



**Comments from Imtac on the consultation on the
Accessible Transport Strategy 2025**

November 2015

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Making our information accessible

As an organisation of and for disabled people and older people Imtac recognises that the way information is provided can be a barrier to accessing services and participation in public life. We are committed to providing information about our work in formats that best suit the needs of individuals.

All our documents are available in hard copy in 14pt type size as standard. We also provide word and pdf versions of our documents on our website – www.imtac.org.uk. In addition we will provide information in a range of other formats. These formats include:

- Large print
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About us

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.

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.

Imtac receives support from the Department for Regional Development.

General comments

Imtac welcomes the opportunity to respond to the current consultation on the vision and strategic direction for the proposed Accessible Transport Strategy 2025. The Committee commends the Department for the approach taken in developing the proposals contained in the consultation. As part of this approach the Department has worked in partnership with Imtac to undertake a survey¹ of disabled people and older people to provide an evidence base for the ATS 2025. The Department has also formally sought the views of Imtac on the findings of the survey² and what the focus and priorities of any new strategy should be³. The Committee recognises and welcomes the inclusion of many of the recommendations of Imtac in the final consultation document. Imtac also commends the Department for its proactive approach in seeking the broader views of disabled people, older people and others during pre-consultation.

¹ [Attitudes of disabled and older people to public transport - November 2014 - January 2014](#)

² [Comments on the DRD report of the results from the Attitudes of Disabled and Older People to Public Transport Survey \(Imtac 2015\)](#)

³ [The Accessible Transport Strategy 2025: Our views on the vision, strategic priorities and how to measure success for a new ATS \(Imtac 2015\)](#)

Imtac acknowledges that the Department is seeking to consult on the strategic direction of the new ATS. The Committee is content that the approach outlined by the Department broadly reflects the advice given by Imtac, subject to a number of changes recommended below. Much work still needs to be done to develop substantive detail about how the Strategy will be delivered. The Committee recommends that the Department take the same proactive approach to this process, as taken to pre-consultation, working with Imtac and the range of other stakeholders.

Our views on a new Accessible Transport Strategy

As previously stated Imtac has already had significant input to the development of proposals for a new ATS. This means that the Department are already aware of the views of Imtac on many of the issues considered by the consultation. With this in mind our response will concentrate our recommendations for changes to proposed approach and issues that the Committee consider to be of primary importance.

“Since the launch of the Accessible Transport Strategy in 2005 do you think the accessibility of the transport system for older people and people with a disability has improved?”

Imtac has been consistent in our views about the impact of the ATS 2005. There clearly have been many positive developments in the last decade that have improved travel choices for disabled and older people. Despite these improvements Imtac has on a regular basis highlighted examples of where investment by the Department and others has failed to fully maximise the benefits for disabled and older people. The Committee has also consistently raised concerns about the limited progress made in addressing specific barriers, such as information, identified by the ATS 2005.

“Do you think there is a need for an Accessible Transport Strategy?”

Imtac has been explicit in our advice to Government⁴ about the continued need for an Accessible Transport Strategy to build on the progress made to date. The Committee believes this position is supported by the evidence gained from the recent survey and pre-consultation by the Department which illustrates that disabled and older people still experience significant barriers to travel.

“Our vision for a new Accessible Transport Strategy is to have a transport network in Northern Ireland that is inclusive and accessible to all. Do you agree with this?”

In our advice to the Department during the development of the current consultation Imtac recommended that the vision for the new ATS should be more ambitious and less restrictive than the vision of the 2005 Strategy. The Committee agrees with and supports the proposed wording for the vision for the ATS 2025. The vision reflects an inclusive approach, seeking to ensure that any investment in transport and travel benefits disabled and older people as well as others in our society.

ATS 2025 Themes

In our advice to the Department Imtac recommended that the ATS 2025 be more focused on a smaller number of key strategic objectives. The Committee is content that in general the suggested approach meets this advice.

The wording of three of the five proposed themes include reference to accessibility. Accessibility is a term that can be interpreted broadly, reflecting the range of barriers experienced by disabled people and older people. However accessibility can also be a narrow term, for example relating to access on and off vehicles. This is of course important but for many older and disabled people issues such as the availability and affordability of these types of services are just as important. To avoid a

⁴ [Imtac Annual Report 2014](#)

narrow interpretation of these themes Imtac recommends that the wording of themes avoid specific mention of accessibility.

Theme 1: Enhancing the accessibility of the public transport network

In our published advice to the Department Imtac recommended that Theme 1 of the new ATS should prioritise improving public transport and pedestrian infrastructure. The Department has proposed that Theme 1 address the accessibility of the public transport network, broadening the theme to include issues such as the coverage of the public transport network as well as issues such as vehicle and infrastructure accessibility. Whilst Imtac does not fundamentally disagree with the Departments approach the Committee would make the following recommendations:

Over the past decade Imtac has undertaken significant work⁵ that illustrates how important the accessibility of the pedestrian environment is to the mobility of older and disabled people. A barrier free pedestrian environment is inextricably linked to an inclusive public transport system and travel in general as nearly every journey involves use of pedestrian infrastructure. Imtac recommends that the Department explicitly recognise the vital importance of the pedestrian environment and its links with public transport by including it in Theme 1 of the new ATS.

Imtac acknowledges that the extent of the current public transport network has a significant impact on whether disabled and older people can use services. However the Committee has doubts whether the future ATS can significantly influence decisions about service levels and provision. Where the Committee does believe the ATS can have a significant impact is on maximising the benefits of any investment in new vehicles and other public transport infrastructure. For this reason Imtac recommends that Theme 1 address specifically improvements to public transport and pedestrian infrastructure. To avoid a narrow interpretation

⁵ [Highlighting barriers in the pedestrian environment - Report into issues, good practice and recommendations](#)

of this theme Imtac recommends that the wording be changed to “Improving public transport and pedestrian infrastructure.”

Imtac welcomes the suggested approach to work towards a step-free public transport system. This is in line with our published advice⁶ to the Department. However the Committee has previously highlighted the urgent need to establish what makes public transport step-free and for an assessment of current public transport services. It is our recommendation that the Department work with Imtac, Translink and others to agree new standards for public transport vehicles and infrastructure to enable a step-free future.

One of the most positive impacts of the ATS 2005 has been the introduction of audio-visual information systems on Metro buses. Imtac recommends that under the new ATS audio-visual information systems on vehicles and at stations become a requirement of any future investment in public transport infrastructure.

Theme 2: Improving the accessibility of the wider transport network

In published advice to the Department Imtac recommended that Theme 2 should address strengthening other transport services, recognising that disabled and older people require and rely on other forms of transport to make journeys and to access the public transport network. As with the previous theme whilst the Committee does not fundamentally disagree with the Departments suggested approach, there are a number of recommendations we would ask the Department to consider:

As previously stated Imtac recommends that improvements to pedestrian infrastructure be given greater priority and included in Theme 1.

To avoid a narrow interpretation of this theme Imtac recommends that the wording be changed to “Improving the wider transport network.”

⁶ [Imtac Statement on Step-Free Transport](#)

The theme addresses issues and services that are extremely important to disabled people and older people including the Blue Badge Scheme, taxi services, DRD funded additional services (DATS, rural Dial-a-Lift, Shopmobility) as well as services provided by others. Imtac has published advice⁷ over the last decade setting out not only the importance of these services but in many cases changes that we believe are required to strengthen services.

Members and others have raised concerns about the lack of specific detail in relation to delivery of this theme. The Committee understands the focus of the current consultation is the broad strategic approach but given the breadth and importance of issues covered by this theme significant work with a range of stakeholders is required to develop specific measures for inclusion in the proposed Action Plan.

Theme 3: Enhancing the customer experience

Imtac agrees with the wording of this theme, as it is line with our published advice. The Theme recognises that the way services are provided can create unnecessary barriers for older and disabled people.

Imtac also broadly agrees with the suggested approach to this theme as detailed in the consultation. We recommend that the Department take a structured approach to developing delivery measures focusing on (1) measures requiring providers to change the way they provide current services and (2) measures that give people the confidence to travel.

Given the investment in services over the past decade Imtac believes it is no longer acceptable to require some disabled people to give 24 hours notice to use public transport. We recommend that the removal of this requirement be given priority in the Action Plan.

⁷ See for example [The future of Door2Door services - an issues paper](#), [Flexible Future - Lessons from the development of demand responsive transport services](#), [Enforcing Blue Badge Fraud](#)

Imtac agrees that quality training is important. As with infrastructure the Committee recommends that the Department works with Imtac and others to agree a standard to ensure quality and consistency of approach in the delivery of training in line with previously published advice from Imtac⁸.

Theme 4: Enhancing the accessibility of information

Imtac broadly supports this Theme. Information (or the lack of it) is consistently highlighted by older people and disabled people as a barrier to travel. Imtac has published its own recommendations about improving information⁹.

As with previous comments the Committee does have some concerns about a narrow interpretation the term “accessibility” in the wording of the theme. Imtac recommends the following change to the wording – “Enhancing the provision of information”.

Imtac broadly agrees with the suggested approach to this theme as it mirrors published advice given by the Committee. As with the other themes significant work is needed to more clearly identify measures and actions under this theme.

Theme 5: Working in collaboration with partners and stakeholders

In our published advice to the Department Imtac recommended that Theme 5 be “improved engagement and participation.” Whilst the Department has chosen a different wording the Committee is content that the suggested approach is broadly in line with our previous advice.

Imtac views the delivery of measures under this theme to be essential to the overall success of the ATS 2025. Cross cutting in nature, successful

⁸ [Disability Training - Good Practice Guidelines for Transport Providers](#)

⁹ [Assessing the impact of the Accessible Transport Strategy on the provision of information about transport in Northern Ireland](#)

engagement will play a major part in delivering successful measures under the other themes of the Strategy.

Better engagement is essential in times of reduced resources across Government. Working with disabled people, older people, their organisations, transport providers and others can help to ensure that limited resources are used most effectively. Imtac plans to publish separate advice for the Department around improving engagement shortly. However in the interim the Committee suggests the Department's approach is guided by two principles. Firstly the Department should seek to maximise opportunities for older people and disabled people to directly influence policy and services. Secondly through broad engagement the Department should seek to prioritise inclusive measures that deliver the greatest benefits to the greatest numbers of disabled and older people.

Action plan

“We are keen to know if you have any specific actions you would want to see in an action plan to deliver an Accessible Transport Strategy. Please list no more than five.”

Imtac has suggested many potential actions for inclusion in a future ATS action plan both in this response and previously published papers. As the Committee will have a significant role in assisting the Department to develop the Action Plan our recommendation is that these discussions start as soon as possible.

It is important that the Action Plan is focused on deliverable actions and activities that are defined with clear outcomes. These must be capable of being measured and monitored to confirm how they have contributed to the achievement of the vision for the ATS 2025. Studies and reviews of options whilst important foundations to the development of actions and activities will not in themselves contribute to achievement of that vision.