



A Bolder Vision for Belfast

Consultation response by the Consumer Council

23 December 2021

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1. EXECUTIVE SUMMARY

- 1.1 'A Bolder Vision for Belfast'¹ sets out actions and projects which aim to drive economic growth, foster vibrant city centre living, create streets and spaces that aim to improve health and wellbeing for all, and enhance pride in Belfast City Centre.
- 1.2 The role of the Consumer Council is to promote and safeguard the interests of all consumers in Northern Ireland and we welcome the opportunity to respond to this consultation. In this response we make overarching comments where we believe the proposals raise an issue in which there is a wider consumer interest. We have chosen to not directly address the questions in the consultation as they are in relation to specific locations in Belfast, each of which has its own characteristics.
- 1.3 Our response is outlined in Section 3. In summary:
- a) The impact on all consumers who live in or travel to Belfast, including those with disabilities, older people and those from rural communities must be fully considered and consumers must continue to be engaged with.
 - b) We welcome the emphasis on sustainability and decarbonisation throughout the strategy.
 - c) There needs to be adequate public transport into, out of, and within Belfast. This must be convenient, affordable, and accessible to support the proposals.
 - d) Parking needs to remain available for disabled people who live or travel into Belfast and are only able to use private cars.
 - e) Park and Ride facilities should be made available to reduce the use of private cars.
 - f) New parking facilities should incorporate electric vehicle charging points.
 - g) Walking and wheeling are distinct from cycling and cycle paths should be segregated from pedestrian lanes.
 - h) The project should be future proofed by considering how the growth in the use of scooters will be accommodated to keep people safe.
 - i) Cycle networks must be inclusive and designed to accommodate the needs of disabled cyclists and the dimensions of non-standard cycles.
 - j) It is essential to work with representative groups such as Imtac, Guide Dogs NI and the Royal National Institute of Blind People on the redesign of streets to ensure that these are fully inclusive for all users.
 - k) Travel hubs should service bus routes that operate beyond Belfast to ensure that the City Centre is accessible by those travelling from further afield - in particular, older and disabled residents.

2. ABOUT US

- 2.1 The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order (The Order) 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland.
- 2.2 We are an insight-led, evidence based organisation:

¹ <https://yoursay.belfastcity.gov.uk/bolder-vision> - developed by Belfast City Council, the Department for Infrastructure and Department for Communities.

- Providing consumers with expert advice and confidential guidance.
- Engaging with government, regulators and consumer bodies to influence public policy.
- Empowering consumers with the information and tools to build confidence and knowledge.
- Investigating and resolving consumer complaints under statutory and non-statutory functions.
- Undertaking best practice research to identify and quantify emerging risks to consumers.
- Campaigning for market reform as an advocate for consumer choice and protection.

We have specific statutory duties in relation to energy, postal services, transport, water and sewerage, and food affordability and accessibility. These include considering consumer complaints and enquiries, carrying out research, and educating and informing consumers. Our non-statutory functions educate and empower consumers against unfair or discriminatory practices in any market from financial services to private parking charge notices. Across all our areas of work, we pay particular regard to consumers:

- who are disabled or chronically sick;
- who are of pensionable age;
- who are on low incomes; and
- who live in rural areas.

The Consumer Council uses a set of eight core principles that are commonly used by consumer organisations for working out how particular issues or policies are likely to affect consumers.

These are:



3. RESPONSE TO CONSULTATION

- 3.1 We welcome that 'A Bolder Vision for Belfast' aims to change the way we travel in order to promote sustainability. We recognise that it supports the travel hierarchy set out in the Department for Infrastructure's document "Planning for the future of Transport"². The hierarchy requires a modal shift with the prioritising of sustainable transport by:
- firstly providing for walking and wheeling,
 - then providing for cycling,
 - then providing for public transport,
 - then providing for taxis and shared transport and goods vehicles, and
 - finally, providing for private cars and motorcycles.
- 3.2 It is important to note that walking and wheeling are distinct from cycling. Cycle lanes should be distinct from areas used by pedestrians and not shared if possible. Cycle networks and facilities must be inclusive and designed to accommodate the needs of disabled cyclists and the dimensions of non-standard cycles.³ The project should be future proofed by considering how the growth in the use of scooters will be accommodated to keep people safe.
- 3.3 If the aspiration of significant modal shift to sustainable transport is to be achieved, public transport must be made more attractive than private car use. This will require a high quality public transport service into the heart of the city that is convenient, accessible and affordable.
- 3.4 The "Bolder Belfast Vision" should ensure that its proposals align with other transport plans whether existing or in development. These include the Belfast Metropolitan Transport Plan⁴, the Department for Infrastructure's (Dfi) Regional and Local Transport Planning⁵ and the development of a Local Transport Strategy recently announced in the NI Executive's "Path to Net Zero Energy Strategy".⁶ Doing this will ensure a holistic approach to transport planning which recognises the need to integrate transport services for Belfast City Centre with those in the Greater Belfast area and regionally.
- 3.5 The strategy will also need to be aligned with plans for delivery of Belfast Rapid Transit Phase 2 and incorporate adequate, central and safe stops for disembarking passengers.
- 3.6 The Belfast Transport Hub, and proposed new active travel hubs, must accommodate bus and rail services that operate beyond Greater Belfast. This is to ensure that the City Centre is accessible by commuters and people who wish to shop or access services, in particular older and disabled residents.
- 3.7 The Consumer Council recognises that it is vital that parking remains available for disabled people who have no option but to use a private car. It is therefore welcome that blue badge provision will be catered for. Furthermore, it is essential that there is provision of adequate parking space for disabled residents, who rely on their cars, and for their carers.

² [Planning for the future of Transport - Time for Change](#)

³ [A guide to inclusive cycling, 2019 2nd edition Wheels for Wellbeing](#)

⁴ [Belfast Metropolitan Transport Plan](#)

⁵ [Transport Planning - 2020 to 2035 | Department for Infrastructure \(infrastructure-ni.gov.uk\)](#)

⁶ [The Path to Net Zero Energy. Safe. Affordable. Clean. \(economy-ni.gov.uk\)](#)

- 3.8 If on-street car parking is replaced with park and ride provision outside of the city centre, affordable shuttle buses should be provided to maintain access for low income consumers. In order to facilitate and promote the use of electric vehicles, all new parking facilities should incorporate electric vehicle charging points.
- 3.9 Research has shown that the low frequency of public transport services means that it is not a viable or convenient option for many rural dwellers to depend on.⁷ If rural consumers are to switch from cars to public transport to access Belfast City Centre, the frequency, convenience and affordability of public transport will need to improve. Infrastructure changes should not remove City Centre public transport pick up and drop down points without viable alternatives such as Park and Ride facilities into the city centre, as to do so would restrict access to Belfast City Centre for consumers living outside of Belfast.
- 3.10 It will be important to engage with representative groups on the redesign of streets to ensure that these are fully inclusive. For example, parklets and pavement cafes may cause difficulties for wheelchair users, people with visual impairments, older people or people with pushchairs. In line with the DfI travel hierarchy private cars should have the lowest priority when it comes to street design.
- 3.11 It will be important that a staged approach is taken when implementing any changes so that consumers are given the opportunity to familiarise themselves with new environments and to change their travel habits. It would be prudent to prioritise the progress of Belfast Rapid Transit 2 and the Belfast Cycling Network⁸ to ensure that consumers have adequate sustainable transport options before parking is removed from the City Centre.
- 3.12 The consultation should be subject to equality screening to consider the impact on consumers who are disabled or chronically sick; who are of pensionable age; who are on low incomes; and who live in rural areas.

4. CONCLUSION

- 4.1 The Consumer Council welcomes the opportunity to comment on the proposals and hope that they will help inform the strategy by identifying key issues which may impact consumers. We look forward to engaging further with Belfast City Council, the Department for Communities and Department for Infrastructure.

5. CONTACT DETAILS

- 5.1 If you require more information please contact Richard Williams, Head of Policy (Transport) on 028 9025 1649 or at Richard.williams@consumercouncil.org.uk.

⁷ [Consumer Council response to the Translink "Better Connected" Strategy](#)

⁸ <https://www.infrastructure-ni.gov.uk/publications/making-belfast-active-city-belfast-cycling-network-2021>



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