



Belfast City Council Supplementary Planning Guidance: Transportation.

Consultation response by the Consumer
Council

August 2022

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1. EXECUTIVE SUMMARY

The Supplementary Planning Guidance (SPG): Transportation, aims to provide additional advice and guidance specific to transport for development within Belfast. 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 which reflect the needs of all consumers including those most vulnerable. Our comments draw on previous responses including Belfast Bolder Vision¹, Translink's Better Connected Strategy², Electric Vehicles Accessible Charging Specification³, and is based on Consumer Council research.

Our response is outlined in Section 3. In summary:

- It is important that investment in public transport and transport infrastructure supports adoption of the Sustainable Transport Hierarchy.
- Safety in transportation is an important issue for consumers and if properly addressed will encourage active travel. The recognition of the need to separate cyclists from pedestrians is particularly welcome, as is the recognition that cyclists should be physically separated and protected from high volume motor traffic.
- The SPG should be regularly reviewed and updated to reflect new legislation and standards. For example, in the use of scooters and electric vehicle charging.
- An integrated transport network will provide increased convenience for consumers which will contribute to decarbonising transport in Northern Ireland. This is a desirable outcome and new developments should set out to achieve this.
- Accessibility to services, particularly for consumers with reduced mobility and hidden disabilities, should be given a high priority from the beginning of planning for developments and throughout the life-cycle of a project. Developers and planners should be strongly encouraged to exceed recommendations and standards regarding accessibility.
- Standards are being developed for electric vehicle accessible charging and once published developers should ensure they use the resulting specification for guidance.
- Consumer engagement - developers and planners should be required to consult with relevant communities and take advice from relevant organisations as appropriate in designing transportation services and infrastructure.

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 [Microsoft Word - Bolder Vision for Belfast - December 2021 - consultation response VERSION 2 \(consumer council.org.uk\)](https://www.consumer council.org.uk/microsoft-word-bolder-vision-for-belfast-december-2021-consultation-response-version-2)

² [Translink Better Connected Consultation Response.PDF \(consumer council.org.uk\)](https://www.consumer council.org.uk/translink-better-connected-consultation-response.pdf)

³ [Consultation response PAS 1899 Electric Vehicle Accessible charging specification.pdf \(consumer council.org.uk\)](https://www.consumer council.org.uk/consultation-response-pas-1899-electric-vehicle-accessible-charging-specification.pdf)

- 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

Sustainable Transport Hierarchy

The SPG depicts the Sustainable Transport Hierarchy from the Energy Saving Trust. We propose that the SPG instead uses the Sustainable Transport Hierarchy depicted in the Department for Infrastructure's Planning for the Future of Transport – 'Time for Change' document⁴. 'Time for Change' also depicts a Hierarchy in Reducing the Carbon Impact of Transport⁵ which is linked but different to the Sustainable Transport Hierarchy. Whilst we recognise the role of digital communication in reducing carbon in transport, digital communication is not a travel mode and it does not realise the health, social and economic benefits of sustainable travel.

Recent research by the Consumer Council found that Northern Ireland consumers need the government to provide leadership, create opportunities and support consumers to make sustainable travel choices.⁶ Therefore, it is important that investment in public transport and transport infrastructure supports the adoption of the Sustainable Transport Hierarchy.

Whilst there is an understandable emphasis throughout the SPG to reduce private vehicle use, consumers must have realistic sustainable alternatives which enable them to move away from private vehicles.

Safe and convenient walking and cycle access

Safety in transportation is an important issue for consumers and if properly addressed will encourage active travel. Paragraph 3.1.5 recognises that fears over personal safety can be a major barrier to walking. We welcome that it is recommended that cycles be treated as vehicles and not as pedestrians and that cyclists should be physically separated from pedestrians.

Safety for pedestrians in the SPG should also consider street furniture and permanent fixtures which can cause access issues, in particular for people with mobility issues including wheelchair users and, blind and partially sighted pedestrians⁷.

In recent qualitative research for the Consumer Council consumers voiced support for active travel and particularly improvements in cycling lanes and cycling safety. There was a consensus amongst cyclists that existing cycle lanes were often dangerous.⁸

Quote from the focus groups⁹:

"We don't have proper cycle lanes in Belfast, they are way too narrow, there are not enough of them..."

⁴ [Planning for the future of Transport - Time for Change](#) Figure 5

⁵ [Planning for the future of Transport - Time for Change](#) Figure 4

⁶ [2 \(consumer council.org.uk\)](https://www.consumer council.org.uk) (Future of Transport, Northern Ireland Consumers, Consumer Council research 2022)

⁷ [Street furniture - RNIB - See differently](#)

⁸ [2 \(consumer council.org.uk\)](https://www.consumer council.org.uk) Page 3

⁹ [2 \(consumer council.org.uk\)](https://www.consumer council.org.uk) Page 11

The quantitative survey element of the research also found that just 36% of consumers said that where they live the roads are safe enough to be able to travel by bike or by walking and only 29% would feel confident cycling.¹⁰

Therefore, we welcome the guidance at 3.1.6 that ‘The need for cyclists to come into proximity and conflict with motor traffic should be removed’.

The guidance should also recommend that where possible cycle networks and facilities must be inclusive and designed to accommodate the needs of disabled cyclists and the dimensions of non-standard cycles.¹¹

The SPG should be future proofed and subject to regular review to consider how growth in the use of scooters and electric bikes will be accommodated to keep people safe.

It is imperative that we achieve safety improvements for both pedestrians and cyclists if we are to encourage active travel.

Integration/convenience

Recent Consumer Council research found most (84%) consumers are supportive of transport services being better connected and integrated.¹² In our response to Translink’s Better Connected Strategy we emphasised that consumers stand to benefit from the integration of a wide range of transport services. We welcome that the SPG notes the need for a ‘connected network approach’ (3.1.13), encourages ‘end to end’ multi-modal sustainable journeys, and that larger developments should ‘link with public transport interchanges and not just a local bus stop’. This will require a high quality public transport service into the heart of the city that is convenient, accessible and affordable. Achieving this will help to make public transport more attractive than private vehicles.

Creating an accessible environment (3.2)

We welcome that the SPG includes a section particular to creating an accessible and inclusive environment. We note and welcome the examples throughout the SPG which consider accessibility. For instance at 3.1.15 the recognition of the need for plans and designs to consider the needs of people with visual impairments or wheelchair users as well as people unable to walk easily. It also states that proposals should explain any specific issues which might affect access to the development for disabled people.

However, we recommend that there should be more prescriptive detail where possible throughout the SPG regarding accessibility. This may require the SPG being subject to regular review to include references to emerging legislation and standards. Developers and planners should also be strongly encouraged to exceed recommendations and standards regarding accessibility.

Design of car parking (3.5)

Whilst the SPG correctly focuses on reducing private vehicle use, cars are likely to remain an important and necessary travel mode for many consumers within the Sustainable Transport Hierarchy. It is important that the SPG not only considers and accommodates the needs of

¹⁰ [2 \(consumercouncil.org.uk\)](https://www.consumercouncil.org.uk) Page 41

¹¹ [A guide to inclusive cycling, 2019 2nd edition Wheels for Wellbeing](#)

¹² [2 \(consumercouncil.org.uk\)](https://www.consumercouncil.org.uk)

local residents but also commuters and others travelling into Belfast. Recognising this and the accelerating shift towards electric vehicles, the SPG should address the need for electric vehicle charging provision. For example, the need for electric vehicle public charge points in a new car park or building development. Furthermore, standards are currently being developed for electric vehicle accessible charging and once published developers should ensure they use the resulting specification for guidance.¹³

Consumer engagement

Development and planning for transportation must focus on the needs of consumers who will use the service. Therefore, developers and planners should be required to consult with relevant communities and take advice from relevant organisations as appropriate in designing transportation services and infrastructure.

4. CONCLUSION

The Consumer Council supports the SPG Transportation and trust that our comments are useful in helping to develop guidance for developers and planners to ensure a transport infrastructure which is sustainable, convenient, affordable and accessible for all consumers. The SPG should be regularly reviewed and updated to include new legislation and standards.

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.

¹³ [Consultation response PAS 1899 Electric Vehicle Accessible charging specification.pdf \(consumercouncil.org.uk\)](#)



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