

Specific points from Consultation that BCC Departments wish to respond to:

Dfl Options	Draft Departmental Response
<p>Option 1 – Raising age eligibility The Department has put forward 3 options:</p> <ul style="list-style-type: none"> • Option A – make no change to the Scheme, leaving the eligibility rules as they are now; or 	<p><u>Option A: Belfast City Council supports this proposal</u></p> <p>Belfast is an Age Friendly City and in May 2023 we published our 3rd Age Friendly Plan (2023 -2027). This plan will be delivered by Belfast City Council and relevant partners working together under the banner of Age Friendly Belfast.</p> <p>One of the 4 key themes in the Age Friendly plan is Infrastructure, supporting people to get out and about. The plan notes, ‘Our partners have worked together to support and influence older people’s use of public transport. It is the main mode of transport for many older people and the 60+ SmartPass and Senior (65+) SmartPass is viewed by older people as an invaluable support in enabling them to get out and about around the city and beyond.</p> <p>For many years, Age Friendly Belfast has done much consultation with older people and partner organisations in relation to the use of public transport. From recent discussions with older people the majority would consider there should be no change to this scheme.</p> <p>The reasons cited for no change:</p> <ul style="list-style-type: none"> • public transport enables older people to connect with social networks, and promotes social inclusion, by attending groups, activities, and programmes on offer across the city, if they couldn’t access these there would be a sharp increase in levels of loneliness, social isolation and an impact on mental health issues. Since Covid much has been done to encourage older people to reconnect to groups/ programmes across the city and having their SmartPass has made this process easier. • For those older people that do have access to a car, they have said how the parking in the city centre has increased in price and as a result with other increases in cost of

<ul style="list-style-type: none"> • Option B – remove the concession from the 60-64 age group. This would mean that the age of eligibility for the SmartPass would increase to 65 (the age of eligibility for the existing Senior 65+ SmartPass). The change would apply to existing users as well as new applicants. • Option C – remove the concession from the 60-64 age group and raise the age of eligibility to State Pension Age. The State Pension Age for men and women is currently 66 and will increase to 67 between 2026 and 2028. This would apply to existing users as well as new applicants. However, for practical purposes those with a 65+ SmartPass would continue to be able to use it. 	<p>living, many are now unable to afford to park or pay for petrol.</p> <ul style="list-style-type: none"> • Since Covid some older people have reported being less confident to drive and as a result are heavily dependant on public transport to move across the city. • As well as connecting to groups and activities the SmartPass has meant that older people using public transport can have improved access to city centre shops, services and other facilities and therefore contributing to the wider economy. • Improve health by promoting a more active lifestyle for the elderly and disabled. • It promotes a modal shift from private cars to public transport. • Should the Department remove and raise the eligibility age in relation to the SmartPass, this would threaten community links for local people and may mean the most vulnerable people in our local communities lose access to vital services and programmes which support their mental and physical wellbeing. <p>However, we would contend that in terms of financial sustainability consideration could be given to means testing those between the age of 60-64 who are in full time employment.</p> <p><u>Option B: Belfast City Council does not support this proposal</u></p> <p>Concession fares increase access to services among this age group. This option will have a negative impact on older people.</p> <p><u>Option C: Belfast City Council does not support this proposal</u></p> <p>Concession fares increase access to services among this age group. This option will have a negative impact on older people.</p>
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<p>Option 2 – Limiting SmartPass use to off-peak travel</p> <p>This change would mean that a SmartPass would no longer permit people to travel before 09:30 on weekdays (Mondays to Fridays). A SmartPass user would have to pay a full fare if they wished to use public transport before this time. They will continue to be able to travel for free at other times, including at any time on Saturdays, Sundays, and Bank Holidays.</p>	<p><u>Option 2: Belfast City Council does not support this proposal</u></p> <p>Many older people’s groups/ activities often start in the morning, limiting older people to off peak travel may mean they are unable to attend their programme or activity. Many older people also use peak travel time to visit family who they are assisting with childcare, who without this support from grandparents, may not be able to continue their employment. Within our sport and leisure facilities, we have high levels of use by older people during early morning periods with many of them able to access physical activity opportunities supported by concessionary public transport. This option will have a negative impact on older people</p> <p>Many of the Council’s concessions in community and leisure centres are specifically aimed at seniors with price reductions available during morning periods.</p> <p>As a result, restricting the time periods to use a SmartPass will directly impact on seniors accessing their local facilities to maintain and improve their health and well-being.</p> <p>Additionally, regularly attending classes and programmes at the Council’s facilities is a crucial lifeline for many people, providing opportunities for social inclusion and a positive, regular constituent to enhancing people’s lives.</p>
<p>Option 3 – Limiting SmartPass use to bus travel only</p> <p>This change would mean that a SmartPass would no longer permit people to travel by rail. It would allow SmartPass users to travel on bus only.</p>	<p><u>Option 3: Belfast City Council does not support this proposal</u></p> <p>Limiting SmartPass to bus travel only would exclude those that only have the train as an accessible form of public transport or where bus services are infrequent or bus stops are not within walking distance, particularly for those with mobility issues and or limited walking capabilities. Whilst older residents in Belfast rank highly in the proximity to services domain, this option will limit the opportunity for older people to enjoy longer distance leisure travel.</p> <p>Any opportunity to maximise attendance and support cross community interaction at facilities, to enhance and improve people’s health and well-being within our local communities is welcomed.</p>

	<p>By limiting SmartPass use to buses only has the potential to remove these opportunities for many people across the city.</p>
<p>Option 4 – Application, renewal and replacement fees This change would mean that SmartPass users would pay a fee for applications, renewals, and replacement cards. An application fee would be paid when a person applies for a SmartPass for the first time. A renewal fee would be paid when the SmartPass holder applies to renew their SmartPass. A replacement fee would be paid when a person applies to have a new card issued if their card has been lost or stolen.</p>	<p><u>Option 4: Belfast City Council does not support this proposal</u></p> <p>We do not support the proposed introduction of application, renewal, and replacement fees, however, there is no statement on the cost of the registration fee or the frequency of renewal.</p> <p>Any changes in relation to fee application, renewal and replacement has the capability to reduce the number of people who will be able to access a SmartPass, with a direct impact for the most vulnerable people in our communities.</p> <p>Given this, there is the potential that the number of vulnerable people who can access the service provision available within facilities delivered through the Physical Investment Programme will be reduced.</p>
<p>Option 5 - Free travel for those currently receiving a half fare concession due to a qualifying disability This change would mean that everyone who is currently eligible for a half fare concession would receive free travel. Free travel would be available on all services. This means that free travel (which is currently available on Glider) would apply to Metro, Ulsterbus, Goldline and NI railways.</p>	<p><u>Option 5: Belfast City Council supports this proposal</u></p> <p>We support this proposal to provide free travel entitlement to everyone who is currently eligible for a half fare concession. Any opportunity that can be developed to support people with disabilities to access local community facilities is positive.</p>
<p>Option 6- Companion passes for disabled people unable to travel alone This change would mean that, if a person is disabled and they are unable to travel alone, they may be entitled to a Companion SmartPass which would allow someone to accompany them on their journey. For the avoidance of doubt, companions are not themselves issued with a SmartPass, nor are they able to travel for free unless accompanying a Companion SmartPass holder.</p>	<p><u>Option 6: Belfast City Council supports this proposal</u></p> <p>We support this proposal to issue Companion passes for disabled people unable to travel alone. By expanding the opportunity, for disabled people who are unable to travel alone, to access vital community facilities, which will fulfil and enrich their lives is an incredibly positive action.</p>
<p>Option 7 - Extend the qualifying criteria for a Half Fare SmartPass in line with other jurisdictions This change would widen the qualifying criteria for a SmartPass on the grounds of disability to align it more closely with other UK jurisdictions.</p>	<p><u>Option 7: Belfast City Council supports this proposal</u></p> <p>We support this proposal to widen the qualifying criteria for a SmartPass on the grounds of disability</p>

	to align it more closely with other UK jurisdictions, though we note detail of alignment is not provided, nor whether consideration of alignment to RoI jurisdictions will be considered.
<p>Option 8 – Free transport for destitute asylum seekers and victims of human trafficking</p> <p>This change would extend the Scheme to provide free transport to asylum seekers receiving asylum support and to victims of human trafficking. Under this new arrangement, all asylum seekers (including those aged between 5-181) receiving such support would be eligible for a SmartPass.</p>	<p><u>Option 8: Belfast City Council supports this proposal</u></p> <p>We support this proposal to extend the Scheme to provide free transport to asylum seekers receiving asylum support and to victims of human trafficking. We welcome any opportunity that can be developed to support inclusivity and enable everyone in local communities an equal chance to access community facilities across Belfast</p>
<p>Option 9 - Changes to the residence test</p> <p>This change would remove the need for applicants to be permanently resident in Northern Ireland for a period of three months and replace it with the ‘primary residence’ test. Applicants would be asked to sign a declaration that Northern Ireland is their primary residence.</p>	<p><u>Option 9: Belfast City Council supports this proposal</u></p> <p>We support this proposal to remove the need for applicants to be permanently resident in Northern Ireland for a period of three months and replace it with the ‘primary residence’ test</p>
<p>Option 10 - Proving Residency</p> <p>This change would extend the list of documentation that can be used to prove residency. The list would be reviewed to ensure that it is open to everyone on an equal basis.</p>	<p><u>Option 10: Belfast City Council supports this proposal</u></p> <p>We support this proposal to extend the list of documentation that can be used to prove residency</p>

Overarching commentary from Belfast City Council’s Planning Department (Transport and Infrastructure), Place & Economy department

The implementation of any option or combination of options which reduces the current level of accessibility to the NI Concessionary Fees Scheme (CFS) would be of concern from a land use planning perspective, specifically in terms of how this change would impact the vision and strategic aims and objectives of the Belfast Local Development Plan (LDP). The Belfast LDP Plan Strategy (adopted May 2023) sets out a number of strategic aims and objectives one of which is ‘building a smart, connected and resilient place’. This aim seeks to support an efficient integrated transport network offering travel choice that minimises congestion and pollution and in operational policy terms will facilitate the expansion of active travel opportunities and promote increased use of public transport.

One of the key strategic policies underpinning the Plan Strategy for Belfast is that of ‘Connectivity’ whereby the Council will support the enhancement of accessibility to and within the city by sustainable transport modes. Promoting and maximising the use of public transport is seen as making a fundamental contribution to this policy direction given that optimal accessibility and connectivity for Belfast cannot be achieved through active travel measures alone. The Plan Strategy also views the promotion of sustainable connectivity as being vital to social inclusiveness, improving the ability of local communities, in particular disadvantaged or vulnerable groups, to access employment and important services such as healthcare, education, shopping and leisure.

A key challenge for the Belfast LDP over the plan period is to provide for increased accessibility into and throughout the city area and to accommodate projected growth in travel demand whilst also discouraging single occupancy private car use. The Plan Strategy seeks to address these issues through the promotion of active travel (walking, cycling and wheeling) and supporting appropriate public transport measures. From a planning perspective we would be concerned that any action that potentially reduces access to public transport would be detrimental to achieving these objectives given that active travel options may not always be a suitable or practical option for certain sections of society, particularly older age groups and those with mobility issues. In terms of potentially undesirable repercussions we would want to avoid any scenario where exclusion from the CFS would result in greater use of the private car given the associated impacts on congestion and air quality.

On the basis that increased private car use may result from reduced access to the CFS it is likely that this will disproportionately impact Belfast residents given that household access to a car is significantly lower in the Belfast council area compared to the Northern Ireland average. According to [Census 2021](#) statistics 34% of Belfast households don't have access to a car compared to the NI average of 20%. With the exception of Derry & Strabane (25%) the Belfast rate is at least twice that of any other council. At the District Electoral Area level the variation in lack of household access to a car is even more marked with four of Belfast's ten DEAs having a rate in excess of 40% (Court 49%; Oldpark 45%; Botanic 41%; and Titanic 41%).

Additionally, any reduction in access to the CFS would be potentially disproportionately detrimental to the citizens of Belfast due to the fact that public transport usage here is significantly higher compared to any other NI council. [DfI's Travel Survey for Northern Ireland 2017-2019](#) clearly demonstrates this higher usage in Table 3.5 of the in-depth report where the proportion of all journeys made by public transport was 12% for Belfast, twice that of the next nearest council areas (Antrim & Newtownabbey and Lisburn & Castlereagh both at 6%).

Whilst not covered in detail in these comments it is assumed that the Council response will consider the potential implications of any changes to the CFS in relation to the age profile of the Belfast population as well as the deprivation context – both in terms of the Multiple Deprivation Measure and the more relevant domains e.g. Access to Services, and the extent to which these factors may result in Belfast's citizens being disproportionately affected.

Overarching commentary from Belfast City Council's City Regeneration and Development Section, Place and Economy Department

The Belfast Agenda, our city's first community plan, sets out how multiple statutory, community and third sector partners have committed to making Belfast a safe, fair and inclusive place for all. In our view the proposed Options to reduce the cost of the NI Concessionary Fares Scheme (with the exception of Option 1 Option A) run contrary to The Belfast Agenda since they propose making the scheme less fair and less inclusive of some of the most vulnerable groups, including those who experience the highest levels of social exclusion.

Loneliness and isolation persists especially among the older and less mobile cohorts in society and therefore we do not support any of the Options to reduce the cost of the scheme (with the exception of the 'Do Nothing' option). While we appreciate there are a number of factors that have combined to impact on the sustainability of SmartPass provision, not least increasing costs of fuel etc. the proposal to raise age eligibility of entitlement will be most keenly felt by the most socially isolated often in the most poorly connected communities.

The proposed options to reduce the cost of the NI Concessionary Fares Scheme will have a disproportionate impact on the elderly, many of who already face some of the highest levels of social exclusion and economic deprivation, as they are less likely to own a private car and are therefore more reliant on public transport to reach their place of work, or to access other social services including GP surgeries, leisure centres etc.

Almost all of the proposals under Part A, if adopted, would likely adversely impact footfall and trade within our town and city centres since it would reduce the ability and inclination of elderly people to make journeys there. Consequently the purchasing power of elderly people as consumers, i.e. the “grey pound” would be significantly reduced.

We believe the proposed budget saving measures under Part A of the consultation will be especially harmful on the basis of age. It will be important to undertake comprehensive stakeholder engagement with this particular Section 75 equality group to ascertain how the proposed measures are likely to impact them. Our position is that, when evaluating savings options, the emphasis needs to be on protecting the needs of the most vulnerable in our society and seeking to maintain the services that they rely upon.

It is our view that the Department needs to consider more carefully and thoroughly areas where resource budget savings can be made that will have reduced impact on the most vulnerable in society and avoid ‘quick fix’ measures such as tinkering with the NI Concessionary Fares scheme in a bid to make savings. Such approaches are short-sighted, run contrary to policy designed to encourage and facilitate more sustainable travel and improve mental and physical health outcomes.

It is regrettable that the area of savings identified, i.e. the NI Concessionary Fares Scheme, appears to be unfairly targeted at some of the most vulnerable groupings. We would encourage minimal impact economically on those most vulnerable in society given the cost-of-living crisis and ongoing economic uncertainty. Our position is that the Department must seek to retain the services, to an adequate standard, that the most vulnerable in our society rely upon.

Concessionary Fares should be extended to include children and young people free bus travel as is the case in other areas such as Scotland. There are a myriad of benefits, including but not limited to:

- Engendering public transport as a primary and preferred modal choice thereby reducing the inclination to purchase a private vehicle
- Improving employment and educational opportunities by improving travel affordability and removing travel costs as a barrier to employment or further/higher level education
- Youth Travel card would offer a youth information and opportunities platform across a range of themes and issues including money management, mental health and well being, retail promotions etc.

Belfast City Council is supportive of each of the options (i.e. Options 5-10) proposed under Part B Options to promote social inclusion.