



Commissioner for **Older People**
for Northern Ireland

22 May 2025

Department for Infrastructure
James House
2 - 4 Cromac Avenue
Belfast
BT7 2JA

By email: budget@infrastructure-ni.gov.uk

Dear Sir / Madam

RE: DfI Draft Budget 2025-26 Equality Impact Assessment Consultation

I am writing to you on behalf of the Commissioner for Older People for Northern Ireland regarding the consultation of the Department's Budget EQIA 2025-26.

This office welcomes the department's funding increase both in resource and capital budget, as this is a positive thing for older people who rely on the work of the Department for Infrastructure in crucial aspects of their lives. However, while the increase in funding is generally positive news, this is subject to caveats—as the Department itself acknowledges.

This year's proposed resource outcome, for instance, falls exceptionally short in comparison with last year's "forecasted resource requirements", particularly in relation to some of its Arm's Length Bodies (ALBs). Therefore, it seems reasonable to assume that very significant service cuts from the past budget—and relevant works that were halted—are not going to be resolved in the present one.

While understanding the difficult position of the department, the consultation document makes a call for respondents to this consultation to share data, needs, issues or impacts in relation to Section 75 groups that have not been considered in the present EQIA. The aim of this response is to provide some of this information.

Public transport

According to the present Budget, the proposed outcome for the Translink resource budget for the upcoming year is £151.1m, which represents a significant increase of

approximately £7m (5%) in its opening resource budget as compared to last year.¹ This is celebrated throughout the EQIA document, and it is indeed good news that Translink will progress to a significantly better resource position than in the previous year. However, this office must point out that this increase does not mean that Translink is now in a favourable or comfortable budgetary position.

First, we must note that this increase falls significantly short from last year's forecasted resource requirements (£178.7m).² In last year's Budget, this shortfall forced the department to reduce the spending forecasts needed by Translink significantly—by 19.4%—as well as other measures that impacted on older people's access to public transport and safe travelling options, including essential Road Maintenance, funding for the annual programme of enhancement on poor footways, and limitations on funding of Community Transport.³

Therefore, while the position of Translink is better than its opening position last year, it remains significantly below its spending forecasts. Understandably, Translink has approached the Commissioner for Older People for Northern Ireland, requesting this office take part in this consultation... As part of this call, Translink has stressed that “the draft budget resource allocation for Translink for 2025/26 of £151.1m, outlined in DfI's Equality Impact Assessment, represents a reduction in real terms of over £25m on the funding received for 2023/24.”⁴

Similarly, the draft budget capital allocation for Translink in the present year is £241m, which “represents a 12% reduction compared to 2023/24, necessitating delays in capital projects, with a potential impact on asset renewals. This will ultimately increase the resource costs of maintaining aging assets and potentially lead to service degradation”.⁵

It is reasonable to assume that services provided by Translink in a context of reduced funding in real terms will deteriorate. This would represent a direct, negative and disproportionate impact to our older population.

¹ Department for Infrastructure (2025) [Draft Budget 2025-26 Equality Impact Assessment Consultation](#); page 11.

² Department for Infrastructure (2024) [Budget 2024-25 Equality Impact Assessment Public Consultation](#); page 11.

³ Department for Infrastructure (2024) [Budget 2024-25 Equality Impact Assessment Public Consultation](#); page 14.

⁴ This information was provided by Translink as part of their budgetary roundtable event.

⁵ This information was provided by Translink as part of their budgetary roundtable event.

Considering this, the aim of this section is to raise concerns relating to the relevance of public transport and road maintenance for older people, which this office believes have been overlooked by the department in the present EQIA.

First, the EQIA misrepresents to a degree the importance of public transport for older people, particularly when describing the usage of public transport by older people as a proportion of the total population.

Per the 2023-24 passenger analysis, older people make up approximately 17% of Metro passengers, 16% of NIR passengers and 11% of Ulsterbus passengers which equates to an overall 14% of Translink's 78.2m total passenger journeys. This evidence is based on the journeys taken by people over 60 years old who hold concessionary fare passes. This overall percentage compares to the percentage of older people (60+) in Northern Ireland which is 24% of the population based on NISRA population statistics.⁶

This analysis seems to affirm that those most affected by any changes in services of Translink will be age groups that are higher users, such as workers and young people, and the fact that older people are statistically less likely to use these services makes them less likely to be affected by any service reduction.

While it is true that older age groups are less likely to make use of public transport, this is likely due to the fact that people from other age groups have commitments—such as work and study—that require higher mobility. However, this does not mean that public transport is less essential for older people, or that older people will not be disproportionately affected by any service reduction in this area. If anything, the converse is likely to be true..

The relevance of public transport for older people is crucial in many areas of their lives, and this office believes this should be stressed much more emphatically throughout the EQIA. The importance of transport to support older people's independence, quality of life, and to reduce isolation and improve active ageing is widely recognised.⁷ To begin with, there is an statistical link between older age and disability,⁸ and therefore,

⁶ Department for Infrastructure (2025) [Draft Budget 2025-26 Equality Impact Assessment Consultation](#); page 21.

⁷ World Health Organisation (n.d.) [Transportation](#).

⁸ Census 2021. [Age - 12 Categories by Health Problem or Disability \(Long-term\) - 2 Categories](#).

the assessments in the EQIA related to disabled people are also valid for older people.⁹

Second, older people may use public transport less in overall terms, but public transport plays a more essential role in their mobility than for other age groups. This is evident when looking at the use of different forms of transport by age. While cars are the favourite form of transport across other age groups, older households are less likely to have access to a car.^{10 11} The difficulties of travelling in Northern Ireland due to a physical disability or long term condition increase with age, and older people are more likely to experience difficulties with travelling (35% of older adults) than the total population (20%).¹² The physical and medical conditions that limit people's ability to travel increase with age—such as long-term pain or discomfort, mobility issues and breathing difficulties.¹³ For instance, people of 65 and older are three times more likely to experience mobility issues (29%) than the total population (11%).¹⁴

Third, within current action plans of the Department of Health (DoH), there is a wide range of services that is being redirected from more rural areas towards highly specialised centres located elsewhere. This includes the centralisation of elective care services,¹⁵ the planned reconfiguration of some general surgery services,¹⁶ and the centralisation of stroke services.¹⁷

With this centralisation, the DoH aims to improve the efficiency and overall quality of these services. However, this requires that older people, who are high service users of health and social care, will have to travel more frequently. This is why the process of reconfiguration of services is accompanied by consideration of travel support for patients such as the Hospital Travel Costs Scheme¹⁸ and the Patient Transport

⁹ Department for Infrastructure (2025) [Draft Budget 2025-26 Equality Impact Assessment Consultation](#); pages 25-27.

¹⁰ Census (2021) [Car or Van Availability by Lifestage \(Household\)](#).

¹¹ Department for Infrastructure (2020) [Travel Survey for Northern Ireland In-Depth Report](#).

¹² Department for Infrastructure (2021) [Travel Survey for Northern Ireland In-Depth Report 2021](#).

¹³ Census (2021) [Health Problem of Disability \(Long-term\) by Age -86 Categories by Health Condition \[Various\]](#).

¹⁴ Census (2021) [Health Problem of Disability \(Long-term\) by Age -86 Categories by Health Condition \[Various\]](#).

¹⁵ Department of Health (2020) [Regional Service Delivery Model for Daycase Elective Care Procedures in Northern Ireland](#).

¹⁶ Northern Health and Social Care Trust (2024) [Working with you to transform general surgery – Frequently asked questions](#).

¹⁷ Connolly, M-L. and Catherine Smyth, C. (2019, March 26) [Shake-up of NI stroke services proposed](#), BBC News NI [Accessed 21st May, 2025]

¹⁸ See NI Direct (n.d.) [Hospital Travel Costs Scheme](#).

Service.¹⁹ Therefore, the DoH, when reforming services, directly relies on public transport for success.

Thus, while older people may not be the highest users of public transport, the lack of alternatives and limitations in their use of other forms of transport, make public transport essential for their health and social connectedness. With the rate of population ageing, transport will become more of an essential service to more people.

While this office understands the difficult position in which the department finds itself in, it is concerning that in their private communications with COPNI, Translink acknowledges that their present financial position will have a detrimental impact on maintenance, upgrade, enhancement, frequency of service and customer service. This office does not blame the department for experiencing financial constraints, but the EQIA should acknowledge the full extent of the impact that this could have on our older population, especially in a context of older population growth.

Housing

Similar concerns are applicable to housing and the difficult position of NI Water. The department is again satisfied in the present EQIA that the opening resource position of NI Water is significantly better than in the 24-25 Budget (£11.5m, an 8% increase). This leaves the predicted opening resource position of NI Water as £149.2m for the upcoming resource budget.²⁰ This, however, is below the forecasted requirements for the past year (£169.3m).²¹ Similarly, the proposed opening capital budget is significantly lower this year (£244.3m) than last year (£323.7m).²² This will surely limit the capacity of NI Water to conduct essential transformation projects.

This office reiterates the understanding of the financial and political position of the department. However, as the department itself notes in the EQIA, the current position of NI Water may make it harder to accomplish the renovation of the water and sewerage system, which in turn hinders the ability to build both private and social housing. These difficulties were noted, in an alarming manner, in 2023 by the department in a consultation on the implementation of water and sewerage charges.²³

¹⁹ See Northern Ireland Ambulance Service Health and Social Care Trust (n.d.) [Patient Transport Service](#).

²⁰ Department for Infrastructure (2025) [Draft Budget 2025-26 Equality Impact Assessment Consultation](#); page 11.

²¹ Department for Infrastructure (2024) [Budget 2024-25 Equality Impact Assessment Public Consultation](#); page 11.

²² Department for Infrastructure (2025) [Draft Budget 2025-26 Equality Impact Assessment Consultation](#); page 14.

²³ Department for Infrastructure (2023) [Water and sewerage charges – options for revenue raising](#).

The EQIA finds that older people may be at risk by these restrictions on the capacity to build social housing related to the funding of NI Water. This office welcomes this analysis, but it is important to stress that it is not only limitations in this aspect of housing policy which affects older people. Restrictions in the capacity to renew and improve the housing stock of Northern Ireland, which may be driving up prices of the private rented sector, is affecting older people disproportionately, and it risks causing a severe crisis to our older population.

The proportion of older people living in social housing has decreased between 2011 and 2021, while the proportion of older people living in the private rented sector has increased.²⁴ It is expected that this trend will continue, and the number and proportion of older people living in the private rented sector will increase substantially in the future.²⁵ Significantly, older renters face additional impacts intrinsic to their age, such as lack of alternatives—limited access to credit to access home ownership in old age—and discrimination fuelled by the lack of age discrimination legislation in Northern Ireland. All this makes it worrisome not only that the building of social housing homes is being affected by the water and sewerage infrastructure, but also the knock-on impact in the private housing sector.

The low provision and renewal rate of Northern Ireland's private and social housing rented sector has a massive impact on older people. Renewing the housing stock will improve fuel poverty, a structural issue that affects, disproportionately, older people.²⁶ This is, understandably, a matter of concern for the Commissioner for Older People for Northern Ireland. But it also highlights the difficulties that Northern Ireland will face in the near future as the age profile of the population changes as a consequence of demographic ageing.²⁷

²⁴ Census 2011, [Tenure by General Health by Long-Term Health Problem or Disability by Age](#); Census 2021, [Household: Tenure - 5 Categories by Age - 7 Categories A](#).

²⁵ Barber, O (2024, June 24) [Proportion of older people living in PRS to treble by 2040, CaCHE report finds](#), [Housing Today](#) [Accessed 21st May, 2025]

²⁶ The House Condition Survey 2016 shows that the likelihood of living in fuel poverty increases with age. 37.7 of households where the age of the household reference person is 75+ were in fuel poverty in 2016, compared to 25.2 of those aged 60-74, 16.7 of those aged 40-59, and 13.3 of those aged 25-39. The House Condition Survey waves of 2011 and 2004 showed similar results. See Department for Communities, [House Condition Survey 2016: Main Data Tables \(Excel Format\)](#); Department for Communities, [House Condition Survey 2011: Statistical Annex](#); Department for Communities, [House Condition Survey 2004: Statistical Annex](#).

²⁷ The proportion of older people living in Northern Ireland will grow substantially over the next fifteen years, at a pace never experienced before in this jurisdiction. While in the period 2000-2022, the proportion of population aged 65 and over grew from 13.1% to 17.6%, this percentage will grow rapidly to 20.7% in 2030 and 24% in 2040. The total number of population aged 65 and over will grow from 335,449 individuals in 2022 to 499,337 individuals in 2050. Calculations based on [NISRA 2022 Mid-Year population estimates](#) and [NISRA 2020-based interim population projections for Northern Ireland](#).

Conclusion

This office acknowledges the financial difficulties that the department is experiencing, which are comparable to similar shortfalls in other departments. As such, this office welcomes that the overall budget for the department and its ALBs has not continued the downward tendency of last year's budget. This said, it is obvious that financial pressures remain high, and that the difficult decisions that were taken as part of last year's budget remain in place.

In this context, while understanding the difficulties intrinsic to working within a tight budget, this office recognises the need for two things. First, an accurate description of the impact on section 75 characteristics. In the opinion of this office, the EQIA does not offer an accurate depiction of the relevance of public transport for older people. Second, given the interconnection of the services and infrastructure provided by this department with those of other departments, we believe that a higher level of cross-government coordination and strategic planning is needed.

A motion on strategic planning for an ageing population was passed unanimously in the Northern Ireland Assembly on the 25th of February 2025. The spirit of that motion is clearly and unambiguously demonstrated in the DfI EQIA document. The interconnection between Health, Communities and Infrastructure is evident in the impact that a good transport services and water infrastructure could have on the efficiency and quality of health and housing. COPNI looks forward to the necessary resourcing, collaboration and implementation measures to realise progress across these crucial, interconnected, aspects of all our lives especially those of older citizens.

Yours faithfully,



Ángel Leira Pernas
Policy Advice and Research Unit
Commissioner for Older People for Northern Ireland