



**Comments from Imtac about the Equality Impacts of
the All-Island Strategic Rail Review - Strategic
Environmental Assessment and Draft Report**

(September 2023)

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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).

Introduction

In January 2022 we responded to the first consultation about the All-Ireland Rail Review¹. In our response to the consultation the Committee expressed its significant disappointment that there was no goals or objectives designed to remove the barriers to travel by rail being experienced by large numbers of Deaf people, disabled people and older people.

Imtac made recommendations including the inclusion of an additional goal to “**Develop an inclusive all Ireland rail network, accessible to all**”. We recommended this goal be supported by the following additional objectives:

- to improve our rolling stock to ensure it is step free, inclusive, and accessible to all
- to improve our rail infrastructure to ensure it is step free, inclusive, and accessible to all
- to improve the delivery of our rail services to ensure they are inclusive and accessible to all

Finally, the committee called for a feasibility study into the introduction of step-free, level access trains which remove the need for assistance and enable many disabled people to turn up and go on an equal basis to others in society.

¹ <https://www.imtac.org.uk/comments-imtac-about-all-ireland-strategic-rail-review-0>

Comments on the All-Island Strategic Rail Review - Strategic Environmental Assessment and Draft Report

In reviewing the draft report, the Committee is extremely disappointed that changes have not been made to the Goals and Objectives of the Strategy to fully acknowledge the importance of a rail network that is accessible to everyone. Given this, it is unsurprising that none of the 30 recommendations included in the draft report address the specific concerns of Deaf people, disabled people, and older people in relation to rail travel on the island of Ireland.

We acknowledge that the report does mention several times some important issues, such as accessibility issues at stations and issues around accessible information but it is damning that nowhere in the recommendations is there any commitment to address these issues.

We also acknowledge the inclusion of a disabled person in personas and stories section of draft report, but it is indicative of the broader tone of the report to disabled people that even after investment Holly can only expect “increased”, not full accessibility to services and will still be required book assistance to travel (albeit using different platforms). The vision for future rail travel for the island of Ireland appears to be one where disabled people and others who require an accessible network will continue to be disadvantaged and receive a less equitable service compared to others.

It is shocking that a draft Report on the future of rail travel on the island of Ireland contains no specific recommendations or wider commitments to improve the accessibility of rail travel. Even the flawed Williams Shapps Plan for Rail from the UK Government² addressed accessibility as an issue. Given the obligations for both Governments under Article 9 of the UN Convention on the Rights of People with Disabilities³, questions need to be asked as to why a report has been developed to this stage without challenge on why accessibility is not deemed important enough to the future of our railways and a plan put in place to correct this omission.

The Department has asked for comments on the draft Report specific to equality impact and rural proofing. In relation to equality, improved accessibility is something that impacts on and benefits all the Section 75 groupings. The omission of any commitments in the draft report to

² <https://www.gov.uk/government/publications/great-british-railways-williams-shapps-plan-for-rail>

³ <https://social.desa.un.org/issues/disability/crpd/article-9-accessibility>

improve accessibility has the potential to negatively impact across all these groups including disabled people, older people, younger people, people with dependants and women.

The draft Report does contain proposals that are likely to garner widespread public support and will merit further discussion and debate. Whether, given the current circumstances, the report is creating expectations that cannot be met needs to be discussed alongside the prioritisation of the objectives and delivery plans in circumstances where hard decisions need to be made. Further consideration also needs to be given to wider transport and travel connections and also to the merits of using enhanced bus services to better meet some of demand and objectives identified by the draft Report in order to bring high frequency, reliable public transport to everyone in society.

As advisors to the Department on issues relating to the mobility of Deaf people, disabled people and older people the Committee cannot ignore the lack of priority given to improving accessibility of the rail network in the draft report. Regardless of the merits of the other proposals in the report this omission must be addressed. Imtac recommends that the Department undertake a full Equality Impact Assessment on the draft report before any further progress with the review. A full EQIA will allow the gaps in the current report to be identified with changes made to mitigate any potential adverse impact.

Conclusion

The Committee welcomes the opportunity to comment on the draft Report. We acknowledge that the Strategic Rail Review was jointly commissioned, but being sponsored as an advisor to the Department, Imtac would like to meet with officials to discuss our concerns about accessibility and how these can be resolved.