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

**September 2008**

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## **1 About Imtac**

- 1.1 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.
- 1.2 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.
- 1.3 Imtac receives support from the Department for Regional Development.

## **2 Comments on the consultation**

- 2.1 Imtac is disappointed that the consultation document fails to meet standard Government practice in terms of accessible design. The typesize is too small (it should be in 14pt) and the letter colour fails to give an adequate contrast with the white background. Also the document fails to provide a message advertising its availability in alternative formats nor a textphone contact number for people who are deaf or hard of hearing. It is disappointing that a major Government Department has not made this consultation document accessible and inclusive. The Committee is concerned that this approach will exclude some disabled people from being able to respond.
- 2.2 Imtac notes from the section entitled "Approach" that disabled people and older people and their organisations have not been considered stakeholders. The absence of input from disabled people and older people is reflected in the issues and priorities identified by pre-consultation. In particular the absence of any statement in the document highlighting the need to ensure improvements made are

accessible to everyone is worrying. “Access for all”<sup>1</sup> principles must underpin any project from the earliest stage as rectifying mistakes after plans have been developed can be extremely difficult.

- 2.3 The Committee is concerned about proposals in the consultation to make further pedestrian areas in the city centre and to restrict further access for the private car and buses in the area concerned. At no point in the document is there any recognition of the potential negative impact these ideas could have on access to the city for older people and disabled people.
- 2.4 Many disabled people have difficulty travelling distances and need access by car or bus as close as possible to their destination. Guidelines indicate that for some disabled people walking more than 50m can be extremely difficult<sup>2</sup>. The Blue Badge Scheme has provided concessions for disabled people enabling them to park close by their destination. In recent years improvements to Metro services in Belfast also mean that disabled people may be able to use the bus to go into the city.
- 2.5 The proposals put forward for the West Side Regeneration coupled with existing plans for Streets Ahead (including the pedestrianisation of Donegall Place and parts of Donegal Square) will substantially reduce access for the car and bus into the core of the city centre. Pushing vehicles out the periphery of the city may be a worthy aspiration but it will result in the exclusion of many disabled people and older people from the city due to impossible walking distances. Imtac recommends in the strongest possible terms that DSD and other key partners such as Roads Service reconsider these proposals. The Committee recommends that any changes to access and movement in the city centre take full account of and makes

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<sup>1</sup> Access for all principles are summarised well in “**Encouraging walking: advice to local authorities**” published by the Department for Transport.

<sup>2</sup> “**Inclusive Mobility – A guide to best practice on access to pedestrian and transport infrastructure**” published by the Department for Transport

provision for those disabled people and older people who have no choice but to travel by car and bus.

- 2.6 The Masterplan for the Streets Ahead project highlighted the benefits of creating mobility hubs in the city centre where disabled people and older people could park, get on or off a bus, get a taxi and access services like Shopmobility. It also proposed that an accessible eco-vehicle could be introduced to help people access the pedestrianised core of the city centre. It is disappointing that this draft Plan does not even acknowledge the idea of mobility hubs. What is particularly worrying is that one of the proposed sites for a hub is the current offices of Shopmobility Belfast. Under the draft plan this whole building is to be demolished and rebuilt. Imtac is concerned that this not only reflects the lack of engagement with disabled people and older people during the development of this Plan but also a lack of joined up thinking with regard to the overall plan for Belfast city centre.
- 2.7 With regard to the proposals to regenerate the western quarter of the city centre Imtac has no issues with making this area a distinctive part of the city centre as long as access for disabled people and older people is a key consideration in the plans. Unfortunately the document includes a picture of Brighton Lanes as an example of what the area could look like in the future. This picture is example of an access nightmare for many disabled people, particularly people with a visual impairment, with no clear walking routes and street clutter randomly strewn across the area. Images such as these undermine the confidence of disabled people that proposed changes will benefit them as much as others in society and reinforces the need for consultation at the earliest stage of these projects.
- 2.8 Imtac welcomes the statement on page 6 that these proposals will be subject to an equality impact assessment. As we have indicated in this paper we believe that the current proposals have the potential to negatively impact on disabled people and older people in particular. Imtac strongly suggest that the DSD look at measures now to

mitigate against this negative impact. The Committee would also like to remind the Department that duties also are in place around disabled people. Like all public bodies the DSD has a statutory duty to promote positive attitudes towards disabled people and promote the participation of disabled people in public life. Again given the issues the Committee is raising it is doubtful whether DSD are meeting these duties.

### **3 Conclusion**

- 3.1 Imtac welcomes the opportunity to respond to the current consultation on plans for regeneration of the west side of Belfast city centre. In our response we have raised concerns about the potential impacts of the proposals on the mobility of disabled people and older. The Committee would request that the Department give serious consideration to the issues we have raised. Imtac are happy to answer any queries the Department may have about the issues we have raised and/or meet with officials to discuss.

### **4 Contact us**

- 4.1 To receive this response in an alternative format or for any other queries contact:

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## **Imtac Members 2008/09**

Frank Caddy	Chair
William Stewart	Vice-Chair
Elizabeth Black	
Terry Butler	
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Anita Gracey	
Tom Hoey	Convenor Public Transport Group
Henry Mayne	
Norma Moore	
Joe McCusker	
David McDonald	Convenor Information & Training Group
Geraldine Mulhern	
Andrew Murdock	
Bryan Myles	
Ronnie Patterson	
Etta Mann	
Neil Gillan	
Philip Blair	
Max O'Brien	
Ann Gamble	

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

## **Observers**

Olaf Hvattum	Age Sector Reference Group
Kevin Doherty	Disability Action
Tony O'Reilly	Equality Commission for Northern Ireland
Alan Preston	Mobility and Inclusion Unit (DRD)
Gavin Hamilton	Mobility and Inclusion Unit (DRD)
Janet Watson	Mobility and Inclusion Unit (DRD)
Claire Toner	General Consumer Council

Ryan Simpson

General Consumer Council

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