



Comments from Intac about the Public Consultation on Northern Ireland's draft Climate Action Plan 2023-2027

(October 2025)

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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 about the consultation process

The Committee has two specific comments about the consultation process which we would like the Department to use to inform future consultations.

Firstly, the bulk of the consultation period was over the two summer months when members and staff are less available due holidays and other commitments. It is poor practice to issue such an important consultation in the mouth of the summer period. We received several other consultations at the same time, limiting our capacity to respond in the detail we would like to each. Consultation undertaken under such circumstances is counterproductive as Government diminishes the opportunity to gain valuable feedback from stakeholders.

Secondly, several Imtac members require documentation in other formats including hard copies of the consultation documents. Alternative formats must be made available as soon as possible following requests, otherwise the recipient is disadvantaged compared to other potential responders. We have made several recent requests for consultation documents in other formats where the speed of response was unacceptably slow. We recommend that all Departments review how they process all such requests for alternative formats and make changes to ensure requests are met and documents are issued within a reasonable timescale.

Background to our comments

Imtac recognises that climate breakdown is the biggest challenge faced by society both locally and globally. The Committee acknowledges that responding to climate breakdown will require significant changes to the way we live our lives, impacting on nearly every aspect of day-to-day life including how we travel. We recognise and support the principles behind the Climate Action Plan and the central need to reduce our emissions as core to that plan.

As a Committee of Deaf, disabled and older people we represent some of people in society most impacted by climate breakdown. For Imtac the principle of a Just Transition to Net Zero is an essential component of success or otherwise of how we respond to climate breakdown. Key to delivering a just transition is the involvement of those most impacted in the decision-making process. The Committee responded to the previous DAERA consultation¹ about establishing a Just Transition Commission, recommending that people most impacted by climate breakdown be included on the membership of the commission. It is disappointing that DAERA did not acknowledge this recommendation in its consultation report². The Committee reiterates our recommendation that Deaf, disabled and older people be involved in decision making around climate change plans, including an active role on the proposed Just Transition Commission.

The focus of the Committee's comments on the current consultation is around the proposals for the transport sector. For many disabled people and older people, the current transport system simply doesn't work. Barriers including physical accessibility, availability and affordability of transport routinely exclude us from making even simple journeys. A planning system designed around car ownership has hard-wired inequality and discrimination to accessing places, services and travel. Imtac has previously stated³ that combatting climate breakdown represents an opportunity to reset and remove the current barriers that make travel inaccessible for so many in our society. For the Committee a key test for the Climate Action Plan is the extent to which the policies being proposed represent a break from the past, whether the changes involved will be transformative, resulting in a fairer, more equal society.

¹ <https://www.imtac.org.uk/comments-imtac-about-consultation-establishment-just-transition-commission>

² <https://www.daera-ni.gov.uk/publications/summary-responses-consultation-establishment-just-transition-commission>

³ <https://www.imtac.org.uk/new-approach-travel-our-streets-and-our-places>

Comments on the transport proposals in the Climate Action Plan

Imtac has recently commented on the consultation on the draft Transport Strategy⁴ published by the Department for Infrastructure. Many of the issues raised in that consultation are relevant to our comments about this consultation so we have included the response as an appendix to this document. Central to our concerns about both documents is the focus and reliance on switching fuels to meet the targets to reduce emissions. From the perspective of the Committee switching fuels will simply result in maintaining an existing transport system that doesn't work for many in our society including many Deaf, disabled and older people.

There are welcome commitments to look at measures that promote more sustainable travel and reduce the need to travel. These measures could include transformative measures that address the barriers to travel experienced by Deaf, disabled, older people and others. However, as with the draft Transport Strategy there is no indication of this type of change beyond improving existing, inadequate provision. The draft Transport Strategy does clearly identify the equality issues created by a society that is car dominated but offers little in the way of solutions which would benefit those impacted by this approach. It is disappointing that the Climate Action Plan fails to clearly recognise the inequalities created by current and past approaches to transport planning and policies and therefore offers little to address the barriers that currently exclude many people from travel and participation in society.

Whilst the Committee understands that switching fuels is the most effective way for the Executive to meet its climate change emission targets in relation to the transport sector, the approach will do little to address the fundamental inequalities that exist within our society. The unique opportunity to introduce transformative changes to how we plan and provide transport will be lost under these proposals. Many disabled people will not benefit from this proposed approach, remaining excluded from everyday activities because of a lack of suitable transport. For other disabled people, who currently rely on the car for mobility, changes proposed in the draft Transport Strategy, will make more journeys difficult or impossible in the future.

⁴ <https://www.infrastructure-ni.gov.uk/consultations/transport-strategy-2035>

Imtac does not believe the approach proposed in both the draft Transport Strategy or the Climate Action Plan is consistent with the obligations on Government in Northern Ireland to achieve a just transition to Net Zero, the statutory equality duties placed on all public bodies in Northern Ireland and wider obligations under Article 9 of the UN Convention on the Rights of People with Disabilities. It is unacceptable for the Committee for Government in Northern Ireland to potentially ignore the clear inequalities and discrimination that exists within our current transport system in both its response to climate breakdown and in setting the approach to transport planning and policy for the next decade.

The Committee is recommending a significant rethink is required to this approach from the Department for Infrastructure. The draft Transport Strategy does contain welcome commitments around tackling inequalities and making transport inclusive but lacks any significant detail about how this will be achieved. During the development of the last major transport strategy, the Regional Transport Strategy for Northern Ireland 2002⁵, the need for an Accessible Transport Strategy was identified, developed and published in 2005⁶. Imtac believes that a similar Inclusive Transport Strategy is now required to ensure that both the Transport Strategy and Climate Action Plans deliver for everyone in society. An Inclusive Transport Strategy would provide the Department and the Executive with an evidence-based approach to delivering on the commitments made in the draft Transport Strategy as well as a just transition to Net Zero. Both Scotland⁷ and England and Wales⁸ have existing strategies / frameworks for delivering a more accessible transport system.

Conclusion

Imtac does not believe that the current approach to meet reductions in transport emissions is acceptable. The Committee believes that by prioritising switching fuels, Government in Northern Ireland is embedding existing inequalities within transport planning and policies for at least the next decade. We do not believe this is consistent with the obligations and commitments the Department for Infrastructure has in relation to addressing inequalities and discrimination and are therefore recommending the development of an Inclusive Transport Strategy to

⁵ <https://www.infrastructure-ni.gov.uk/publications/regional-transportation-strategy-2002-2012>

⁶ <https://www.infrastructure-ni.gov.uk/publications/accessible-transport-strategy-2005-2015>

⁷ <https://www.transport.gov.scot/our-approach/accessible-transport/accessible-travel-framework/>

⁸ <https://www.gov.uk/government/publications/inclusive-transport-strategy>

support both the delivery of a transport system that works for everyone and a just transition to Net Zero. The Committee would welcome further discussion with both DAERA and DfI around our concerns and recommendations.

Appendix A

Comments on the Draft Transport Strategy 2035

Imtac welcomes the publication of a new Transport Strategy for Northern Ireland. A new long-term approach to transport policy and planning here is long overdue with the Regional Transport Strategy having lapsed over a decade ago.

The draft Strategy does have much to commend. It identifies five key issues that are driving change including climate breakdown. The Committee particularly welcomes the inclusion of equality as a key driver of change, recognising that the design of the current transport system based around car dominance has disadvantaged and excluded many including disabled people

The Committee also broadly welcomes the four broad key strategic priorities identified in the draft Strategy designed to tackle the key issues. They build on the direction of travel first set out in the 2021 policy paper, Time for Change, setting out the need to rethink how we design and prioritise our transport and places to prioritise people over traffic and vehicles. This is in line with principles promoted by Imtac in New Approach.

The draft Strategy explicitly mentions accessibility in its vision with inclusivity included in the wording of the second of the strategic priorities. This strategic priority includes a detailed section on Inclusive Transport with a commitment to “build in accessibility as a condition of investment in our transport system and spaces.” The section also specifically mentions the importance of engagement with disabled people when planning and making changes to the transport system. The Committee welcomes the prominence given to accessibility and inclusivity in the draft Strategy and the high-level commitments to embed these into future policy, infrastructure and services.

Imtac also welcomes the recognition in a number of places in the draft Strategy, that certain interventions, such as greater pedestrianisation, may have specific impacts on disabled people. This recognition sits alongside another welcome commitment to seek to mitigate these impacts.

Imtac believes the Strategy fails to deliver in several ways. Many of the measures are weakly worded, vague and non-committal. This includes

the commitment about inclusive transport. There are hints in the document of potential investment in infrastructure and services including the expansion of community transport services and the rail network. There are suggestions of other interventions including tackling issues around pavement parking but there is an overall lack of detail and ambition in the strategy. One explanation for this could be the uncertainty over the funding available as detailed in the final section of the draft Strategy.

It is also of concern to the Committee that climate change objectives are linked to proposals to prioritise the switching of fuels of existing vehicles rather than prioritising more sustainable journeys and reducing the need to travel. Imtac understands that prioritising switching fuels best helps the Department meet its Net Zero targets, but it will do little to change or address the current barriers experienced by Deaf, disabled people and older people trying to access the transport system. Prioritising switching fuels does little to combat the inequality created by car dependency, identified as one of key drivers for change by the draft Strategy.

The Committee is concerned the lack of detail and specific commitments and the prioritising of switching fuels will not offer the transformative change Imtac believe is required to make travel and our places more accessible and inclusive, removing the barriers to travel currently experienced by Deaf, disabled, older people and others. From a Net Zero perspective the approach does not fit with the principles of just transition as many people most impacted by climate change (including disabled people) are unlikely to benefit significantly from the approaches suggested in the draft Strategy, indeed for some the measures introduced to reach Net Zero targets may result in further restrictions to current travel choice.

Recommendations

The Committee believes the draft Strategy contains excellent high level commitments to make travel and our places inclusive and accessible. There are other welcome commitments to build accessibility as a condition of public investment and to engage with disabled people when doing this. However, there is a lack of detail about what will be done and how these commitments will be achieved. Imtac is concerned that the lack of clear detail and the proposed prioritising switching fuels in relation to Net Zero will minimise the opportunities for transformative change through addressing all the barriers that currently prevent Deaf,

disabled, and older people from accessing our transport system and our places.

The Committee believes that there is a need for the Strategy to set out detailed approach to tackling barriers that currently exclude people from travel and places. This will include addressing physical accessibility by embedding best practice inclusive design when investing money in our infrastructure and services. It will include tackling the availability of services, enhanced more accessible public transport including more bus and rail services as well as access to better rural services and services such as taxis. It will include innovation in the way we provide services such as looking at better demand responsive services. It will involve tackling affordability of travel, looking at making free concessions standard for Deaf, disabled and older people on a range of public and other transport services. It will involve ensuring private vehicles remain an option for people who have no other form of mobility. It will mean challenging and changing cultures and attitudes of both those that design and deliver our services and infrastructure through the adoption of social model / rights based training. It will involve adjusting current legislation, policy and practices to address and remove barriers such as issues created by pavement parking. It will involve ensuring that just transition principles are enshrined in our approach to Net Zero and combatting climate breakdown, recognising that the people currently most impacted by climate breakdown are not further disadvantaged by the change we make in response to it. Underpinning the success of all of this will involve embedding the participation of Deaf, disabled and older people at every stage of future policy and service design and delivery.

A ten year Transport Strategy must be ambitious. Travelling and using our built environment is still difficult or impossible for far too many in our society. The Transport Strategy must set out a plan to address the continued exclusion of many in our society. The Committee recognises the scale of the challenge and that is unrealistic to identify and include all the required actions and measures in the Strategy. Our key recommendation is that the revised Transport Strategy contain a commitment to develop an Inclusive or Accessible Transport Strategy / Plan to run alongside the Transport Strategy. Such a strategy will seek to identify the key barriers experienced by Deaf, disabled, older people and others and develop action plans with measures to address these barriers.

This mirrors existing approaches in Scotland, England and shortly to be published in Wales. It also replicates the approach taken with the

previous Regional Transport Strategy. The Accessible Transport Strategy published in 2005 was ground breaking, however the limited implementation of its policies does provide lessons for any future similar strategy / plan.

Resources will always be key to delivering an transformational change. Whilst the Committee recognises the competing demands for resources and challenging financial outlook, we believe there are other sources of income generation that the draft Strategy has not included. Our second recommendation is that the revised Strategy look at wider measures to generate income for investment in services and infrastructure including measures such as road user charging and parking levels.

Conclusion

Imtac thanks the Department the opportunity to comment on the draft Transport Strategy 2035. The Committee welcomes the high level commitments in the draft Strategy around accessibility and inclusion but feels there is a need for detailed measures aimed at tackling the exclusion of many disabled people from travel and our places. We are therefore recommending an Inclusive / Accessible Strategy be developed to run alongside the Transport Strategy. We welcome the engagement with the Department to date and look forward to further discussions and engagement as the Strategy is finalised,