



**Comments on the consultation on Northern Ireland's  
2030 & 2040 Emissions Reduction Targets & First  
Three Carbon Budgets & Seeking views on Climate  
Change Committee (CCC) Advice Report: The path  
to a Net Zero Northern Ireland**

**(October 2023)**

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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](http://www.imtac.org.uk). In addition we will provide information in a range of other formats including:

- Large print
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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).

## **Imtac approach to Climate Change**

Imtac accepts that our society faces a huge but necessary challenge in responding to and adapting to climate change. The Committee recognises that this will mean significant changes to the way we all currently live our lives.

The United Nations has already highlighted significant concerns that disabled people and older people will be one of the groups most disproportionately impacted by climate breakdown, yet there is growing evidence that we are not being fully included in discussions about the changes we will be required to make. It is essential that Deaf people, disabled people, and older people are fully involved in all aspects (from design to implementation) of shaping our response to climate change.

Imtac is a body that is primarily focused on transport and mobility, specifically as they effect Deaf people, disabled people and older people. It is inevitable that a transition to Net Zero will mean changes to the way everyone travels, reducing current car dependency in favour of sustainable modes. For some Deaf people, disabled people, and older people this transition offers an opportunity to address some of barriers that currently make travel difficult or impossible. For other disabled people and older people, completely dependent on the car for mobility, the prospect of transition will understandably be a worry. In responding to climate change it is essential that we do not repeat past mistakes and that tackling inequalities must be a key priority for a just transition to Net Zero.

As part of our approach to meeting the challenges of climate change Imtac has published “A new approach to travel, our streets and our places”<sup>1</sup>. New Approach sets out four key principles that inform our advice around how we can ensure that the changes that need to be made, work for everyone in society including Deaf people, disabled people, and older people. These principles are:

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

### **Comments about Northern Ireland’s 2030 & 2040 Emissions Reduction Targets & First Three Carbon Budgets & Seeking views on Climate Change Committee (CCC) Advice Report**

Given the role and remit of the Committee, our comments are predominantly focused on emission reduction targets and carbon budgets related to Transport although our members and those we represent will be impacted by other sectoral changes including Buildings.

#### *Comments on the 2030 & 2040 emission reduction targets first three Carbon Budgets*

The emissions reduction targets and carbon budgets set out in the consultation are hugely challenging; they involve a pace of emissions reduction far beyond what has been achieved to date. Given factors such as the lack of Executive and the significant budgetary pressures across Departments there are strong arguments to suggest that the budgets are both unrealistic and unachievable. The Transport carbon budget targets appear extremely challenging since there has been a significant increase in sector GHGs from 1990 to 2019

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<sup>1</sup> [A new approach to travel, our streets and places \(Imtac 2022\)](#)

For Imtac these wider concerns must be balanced against the impact and additional costs that not meeting these targets will bring. The Committee also feels that the very ambitious targets focus attention and energy on the scale of changes required to meet Net Zero. For this reason, Imtac supports and recommends retaining the first three Carbon Budgets unamended at this initial stage of addressing the problems.

### *Comments on the Climate Change Committee Advice Report*

In relation to reductions in transport emissions the CCC Advice Report recommends “implementing effective intervention policies to make it more attractive and accessible for people to walk, cycle and use low carbon public transport.” However much of the report focuses on prioritising the transition of existing private vehicles from fossil fuel to zero emission vehicles. By contrast the approach that is being promoted by the Department for Infrastructure promotes a transport hierarchy that prioritises switching fuels behind substituting trips (reducing the need to travel) and switching to more sustainable modes (walk, wheel, cycle and public transport).

It is Imtac’s view that emission reduction focused on mainly on transitioning existing vehicles to zero emission does little to address the inequalities created by a society based around car dependency. It does not address, and in fact may exacerbate, the barriers to participating in society experienced by the many Deaf people, disabled people and older people who have limited or no access to a car. The approach promoted by the Department for Infrastructure in it’s Time for Change document represents a greater opportunity to make society fairer and more equal as part of a just transition to Net Zero.

Coupled with issues around access to EVs, we have concerns about the availability and accessibility of charging infrastructure. Apart from well publicised issues of having adequate grid connections to provide rapid public charging points (and the safe access to and around them) there is the difficulty of providing connections at residential priorities that rely on on-street parking.

We welcome the proposal for a Just Transition Commission for Northern Ireland.

If we are to achieve a just transition, Imtac, recommends adoption of the principles outlined in our New Approach, to be implemented in order to:

- 1 Ensure Deaf people, disabled people and older people are at the heart of decision making in developing and implementing a just transition to Net Zero<sup>2</sup>. This includes disabled people having an active role in determining the Terms of Reference for as well as participating in the proposed Just Transition Commission.
- 2 Prioritising accessibility and inclusion for all in developing and implementing all aspects of a just transition.
- 3 Prioritisation of the movement of people, not vehicles in the the design of our streets and places.
- 4 Ensure the highest inclusive design standards are used when investing in transport infrastructure including walking and wheeling infrastructure, cycling infrastructure and public transport infrastructure and vehicles.
- 5 Make end to end journeys easier for everyone including by:
  - Supporting innovations such as demand responsive transport (DRT), Mobility as a Service (MaaS) and the development of autonomous vehicles
  - Encouraging the shared use of cars and vehicles, eg car clubs
  - Providing support, including financial support, to help everyone make active travel journeys
- 6 Reduce the need for people to travel including the creation of 15 minute neighbourhoods with better integration of transport and land use planning.

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<sup>2</sup> New Approach sets out what good engagement with Deaf people, disabled people and older people involves and is centred on the Convention of the Rights of People with Disabilities General Comment Number 7. It means working directly with Deaf and disabled people rather than through organisation for disabled people. It must include engagement with people with a diversity of impairments. It must also include diversity in backgrounds including, for example, children and young people, women and girls and people who live in both urban and rural areas. It must also include carers, families and relatives who play a vital role in assisting some disabled people to have a voice in decision making.

- 7 Ensuring that the costs and changes associated with a transition to Net Zero are shared proportionately across society and do not disproportionately impact on already excluded groups such as Deaf people, disabled people and older people.

## **Conclusion**

Intac welcomes the opportunity to comment on the current consultation.

It is important to emphasise that the transition to net zero should not marginalise anyone and that progress made to date developing accessible and inclusive transport choices for all is not lost. Maintaining the change in the culture and the provision of accessible and inclusive transport choices (as well as sufficient ongoing maintenance of travel routes) will take time and significant investment. Even after investment some disabled people will still rely on private transport such as the car for their mobility. It is essential that a just transition to Net Zero recognises that the car maybe the only viable form of mobility for some disabled people and that accessibility for these users is maintained and improved alongside implementing other solutions aimed at reducing car dependency.

For the Committee, a just transition is an opportunity to take a further significant step in addressing much of the inequality and discrimination that exists in society. However, unless Deaf people, disabled people and older people are part of the decision making around the transition it is likely that it will exacerbate these issues. We would ask for the opportunity to have further discussions with officials from DAERA and DfI about how we can ensure Deaf people, disabled people and older people have an active role in designing and implementing the changes required, including through the proposed Just Transition Commission.