



Comments from Imtac about the consultation from the Department for Infrastructure seeking views on the challenges, vision, and objectives for the proposed Eastern Transport Plan (ETP)

(October 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

Imtac welcomes the opportunity to comment on the current consultation. We commend the Department for engaging with the Committee during the early development of the Eastern Transport Plan (ETP) and meeting with members to discuss the current consultation. Effective and meaningful engagement with Deaf people, disabled people and older people is an essential component of developing an ETP that delivers change for everyone in society and must be continued during the next stages of the development and then implementation of the Plan.

Engagement with Deaf people, disabled people and older people¹ is one of the four key principles set out in the Committee's New Approach² paper published in 2022. The principles set out in New Approach are the

¹ New Approach sets out what good engagement with Deaf people, disabled people and older people involves and is centred on the UN Convention on the Rights of People with Disabilities (CRPD) General Comment Number 7. It means working directly with Deaf and disabled people rather than through organisations 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.

² <https://www.imtac.org.uk/new-approach-travel-our-streets-and-our-places>

foundation of the advice we provide to the Department and others and inform the comments made by Imtac in response to the current consultation. The four 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

New Approach mirrors and supports the changes in approach to planning our transport and places as set out in the Department's own Time for Change³ policy paper. The Committee broadly welcomes the move away from society based on car dependency to one promoting both a sustainable transport hierarchy and a road users' hierarchy where walking and wheeling is given greatest priority and private car use the least. We support the use of these priorities in developing the Vision, Objectives and Guiding Principles which will inform the development of the ETP.

If the ETP is to be successful in delivering change for everyone, there is a need for further changes, in particular, strengthening the approach to accessibility and inclusion. New Approach sets out how this can be achieved. Firstly, a change in culture is required which recognises the fundamental value improved accessibility and inclusion brings to society beyond simple benefits for Deaf people, disabled people and older people. Secondly, this change in culture ensures that any future investment in our transport, streets and places adopts the highest standards of inclusive design rather than the minimum standards or compliance approach currently used.

In responding to the consultation about the challenges, vision, and objectives for the proposed Eastern Transport Plan the Committee believes significant changes need to be made to explicitly recognise the impact that transport is contributing to the current inequalities and discrimination experienced by many Deaf people, disabled people, older people and others as well as explicit commitments to address issues

³ <https://www.infrastructure-ni.gov.uk/publications/planning-future-transport-time-change>

around accessibility and inclusion in both the vision and the objectives of the new ETP. We are making several recommendations in relation to the challenges, vision and objectives designed to strengthen the further development of the ETP.

Recommendations on the context and challenges

In relation to societal challenges Imtac agrees that tackling Climate Change is a key challenge for all in our society. New Approach identifies a just transition to Net Zero as a priority. The Committee also recognises and endorses the important challenges of protecting the built and natural environment and the need to drive sustainable economic growth.

The Committee also recognises the importance of healthy, safe and inclusive communities, however the final ETP also needs to explicitly recognise how current approaches to transport, our streets and places contribute to the social exclusion of a significant number of people in our community including many Deaf people, disabled people and older people. The links between social exclusion and transport have been subject to significant research and are perhaps best summarised by the Making the Connections report published by the UK Government Social Inclusion Unit in 2003.⁴ The ETP must commit to prioritising accessibility and inclusion and reducing inequalities and social exclusion.

Whilst the transport challenges do reflect some of barriers experienced by people with limited or no access to a car, they do not fully reflect the barriers that contribute to inequalities in society. These barriers include:

- The lack of availability of alternative transport to the car including public transport, taxis and services such as DATS and Rural Dial-a-Lift.
- The physical accessibility of transport and our streets including the continued use of inaccessible public transport vehicles and infrastructure, inaccessible footways (including issues created by clutter and poor maintenance) and the complete absence of accessible cycling infrastructure.
- The affordability of alternatives to car travel including the relatively high costs of public transport, alternatives such as taxis and for

⁴ https://www.ilo.org/wcmsp5/groups/public/---ed_emp/---emp_policy/-invest/documents/publication/wcms_asist_8210.pdf

many disabled people additional costs around mobility equipment, accessible and non-standard cycles associated with active travel journeys.

- The inaccessibility of many services and activities caused by land use planning policies that have prioritised access for people with cars.
- Legitimate concerns people have about safety and security when making journeys walking, wheeling, cycling or using public transport.
- The negative impact car dependency has on specific communities in the ETP area including the impact of all day commuter parking, road safety issues for people walking, wheeling and cycling and poor air quality caused by traffic. These communities predominantly have lower levels of car ownership.

Any assessment of the transport challenges associated with the ETP must recognise these barriers that impact on sections of the population for whom travel is most difficult. Failure to do so will potentially result in the ETP not addressing barriers to travel currently experienced by the significant number of people who experience the greatest inequality and discrimination in our society.

Recommendations on the Vision for the ETP

The ETP vision currently identifies sustainability and efficiency as the priorities in any future transport network. The Committee is concerned that without mention of the specific barriers identified above in it's vision, the ETP will fail to address current issues around accessibility and inclusion.

Imtac recommends that the final vision be amended to include:

“Deliver an integrated plan to enhance and re-balance transport networks in favour of sustainable, **affordable**, efficient, **accessible and inclusive** modes, which connect communities that create attractive, inclusive and safe economic region for all by delivering carbon reduction, improving air quality, enhancing the built and natural environment and facilitating healthy, sustainable, **accessible and inclusive** travel choices over unnecessary private car travel.”

Recommendations on the Objectives for the ETP

As with the challenges / context and vision the objectives for the ETP largely focus on the issues of sustainability and efficiency. There is little recognition of the importance of making the changes in approach envisaged by the ETP accessible and inclusive to all.

Imtac recommends that each of the objectives be amended to ensure that accessibility and inclusion receive the same priority as sustainability and efficiency. The Committee also recommends that objectives explicitly acknowledge affordability as a key consideration for transport modes including active travel.

Comments on the guiding principles

Imtac broadly supports the guiding principles outlined in the consultation, conditional on enhanced commitments around accessibility and inclusion being made to the final vision and objectives for the ETP. The benefits or otherwise of the use of guiding principles for Deaf people, disabled people and older people will be largely dependant on the detailed development the plan. Ongoing engagement with Imtac and other organisations of Deaf people, disabled people and older people will be essential as the plan is further developed and implemented.

One further issue that needs to be a key consideration moving forward is a recognition of the continued importance of the car for the mobility of some Deaf people, disabled people and older people. The ETP must ensure that interventions do not negatively impact on people for whom the car will be the only viable form of mobility for the foreseeable future.

Conclusion

Whilst Imtac broadly supports the proposed changes in approaches and priorities in the proposed vision and objectives for the new ETP, the Committee recommends the final vision and objectives are strengthened to include explicit references to accessibility and inclusion. As the Plan is developed further ongoing engagement with Deaf people, disabled people and older people is essential to ensure outcomes deliver for everyone. We are committed to working with the Department to ensure this happens.