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Working together for a healthier Belfast*

**Response to Consultation on Access and Mobility Study for Belfast City Centre
Department for Social Development**

29 September 2009

Belfast Healthy Cities welcome the opportunity to comment on the draft Access and Mobility Study for Belfast City Centre. We also welcome the extended consultation period, as the previously given period of four weeks did not adhere to the UK government code of practice (normally a minimum of 12 weeks) and allowed for very limited consideration of the report.

Belfast Healthy Cities is a partnership organization working to improve health and health equity in the city through intersectoral collaboration. Equity is one of the founding principles of the WHO European Healthy Cities Network, within which Belfast is a leading member, and all our work puts special emphasis on tackling inequalities and differential health impacts on vulnerable populations, including people with disabilities. One of our core areas of work is healthy environments, which considers the health impacts of the built environment and aims to integrate health as a key objective in spatial policies and plans.

Our comments will focus on the recommendations, as these will be key to taking forward plans for the Streets Ahead project and Belfast City Centre Traffic Management Project.

To begin with, however, we emphasise that we support extending the pedestrianised area of the city centre. From a (whole) population health perspective, a larger pedestrianised city core would have the following benefits:

- Improved safety for users
- Increased opportunities for social interaction through a larger shared space for all, supporting mental wellbeing
- Improved opportunities to build unique city identity, which can enhance a sense of belonging and pride for all citizens and, consequently, improve individual mental wellbeing as well as social cohesion
- Both of the above are essential for improving community safety and building a shared future
- Providing an example of alternatives to a car based society and lifestyle

All of the above would benefit the overall health and wellbeing of people with disabilities as well as other population groups, and also contribute to making the city centre more inviting for all users including visitors. A larger pedestrian area might also encourage physical activity to some degree, in particular for people working in the city centre.

However, we are not convinced that pedestrianisation in itself will support a modal shift away from private car travel, as existing car parks already are located on the edges of the city core and there has been a recent increase in capacity. To enable modal shift, a wider perspective is required focusing on improving public transport (integration of transport with other services, connectivity and routing) and active travel options to and within Belfast as a whole. A particular issue is the location of Metro services in the city centre. While current provision at Donegall Square poses significant safety, amenity and congestion problems for all city centre users, relocating the hub away from the core would make Metro a much less convenient service and might therefore discourage patronage, especially by people with disabilities.

As a general comment, we would also welcome clarification on how the 'results' sections of the case studies presented in Chapter 6 have been arrived at. In particular, we are interested in whether these are based on evidence such as evaluations or surveys with disabled users.

We would also note that in Britain as well as elsewhere, transport planning increasingly focuses on the concept of accessibility, rather than mobility. This is a wider concept considering how easy it is for people to reach desired destinations, and includes the affordability and quality of available services. It would be important that the study highlight how this concept has been integrated, and provide recommendations on how the city centre more long term can be made more accessible throughout.

Strategic issues

Intersectoral collaboration and public engagement

We strongly support the proposal to improve intersectoral collaboration among organizations involved in developing and regenerating the city centre. This is essential to achieve a coherent outcome, which meets the needs of all users. To ensure that the needs of people with disabilities are considered in a systematic and consistent manner, we would suggest that a recommendation is made to develop a cross Departmental/sectoral strategy and action plan for integrating accessibility for people with disabilities. This would help organizations see their role in the overall process, keep them informed and also provide a concrete way for people with disabilities to scrutinize proposals. Ideally, this would form part of an integrated plan for the city centre as a whole.

We also support the recommendation to improve engagement with people with disabilities and disability groups. However, we note that there is no civic or

disabled representation on the Belfast City Centre Change Working Group, and also that this is not commented upon in the draft report. We believe a specific recommendation should be made that representatives for the disability sector (and indeed representatives for local communities in general) are invited to join the working group, or at minimum a consultative forum is established. This would be more constructive than asking disability groups to seek engagement, as this already happens but is not guaranteed consistency or commitment. It should be noted that IMTAC – the Inclusive Mobility and Transport Advisory Committee – was established as an advisor to the Department for Regional Development, and therefore, Departments should seek to engage proactively with the committee to utilise its expertise to the full.

Beacon scheme

We would first like to note that the Beacon scheme is aimed at English councils only, and it is therefore surprising that such a recommendation has been included in the draft report. Notwithstanding, there may be merit in the relevant agencies considering the requirements for Beacon status and exploring changes made in councils awarded this status on the basis of their access and mobility action. In particular, strategic models would be beneficial to strengthen the currently disjointed approach to regeneration of Belfast city centre. The recommendation should be reworded to reflect the Beacon scheme as a potential model rather than an actual aim.

Access to the city centre

Public transport

We support the recommendations in relation to Translink driver training and establishing disability awareness training as part of taxi licensing requirements. Careful consideration should be given to how taxi driver training is provided and who will fund it, however; many people who lose another job turn to taxi driving as an alternative or supplement low incomes with taxi driving, and passing the cost on to applicants could have an undue impact on these drivers.

The difficulties of people with disabilities in using public transport are documented in the draft report. We are, therefore, disappointed that very limited mention is made of public transport to and within Belfast, as this plays a part for accessibility – including reducing parking need – and is also a prerequisite for modal shift for the population as a whole. Currently connectivity is poor within Belfast city centre, with bus and train hubs a notable distance from all other key services. Public transport outside the centre is virtually inaccessible to people who do not live along the key corridors, especially people with disabilities who are unable to walk long distances to a stop. In this case, improved information on services will do little to ‘instil confidence’ as the report suggests (p. 8)

We note there is no mention of the Easibus service, which Translink currently operate, although its future is unclear and it is not marketed. While it may have been omitted as Easibus serves local shopping centres, this service is highly valued by those who do use it, and we would urge that it is incorporated into the report in some way. For example, it could help inform the development of the proposed shuttle bus system around the pedestrian core.

In short, consideration of the wider transport system is essential to improve access and accessibility in Belfast. We believe it is crucial, therefore, to link this piece of work to wider work on transport policy, in particular the Belfast Metropolitan Transport Plan ((BMTP) as well as the forthcoming review of the Regional Transportation Strategy and in extension, the Accessible Transport Strategy. It would be useful to strengthen this recommendation, to state that this study should form key evidence for this work. A process should also be put in place to follow this up.

Parking for people with disabilities

We appreciate the concerns of people with disabilities in relation to parking. We would also note that many people with disabilities have low incomes, and therefore off-street car parking costs may be high for them in relation to their income. This recommendation to encourage off-street parking may, in effect, have a harmful effect on the health and equity of people with disabilities. As free on-street car parking essentially constitutes a form of public subsidy for people with disabilities (through foregoing parking fee revenue), we would instead suggest a recommendation to explore subsidizing the cost of off-street car parking for people with disabilities, identified eg. through the Blue Badge. Opportunities to provide buses that can accommodate people with disabilities at park and ride sites, which can link to Shopmobility services, should also be explored; this would fit well with the concept of mobility hubs.

We note in Appendix B that some consultees at the August 2008 workshop felt an access scheme for a 'Clear Zone', which is proposed in this report, would be overly complicated. However, in principle we support this suggestion, as it would help achieve benefits for all while providing some flexibility for people with disabilities. We believe, nevertheless, that the recommendation could be more concrete and provide key options and issues to consider in implementation. For example, it could propose linking access to the Blue Badge application process, thus minimizing complexity for users and also administrative burden.

Regarding enforcement of the Blue Badge scheme, we support efforts to eradicate misuse of both Blue Badges and disabled parking bays. However, we are concerned that a punitive approach marketing a 'crackdown' may have an unintended consequence of encouraging negative attitudes to people with disabilities, which would harm their health and wellbeing and also counter the work intended at equality and equitable provision. Better results may be achieved by highlighting how important access to disabled parking is for people with disabilities, through personal stories in the media etc; if necessary coupled with a

message about stronger enforcement. Such an approach might also contribute to improved 'common courtesy' towards people with disabilities, highlighted as an issue in Appendix B.

We would urge consideration of this and amendment of the recommendation accordingly.

Mobility Hubs

We support the proposals for Mobility Hubs. We believe these could, as suggested, help improve access to Belfast city centre for people with disabilities both resident in Belfast and visiting the city, by providing a more integrated transport system. They may also allow people to access the city centre with more confidence, but more importantly, they would help mainstream the needs of people with disabilities, which is essential for equity and social inclusion of the group as citizens.

Building the hubs around Shopmobility provision appears highly logical, as this would provide the most seamless service to people with disabilities. However, we believe the obvious implication of this is that the recommendation regarding 'some assistance' to Shopmobility should emphasise the need to secure long term financial support for and development of the service; the service is already well known and the urgent issue concerns capacity and sustainability.

Similarly, we believe it is essential to integrate Door-2-Door services with the mobility hubs. Meanwhile, the recommendation regarding community transport is unclear and needs to be reviewed. DRD currently does support a range of community transport providers, although there are issues in relation to the availability and flexibility of the service and also what journeys can be undertaken (health care trips currently excluded). We believe the recommendation should address integration of all community transport with mobility hubs, and anticipating their development, establishing informal hubs eg. with Shopmobility services. Strategically, there should be a cross Departmental review of how community transport is funded and how it can be further developed.

A basic costing of developing the mobility hubs and supporting Shopmobility would be beneficial. Alternatively, if one has been carried out as part of the work by EDAW, a reference to this would be useful.

Shuttle bus service

We support in principle the proposal for a shuttle bus service providing mobility around the pedestrian core. As noted in the draft report, this could help reduce the need for parking and improve connectivity and thus accessibility within the pedestrian core. We would suggest that further work on the route(s) should be developed in collaboration with people with disabilities, and focus on 'desire lines' or key destinations in and around the centre which could usefully be linked in this way (eg. Victoria Square and Central Station; Europa buscentre and Waterfront Hall); to link the mobility hubs only would appear underutilizing the opportunity. It

should also be established whether the bus would be a general service running throughout the day, as the Gasworks shuttle, or a targeted or time limited service.

On first impression, it would appear that neither route option 1 or 2 would be ideal; in particular option 2 would not significantly support accessibility. Routes should be established in close collaboration with people with disabilities, to ensure they meet needs and therefore can maximize usage.

Mobility within the pedestrian core

To enable people with disabilities to fully participate in civic life in the city centre, appropriate provision in pedestrian areas remain as important as access to the city centre. We broadly support all recommendations made regarding crossing facilities, street furniture, restrictions on café facilities, signage and surfacing. However, we believe these could be more helpful by being more detailed and specific, for example by indicating a process and timescale for putting in place required standard improvements. Processes for consideration might be street audits, or a full city centre audit, in close collaboration with people with disabilities and disability organizations. These could also take into account how and where new signage and other support systems should be located.

Conclusion

Belfast Healthy Cities broadly support the proposals and recommendations made in this draft Access and Mobility study. We believe, however, that all recommendations would significantly benefit from being more detailed and making specific suggestions for implementation and timescales. We also believe that more emphasis should be put on the inclusion of people with disabilities in planning services, and indeed the future structure of Belfast city centre overall.