



Commissioner for Older People
for Northern Ireland

Active Travel Team
Major Projects, Room 3-09
Clarence Court, 10-18 Adelaide Street
Belfast
BT3 9ED
Email: activetravel@infrastructure-ni.gov.uk

28 February 2025

RE: Consultation Response to Department for Infrastructure Active Travel Delivery Plan

Dear Minister Kimmins

The Commissioner for Older People for Northern Ireland (COPNI) welcomes this opportunity to offer feedback on the Active Travel Delivery Plan public consultation. As recognised in your delivery plan, greater opportunities for, and participation in, active travel can have significant health benefits for people of all ages and levels of fitness. Your promise to use a systematic approach to establish a technical, unified plan for active travel is therefore welcome, as is your long-term vision to create a seamless, integrated network that “allows people, regardless of age or ability, to choose active travel”. COPNI hopes that this updated Active Travel Delivery Plan will bring renewed focus to the principles of Active Travel, delivering meaningful change.

COPNI notes some of the barriers faced by older people with regards active travel, as identified by the Centre for Ageing Better and Sustrans. These include: the distance of routes in rural areas, the lack of motivation or priority of active travel, the weather, personal safety, the lack of habit, disability and declining health. Specific to cycling, fear of motorised traffic, the lack of confidence, poor infrastructure and a prevailing car culture were highlighted as barriers.¹ COPNI hopes that these barriers will be considered in your planning, and that the Department adopts the highest inclusive design standards when investing in travel, rather than the minimum standards or a legal compliance approach.

It is positive to see that you have already engaged with the Inclusive Mobility and Transport Advisory Committee (IMTAC); and that your plan includes a commitment to safe and accessible travel routes for people walking, wheeling or cycling. COPNI hopes that as a result of such engagement, the design choices you make will have a meaningful, positive impact on older and disabled people. COPNI would expect all future infrastructure to reflect the principles

¹ Centre for Ageing Better (2021) *Active Travel and Mid-life: Understanding the barriers and enablers to active travel*. Available at: <https://ageing-better.org.uk/sites/default/files/2021-08/active-travel-mid-life.pdf>

set out in IMTAC's *A New Approach to Travel: Our Streets and Our Places* document.² Briefly, that walking and wheeling infrastructure is prioritised, and that all future developments and maintenance of public pathways meet the highest standard of accessibility. New cycling infrastructure must not put people walking or wheeling at risk but should be prioritised over other forms of transport. Cyclists must be viewed as vehicles, and any future active travel areas should have segregated pathways, limiting risk to people walking or wheeling. Where infrastructure is installed to store bikes, it must also meet the specifications of accessible cycles. Finally, it is crucial that the transport hubs and public transport linking our population centres are accessible to all individuals walking or wheeling.

As your plan sets out to “be people-centred, with the aim of creating places that are welcoming and accessible to all... [through] the provision of high-quality infrastructure, appropriate to the situation, with safety at its heart”, COPNI hopes that the diverse requirements of different groups in Northern Ireland represented by COPNI, IMTAC and other partners are understood, and incorporated into your design. In terms of recommendations, COPNI would reiterate those presented by IMTAC. Summarised below these include:

- A clear commitment is made to ensure ongoing and early engagement with Deaf, disabled, and older people during the development of active travel policies and plans (including delivery at the local level), consistent with the first principle of IMTAC's New Approach paper.
- That Active Travel policy makes clear that whilst active travel includes walking, wheeling and cycling, walking and wheeling is a mode of travel distinct from cycling and vice versa. Active travel design and delivery must take this into account. This is consistent with the principles of LTN 1/20.
- That Active Travel policy and delivery make clear that the road users' hierarchy will be used. This places walking and wheeling first, meaning design should promote access for pedestrians before other road users. This is consistent with the Department's own policy statement “Time for Change”.
- That, if not already considered places of interest, health facilities including GP Surgeries and local hospitals, places where employment opportunities are concentrated and supermarkets and other retail opportunities (where people can access cheaper food) are considered.

² IMTAC (2022) *A new approach to travel, our streets and our places*. Available at: <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.imtac.org.uk%2Ffiles%2Fimtac%2Fmedia-files%2FA%2520new%2520approach%2520to%2520TSP%2520-%2520Final%2520Version.docx&wdOrigin=BROWSELINK>



- That the Department introduce policy guidance to ensure that any investment in our road network maximises active travel opportunities.
- That the Department requires other public and private developments to provide the same high quality active travel provision as envisaged under the Delivery Plan.
- As part of the overall increased spend on Active Travel, Imtac recommends that funding be provided to improve accessibility on existing routes, including widening paths, resurfacing paths, the provision of lighting and seating and the removal of any barriers that make access impossible for people who use mobility scooters or non-standard or accessible cycles.
- That the Department engage and consult with Imtac before finalising design guidance for active travel.
- That the Department continue to engage with Imtac and others when designing this type of infrastructure to reduce the potential of conflict between users.
- It is essential that provision for users of public transport and Blue Badge parking must be prioritised when making any changes. Neither user should be disadvantaged when making any changes to streets, whether the street be a residential area or key streets in our towns and cities. Key to achieving this is early high level and local engagement with Deaf, disabled and older people and other organisations including Imtac.
- Inclusive and accessible cycle parking is an essential component of enabling people to make routine cycle journeys. Developing a plan to develop cycle networks is welcome, but not including cycle parking provision as part of infrastructure improvements is a mistake in the opinion of the Committee. People, including disabled people and older people, will not cycle if there is nowhere to park their cycle at the end of a journey.

Many thanks

Conor Tinnelly
Policy Advice and Research Unit
Commissioner for Older People for Northern Ireland