



## **Comments from Imtac on the Department for Transport Accessibility Action Plan Consultation**

**November 2017**

Imtac is committed to make information about our work accessible. Details of how we can do this and how to contact us are included on the next page.

## **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. These formats include:

- Large print
- Audio cassette or CD
- Daisy disc
- Braille
- Electronic copies on disc or via email in PDF or word
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We will also provide information about our work in other languages if you require this.

If you would like this publication in any of the formats listed above or if you have any other information requirements please contact:

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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 key transport professionals. Its role is to advise Government and others in Northern Ireland on issues that affect the mobility of older people and disabled people.

The aim of the Committee is to ensure that older people and disabled people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Infrastructure in Northern Ireland.

## **General comments**

Imtac welcomes the opportunity to respond to the Accessibility Action Plan consultation. Whilst devolution means that many of the issues raised in the Action Plan are the responsibility of Government in Northern Ireland, it is important for the Committee to respond to the consultation. The Department for Transport (referred to hereafter as the Department) retains a UK wide remit in important policy areas such as air and sea travel. In addition to this devolved administrations, including in Northern Ireland, continue to rely on the Department to take the lead in developing guidance and standards relating to accessibility. Finally many disabled people travel from Northern Ireland travel to Great Britain so will benefit from any changes arising from the Action Plan.

Imtac recognises there has been significant progress over the past two decades in making the transport system more accessible and inclusive. Legislation and investment has undoubtedly increased travel choice for disabled people and older people. However as the Action Plan illustrates significant barriers remain, preventing disabled people from accessing transport and travel on equal basis to others. The Committee welcomes the recognition by the Department of these continuing inequalities and particularly welcomes the commitment by Minister Maynard to ensure

disabled people “have the same access to transport and opportunities as everyone else.”

In order to do so, however, Imtac believes that the Department needs to act on areas where the Action Plan has identified an issue or barrier but failed to identify an appropriate action. In some cases no action is proposed, in others the Department requests more information and in others there is an over reliance on encouraging voluntary compliance with good practice. In order to strengthen the Action Plan Imtac recommends that the Department make changes in three general areas.

Firstly Imtac believes that disabled people themselves are best placed to advise on issues that affect their lives. The Department should amend the Action Plan to ensure that disabled people have an active part in every aspect of the Action Plan and are provided with equal opportunity to that of policy makers, regulators and providers in contributing to the development of policy, proposals and projects. DPTAC will clearly play a key role in this process but the Action Plan should also commit to involving more organisations of disabled people and individual disabled people.

Secondly whilst much can be achieved through changing the way services and policies are delivered there are areas of the Action Plan where change is dependent on investment and resources. This is particularly true of infrastructure programmes such as Access for All. It is unlikely that Government will meet its commitment to make travel accessible to all, if there is not a commitment to increase investment in accessible infrastructure.

Finally it is the lived experience of disabled people that encouraging change through voluntary compliance with standards or guidance has limited success. Much of the positive change of the last few decades has been driven by legislation and regulation. Whilst the Committee does not discourage Government from seeking to promote and encourage best practice, requiring change through strengthening legislation or regulation must always remain an option. By way of example Imtac believes the Department could make the provision of a Changing Places Toilet facility

a mandatory requirement in any future major new transport project or refurbishment.

## **Specific comments**

Imtac will be addressing many of the specific issues covered by the Action Plan with the relevant Northern Ireland Government Departments. However the following issues have UK wide importance.

### Sea and air travel

There are three key issues the Department must address in relation to disabled peoples experiences of sea and air travel. Firstly the Action Plan does not mention the impact of Brexit on the rights of disabled people in relation to sea and air travel. Secondly the work of the Consumer Council in Northern Ireland has indicated that many disabled people are unaware of their rights when it comes to sea and air travel. Finally based on feedback from disabled people, the Consumer Council has identified a lack of consistency in the delivery of regulation by airports and sea ports, operators and individual members of staff as the major issue for disabled people when travelling by air or sea. The priority for the Department must be to ensure that disabled people receive a consistent and quality service from both airports, airlines and ferry operators and that assistance is more tailored to individual requirements.

### Shared Space

The concept of shared space is controversial across all regions of the UK with the majority of disabled people and their organisations, including Imtac, expressing serious reservations about schemes. Rather than awaiting the CIHT Review, Imtac backs the recommendation of the Women and Equalities Committee Report into Disability and the Built Environment calling for the Department to revise and replace its 2011 guidance on shared space. This should be included in a revised Action Plan.

### PSVAR/Vehicle standards

PSVAR has been beneficial in changing bus fleets across the UK, moving from a situation where there were relatively few buses accessible to disabled people to the current situation where most buses and coaches meet minimum accessibility standards. However even at the time of development PSVAR had limitations and over the past decade or so the population has changed with, for example, wheelchairs in general becoming larger. Imtac believes it is important that standards are periodically reviewed and improved on to reflect the current requirements of the population. The Committee recommends the Action Plan contain a commitment to review PSVAR. The Committee also recommends that the Department also look at introducing accessibility standards for small minibuses as services delivered using these vehicles are disproportionately used by disabled people and older people.

#### Involvement of devolved administrations

The Action Plan contains some welcome proposals to review and revise guidance documents such as Inclusive Mobility and Guidance on the Use of Tactile Paving as well as looking again at Blue Badge eligibility. These actions have a UK wide dimension and Imtac recommends that the Action Plan contain a commitment to work with devolved administrations, and disabled people and older people in those administrations, when undertaking reviews.