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9th July 2024

RE: Budget 2024/25 Equality Impact Assessment Public Consultation

The Commissioner for Older People for Northern Ireland (COPNI) acknowledges how a single year budget, and the current funding levels limit the extent to which the Department for Infrastructure can deliver against its objectives. COPNI also acknowledges the overall detrimental impact that a lower budget will have on public service delivery and quality of life for all citizens in Northern Ireland. However, in line with COPNI's duties and responsibilities, this letter offers feedback solely in relation to the several cost-saving measures included in the Department's budget that will have a disproportionate, detrimental impact on older people. Proposed measures are taken from Section 4.11 of the *Budget 2024-25 Equality Impact Assessment Public Consultation* document,¹ with COPNI feedback below:

- i) Translink – 19.4% reduction to funding against its forecast requirements

The World Health Organisation (WHO) cites the value of public transport in supporting older people "to age actively and remain engaged with their community, with access to health and social facilities".² Wider literature also suggests that public transport can support a person's independence, wellbeing, quality of life, and social connectedness.^{3 4} Each of these outcomes are positive and relate to existing policy objectives in Northern Ireland.⁵ The Department should therefore recognise the strategic significance of frequent, and accessible public transport, and its important role in supporting societal wellbeing.

¹ Department for Infrastructure (2024) *Budget 2024-25 Equality Impact Assessment Public Consultation*. Available at: <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/eqia-consultation-budget-2024-25.pdf>

² World Health Organisation (n.d.) *Transportation*. Available at: <https://extranet.who.int/agefriendlyworld/age-friendly-practices/transportation/>

³ Lin and Cui (2021) *Transport and Mobility Needs for an Ageing Society from a Policy Perspective: Review and Implications*. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8625775/>

⁴ UITP (2022) *Public transport benefits*. Available at: <https://cms.uitp.org/wp/wp-content/uploads/2022/01/Public-Transport-Benefits-Mobility-for-YEU-Benefits-for-all.pdf>

⁵ For example, see the Department for Communities [Active Ageing Strategy](#) and the Department of Health's [Making Life Better whole system framework](#)

Public transport is vital for older people. It allows them to stay connected and to participate in society. While cars are the most popular form of transport for all age groups,⁶ both Census and Travel Survey for Northern Ireland data suggests older households are less likely to have access to a car.^{7 8} Older people are also more likely to experience mobility deprivation⁹ and have a long-term health condition,¹⁰ which impacts their ability or willingness to drive.¹¹ Any reduction in frequency or quality of public transport can therefore be viewed as disproportionately impacting this age group over others.

Overall, COPNI strongly advises against any reduction of funding in this area that impacts service quality or frequency. Effective public transport can support outcomes across a breadth of policy areas. It can support the health and wellbeing of our society and help mitigate the growing inequality that has emerged in recent years.¹²

- ii) Essential Road Maintenance – Maintain a limited level of service level for a further consecutive year; and Remove funding for annual programme of footway enhancement on poor footways

The UK's Department for Transport outlines the importance of accessible infrastructure in its best practice, noting that "creating and maintaining an accessible public realm is crucial for ensuring that disabled people are not excluded from playing a full role in society".¹³ The same document highlights the spillover benefits for wider society, "People travelling with small children or carrying luggage or heavy shopping will all benefit from an accessible environment,

⁶ Department for Infrastructure (2021) *Travel Survey for Northern Ireland In-depth Report 2021*. Available at: <https://www.infrastructure-ni.gov.uk/system/files/publications/infrastructure/tsni-in-depth-report-2021.pdf>

⁷ Census (2021) *Car or Van Availability by Lifestage (Household)*. Available at: https://build.nisra.gov.uk/en/custom/data?d=HOUSEHOLD&v=HH_CAR_VAN_TC5&v=HH_LIFESTAGE_AGG15

⁸ Department for Infrastructure (2020) *Travel Survey for Northern Ireland In-depth report*. Available at: <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.infrastructure-ni.gov.uk%2Fsystem%2Ffiles%2Fpublications%2Finfrastructure%2Ftsni-in-depth-report-2020-tables.xlsx&wdOrigin=BROWSELINK>

⁹ Government Office for Science (2015) *How can transport provision and associated built environment infrastructure be enhanced and developed to support the mobility needs of individuals as they age?* Available at: <https://assets.publishing.service.gov.uk/media/5a81973b40f0b6230269820f/gs-15-7-future-ageing-transport-er23.pdf>

¹⁰ Census (2021) *Health Problem or Disability (Long-term) by Age*. Available at: https://build.nisra.gov.uk/en/custom/data?d=PEOPLE&v=DISABILITY_DVO&v=AGE_SYOA

¹¹ Ahern and Hine (2012) *Accessibility of Health Services for Aged People in Rural Ireland*. Available at: <https://www.tandfonline.com/doi/abs/10.1080/15568318.2013.800926>

¹² A higher proportion of the total population and a higher proportion of the older population reporting either "good" or "very good" or "bad" or "very bad" health in 2021 compared to 2011. Calculated using Census (2011) *General health by broad age bands*. Available at: <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.nisra.gov.uk%2Fsystem%2Ffiles%2Fstatistics%2Fce nsus-2011-commissioned-table-ct0551ni.xlsx&wdOrigin=BROWSELINK> and Census (2021) *General health by broad age bands*. Available at: <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.nisra.gov.uk%2Fsystem%2Ffiles%2Fstatistics%2Fce nsus-2021-ms-d01.xlsx&wdOrigin=BROWSELINK>

¹³ Department for Transport (2021) *Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure*. Available at: <https://assets.publishing.service.gov.uk/media/61d32bb7d3bf7f1f72b5ffd2/inclusive-mobility-a-guide-to-best-practice-on-access-to-pedestrian-and-transport-infrastructure.pdf>

as will people with temporary mobility problems (e.g. a leg in plaster), and many older people. Good, inclusive design benefits all users, including those who have non-visible disabilities.”

In Northern Ireland, Census data suggests there is a growing health inequality.¹⁴ Census data also suggests that as we age, the likelihood of developing a limiting long-term health condition also increases. The most common conditions limiting people across the population include long-term pain or discomfort (12% total population, 27% 65 and over), mobility issues (11%, 29%), and shortness of breath or difficult breathing (10%. 19%).¹⁵

Health implications have a significant impact on Northern Ireland’s population’s ability to travel. That is, a fifth of all adults (20%) report difficulty travelling in Northern Ireland due to a physical disability or long-term health problem.¹⁶ This figure increases in older age groups, up to 35% of people over 65. Reduced funding for road maintenance and removal of footway enhancement funding therefore should not be an option for the Department. If roads and footways are not appropriately maintained, the proportion of older people unable to get around is likely to grow significantly, both in the context of degrading infrastructure, and in the context of Northern Ireland’s rapidly ageing population.

- iii) Increase controlled parking zones charge, increase charge for blue badge and turn on all Monitoring Traffic Offences enforcement cameras

Older people are likely to feel the impact of increased fees. Research from Age NI suggests that in 2022 almost 40% of households aged 60 and over were in poverty, or just above the poverty line.¹⁷ Further insight from the All-Party Group on Ageing and Older People highlights that this is linked with spiralling energy prices and the cost of living, and that the issue is more pronounced among older people who are often on a fixed income.¹⁸ It is therefore important to consider what an increase in parking charges means to older people who are on a fixed

¹⁴ A higher proportion of the total population and a higher proportion of the older population reporting either “good” or “very good” or “bad” or “very bad” health in 2021 compared to 2011. Calculated using Census (2011) General health by broad age bands. Available at:

<https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.nisra.gov.uk%2Fsystem%2Ffiles%2Fstatistics%2Fce nsus-2011-commissioned-table-ct0551ni.xlsx&wdOrigin=BROWSELINK> and Census (2021) General health by broad age bands. Available at:

<https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.nisra.gov.uk%2Fsystem%2Ffiles%2Fstatistics%2Fce nsus-2021-ms-d01.xlsx&wdOrigin=BROWSELINK>

¹⁵ Census (2021) *Health Problem of Disability (Long-term) by Age -86 Categories by Health Condition [Various]*. Available at: https://build.nisra.gov.uk/en/custom/data?d=PEOPLE&v=DISABILITY_DVO&v=AGE_SYOA_85

¹⁶ Department for Infrastructure (2021) *Travel Survey for Northern Ireland In-Depth Report 2021*. Available at: <https://www.infrastructure-ni.gov.uk/system/files/publications/infrastructure/tsni-in-depth-report-2021.pdf>

¹⁷ Age NI (2022) *Age NI statement on cost of living*. Available at: <https://www.ageuk.org.uk/northern-ireland/news/age-ni-statement-on-the-cost-of-living/>

¹⁸ All Party Group on Ageing and Older People (2022) *The Cost of Living Crisis and Older People*. Available at: <https://www.ageuk.org.uk/globalassets/age-ni/documents/policy/apg/apg-briefing-cost-of-living-september-2022.pdf>

income and, as outlined, are more likely to be reliant on their car due to long-term health issues.

- iv) Funding of Community Transport remains at the total level provided in 2023- 24, with funding for Assisted Rural Travel Scheme to be provided by the Department for Agriculture, Environment and Rural Affairs

It is important that community transport services within rural areas are maintained. These services act as a valuable “third place” for older people, and therefore deliver social value alongside meeting transport needs.¹⁹ Maintaining rural services and supporting opportunities in rural communities are invaluable in the context of wider rural decline. Research conducted by O’Shea²⁰ suggests that rural decline limits future employment opportunities, which can have a bearing on what services are available in a rural community. While there are a number of DfI projects which will support people living in rural areas to commute, there is also notable outward migration to areas of higher economic activity. Decline in rural activity means there are less private, state, and voluntary services available. Overall, this has a bearing on older people wishing to live and receive services in the area in which they currently live, which should be a consideration of the Department.

Finally, COPNI seeks assurance from the Department that steps will be taken to mitigate any disproportionate impact on Northern Ireland’s older population. The Department must consider how cost saving measures will impact older people, which as a population group are more likely than younger age groups to experience mobility issues, are less likely to use a car, and who live on a fixed pension income. COPNI would welcome, for example, additional concessionary fares in light of increased parking charges to account for the typically fixed income of older people; or targeted roadway enhancement and repair in areas with identified hazards, or on routes between social housing sites accommodating older people and town centres. COPNI welcomed the recent update with regards to the 60+ SmartPass, and the Department’s commitment to maintain funding for Community Transport. These are both significant and appropriate public services, and the positive impact of each should offer meaningful examples to the Department with regards to the need and value of additional

¹⁹ Hagan (2019) *Getting out of the house: the use of community transport as a third place for rural-dwelling older adults*. Available at: <https://e-space.mmu.ac.uk/6237617/hagan%2019%20final%20e.pdf>

²⁰ O’Shea (2009) *Rural Ageing and Public Policy in Ireland*. Available at: https://d1wqtxs1xzle7.cloudfront.net/58532904/a_living_countryside.pdf?1551541120=&response-content-disposition=inline%3B+filename%3DA_Living_Countryside_The_Politics_of_Sus.pdf&Expires=1720427558&Signature=ZaYQEIQI7fkTJ9IM3-5CA0R4eYbSwC5Idep~-p4CS42nHGoAP~TybdJLmJ8aMuMuTYM9cU0Mgi-kluHwAi0fGRZyggHVba~b6HGeQpQNuDt3bhF6F1q9aDwZHbZWcVLzIIUf~scSaGWFv1JRa0xebqRV2npKxO2RzGlse8d6Vqv isBJLaNNX3~3NuXFbnElabRHyrPQzLabHkl~EOusSSn8rv9X21cJXZ70DRTeA0iR4RxzN8QDcpY Gdskp19EA8YVCrMKdhHZ9 aFa0XXtjTUF5MrDexEDYocGv4gYywUHJb3OAoYkiV5l4s2609onysmgkCacrBPXktYg9w8hWCA_&Key-Pair-Id=APKAJLOHF5GGSLRBV4ZA#page=290



Commissioner for **Older People**
for Northern Ireland

mitigations to support older people. Lessons from these schemes should be replicated within the current budget year to limit disproportionate impact on Northern Ireland's older population.

COPNI welcomes further engagement with regards to planning for the current budget year and into the future.

Very many thanks

A handwritten signature in black ink that reads "Evelyn Hoy".

Evelyn Hoy

Chief Executive Officer