



**Comments from Imtac about the Draft  
Investment Strategy Northern Ireland 2050  
(April 2022)**

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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**

Imtac is a committee of disabled people and older people as well as others including carers and key transport professionals. The role of the Committee is to advise Government and others in Northern Ireland on issues that affect the mobility of Deaf people, disabled people and older people.

Imtac's aim 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 (hereafter referred to as the Department).

## **Background**

Disabled people make up over 20% of the population of Northern Ireland, a higher percentage than any other part of these islands. There is a strong correlation between age and impairment, and with projections for an increasingly older population in Northern Ireland, it is not unreasonable to suggest that the numbers of disabled people are likely to increase in the future.

As indicated in the EQIA accompanying the Draft Strategy all evidence shows that disabled people experience inequality and discrimination in accessing key services and undertaking everyday activities compared to others in our society. Some of these inequalities are demonstrated by the following key statistics:

- Northern Ireland has the lowest levels of employment of disabled people and largest employment gap between disabled people and non-disabled people of any of the UK administrations
- Northern Ireland has the lowest levels of educational achievement for disabled children and the lowest levels of participation of disabled people in higher education of any of the UK administrations
- Disabled people in Northern Ireland experience greater difficulties accessing transport and make significantly fewer journeys than non-disabled people

- Disabled people in Northern Ireland are much more likely to experience digital exclusion compared to non-disabled people
- Disabled people in Northern Ireland are less likely to participate in sports, arts, cultural and leisure activities compared to non-disabled people
- Disabled people in Northern Ireland are underrepresented in public life
- Disabled people in Northern Ireland are more reliant on key services such as health and social services to live independently and be part of the community compared to non-disabled people
- Disabled people are more likely to live in social housing, in housing that is not suited to their needs and to become homeless because of lack of appropriate housing
- Disabled people in Northern Ireland are more likely to live in poverty compared to non-disabled people and disabled people living in other parts of the United Kingdom
- Disabled people have been one of the groups in society most impacted by the pandemic and statistically more disabled people have died from COVID-19 than any other part of society

As previously indicated, there is a strong correlation between disabled people and older people. It also needs to be recognised that the inequalities and discrimination experienced by disabled people also impact in many cases on families and carers to.

### **The importance of investment in infrastructure**

Physical and digital infrastructure is key to a fair and equal society. It enables people to have choice in where they live and where they work. It enables people to get an education, undertake training and participate in lifelong learning. It enables people to access key services including our health services. It enables people participate in our community including social, leisure and sporting activities.

Disabled people are not disabled by their condition or impairment, they are generally disabled by the way we design society, including how we

design our infrastructure and our services. Historically our infrastructure was designed without input from the disabled people who would use it, resulting in a series of barriers that prevented disabled people from undertaking everyday activities and participating fully in society.

There have been some positive changes in this situation over the past two decades. The Disability Discrimination Act (1995) has driven improvements to the accessibility of key infrastructure, including access to transport and buildings, but even the most cursory assessment quickly identifies that we still have a long way to go before disabled people can access society, including services and everyday activities, on an equal basis to others.

As with most other organisations of disabled people we are realistic about the scale of the challenge and the timescales involved in moving towards a fair and equal society. We firmly advocate that disabled people have the right to access society on an equal basis to others, but we recognise that given the scale of investment required there will need to be a progressive realisation of this right. To deliver rights, it is essential that we fully maximise the benefits of future investment in our infrastructure to deliver benefits for all in our society. This is particularly important because many infrastructure projects have a long lifespan, with decisions made now determining whether we remove or maintain existing barriers for decades to come.

It is essential that any Strategy looking at long term investment in our infrastructure recognises the inequalities that currently exist for all sections of our community and commits to removing these inequalities as a condition of spending public money in the future. For Imtac this means recognising the value and benefits of inclusive design in ensuring investment works for all.

Imtac has extensive experience of working with Government and others in the development and delivery of infrastructure projects and services associated with investment in infrastructure, stretching back over 20 decades. Chief amongst many examples of successfully delivered inclusive infrastructure projects, is BRT / Glider, designed and delivered in genuine partnership with Deaf people, disabled people and older people. It is cited in the draft Strategy as, and remains, an exemplar in ensuring that investment in infrastructure delivers for everyone through implementing inclusive design standards.

There have been, however, many other examples where accessibility and inclusion were not prioritised and viewed largely as an irrelevant, 'add on' or 'nice to have' option. When this happens, we lose an opportunity to deliver beneficial change for everyone in society. A recent example of this was the decision by Translink to replace its Goldliner fleet with the same high stepped coaches, ensuring that inter-urban travel retain the physical access barriers that make their use difficult or impossible for many disabled people and older people for the next decade.

## **Comments on the Draft Investment Strategy**

The Committee only became aware of the current consultation in recent weeks, following notice of an engagement event (which subsequently did not take place) from the Department of Communities. A review of the consultation materials appears to indicate that there has been minimal engagement with disabled people in the development of the draft Strategy. From an Imtac perspective this is an unacceptable omission that must be rectified before the Strategy is finalised.

It is perhaps unsurprising, therefore, that the draft Strategy contains no mention of disabled people, other than one reference to people with a learning difficulty. This is despite, as previously mentioned, the associated EQIA specifically identifying the crucial impact of the issues covered in the Strategy on the lives of disabled people (and by association their families and carers). The Committee acknowledges that the draft Strategy does recognise the challenges presented by an ageing society. However, without recognising the correlation between age and disabled people it is unlikely the Strategy will deliver the response this challenge necessitates.

It is the experience of the Committee that a Strategy that fails to acknowledge that disabled people exist will inevitably fail to deliver for disabled people (including many older people as well as families and carers). Given the huge importance of the Investment Strategy in shaping our society for the next 3 decades, it must not be published without significant changes, acknowledging both statutory and moral obligations to ensure that public and private investment in our infrastructure benefits everyone. We are requesting an urgent meeting with the ISNI team to begin discussions on how this can be achieved.

## **Our recommendations**

Given the limited time available to members to formulate a response and the scale of the change required, the Committee has decided not to submit substantive comments on the detail of the draft Strategy. Our recommendations focus on broad themes we believe need to be woven into the Strategy and reflected in priorities for delivery. These themes form part of a wider strategic document currently being developed by Intac.

The first recommendation is that the final Strategy recognises the importance of involving Deaf people, disabled people and older people at the centre of decision making on infrastructure projects. This was a key factor in the successful implementation of BRT / Glider.

The second recommendation is a shift in culture around how inclusion and accessibility are weighted and prioritised when decisions are made about future infrastructure projects. Fundamental to achieving this is an explicit recognition in the final strategy that access and inclusion are essential to delivering a fair and equal society and provide benefits for everyone.

The final recommendation is the inclusion of a commitment in the final strategy to ensure that public (and private) investment in infrastructure contributes to an accessible and inclusive society. This can only be achieved by adopting the highest inclusive design standards when investing in future infrastructure projects.

## **Conclusion**

Deaf people, disabled people, older people and their families and carers make up a significant proportion of our society, but we continue to be marginalised and excluded in the decisions made by Government and others. As currently drafted the Investment Strategy is a missed opportunity to change this approach and will, potentially, result in existing inequalities being locked into future long-term investment in our infrastructure and services. We do not believe this to be in the best interests of Northern Ireland society and would repeat our request for urgent discussions about how this can be fixed before the final publication of the Strategy.

