both the current document and in the previous consultation document.

- 17 Given these concerns Imtac dispute the conclusion of the draft EQIA that there is no adverse impact for any of the Section 75 Groups. To address these concerns we would ask the DSD make the following amendments to the masterplan. Firstly one of the key aims of the project must be to develop an environment that is accessible to all including disabled people and older people. Secondly we ask that the DSD make a commitment to engage with organisation of and for disabled people and older people during the future development and implementation of the plan.

Contact us

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More information on our members is available on our website, visit www.imtac.org.uk.

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