



Comments from Imtac on the draft Access & Mobility  
Study for Belfast City Centre

**September 2009**

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## **Introduction**

- 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.
- 4     Imtac's role is to advise on issues that affect older people and disabled people. The Access & Mobility Study addresses issues for disabled people only. However the strong correlation between age and disability means that many of issues will affect older people as well.

## **General comments**

- 5     Imtac welcomes the publication of the draft Access & Mobility Study for Belfast City Centre. We believe that the Study has clearly identified the issues around access to and around the city centre for disabled people. However the Committee is disappointed with the overall content of the Study and we do not believe that its findings answer any of the questions that currently exist around how disabled people will access and move around the city centre in future.
- 6     The Committee is concerned in particular about the overall approach of the Study which illustrates how the access requirements of disabled people can be accommodated in the city centre in future. For Imtac this approach is unacceptable, access to and around the city must be an integral part of the design and development process.

- 7 Imtac feels that the Study highlights a lack of awareness of who disabled people are and what their requirements are. This is reflected in simple things such as the small type size used in the document and the language used on occasions. There are also more fundamental issues such as the lack of understanding of acceptable walking distances for disabled people. It is also highlighted in the use of good practice examples that are not accessible to many disabled people – for example the I+ system.
- 8 Effective consultation with Imtac and others would have ensured that these issues could have been highlighted and addressed prior to the publication of the draft Study. Imtac members took part in the consultation event over one year ago but have had no input to the emerging recommendations arising from the study until now. Given the time it has taken to develop this Study and that development in the city centre is ongoing, better consultation with the disability sector is a priority moving forward.
- 9 The recommendations of the Study are particularly disappointing. Many of the recommendations have no tangible outcome, no agency with responsibility for implementation and no timescale for implementation. Overall Imtac is extremely concerned that Study will not address the issues raised by the disability sector throughout this process. Given the ongoing nature of works and the pace of change in the city this is not acceptable.
- 10 Imtac believes that the Study reflects an overall lack of commitment from all the agencies involved to ensure that disabled people have equality of access to the city centre in future. Imtac would like to remind all involved that every Government Department and public body has a statutory Disability Equality Duty (under the Disability Discrimination Order 2006) to promote equality of opportunity for disabled people. The Committee would like to advise DSD, Roads Service and others that based on the evidence presented in this Study these duties are not being met.

- 11 We believe there is a resolution to current difficulties and want to focus the rest of our response on a constructive way forward. Key to addressing these difficulties is effective engagement with disabled people and their organisations.

## **Comments on the recommendations**

### Consultation/co-ordination

- 12 The report correctly identifies consultation and co-ordination as a key part of addressing many of the existing difficulties and issues. However the two recommendations simply reinforce existing consultative practices that have proved ineffective in dealing with the problems. Imtac is therefore recommending that a formal consultative group be established as soon as possible with representation from the disability sector and all relevant agencies (including DSD and Roads Service). Imtac would envisage that such a group will be time limited (our suggestion is one year) and will look to agree a way forward on the outstanding issues raised in the Study. Given the urgency of many of these issues Imtac believes that this Group may have to meet on a monthly basis. We believe the creation of this group will be a positive step forward, illustrating a commitment from DSD and others to meet their Disability Equality Duties.

**Imtac recommends DSD establish a Consultative Forum to formalise consultation methods – this forum should consist of DRD, DSD and any other relevant government departments, Belfast City Council, and disability organisations. The Forum should meet at least quarterly or as required to assist in making decisions regarding any matters which may impact upon access and mobility in the city centre.**

### Parking Provision

- 13 Parking provision has been a major issue since the early stages of the Streets Ahead process. The Study recognises the importance of

parking. However the analysis in the Study fails to recognise the difference between general parking provision and the specific requirements of disabled people. In particular there is no recognition of acceptable walking distances for disabled people, the requirement for well-designed accessible parking bays and the requirement for the built environment around parking provision to be accessible. As a result of this flawed analysis too much emphasis has been placed on off-street car parking. Imtac's own assessment of off-street parking indicates that only two locations would allow suitable access to the core of the city centre for many Blue Badge holders. Given the lack of on-street accessible parking provision (acknowledged by the Study) this effectively means that many disabled people will be restricted in where they can go in a future city centre – for example a pedestrianised Donegal Place will not be accessible to many in future. The potential on-street parking opportunities identified by Roads Service (see page 50) are too far to be of any practical use for disabled people wishing to access the core of the city centre.

- 14 Imtac does not believe that the recommendations as outlined in the Study will resolve the parking issues (nor do we believe they meet the statutory duty to promote equality of opportunity for disabled people). Imtac believes that we must look at both on and off-street parking solutions for disabled people in the city centre. We must make an assessment of where off-street parking cannot meet the requirements of disabled people who rely on the car for mobility and provide suitable on-street accessible parking in these areas. Whilst Imtac recognises the competition for road space in these areas, disabled people must be recognised as essential car users.

**Imtac recommends a comprehensive audit of all the current parking opportunities in Belfast City Centre be undertaken which can feed into the traffic management plan. DRD and DSD should demonstrate a commitment to their DDO and s75 duties and recognise that disabled people are essential users and**

**therefore require on-street parking provision close to the central area, within the proposed pedestrian priority area. The proposed Consultative Forum should lead on this issue and develop proposals around accessible parking in the city centre that will feed into the emerging traffic management plan.**

#### Special access scheme

- 15 One of the recommendations in the Study is to look at special access schemes to allow limited access for Blue Badge holders to pedestrian areas. Such schemes already exist in Northern Ireland (Coleraine for example) and have proved highly unsatisfactory as creating access for one group of people can restrict access for others. Imtac strongly advises the agencies involved not to progress this recommendation and instead look at good peripheral accessible parking around the pedestrian zones.

**Imtac recommends that plans to look a special access scheme be scrapped. Imtac believes only the provision of adequate Blue Badge parking in locations close to the central area can ensure access to the city centre for disabled people.**

#### Parking enforcement

- 16 Parking enforcement can play a key role in ensuring that limited accessible parking available in the city centre is available to disabled people. Enforcement not only should focus on abuse of bays by non-disabled people but misuse of the Blue Badge by non-disabled people. Figures already show that enforcement of accessible parking bays is effective – however progress in tackling misuse of the Blue Badge has been more modest. Parking enforcement can only be effective if there are accessible bays available where disabled people can use them. When Liverpool was undertaking a similar exercise (the Big Dig) the council and police launched a major clampdown on misuse of the Blue Badge with the support of local disability

organisations. The recommendation in the Study does little more than endorse the current situation.

**Imtac recommends more resources should be dedicated to the enforcement campaign to tackle abuse/misuse of the Blue Badge rather than to advertise the campaign. The Consultative Forum should look at measures in conjunction with Roads Service/PSNI for an effective enforcement campaign.**

### Shopmobility

- 17 Shopmobility services are an essential part of the mix of services required to make any city centre accessible to disabled people. It should be noted that Shopmobility is not a service that can be used by all disabled people nor do Imtac believe should disabled people be forced to use services because the design of the city centre is not inclusive. Much of the debate around Shopmobility has focused on the best location of services, how services can best be accessed by car, public transport etc and how services should be funded. The recommendations in the Study do not address these issues in any meaningful way.

**Imtac recommends the Consultative Forum consider and develop recommendations on how future Shopmobility services can be funded, marketed, where they should be located and how they can match in with the Mobility Hubs and other services i.e. door-to-door, accessible taxis, public transport, parking etc.**

### Door-to-door services

- 18 Imtac is concerned that the Study seems to suggest that Door-to-door transport can play a major role in ensuring access to the city centre for disabled people. Whilst we recognise the value of door-to-door as a safety net service for people who have no other access to transport, the service is of limited value in meeting the needs of all disabled people who will want to access the city centre. As with Shopmobility

disabled people should not be forced to rely on the service because the design of the city centre is not inclusive. Imtac believes that it essential that door-to-door services can access the city centre and that access should enable users of the service to access other services such as Shopmobility. Imtac feels this should happen already and believes issues preventing this can be resolved without fuss or need for “a strategic approach”.

**Imtac recommends that Door-to-door services should have access to drop-off and pick-up in the city centre, pedestrian priority areas, shopmobility services, and Mobility Hubs. The consultative forum should work to resolve any barriers that prevent this happening.**

### Mobility Hubs

- 19 The concept of Mobility Hubs was first discussed in the relation to the Streets Ahead masterplan. The concept was welcomed by all the organisations involved. However nothing has been done in the interim period to turn the concept of mobility hubs into a reality. The recommendations contained the Study do very little to move us beyond the concept stage.

**Imtac recommends that the Consultative Forum look in detail at the issue of mobility hubs and make recommendations to enable their introduction across the city centre.**

### Eco Bus

- 20 Key to the original mobility hub concept was the provision of an Eco Bus to enable penetration into the core of the city centre. As with the mobility hub concept the bus has yet to move beyond the idea phase. The recommendations in the Study do little to move the Eco Bus further forward.

**Imtac recommends that the Consultative Forum assesses the potential of introducing an Eco Bus in Belfast and recommends**



**a way forward – the recommendation maybe the bus is not workable.**

### Public Transport

- 21 Imtac is surprised that access to the city centre by public transport (including taxis) is given so little prominence in the Study. This is in contrast to the emphasis placed on door-to-door services. As currently drafted the Study appears to indicate that accessing the city centre by bus or taxi is not important for disabled people. Nothing could be further from the truth. As with drivers, disabled people who use public transport need services to access the core of the city centre. Without this vital access the welcome recommendations in the Study around driver training are meaningless.

**Imtac recommends that the consultative forum look in detail at public transport access to the city centre, including the location of infrastructure, and develop proposals to feed into the emerging traffic management plan. Public transport includes bus services, taxis and emerging rapid transit proposals.**

**As part of this work Imtac also recommends that the forum look at the potential for Park & Ride to provide an alternative choice for disabled people who use the car to access the city centre.**

**Imtac recommends that Consultative Forum also look at the potential of developing accessible walking routes linking the major public transport hubs (Central Station & Europa/Great Victoria Street) to the city centre.**

### Street clutter/furniture

- 22 Street clutter was rightly identified by the study as a major barrier for disabled people when in and around the city centre. Imtac is aware that much of this street clutter is currently illegal and that the documents listed in the Study have either not been published or are not enforceable. At the same time Imtac recognises that initiatives

such as cafe culture can enhance a city centre. The recommendation in the Study will do very little to remedy current difficulties.

**Imtac recommends that regular audits be undertaken to identify problem areas and that the Consultative Forum agree measures to resolve these issues.**

- 23 The Study fails to acknowledge the importance of the design and location of street furniture in minimising the barriers these can cause for disabled people. Imtac notes that previous commitments given to ensure that street furniture is located and designed to good practice guidelines is not always adhered to. For example bollards without a contrasting banding.

**Imtac recommends that the Consultative Forum identify areas where street furniture design falls short and recommend remedial measures.**

#### Surfaces/Crossing points

- 24 The Study correctly identifies major issues with poor crossing points, footways and dropped kerbs. Imtac agrees with the recommendation that where these difficulties are identified they should be remedied.

**Imtac recommends that the findings of this study be used to develop a programme of remedial works to correct substandard pedestrian infrastructure in the city centre.**

- 25 Surfacing in the pedestrian zones has been a major issue since the design consultations particularly in regard to access for people with a visual impairment. Two issues have remained problematic during the construction of Phase One of Streets Ahead – the lack of contrast in bands delineating between walking routes and bands of street furniture/shop frontages and the lack of tactile differential between these areas. The recommendation in the study does not appear strong enough to deal with this issue.

**Imtac recommends that the Consultative Forum consider these two issues in detail and agree recommendations for remedial measures.**

### Signage

- 26 The Study rightly recognises that signage and information is a barrier to disabled people using the city centre. Improvements are required. However Imtac believes that the recommendations in the Study do not go far enough to resolve issues. In particular we would like to see further initiatives around wayfinding technology for people with a visual impairment. Whilst the React proposal is welcome the systems usefulness for wayfinding is limited as it can only tell people their location.

**Imtac recommends that the Consultative Forum exam in detail options for using wayfinding technologies and bring forward recommendations.**

**Imtac recommends that the Consultative Forum be consulted on proposals for future city centre signage.**

### Cycling

- 27 Cycling in pedestrian areas is rightly identified as a potential hazard for many disabled people. However the Study does not make any recommendations in regard to cycling and idea appears to condone such activity. Imtac would like to reinforce our view that cycling is not acceptable at any time in pedestrian areas. Given that walking is also a sustainable mode of transport we do not believe it is unreasonable to ask cyclists to dismount for what are short distances.

**Imtac recommends a zero-tolerance approach to cycling in pedestrian zones – signage should be prominent asking cyclists to dismount in these areas.**

## Accessible toilet provision

- 28 The lack of public toilet provision is rightly identified as an issue for many disabled people in the city centre. Imtac welcomes the recommendation to look at identifying potential locations for new facilities in the city centre. Disabled people must be involved in these decisions. Imtac would recommend that any toilets should include changing places facilities.

**Imtac recommends that the consultative forum be involved in decisions about future toilet provision in the city centre.**

## Beacon status

- 29 Imtac believes that much work and consultation is required before Belfast should apply for any award for the accessibility of the city centre.

## Conclusion

- 30 Imtac is disappointed that the draft Access & Mobility Study fails to resolve many of the outstanding issues around access to the city centre for disabled people. This particularly frustrating for members who have devoted large amounts of time on a voluntary basis trying to assist officials develop a city centre for all. Unfortunately the approach outlined in the Study clearly indicates that in future disabled people will have to fit in with the design of a future city centre rather than being integral to that design.
- 31 Imtac views this approach as unacceptable and a collective failure by the agencies involved to meet their statutory disability equality duties to promote equality of opportunity for disabled people. The Committee is still committed, however, to work with all the agencies involved to help make things better. We believe consultation and partnership is key to achieving this and we ask that the DSD and others give careful consideration to the recommendations we have made.

## Contact us

32 If you have a query about this document or would like it in another format you can contact us at:

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More information on our members is available on our website, visit [www.imtac.org.uk](http://www.imtac.org.uk).

## **Observers**

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