



**Community
Transport
Association**

Community Transport Association

**Comment from CTA on the Accessible
Transport Strategy Draft Action Plan 2009-
2012**

July 2009

About the CTA

The CTA is a rapidly growing national charity giving voice and providing leadership, learning and enterprise support to member organisations across the third sector which are delivering innovative transport solutions to achieve social change.

We promote excellence through providing training, publications, advice, events and project support on voluntary, community and local accessible transport.

Voluntary and community transport exists to meet the travel and social needs of people to whom these would otherwise be denied, providing accessible and affordable transport to achieve social inclusion.

CTA's Vision

Our vision is:

Of a society free of social exclusion and injustice where everyone has mobility and access to the services they require.

General Comments on ATS Draft Action Plan 2009-2012

CTA have reviewed the Accessible Transport Strategy Draft Action Plan 2009-2012 and are submitting comments in response to the questions posed in your letter dated 2 April 2009.

CTA has consulted with our members and stakeholders on the ATS Draft Strategy and have included their comments in this response.

CTA commends the work completed through the ATS Action Plan 2007-2009. The strategic objectives identified remain relevant and CTA supports the proposal for those objectives to be included in the 2009-2012 ATS Action Plan.

CTA would welcome a strengthening of the ATS to ensure the actions are delivered across DRD and all government departments with transport considerations. The strategy is of utmost consideration when future policies and programmes are being designed and developed.

CTA Response

- 1 **Improvements to Public Transport provision**
The physical network of accessible buses and trains has improved through investment by DRD and Translink into more appropriate vehicles. However, there is still some way to go to ensure the whole public transport bus network is fully accessible. Many rural routes are not regularly serviced by accessible vehicles unless a request is made in advance by passengers (giving at least 24 hours notice). With further investment the system will not require people with disabilities to have to pre-request transport when this is not a requirement of people without disabilities.
- 2 **Bus Depots and Bus Stops**
Investment needs to continue to improve bus depots and bus stops across Northern Ireland. Older people and people with disabilities need to be able to safely and easily use public transport from specified depots and bus stops. Vehicles suitable for urban transport are not always appropriate for use in the rural setting where there are few pavements and boarding takes place from a grass verge. A review of all bus stops in rural areas is required to ensure all stops are accessible. The review should look at lighting, availability of timetable and if stop has any protection from the elements. CTA recommends a review of bus stops across the whole of Northern Ireland to highlight and map where accessible stops are located and for plans to improve all others are in place.
- 3 **Consultation**
While MIU has improved its consultation with older people and people with disabilities there needs to be more commitment and insistence

that all transport related services are consulted on before policy design and delivery is completed (P04 A01). Prior to investment and commitment to deliver new or alter existing services (e.g. introduction of Dial a Lift in rural areas, amendments to Door-2-Door in urban areas, review of Easibus services or removal of specific rural routes) public consultation should be completed. The community should be involved in design of services to ensure proposed solutions will meet need. Designers and developers should have to involve other stakeholder organisations such as IMTAC, CTA, NICVA, Age Concern/Help the Aged/ Mencap/ Disability Action/ etc.

4 **Attitudinal Barriers and Communications**

There needs to be an improvement in the government's activities undertaken to address attitudinal and psychological barriers that prevent or discourage older people and people with disabilities from using transport services and facilities that are available to them (Strategic Objective 5). CTA supports a public awareness campaign led by MIU not individual transport providers. Effective promotion of public transport as an inclusive solution will provide an awareness of services available to older people and people with disabilities but will help to create awareness services are inclusive across the whole community.

MIU is best placed to develop, with stakeholders, an interdepartmental and cross departmental marketing strategy. Investment from relevant government departments into a centralised promotional campaign will be more effective than funding individual transport providers who have already demonstrated little or no practical promotion of accessible services. MIU should co-ordinate accessible communications to ensure all formats are provided rather than advice transport providers to include option in their individual marketing programmes.

5 **Buddying scheme**

CTA would like to see a review and publication of a report on the Buddying scheme (P25 A07). The scheme originally developed in conjunction with Belfast Healthy Cities had potential to introduce or re-introduce older people and people with disabilities to the public transport solutions available in their local area. The pilot has been expanded outside Belfast but is changed to help people to make use of the Urban Door-2-Door system. CTA would like to review what travel training is delivered in that scheme, how many people have availed of the Buddy service and have been able to move on to independent travel, which forms of public transport they now use and how the scheme has developed social investment opportunities (volunteer recruitment and retention, use of older people / people with disabilities to act as Buddies and number of volunteers trained to deliver travel training). CTA are keen to explore the social value of the scheme and potential learning opportunities that could be developed across Northern Ireland.

CTA would like to work with MIU to provide travel training opportunities across the range of transport providers. CTA has a travel training

agenda and trainer's courses that could be adopted to be rolled out as best practice across Northern Ireland.

6 Improved partnership working

ATS should create a Transport Forum where all providers are required to attend at least 2 meetings per year. The forum will ensure best practice; training and quality of service delivery are openly discussed and agreed. The public expect an accessible, quality and professional transport network. Government expect the same. Do all service providers meet that need and are aware of the expectations required through their services? An ATS action should include the formation of open dialogue across providers of publicly funded transport services to ensure funder's standards are maintained and understood across the whole provision.

There should be better use of stakeholders to provide support in other areas. CTA are listed in P04 A02 as providing guidance and advice on vehicle design, service co-ordination, better information provision, training standards etc in relation to CT operations. The effective, quality services provided by CT in Northern Ireland is testament to the work provided by CTA. The CTA has not however been consulted with on vehicle design, service co-ordination, information provision or training standards in other transport areas. The ATS should build partnership co-operation and learning by involving previously recognised stakeholders in more areas of the ATS.

7 Driving standards and training

CTA would like to see enforcement of P06 A01 to ensure all drivers and frontline staff providing public transport takes regular disability awareness and equality training. ATS has the opportunity to ensure transport funded by public money is provided by appropriately trained staff and for this to be included as part of the terms and conditions for funding.

ATS should add an action requiring all departments to add to terms and conditions of funding drivers of larger buses providing public transport must take a disability awareness/equality module through the new Driver's CPC periodic training. Only by building in this requirement will any positive changes be effected across the public transport system. As the Driver's CPC license and periodic training must be taken by drivers of all large passenger carrying vehicles there is no additional cost for government to insist such customer focused training is required by drivers and providers of publicly funded transport. Rather than indicating a commitment to deliver training to staff all public transport providers must be required and evidence a nationally recognised qualification has been taken and training maintained. If transport providers are not willing to invest in the safe carriage and care of passengers with disabilities or older people then that provider should be excluded from public transport service provision.

8 **Concessionary Fares**

CTA welcomes the action (P30 A01) where expansion of concessionary fares will be reviewed. Concessionary fares are not currently available for passengers of Community Transport vehicles. Passengers avail of community transport because they are unable to access or avail of the conventional public transport system or they use community transport to link them to the public transport network. The passenger is not however able to benefit from concessionary fare until they use a Translink vehicle. This has resulted in an inequitable concessionary fare system. If you live on a Translink route then you can avail of a concession. If not then the publicly funded alternative mode of transport is not deemed to fit into the concessionary fare model.

Concessionary fares for people with disabilities needs to be completely reviewed. The SmartPass application process is not available in alternative formats. People with disabilities and in particular people with learning disabilities are asked to provide proof of identity by travelling to a bus station with several forms of ID which simply can not be produced. Many people with learning disabilities will not have a bank statement or utility bill in their own name or have a driving license or passport – how then are they expected to prove their residential address? Why can their parent or guardian's details not be used? The system has and does not consider the issues relevant to a person with disabilities.

Similarly an older woman who has never had a driving license with all her household utility bills in her husband's name is not bale to prove residency. The application process must take into consideration the needs of the people it is meant to assist.

Through consultation a more relevant and effective system should be introduced during the life of the new ATS.

9 **Economic Environment**

CTA is concerned the current financial situation will see many proposed actions delayed or shelved due to lack of resources. The ATS needs to have more power and must be taken into account at design, development and investment negotiations. Only when government commits to an accessible shared future can further improvements be made through ATS.

CTA propose DRD review:

How the ATS has been implemented across all departments
Requirements from and monitoring of transport providers to ensure all services include accessible; communication, delivery (including driver and front line staff training), appropriate vehicle provision and consultation with passengers.

Additional Inclusions for consideration in the ATS Draft Strategy 2009-2012

CTA propose the following additions to the Draft Action Plan for 2009-2012

1. Resources for ATS

MIU to be tasked with securing resources to implement the ATS from DRD and the NI Assembly. The only fault of the ATS has been a dependence on other departments and strategy's to acknowledge and implement ATS actions. With investment MIU will be better placed to ensure the Action Plan is implemented.

2. Research

Research into accessible transport provision across Northern Ireland. The ATS should include a review of the range and type of accessible transport already available across Northern Ireland against the current population data. This should look at: public transport, community transport, private coach transport, taxis, rail and ferries (e.g. Strangford/Portaferry and Rathland ferry). By producing a map of accessible options across the region ATS can help all government departments focus investment and training in areas where accessibility should be improved. Funding for this research should come from DRD, DHSSPS and DEL. Research and the ultimate report should be managed by MIU but delivered by a mix of resources including Translink, CTA, Transport planners, NISRA and so forth to ensure a complete picture is known and will link into the next census data (2011).

2.1. Research into the needs of people with disabilities and older people.

The needs of older people and people with disabilities have changed and continue to do so in light of our aging population, developments in healthcare and disability living tools.

2.2. The ATS needs to review and research the individual needs of people with disabilities to ensure government led transport solutions are appropriate. By using the database of people registered as disabled (in receipt of higher rate of benefits) would be an initial starting point for the research. Included in the review should be – SmartPass application process (both for older people and people with disabilities), concessionary fares, appropriateness of current fleet of accessible vehicles (bus and rail), types and models of wheelchairs used and transport requirements, communication needs, use of public transport, residential location (urban/rural), requirement for passenger assistant/s, travel patterns, reason for travel, etc. The research should look to how and why people use public transport and what reasons there are for not using public transport. The research should highlight opportunities of solutions that will improve and make more effective accessible transport provision in Northern Ireland. The research will also update government knowledge on the needs of people with disabilities.

2.3. Research should take into consideration all forms of transport supported by public funds. This will review transport provided outside DRD such as Education and Health transport. The research could lead to the development of a cross departmental approach to the future of transport provision and integrated transport planning.

2.4. CTA is very keen to work with MIU on this project and welcomes the opportunity to discuss the potential government knowledge bank from this action.

3. Partnership working

ATS should have an action requiring all planned and development of transport solutions to include element of interdepartmental and cross department communications to give rise to furthering partnership working. This will ensure the various government department sections communicate openly sharing integrated solutions to create more effective transport provision across Northern Ireland. The public benefit from a shared agenda will see a reduction in overlapping or contradicting transport schemes. Through ATS the government has an opportunity to break out of 'silo' planning ensuring efficiencies are shared not only within individual government departments but across all government departments. The ATS has an opportunity to bridge all departments by creating guidance on how to ensure accessibility through shared provision.

4. Accessibility of Private Coach / vehicles

4.1. The OFMFDM removal of Part III exemption from Private Operators will require investment within the private sector for accessible vehicle alternatives. ATS should add an action to review the DRD grant for making vehicles accessible to consider extending this to all transport providers rather than only those vehicles / organisations linked to the RTF.

4.2. Similarly training and education for these operators will be required to ensure the same quality and level of accessible services is provided as is required from Translink or Community Transport.

4.3. CTA would like to develop a training package or accessible quality standard, in conjunction with MIU, to ensure these private coach operators and drivers will maintain the same recognised level of service as is provided by Community Transport.

5. Community Planning

All too often planning does not consider the future requirements of a community placing undue pressures on infrastructure such as transport, education and health. Transport and accessibility need to be considered from the initial planning stage. ATS should add as an action all community planning needs to consider transport (in the present and for the future population needs). Given the population of Northern Ireland is ageing the needs of that future population needs to be considered and planned for

now. ATS should add as an action MIU production of accessibility guidance for planners of both transport and of community development (housing, location of health and education services, infrastructure etc).

6. Review of the s10b operators permit and the effects on accessible transport provision

The ethos of the Community Transport movement is to provide affordable, accessible transport operated by and for the community. Community Transport meets the community's transport needs filling the gap where people find it difficult to access conventional or public transport. Community Transport operates under the s10b permit which is currently being reviewed by DRD/DOE. There is a threat the permit could be removed or altered so significantly the community may no longer be able to meet local needs. There is pressure for community transport to deliver services for government under contract rather than apply for grant assistance to meet the transport needs highlighted from within the locality / community. Substantial changes to s10b will increase social exclusion, increase rural isolation and create a community where older people and people with disabilities have no alternative transport solutions. CTA encourage ATS to add an action to ensure accessible service provision led by the community is maintained and encouraged. For over 10 years Community Transport has received government grant aid paid through the DRD to ensure gaps in transport provision could be met. Should the review of the s10b result in a dilution of community transport's ability to meet need then who will support the aims of the ATS, who will provide innovative accessible transport solutions to meet those considered the most vulnerable in society? The Community Transport sector is an integral function of accessible transport provision in Northern Ireland. ATS should include an action to ensure the government, and DRD in particular, retain alternative methods of transport delivery to meet the individual's and small community group / association's access needs.

7. RPA

During the life of this Action Plan there will be many changes in Northern Ireland. ATS has the opportunity to provide education and training for the new Council structures under the Review of Public Administration The future of transport management in Northern Ireland is as yet unknown. At present transport is the remit of DRD however this could change. Should transport move out of DRD and into Council responsibility ATS should prepare a training programme to ensure Councils and their officers are aware and prepared for accessible transport strategy and provision.

8. Review of Public Transport

The Review of Public Transport is due for consultation late 2009. There should be an action within ATS to ensure future public transport provision maintains as a primary consideration inclusive, accessible transport across Northern Ireland.

9. Regional Transportation strategy

MIU to ensure ATS is integrated into the Regional Transportation Strategy to ensure accessibility is at the forefront of planning and development of the Northern Irish transport agenda.

10. Transport provision post 2012

10.1. The Rural Transport Fund is due for review and is expected to conclude in its current format March 2012. An action for ATS should be the continuation of community and voluntary sector transport solutions in order to meet the needs of older people and people with disabilities who find it difficult to access conventional or public transport.

10.2. The ATS action should include the benefit of community led transport solutions and the possibility of amalgamating both RTF and TPPD into one funding unit to ensure both rural and urban dwellers have the same access to services provided through one government programme.

10.3. CTA would be best placed to provide support for ATS on the involvement of the community and voluntary sector as a transport supplier for future provision.

Contact Us

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