



**Comments from Imtac about the consultation on the
Fermanagh and Omagh Sub-Regional Transport
Plan**

(February 2024)

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About Imtac

The Inclusive Mobility and Transport Advisory Committee (Imtac) is a committee of disabled people and older people as well as others including carers and key transport professionals. Its role is to advise Government and others in Northern Ireland on issues that affect the mobility of Deaf people, disabled people and older people.

The aim of Imtac is to ensure that Deaf people, disabled people and older people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Infrastructure (herein after referred to as the Department).

General comments

Imtac welcomes the opportunity to respond to the current consultation on the development of the Fermanagh and Omagh Sub-Regional Transport Plan. The Committee notes the limited time provided for responding to the current consultation. Allowing only 4 weeks for consultation on important matters is not good practice. From Imtac's perspective short consultation periods create difficulties in developing detailed responses given the limited resources available to the Committee. Short consultations, for example, make it impossible to obtain accessible formats required by some Imtac members, restricting our capacity to develop responses that reflect the views of all our members. This is particularly relevant to the current consultation as the means of consultation was not accessible for some members. This is unacceptable to the Committee and should also be for the Department. Future consultations should be a minimum of 8 weeks but preferably be 12 weeks. Because of the limitations on the consultation period the Committee considers this response as interim with more detail to be provided when further engagement takes place with the Department.

There are two other areas of general concern to members. Firstly, is the focus on the urban settlements of Omagh and Enniskillen. As the background information to the consultation makes clear the area covered by the Transport Plan is primarily rural with numerous smaller settlements. Accessibility and mobility in, to and through these areas is, for our members, of equal importance to the functioning of an accessible and inclusive transport network for the sub region. Members have also

questioned whether the predominantly urban focus of the scheme is consistent with the Department's obligations under the Rural Needs Act.

The second concern is the omission of community transport services from the Transport Plan with the proposals indicating that services are being considered separately by the Department at a regional level. Given these services currently make an important contribution to accessibility and the mobility of disabled people and older people in the sub region, the proposed omission of services from the Plan raises questions over the credibility of the proposed direction of the Transport Plan.

Our approach in developing this response

The advice from Imtac is informed by several factors. These factors include:

- The social model of disability which holds that people with impairments are “disabled” by the barriers operating in society that exclude and discriminate against them¹.
- The rights and obligations outlined in the Articles of the United Nations Convention on the Rights of People with Disabilities (UNCRPD). In particular Article 9 Accessibility².
- The legal and statutory duties placed on all public bodies in Northern Ireland including the Disability Discrimination Act and statutory equality and disability duties³.

These factors have also informed the development of Imtac's New Approach paper⁴ which sets out 4 key principles Imtac views as essential in ensuring that any new infrastructure plan or investment delivers accessible and inclusive outcomes. These principles are:

1. Putting Deaf people, disabled people, older people and carers at the centre of every stage of decision making

¹ For more information on the social model of disability see this factsheet developed by Inclusion London <https://www.inclusionlondon.org.uk/about-us/disability-in-london/social-model/the-social-model-of-disability-and-the-cultural-model-of-deafness/>

² Article 9 of the UNCRPD <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-9-accessibility.html>

³ Summarised here <https://www.nidirect.gov.uk/articles/protection-against-disability-discrimination>

⁴ <https://www.imtac.org.uk/new-approach-travel-our-streets-and-our-places>

2. Ensuring a shift in our cultures
3. Ensuring public and private investment contributes to an accessible and inclusive society
4. Ensuring end to end journeys are straightforward and accessible

In responding to the current consultation, we have assessed the work done to date on the Fermanagh and Omagh Sub Regional Transport Plan against the 4 principles set out in New Approach. This assessment includes the baseline studies, the list of key challenges, the draft vision and objectives,

Comments on the consultation

Putting Deaf people, disabled people, older people and carers at the centre of every stage of decision making

Engaging with Deaf people, disabled people and older people at an early stage is crucial to the success of any project. Not doing so can mean that important issues are overlooked and that a plan or project fails to include what are significant numbers of people in society. Trying to fix a lack of engagement at a later stage of projects is often very difficult, making it impossible to maximise the benefits of investment in our infrastructure for everyone.

Having reviewed all the materials associated with the current consultation, Imtac is concerned that there appears to be little or no evidence of any meaningful engagement with Deaf people and disabled people in identifying key challenges, developing the vision and objectives for the plan. There is limited acknowledgement in the report of the important link between better access to transport for older people and participation in society.

The lack of engagement, and acknowledgement of issues for Deaf and disabled people is a major omission, given disabled people account for over 20% of the population in Northern Ireland.

Imtac recommends that as a priority engagement with Deaf people and disabled people is undertaken by the Department and the feedback received used to inform the final challenges, vision and objectives for the Plan. Imtac would welcome further discussion with the Department about engagement and we are happy to provide advice and support to ensure appropriate consultation is undertaken.

Ensuring a shift in our cultures

In New Approach Imtac sets out the importance of a shift current cultures to ensure that investment benefits everyone. There are two areas where shifts in culture are required.

The first relates to shifting the current priority we give to moving vehicles over moving people. This reflects the significant negative impact car dependency has had on the many disabled people and older people who have limited or no access to car. The draft Plan does acknowledge the need to shift cultures to encourage more sustainable travel, particularly considering the challenge of climate breakdown and targets for Net Zero. The Committee questions whether the proposed approach is sufficiently ambitious given the scale of this challenge. However, of much greater concern is the failure to acknowledge the link between poor access to transport, car dependency and the exclusion of Deaf people, disabled people, older people and others from our society. The exclusion of community transport services and the urban focus of proposals emphasise these gaps in the development of the Transport Plan.

Imtac recommends that addressing inequalities created by car dependency be included in the list of key challenges for the Plan.

The second shift in culture relates to how inclusion and accessibility is weighted and prioritised when decisions are made on policy and allocation of resources. Rather than accessibility being seen as an add on or nice to have, it needs to be recognised as a fundamental to delivering a fairer more equal society and something that provides benefits to everyone. It is damning that accessibility and inclusion has been given little or no priority in the development of the plan to date. If not addressed, it is likely that the Plan will continue to deliver a transport system that continues to focus predominantly on car usage and ownership and excludes significant numbers of people in our society.

Imtac recommends that improving accessibility and inclusion be highlighted as a key challenge for the plan and be a clear priority for both the vision and objectives for the final Plan.

Ensuring public and private investment contributes to an accessible and inclusive society

For Imtac it is essential that when we invest in transport services and infrastructure that we ensure we meet best practice in inclusive design standards, not minimum standards. The work undertaken on the plan to date highlights potential to make improvements to both public transport and active travel journeys. However, at no stage is there any indication that improvements made will be accessible to everyone. Similarly, when highlighting measures to manage car parking in towns there is no acknowledgement of the importance of accessible parking for the over 120,000 people in Northern Ireland who rely on the Blue Badge Scheme for mobility.

Imtac recommends that the vision and objectives make it explicit that accessibility and inclusion will be priority for any intervention made under the final Plan.

Ensuring end to end journeys are straightforward and accessible

Most journeys involve use of more than one mode of travel. A lack of joined up, accessible transport or travel chains are a major barrier for many Deaf people, disabled people, older people and others. Problems with connectivity are particularly acute in rural areas such as Fermanagh and Omagh. Improving connectivity and whole journey approaches must be a key component of any transport plan seeking to (1) address social exclusion and improve access for those with limited or no access to travel and (2) promote more sustainable travel behaviours and reduce car dependency.

Currently there is little or no acknowledgement of improving end to end journeys in the development of the transport plan, particularly for those who limited or no access to the car. The fact that it is stated that current community transport services are not to be considered in the assessment of issues is a glaring omission. The lack of ambition around innovative solutions to improve connectivity in both the vision and objectives is both worrying but also inconsistent with the future vision for transport and travel outlined in Time for Change⁵. As with other aspects of the current approach to the development of the transport plan, the lack of focus on improving the accessibility of end to end journeys means a final Plan will largely do nothing for people currently excluded from the transport system.

⁵ <https://www.infrastructure-ni.gov.uk/publications/planning-future-transport-time-change>

Imtac recommends that providing for accessible, connected journeys be a key objective for the final Plan. The objective must make clear that innovative services, including Demand Responsive Transport will play a key part in delivering this objective.

Conclusion

As currently presented the Fermanagh and Omagh Sub Regional Transport Plan falls well short of an acceptable approach to removing the barriers to travel experienced by Deaf people, disabled people and older people or to contribute to wider climate change objectives. The Committee are recommending the following immediate actions:

- Urgent engagement with Imtac as well as local Deaf people, disabled people and older people to identify key issues and challenges.
- Amend both the vision and objectives for the Transport Plan to reflect that accessibility and inclusion will be a significant priority.
- Amend the challenges and objectives to reflect the importance of accessible end to end journeys.
- Consideration of innovative solutions to address issues experienced by both urban and rural communities across the sub-region

To progress matters, the Committee would welcome the opportunity to meet with the Transport Plan Team to discuss our response.