



Commissioner for Older People
for Northern Ireland

Transport Planning and Modelling Unit
Department for Infrastructure
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8 September 2025

RE: Consultation on The Transport Strategy 2035

Dear Sir / Madam

I am writing on behalf of the Commissioner for Older People for Northern Ireland regarding the Department's consultation on The Transport Strategy 2035.

Public transport is a matter of enormous importance for older people. A good transport network has great benefits for older people, particularly for their physical and mental health, whereas a poor network can be very detrimental. Good transport services facilitate older people going out to socialise, to attend hospital appointments, and to feel connected to their community.

However, this office is aware of the growing financial challenges of the Department and Translink, and of how these challenges are affecting our older population's transport options. For this reason, the present strategy is of enormous importance for the Commissioner. The success or failure of the present strategy will be a determining factor in the health and wellbeing outcomes of our older population in the near, medium and long term future.

Overall vision

COPNI supports the overall vision and priorities of the strategy. As the consultation document notes, Northern Ireland is the UK jurisdiction with the lowest proportion of travel made by public transport. The Department also describes an extraordinary use

of private transport—particularly cars—, with 70% of all journeys made by private transport in 2021 and only 2% made by public transport.¹

This office supports the aim of increasing the appeal of public transport and active travel in Northern Ireland by improving the efficiency of transport networks, creating safer spaces for walking and accessing public transport, and providing better solutions and connections for travellers.

We are also supportive of the four strategic priorities of the strategy, which would contribute—if achieved—to the modernisation of the transport network of Northern Ireland, and increase sustainability, inclusivity and safety. This includes the introduction of the Place and Movement Framework (PMF) to improve spaces for people and reduce traffic congestion.

However, these aims and goals often conflict with the Department's existing resource limitations and the lack of clarity surrounding the strategy's specific implementation plans. The achievement of these goals is heavily dependent on available resources. According to the strategy's own assessment, decades of underfunding have led to the deterioration of the transport network, which now requires a substantial increase in funding merely to maintain its current condition.

In this climate, this office is concerned that the strategy—despite its good intentions and high aspirations—does not commit to addressing the fundamental and well-known transportation challenges faced by older people.

Behavioural change

Having access to a good transport network is crucial for older people. Lack of suitable transport affects older people physically, mentally, and socially.

First, an inadequate transport network can, for example, hinder attendance at medical appointments, disrupting the monitoring and treatment of health conditions and ultimately affecting physical health.² In a recent strategy, the Department of Health announced plans to reconfigure and centralise hospital services in order to improve quality and specialisation. However, a specialised and centralised hospital network further increases the need for reliable transport. The interconnection between health and transport is therefore essential to safeguarding the health of the population.³

¹ Department for Infrastructure (2025) [Transport Strategy 2035 - Consultation Document](#); page 12.

² Belfast Healthy Cities (2025) [Transport Poverty in NI: A Health Equity Perspective](#).

³ Department of Health (2025) [Hospitals – Creating a Network for Better Outcomes](#).

Moreover, older people report higher levels of loneliness than those in younger age categories. The Wellbeing in Northern Ireland 2022/23 report found that 18.7% of 65 to 74-year-olds and 22.6% of people aged 75+ reported experiencing loneliness, compared to 17% of those aged 35 to 44, and 17.8% of those aged 45 to 54.⁴ Access to transport impacts on the prevalence of loneliness, while affordable, accessible transport links were cited as essential for tackling loneliness by 41% of respondents in a recent survey by the Mental Health Foundation.⁵ Lack of service and increased distance to retail, social, and leisure facilities are likely to increase loneliness with the widespread reduction in opportunities for face-to-face interactions.

The current strategy places strong emphasis on transforming the transport habits of the population of Northern Ireland, focusing primarily on behavioural change through education, information, and raising awareness. However, the strategy also recognises that

*Some journeys will always need to be undertaken by private vehicle. For example: journeys in more rural areas, where public transport services are more limited; journeys where health or mobility make other modes infeasible; or journeys by people working in occupations which require regular travel to multiple locations such as tradespeople or those working in the community.*⁶

This is particularly true for older people, who are more likely to experience long-term health issues,⁷ disability⁸ and multimorbidity,⁹ while also being less likely to have access to a car or van.¹⁰ For this reason, older people's transport choices are often driven not by preference, education, or awareness, but by necessity. A reliable public transport network is therefore essential as an alternative to private cars. As the consultation document confirms, "24% of people living in a household whose day-to-day activities are limited do not have a car or van available for use."¹¹ The strategy itself acknowledges that an overreliance on cars has disadvantaged certain groups—older people among them.

Thus, older people require access to a reliable public transport network, as they face higher levels of vulnerability and have lower access to private transport. Regrettably, it is questionable whether such access is currently available. Older people's use of

⁴ The Executive Office (2023) [Wellbeing in Northern Ireland Report 2022-23](#).

⁵ Mental Health Foundation (2022) [Hundreds of thousands of adults in Northern Ireland affected by loneliness](#).

⁶ Department for Infrastructure (2025) [Transport Strategy 2035 - Consultation Document](#); page 23.

⁷ NISRA Census 2021, [Age - 19 Categories by Health in General](#).

⁸ NISRA Census 2021, [Health Problem or Disability \(Long-term\) - 2 Categories by Age - 19 Categories](#).

⁹ NISRA Census 2021, [Age - 19 Categories by Health Conditions \(Number\)](#).

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

¹¹ Department for Infrastructure (2025) [Transport Strategy 2035 - Consultation Document](#); page 10.

public transport is lower than that of other age groups: in 2023-24, people over 60 accounted for only 14% of Translink's passenger journeys, despite representing 24% of Northern Ireland's population¹²—and despite the 60+ concessionary fares scheme. Given their reduced access to private transport, this represents a significant disparity.

Among the possible reasons for the low usage of transport, the Department cites in the draft strategy a recent Consumer Council survey showing that less than half of consumers believe that public transport in Northern Ireland is convenient (45%) and frequent enough to meet their needs (36%), with 29% of them referring to service availability and frequency as their main barrier to using public transport.¹³

In conclusion, while the focus of the Department on the issue of creating a transport network that is resilient and sustainable through behavioural change is mainly on messaging, the main issue for older people is accessibility. Poor transport access contributes to social isolation, sedentary lifestyles and reduced control over health conditions.¹⁴

Barriers experienced by older people using public transport

Given the importance of transport for the wellbeing of older people, transport services must be adequate for, and responsive to the needs of the older population. However, research indicates that transport services in Northern Ireland continue to struggle to meet the demands and requirements of older people.

According to the Travel Survey for Northern Ireland, 20% of the total population report difficulty travelling due to a physical disability; among older people, this rises to 33%.¹⁵ People aged 65 and over are also three times more likely to experience mobility issues (29%) compared with the overall population (11%).¹⁶ This greater prevalence of mobility limitations makes older people more dependent on transport to carry out daily activities, while also making it harder for them to walk long distances, whether to complete manage daily tasks or simply to reach a bus or train stop.

The issues and barriers experienced by vulnerable users in public transport are well acknowledged in the consultation document, with the Department recognising that “the current design of some of our transport system and spaces can create barriers for

¹² Department for Infrastructure (2025) [Draft Budget 2025-26 Equality Impact Assessment Consultation](#); page 21.

¹³ Department for Infrastructure (2025) [Transport Strategy 2035 - Consultation Document](#); page 36.

¹⁴ Belfast Healthy Cities (2025) [Transport Poverty in NI: A Health Equity Perspective](#).

¹⁵ Department for Infrastructure (2021) [Travel Survey for Northern Ireland In-depth Report](#).

¹⁶ NISRA Census 2021, [Health Problem of Disability \(Long-term\) by Age - 86 Categories by Health Condition](#).

disabled people and others with reduced mobility ... In addition, parts of the public transport network have limited accessibility for those with reduced mobility.”¹⁷

Recent pieces of research have highlighted the barriers that are currently faced by older people accessing public transport in Northern Ireland. These include:

- **Physical barriers and infrastructure gaps:**
 - Deficient walking infrastructure with lack of footways and a need to travel long distances to bus stops or train stations.^{18 19}
 - Competition for limited wheelchair spaces on buses; lack of shelter and seating spaces at bus stops and deficient seating areas at train stations.^{20 21 22} According to the Transport Poverty report, these are areas that older people highlighted as fundamental barriers to use public transport.²³
 - Irregular and unreliable services also deter older people from travelling.^{24 25}
- **Safety concerns:** in addition to infrastructural safety concerns, older people experience fear of harassment and anti-social behaviour when using public transport.²⁶ The strategy includes a commitment to End Violence Against Women and Girls²⁷ on public transport, but this issue also affects older people's usage of these services and should also be addressed.

These challenges are even more pronounced for older people living in rural areas. Rural communities tend to face more limited and irregular transport services, making

¹⁷ Department for Infrastructure (2025) [Transport Strategy 2035 - Consultation Document](#); page 51.

¹⁸ Murtagh, B., Ferguson, S., Lyne Cleland, C., Ellis, G., Hunter, R., Kou, R., Rodriguez Añez, C., Hino, A. A. F., Becker, L. A., and Reis, R. S. (2022) 'Planning for an ageing city: place, older people and urban restructuring', *Cities & Health*, 6(2), pp. 375-388.

¹⁹ IMTAC (2023) [Comments from IMTAC about the Department for Transport \(DfT\) Call for Evidence on the Review of the Public Service Accessibility Regulation 2000 \(PSVAR\)](#).

²⁰ Murtagh, B., Ferguson, S., Lyne Cleland, C., Ellis, G., Hunter, R., Kou, R., Rodriguez Añez, C., Hino, A. A. F., Becker, L. A., and Reis, R. S. (2022) 'Planning for an ageing city: place, older people and urban restructuring', *Cities & Health*, 6(2), pp. 375-388.

²¹ IMTAC (2023) [Comments from IMTAC about the Department for Transport \(DfT\) Call for Evidence on the Review of the Public Service Accessibility Regulation 2000 \(PSVAR\)](#).

²² Age NI (2024) [Healthy Ageing in Rural and Coastal Areas of Northern Ireland: Challenges and Solutions](#).

²³ Belfast Healthy Cities (2025) [Transport Poverty in NI: A Health Equity Perspective](#).

²⁴ Age NI (2024) [Healthy Ageing in Rural and Coastal Areas of Northern Ireland: Challenges and Solutions](#).

²⁵ Belfast Healthy Cities (2025) [Transport Poverty in NI: A Health Equity Perspective](#).

²⁶ Belfast Healthy Cities (2025) [Transport Poverty in NI: A Health Equity Perspective](#).

²⁷ Department for Infrastructure (2025) [Transport Strategy 2035 - Consultation Document](#); page 53.

trip planning difficult and often unpredictable.^{28 29} In Northern Ireland, 19% of residents live more than a 14-minute walk from their nearest bus stop; in rural areas, this rises to 39%.³⁰ Furthermore, while 66% of urban residents have access to bus services running at least once per hour, this frequency level is only enjoyed by 18% of rural residents.³¹ This creates a significant barrier for older people with mobility issues and reduces public transport use in rural areas. For example, rural residents spend an average of 7 hours per year travelling by Metro and Ulsterbus services, compared with nearly three times that amount for urban residents.³²

Overall, 39.6% of all older adults in Northern Ireland live in rural areas,³³ and the implications of poor transport infrastructure in these settings are enormous for them. In addition, this issue impacts healthcare spending, with £40m in funding from the Department of Health being used to fund taxi trips for individuals living in rural areas attending appointments due to lack of service in their area.³⁴

For this reason, we welcome the Department's commitment to improving the inclusivity of public transport (Measure CC01).³⁵ However, while this is a positive step, stronger and more specific commitments will be required to achieve a transport network that ensures accessibility for older people by 2035. By that year, the number of people over 60 in Northern Ireland is projected to rise by more than 20%, amounting to an increase of approximately 100,000 individuals.³⁶ As a result, existing accessibility challenges are likely to intensify in the near future, demanding a much more ambitious approach from the Department.

Specific commitments, solutions and risks

Section 2 of the consultation document discusses the development of a strategy that "Supports Connected and Inclusive Communities". This section of the strategy focuses on individuals and communities, particularly rural, that experience difficulties

²⁸ Age NI (2024) [Healthy Ageing in Rural and Coastal Areas of Northern Ireland: Challenges and Solutions](#).

²⁹ Belfast Healthy Cities (2025) [Transport Poverty in NI: A Health Equity Perspective](#).

³⁰ Department for Infrastructure (2021) [Travel Survey for Northern Ireland In-depth Report](#).

³¹ Department for Infrastructure (2021) [Travel Survey for Northern Ireland In-depth Report](#).

³² Department for Infrastructure (2021) [Travel Survey for Northern Ireland In-depth Report](#).

³³ NISRA 2021 Census, [Population aged 65+ by Urban/Non-Urban status](#).

³⁴ This figure was spent over 5 years prior to June 2023. McCracken, N. (2024, June 23) '[We must scrutinise' £40m healthcare spend on taxis](#)', BBC News NI [Accessed 21st August 2025].

³⁵ Department for Infrastructure (2025) [Transport Strategy 2035 - Consultation Document](#); page 51.

³⁶ The number of people older than 60 was in Northern Ireland 461,430 in 2023 (the most recent mid-year population estimate). This is expected to grow to 566,800 individuals in 2035. Sources: NISRA [2023 Mid-Year Population Estimates](#) and NISRA [2022-based Population Projections](#).

accessing transport, and proposes a series of commitments aimed at ensuring the aforementioned overarching goal.

In this section, the Department aims at improving some of the issues with public transport highlighted by users, without committing to an increase of services and routes. The Department's proposed solutions include "travel demand management", "improved bus priority measures on key corridors", "additional Park and Ride facilities", "demand responsive services" or "community transport".

The Department's measures are aimed at achieving the "rationalisation", "sustainability" or better management of the transport network. However, the Department does not commit to increasing services and frequency—likely due to a lack of resources. In particular, regarding rural transportation issues, the Department states that

In many rural locations it can be challenging to provide the same frequency of services along direct routes to make public transport a realistic alternative to private vehicles... The Department will continue to consider the benefits of providing minimum levels of frequency and services by settlement type and size and learn from initiatives delivered by other jurisdictions to improve rural connectivity.³⁷

While the measures proposed by the Department appear positive, it is questionable that they will have any noticeable impact without a substantial increase in routes and frequency—particularly in the context of an ageing population, which will inevitably increase the demand for transport services among people with mobility issues.

In addition, there may be a risk that some of the innovative solutions that can be adopted to rationalise transport can increase—rather than reduce—the disconnection of older people. For instance, the Department states that the reduction of journeys by car "requires better physical and digital connectivity".³⁸ Currently, tools are being developed worldwide to expand "demand responsive transport" to create a more dynamic usage of public transport through technology, providing more effective door-to-door services. The Department suggests—although it does not provide specific plans or details—that demand responsive services, "aided by technology, may also provide an alternative model of service delivery."³⁹

³⁷ Department for Infrastructure (2025) [Transport Strategy 2035 - Consultation Document](#); page 63.

³⁸ Department for Infrastructure (2025) [Transport Strategy 2035 - Consultation Document](#); page 24.

³⁹ Department for Infrastructure (2025) [Transport Strategy 2035 - Consultation Document](#); page 63.

Solutions based on active engagement of users with technology for a more dynamic and personal approach require, above all, tech-savvy and engaged users, which may exclude some older users from utilising these technologies and services. For instance, only 54% of those over 75 are regular internet users, compared to 99% of adults aged 16-44.⁴⁰

While it is tempting to improve efficiency and rationalisation through digital tools, this may eventually exclude older people, something that must be taken into account, particularly if routes and frequencies are not expanded. And while the increased use of technology is positive, this cannot be seen as the only solution to limited services and routes.

On the other hand, community transport services are being explored in the consultation document as alternatives to public transport. The document states that

An evaluation of community transport has been completed, and a review will be undertaken to consider community transport provision for the medium to longer term and how the benefits and flexibility of the provision can be captured and more fully used in the wider transport system.⁴¹

While community transport plays a positive role to facilitate travel for vulnerable people, it is an insufficient option on its own. In its current form, community transport requires two working days' notice. The convenience of planning a trip to do groceries or go to a pharmacy with two working days' notice is questionable. Community transport cannot replace the role of a high quality public transport network. It fills a gap but provides an insufficient service for a fulfilling life.

Therefore, while the draft strategy addresses some solutions that may increase inclusivity of the transport network, the lack of clarity and commitment over increased services and routes in rural areas—where more than a third of the older population live—is concerning.

Smart-Pass

Given the unquestionable importance of public transport to ensure older people's physical and mental wellbeing, it is essential to facilitate the use of transport by our older people, rather than making it more difficult. Barriers must be lifted and not built. Among the most important benefits that older people enjoy regarding their use of

⁴⁰ Ofcom (2024) [The future of the universal postal service. Data tables.](#)

⁴¹ Department for Infrastructure (2025) [Transport Strategy 2035 - Consultation Document](#); page 64.

public transport is the Concessionary Fares SmartPass scheme for people older than 60.

The usage of public transport among older people highlights that barriers remain despite the SmartPass. Even with the SmartPass scheme, people older than 60 make up only 14% of Translink's passenger journeys (2023-24) despite representing 24% of the population of Northern Ireland.⁴²

For many older people, public transport is their only means of staying connected, participating in social life, and staying healthy and medically controlled. For this reason, the Department's plans in 2023 to end the Concessionary Fares Scheme have generated tangible concern among older people, many of whom rely heavily on this benefit.⁴³ Given the generally precarious financial position of older people, which is well-documented in the Section 75 screening of this strategy,⁴⁴ terminating the scheme would raise serious affordability concerns.

The present strategy states that the scheme will be modified to introduce an issue fee. This has recently been proposed in the Administrative and Financial Provisions Bill.⁴⁵ In Section 17 of the proposed Bill ('Travel Concession Pass') it is stated that 'The Department may by regulations subject to negative resolution provide for a fee to be payable for the issue of – (a) a travel concession pass'.

This office is concerned that any introduction of charges for concessionary travel passes such as the SmartPass would in effect convert a free travel scheme into a discounted fare travel scheme, which would make it unobtainable to some older people.

According to the 2022-based Population Projections published by NISRA, an average of 24,543 individuals will reach the age of 60 each year between 2025 and 2040 in Northern Ireland.⁴⁶ Based on the DfI's statistics, approximately 79% of individuals over 60 avail of the SmartPass.⁴⁷

This suggests that, on average, around 19,388 individuals are expected to apply for the SmartPass annually over the next 15 years. Introducing an application or issue fee

⁴² Department for Infrastructure (2025) [Draft Budget 2025-26 Equality Impact Assessment Consultation](#); page 21.

⁴³ Belfast Healthy Cities (2025) [Transport Poverty in NI: A Health Equity Perspective](#).

⁴⁴ Department for Infrastructure (2025) [Transport Strategy 2035 - S75 Screening form](#).

⁴⁵ Northern Ireland Assembly, [Administrative and Financial Provisions Bill](#).

⁴⁶ NISRA [2022-based Population Projections](#).

⁴⁷ Department for Infrastructure (2023) [Management information relating to Northern Ireland concessionary fares scheme tables and figures](#).

for the SmartPass would therefore generate only limited income, depending on the level of the charge:

Level of charge	Estimated annual income
£20	£387,760
£50	£969,400
£100	£1,938,800

According to the Department's draft 2025-26 Budget Consultation, the opening resource budget for the period is £633.3 million, of which £151.1 million is allocated to Translink. The capital budget totals £975.5 million for the Department, with £195.0 million for Translink.⁴⁸ In this context, income from SmartPass application fees would represent only a very small fraction of the overall funding for either the Department or Translink.

It is concerning that the Department has not provided specific details regarding the proposed charging fee, leaving the possibility of an exceptionally high fee open. In reality, for the fee to have any meaningful economic impact on the Department's or Translink's budget, it would need to be set at a significant level—something this office would reject. Such a measure would be counterproductive, likely discouraging older people from using public transport and leading to wider social, economic, and health-related consequences. Conversely, a small fee might still deter some travel but would have negligible impact on overall budgets.

Therefore, aside from the fact that COPNI opposes any measure that would restrict older people's access to public transport, the introduction of a SmartPass issue fee does not represent—in this office's opinion—a compelling financial case.

Conclusion

The Department states that achieving behavioural change is at the core of the strategy:

Investing in sustainable modes of transport and successfully encouraging people to think about how they travel and consider choosing a sustainable way to make that journey, will have a significant impact on the environment, as well as on our society's general health and well-being.⁴⁹

⁴⁸ Department for Infrastructure (2025) [DfI Draft Budget 2025-26 Equality Impact Assessment Consultation](#).

⁴⁹ Department for Infrastructure (2025) [Transport Strategy 2035 - Consultation Document](#); page 34.



**Commissioner for Older People
for Northern Ireland**

COPNI strongly supports the Department's vision and aim for a societal shift from private to public transport, especially if this shift is backed by a more accessible, frequent, convenient and comfortable public transport network. While the strategy's aims and visions are ambitious, it is unclear how its commitments and proposed actions will fundamentally change the accessibility of transport for older people, people with mobility issues, people with disabilities, and those who live in rural areas.

This office is aware of the financial pressures experienced by Translink and the Department. However, the consultation document rightly states that a good transport network is an investment and not an expense. The direct returns of a healthier, more active, more social and more engaged population—and older population—cannot be underestimated.

Yours faithfully

A handwritten signature in dark blue ink, which appears to read 'Ángel Leira Pernas', is written over a light blue circular stamp.

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