

# Consultation on Free and Discounted Fares on Public Transport (Concessionary Fares)



23rd August 2023

## Summary of NIFHA View:

- The Northern Ireland Federation of Housing Associations (NIFHA) contends that the Department for Infrastructure (DfI) policy on concessionary fares should be retained in its current form without any reduction in the current eligibility criteria.
- NIFHA supports Option 1A set out by the DfI in the consultation document – to make no changes to the scheme, leaving age eligibility rules as they are now.
- NIFHA rejects the proposals laid out in the consultation that would limit the use of the SmartPass or introduce fees for the application, renewal, and replacement of the card.

## About NIFHA

The Northern Ireland Federation of Housing Associations, formed in 1977, is the representative body for Northern Ireland's 20 registered housing associations.

Our members are all not-for-profit organisations. Together, supported by the Department for Communities and the Housing Executive, they provide over 58,000 social and affordable homes.

Housing associations access private finance to effectively double the number of homes they could build with government housing association grant alone.

Housing associations also deliver high quality care and support to help people stay as independent as possible.

Working in partnership with other organisations, they also invest millions each year in community services and facilities.

Our sector employs more than 3,300 people and manages housing assets worth £5.1 bn.

NIFHA welcomes the opportunity to comment on this Department for Infrastructure Consultation on Free and Discounted Fares on Public Transport (Concessionary Fares).

## Setting the Context:

Section 75 of the Northern Ireland Act - The current challenges facing decision makers across the Northern Ireland public sector are recognised. In this context, when difficult decisions around reducing or cutting public services are being considered the need to comply with the Section 75 duties, while always important, is even more essential. Any decisions taken have the potential to have major adverse impacts on people in the Section 75 groups, to exacerbate existing inequalities and have long lasting impacts. In complying with the Section 75 duties, arrangements considering potential differential impacts of each proposed policy as well as the potential cumulative differential impacts of a range of such decisions, between those groups of people who avail of those services and who share particular Section 75 characteristics, e.g. older people, people with disabilities, people with dependents. Such assessments should be informed by relevant data and information on which inequalities would be exacerbated, with due consideration being given to taking all possible steps to avoid or reduce any likely adverse impacts to protect people in our society most at risk of disadvantage within the Section 75 groups.

**Response to consultation:**

Question 1	Do you think changes should be made to the age eligibility for the scheme?	No
Question 2	If the Department was to introduce changes to the age eligibility, which is your preferred option?	N/A
Question 3	If you already hold a 60+ SmartPass but in future were not able to use it, how would you make your journeys the majority of the time?	N/A
Question 4	If you wish to provide comments supporting your answers, please do so below.	See below

NIFHA does not support any changes being made to the existing scheme. The free and discounted public transport fares scheme is an important mechanism whereby those eligible can visit family and friends and stay active and independent in their communities. The value of this scheme cannot be understated in communities where the withdrawal of this service could lead to social isolation, deprivation, and disadvantage. Moreover, as the data from the 2021 census demonstrates, Northern Ireland has an aging population.<sup>1</sup> This combined with the removal or restriction of the SmartPass, would only increase the reliance on cars in Northern Ireland and in turn be a backward step in terms of achieving sustainability goals.

Question 5	Do you think SmartPass users who hold an age-related SmartPass (60+ or Senior (65+)) should be able to use their SmartPass before 09:30?	Yes
Question 6	Do you think SmartPass users who hold a disability-related SmartPass should be able to use their SmartPass before 09:30?	Yes
Question 7	If you hold a SmartPass and could not use it before 09:30 on a weekday, how would you make your journeys the majority of the time? (Select one)	N/A
Question 8	If you wish to provide comments supporting your answers, please do so below.	See below

NIFHA does not support the restriction of the SmartPass to after 09:30 or any time restrictions on the use of the SmartPass. The use of the SmartPass prior to 09:30 is especially important for people in rural communities across Northern Ireland who often leave their homes before 09:30 to access services in the cities across Northern Ireland.

Question 9	Do you think SmartPass users who hold an age-related SmartPass (60+ or Senior (65+)) should be able to use their pass on rail?	Yes
Question 10	Do you think SmartPass users who hold a disability-related SmartPass should be able to use their pass on rail?	Yes
Question 11	If you hold a SmartPass and could not use it on rail, how would you make your journeys the majority of the time?	N/A
Question 12	If you wish to provide comments supporting your answers, please do so below.	See below

NIFHA does not support the restriction of the SmartPass that would prevent those currently eligible, from using their SmartPass on the rail network. Restricting the services could reduce the accessibility of the public transport network to those who use the most convenient service to them. As mentioned above, we would be concerned that this would be a backward step with regards to sustainability.

<sup>1</sup> [www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-press-release.pdf](http://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-press-release.pdf)

NIFHA welcomes additional consultation with local communities and Housing Associations about the potential impact that any changes to the scheme would have on communities across Northern Ireland.

Clára Robinson  
Policy and Research Executive  
Northern Ireland Federation of Housing Associations  
crobinson@nifha.org