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**Comments from Imtac about the Department for Infrastructure Draft Budget 2025-26 Equality Impact Assessment**

**(June 2025)**

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**Making our information accessible**

As an organisation of and for Deaf people, 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. These formats include:

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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).

**Comments on the draft Budget**

Imtac thanks the Department for the opportunity to comment on the current consultation about the draft Budget. The Committee broadly welcomes the increases in budget allocations this year as outlined in the consultation and subsequent statements made by Minister Kimmins in which she has made clear her intention to increase funding to community transport and Shopmobility services.

Whilst increased budget allocations are welcome, they must be viewed in the context of sustained cuts and spending restrictions over the past 15 years. Austerity as well as the challenges created by the COVID 19 pandemic and the cost-of-living crisis, have seriously impacted on investment in our infrastructure and transport services. This has had a direct negative impact on the lives of Deaf, disabled and older people, significantly delaying a transition to a fully inclusive and accessible transport system. As a result, we believe many Deaf, disabled and older people, particularly those living in areas outside of Belfast, have experienced their options for travel diminish rather than improve in the last decade.

The Budget consultation makes clear that, despite increases, there are many demands for funding that cannot be met within the current settlement. This highlights general concerns that unless there are sustained increases in spending on our transport and infrastructure it will not be possible to reverse the damage created over the last 15 years both to create a society that is accessible to everyone or to meet the unprecedented challenges of climate breakdown. It is worrying to the Committee that the signals from the UK Government indicate that increased investment may be temporary, with the Spending Review likely to see a return of spending cuts for unrestricted Departments.

**Comments on the assessment of impact**

For the Committee it is difficult to assess the impact of the budget because of the lack of evidence to base the assessment on. The Committee welcomes the inclusion of the Disability Strategy Expert Panel’s Report[[1]](#footnote-1) findings on transport in the consideration of data, but these findings are high level in nature. There has not been a comprehensive examination of the accessibility of our transport and infrastructure in Northern Ireland since the development of the Accessible Transport Strategy in the early 2000’s. There is a dearth of data about the impact of the ATS itself in delivering change and if investment, or lack of it, has improved the lives of Deaf, disabled and older people in the past two decades.

Imtac uses its resources to assess the impact of investment and the lack of investment by engaging directly with and noting the experiences of Deaf, disabled and older people, policy makers and transport providers. This has included hosting engagement events around Northern Ireland and undertaking surveys. Broadly our findings are that there has been some improvement including public transport in Belfast and our rail network generally. For many people outside of the Greater Belfast area, however, little has improved in the past two decades and for people in many other areas choices have become more restricted with both community transport services and taxis becoming less available. Even where improvements have taken place, the feedback we have received indicates that Deaf, disabled and older people continue to experience unacceptable barriers to travel which are not generally experienced by the wider public.

For the Committee issues we face are exemplified by one policy area, concessionary travel. It has been accepted by all, including successive Ministers, since 2008 that the current disparity between the concessions available to disabled people and older people cannot be justified. Despite this recognition, budgetary constraints have prevented the equalisation of this concession for the past 17 years including following the most recent review[[2]](#footnote-2) conducted in 2023. For the Committee this is stark demonstration of how spending cuts have prevented measures that would make travel and transport more accessible. Disabled people are left with a scheme that is overly complex, requiring part card, part payment, delivering minimal if any savings on standard fares.

The Committee firmly believes that more evidence is required to assess where we currently are in relation to the accessibility of our transport and infrastructure. The Department should be aware of the recent, damming report[[3]](#footnote-3), published by the Transport Select Committee in Westminster. Although the report is mainly focused on the experiences of Deaf and disabled people in Great Britain, from our own work Imtac believes a similar report in Northern Ireland would not significantly different in its conclusions.

One final issue needs to be acknowledged in assessing the impact of policies on Deaf, disabled and older people. There is ample evidence to show that disabled people and older people have been disproportionately impacted by austerity, the pandemic and the cost-of-living crisis. This has seen services and support for people being reduced and removed, often having a hugely negative impact on people’s lives. Transport is a key resource everyone relies on, and funding decisions have a more significant impact on the lives of Deaf, disabled and older people than other groups.

**Comments on mitigations**

In responding to previous budget consultations Imtac has made it clear that it is almost impossible to mitigate against the consequences of budgets which see spending remain static or reduced. Even with a budget where spending is increasing there will be important and essential services that remain under pressure and vital infrastructure that cannot be maintained or improved. As previously indicated by the Committee, it is only through sustained and increased funding for our transport services and infrastructure that we can address the issues currently faced by Deaf, disabled, older people and others.

For Imtac, however, increased spending is only one part of ensuring we develop transport and infrastructure that is accessible and inclusive to everyone. As referred to earlier in this response a fresh strategic look at accessible and inclusive travel is long overdue. We need to identify where investment has worked and what else needs to be done. As we develop new transport plans the time is now right to develop a new strategic framework / plan to ensure investment delivers for disabled and older people where it’s needed most.

We also need to ensure that, when investment is made in services and infrastructure, it works for everyone including Deaf, disabled and older people. Too often in the past 20 years this hasn’t always been the case. Issues can range from a lack of care when installing a dropped kerb to disabling barriers built in to major investment programmes. Probably the most obvious example has been the continued procurement of high floor coaches for inter urban bus services in Northern Ireland. Since 2005 these vehicles have been replaced numerous times, using vehicles Translink readily admit cannot be used by some disabled people at the vast majority of stops across Northern Ireland. Tens of millions of pounds of public investment should not be used to maintain barriers to travel for a significant number of our population; public investment must be an enabler not a disabler.

Imtac has set out how we can seek to maximise investment through application of the principles detailed in our New Approach paper[[4]](#footnote-4). Key to progress is the active involvement of Deaf, disabled and older people in shaping services and infrastructure from the earliest stage. Over recent years Imtac has been working with the Department, Translink and others to implement these principles. Progress is being made on a range of issues including the bus procurement issues highlighted above. It is essential that we build on this progress and that Ministers and Departments demonstrate a clear commitment to maximise future investment.

1. <https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-disability-expert-advisory-panel-report.pdf> [↑](#footnote-ref-1)
2. <https://www.infrastructure-ni.gov.uk/articles/outcomes-concessionary-fares-consultation> [↑](#footnote-ref-2)
3. <https://publications.parliament.uk/pa/cm5901/cmselect/cmtrans/770/report.html> [↑](#footnote-ref-3)
4. <https://www.imtac.org.uk/new-approach-travel-our-streets-and-our-places> [↑](#footnote-ref-4)