

20 June 2006

Ms Geraldine O'Neill  
Sub Regional Transport Plan Team  
Department for Regional Development  
Transport Unit  
Roads Service  
Room 3-29 Clarence Court  
10-18 Adelaide Street  
BELFAST  
BT2 8GB



Dear Ms O'Neill

**Re: Northern Disability Alliances Response to:-**

**The Department for Regional Development  
Draft Sub-regional Transport Plan 2015**



The Northern Disability Alliance was set up in 2005 to bring disability organisations, people with disabilities and carers together to promote the social, economic, political and social inclusion of disabled people in the Northern area of Northern Ireland.

The Alliance welcomes the opportunity to respond to this Plan and we commend the Department for Regional Development for many of the proposals contained within it.

The Alliances believe that the Department could have started the process of consultation a lot earlier to give groups the time to consult with their own members and other organisations. The involvement of disabled people at an early stage could have resolved some of our reservations about the Draft Sub-regional Transport Plan 2015.

The final Plan should reflect other Department's policies, for example the, DRD's Accessible Transport Strategy.

The need to highlight the particular barriers the present transport system presents to older people, people with disabilities and others with reduced mobility.

The Alliance welcomes the proposed improvement of key pedestrian routes in towns and city centres amongst other benefit links to other transport facilities. This is an essential component of providing access to transport chains envisaged by ATS. However, the Plan should have addressed the present problem of footpaths not being kept clear so that people with disabilities have no obstructions when going about their daily lives. We need some Department to take responsibility for enforcement.

We think that the Plan should have looked at existing gaps and needs, which was identified in the recent research carried out by SRTP. For example, the Draft plan does acknowledge that older people and people with disabilities are often prevented from using bus services because of the lack of accessible buses on rural routes. We agree with the assessment, the Alliance would argue that similar difficulties are encountered by people with disabilities and older people living in all areas that the Draft Plan covers, while accepting the fact that all people living in rural areas have major barriers in provision of transport in general.

More reference should be made to older people, people with disabilities and those on a low income.

The Department should be to the fore in the promotion of information in accessible formats.

The plan should prioritise a minimum level of demand responsive travel service in rural areas and accessing these improved services should be made easier by providing information which is easily understood and highlighting the services widely throughout the Community so that people know about the service. We would suggest that local networks be used to promote the service.

Under "Bus Measures" page 63, 6.3.9 the Alliance cannot understand this statement. If it is based on the principle of "demand response" how then can you restrict this to four

return journeys per month? Then it goes on to state that if have you mobility difficulties you will be entitled to one additional return journey per month. If the Department is stating that for people with disabilities living in rural areas can only use the service five times per month, the Alliance would strongly object too this. We believe this is core to the transport needs of disabled people living in either rural or urban areas of Northern Ireland.

Under Transport Programme for People with Disabilities, page 58, 5.7.12 the Department is proposing a minimum level of door-to-door services. What about those people living in areas below 5,000? We also would advise that information should be provided on all Accessible Transport Schemes so that disabled people can use them when they are in the area.

The Department has made no reference to the Government's proposed Review of Public Administration. Transport will be key to any community planning process proposed within the Review. We would suggest that the final Plan should reflect this.

We also proposed that local Community Forums be established with the focus on Transport and Mobility. These Forums would monitor and evaluate the final Plan at a local level and will be able to work with the Department to ensure that the Plan meets the needs of local people.

It would also be able to explore new ways of meeting the needs of disabled people and, if successful, could pass this model on to other areas. It would also be the platform for disabled people to influence any local transport plan that may come out of the Community Planning Process.

In funding door-to-door transport the Alliance is of the opinion that quality should come before quantity. The fact that a transport provider carries x number of passengers as opposed to y by another provider tells nothing about the service. For example, x could be lifting groups while y is providing for individuals.

The Alliance notes that Shopmobility services partly funded by the DRD in some urban areas covered by SRTP, are not included in the assessment of current services. Shopmobility provides a valuable service to people with disabilities and is a vital part of the mix of services required to make the transport system accessible.

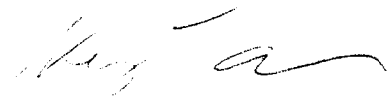
The Plan should be amended to acknowledge the important role of Shopmobility schemes.

Proposals for Highway Management need to explicitly acknowledged, for example, the needs of Blue Badge holders.

Finally, the Alliance is concerned as to why there is no reference to Cross-border transport. Many people live in the border regions of the Island of Ireland and cross border transport is an important issue for them.

If you require any further information please do not hesitate to contact me.

Yours sincerely



**Kenny McAdams**  
Regional Community Development Manager