



**Response to the Department for Regional Development
Accessible Transport Strategy
Draft Action Plan
2009-2012**

About USDC Ltd

1. The Upper Springfield Development Company Ltd hereon in referred to as USDC Ltd welcomes the commitment of the Department for Regional Development to provide an Accessible Transport strategy and would like to commend the Department for the inclusive approach it has taken to the consultation around the draft Action Plan. We believe this approach represents good practice and should be used on a more consistent basis by both DRD and other Government Departments. The process also meets policy 4 of the ATS.

2. As the lead strategic development organisation in the Upper Springfield area, the USDC Ltd is uniquely placed in offering a holistic range of fully integrated programmes that facilitate the development of local people and the local community infrastructure. We add value through our involvement, at a strategic level in economic development, personal development, disability, women, young people, employability, neighbourhood regeneration, community development, and health and well being. We have extensive experience in engaging with those hardest to reach and furthest removed.

3. The organisation delivers services on the ground to local people through a series of integrated programmes. One such programme, provides community transport and works in partnership with the Action on Disability Project another programme within USDC Ltd to address the difficulties experienced by local people with disabilities and older people within the community. It is our experience that in addressing the barriers to accessible transport for people with disabilities and older people particular attention must be paid to integrating existing services to make a real and significant difference. With this in mind the USDC Ltd wish to make the following points in response to the strategy document currently out for consultation:

General Comments:

4. USDC Ltd supports and welcomes the significant investment made by Government here in transport services. Investment in buses, trains and infrastructure means public transport here is physically more accessible.

5. In addition Government has invested in other services such as door2door, rural transport and concessionary fares. The ATS recognises that investment alone is not enough. The Strategy recognises that all the barriers that make using transport difficult must be addressed in order to maximise the impact of investment for disabled people and older people. It sets out a framework to achieve this through implementation of policies many of which do not require resources only a change in custom or practice.

6. In order for investment in services to be deemed successful disabled people and older people must experience an improvement in travel choice and mobility. USDC Ltd has talked to many disabled people and older people and the consensus of all these discussions has been that whilst many things have improved people still experience unacceptable difficulties accessing transport. We believe this feedback reflects the fact that investment here has not been maximised. It is the key recommendation of our response that rather than look at renewing the Action Plan for the next three years the Department needs a more fundamental look at how the Strategy can be implemented more holistically in the future.

7. Without meaningful targets that are measurable it is impossible to comment on whether the strategy is adequate or will have any long lasting impact on the lives of disabled people and older people.

Comments on the achievements 2007-2009

8. The draft Action Plan sets out on page 10 a number of key achievements of the ATS over the past two years. Many of these achievements are not directly attributable to the Strategy. Actions such as investment in buses arise from wider strategic priorities set by the Regional Transportation Strategy. Improvements are

also driven by legislation, particularly the Disability Discrimination Act, which sets minimum accessibility requirements for buses, coaches and trains. These regulations mean that services will improve regardless of the ATS. The list of achievements focuses largely around investment in services not the implementation of policies. Chapter 3 of the consultation sets out the achievements of the 2007-2009 Action Plan. However, USDC Ltd questions how many of these have been fully achieved.

9. For example, the “achievement” around the start of the process to introduce legislation to extend Part III of the DDA to transport services here. This legislation was introduced in Great Britain in December 2006. As Policy 1 of the ATS commits Government here to introducing legislative changes in parallel to elsewhere in the UK, clearly a three year delay cannot be viewed as an achievement.

Where the ATS is working

10. There have been many achievements directly relating to the ATS and there are examples that highlight how the ATS can and is working. These examples also clearly highlight that the Strategy is not about investment in services - it is about maximising investment by ensuring all the barriers that prevent disabled people and older people accessing transport are removed.

Issues such as information, training and developing positive policies are as important as having vehicles people can get on and off easily. Perhaps the most important aspect of each of these examples is the involvement of disabled people and older people in the development of policy and services.

Where the ATS is not working

11. Despite the positive developments to date there are areas where USDC Ltd believe the ATS is not working, or could be improved. This section highlights some of these areas using examples where appropriate.

12. Our position is based on the experiences and feedback we have received from disabled people and older people who tell us

the undoubted substantial investment in transport is not meeting expectations.

13. Translink has received substantial public funding over the past decade. Despite the improving physical access to transport the transition to a more accessible public transport system has been difficult due to other barriers such as attitudinal and the lack of public transport in certain areas throughout the North. For example: USDC Ltd is located in the Upper Springfield area where the only form of public transport is black taxis which do not meet the requirements of the wider community. Disabled people and older people therefore tend to remain isolated or rely on private taxis which cost considerably more and is counter to Policy 16 of the ATS. Moreover, USDC Ltd is aware of the new proposed rapid transport system due to be implemented in West Belfast this however, will once again be restricted to the main arterial routes and does not extend into the most remote parts of the area.

14. With the implementation of Door2door which is a vital service that ensures that those disabled people and older people who cannot access mainstream public transport have an alternative mode of transportation. The Department has invested heavily in door2door and its promotion and as such it has been successful with some 9000 people having joined the scheme to date. Door2Door however, does not meet the needs of the wider community. It is restricted to people aged 80 and over and those in receipt of the higher disability allowance. USDC Ltd is aware that operators have only around 40 vehicles to deliver this service. USDC Ltd is increasingly receiving feedback from local people who find the service difficult or impossible to access. There are growing concerns among the community that perhaps the Department has created the demand for a service that operators will never be able to meet.

15. This poses the question: **How will the DRD meet the needs of people with disabilities and older people who do not meet the criteria of door2door and have no access to accessible public transport?**

16. This highlights the issue of the inequalities existing between rural and urban community transport providers and the lack of recognition of urban CT's in the ATS and the pivotal role they play within the community.

17. It has become apparent to us and organisations such as Imtac that many of the policies within the ATS are not being applied consistently, particularly with regard to the design of important services. Policy 11 for instance requires the Department to promote the use of accessible vehicles on alternative services. USDC Ltd is aware that Imtac has questioned whether the Department is meeting this policy through the delivery of door2door transport using taxis. Imtac has received reports from disabled people who are members of door2door who cannot access these vehicles or can only access them with great difficulty.

18. We have also become aware that the Department created a Travel Voucher Scheme to be used by large groups in rural areas. Whilst vehicle accessibility was mentioned in the criteria for operators it was not a requirement. As a result few if any of the operators currently involved in the scheme provide vehicles that are accessible. This will mean that many disabled people and older people cannot use a publicly funded service aimed at specifically improving their mobility. The same scheme also does not require any of the operators to train staff around disability equality or awareness. This is counter to Policy 6 of the ATS.

19. This poses the question: **Why are 10b permit holders excluded from bidding for contracts?**

20. Another area that highlights imbalance in implementing the ATS policies around the transition to an accessible transport network is the current support for a Travel Buddy Scheme by DRD. Policy 25 of the ATS recognises that disabled people and older people will require additional support to address concerns about using new transport services. Travel training has been used elsewhere, and by some organisations here, to support disabled people and older people to use conventional public transport independently. The Buddy Scheme here initially started as a pilot working with older people to encourage use of bus services. At the direction of DRD the focus of this pilot was changed to encourage people to use door2door services in certain areas. We do not see the rationale for supporting a scheme with such a narrow focus and we do not believe this scheme fits within the framework set by the ATS.

21. Investment in alternative services such as door2door has been a good thing but we are concerned that the imbalance in the promotion of these services as opposed to better bus and rail services is placing an unrealistic demand on services and is not maximising the investment made in these other services. By way of illustration nearly 90% of Metro bus services currently meet accessibility standards as do all town bus services in places outside Belfast. Further investment may mean we have a fully accessible bus network by 2012. New trains on order will mean the entire network here will meet accessibility standards by 2012. This means that the public transport network is and will be more accessible. Yet collectively little has been done to promote this. USDC Ltd believes that many of the 9000 members of door2door could be benefiting from these improved services freeing up this vital service for those who do not have this choice.

22. Other areas and local authorities do provide better examples of utilising resources to maximise the benefits of investment in public transport services. In London for example the bus network is 100% accessible. Transport for London has recently changed its approach to Dial-a-ride services for disabled people with a view to the service acting as a stepping stone for many dial-a-ride users to use mainstream buses. This approach is complemented by travel training schemes. This approach should mean that Dial-a-ride services are more available to disabled people who cannot access conventional bus services.

23. Working with disabled people and older people is at the heart of implementing the ATS. Section 5.3 of the ATS sets this in context highlighting the key role Imtac has to play in the process. Policies 3 and 4 of the strategy set out the framework for future engagement with disabled people and older people. Policy 3 seeks to clarify the role and importance of Imtac as the main source of advice to the Department and others. Policy 4 is a commitment to consult with older people and disabled people generally around policy and service developments. However, Imtac and others are too often not consulted around key policy and service developments. As a result Imtac often has to raise issues with the Department after services have been introduced. This approach is far from ideal as it makes positive change more difficult to achieve.

The way forward

24. Working with disabled people and older people is at the heart of implementing the ATS.

25. To meet Strategic Objective 3 invest in urban community transport to act as a stepping stone to enable people with disabilities and older people access mainstream buses/trains especially in areas where there is no public transport infrastructure etc. This approach should mean that the Door2Door services will be more available to disabled people who cannot access conventional bus services.

Conclusion

26. USDC Ltd thanks the DRD for the opportunity to respond to the consultation. USDC Ltd acknowledges the progress that has been made to date through implementation of the ATS and substantial investment in services. Despite this progress we cannot ignore the growing number of disabled people and older people who are telling us things are not improving for them.

Contact:

Ann-Marie McCormick
Upper Springfield Development Company Ltd
689 Springfield Road
Belfast
BT12 7FP

Tel: 028 90 236677

Fax: 028 90 231074

Email: annemarie.mccormick@usdt.co.uk