



NTP 10

Disability Wales Reprioritisation of the National Transport plan Consultation Response.

Disability Wales, as the national association of disabled people's organisations in Wales, is striving to achieve disabled peoples' rights to, equality, and independence.

Disability Wales promotes the adoption and implementation of the Social Model of Disability, which in contrast to the Medical Model of Disability identifies that it is environmental, institutional, and attitudinal barriers that disable people and prevent them from full participation in society not their medical conditions or impairments.

Disability Wales is an independent, not for profit organisation established in 1972 and managed by a voluntary Board of Directors drawn from disabled people active in local and national disability organisations across Wales.

Reprioritisation of the national transport plan and scrutiny of the minister for local government and communities.

What are the key issues currently affecting transport in Wales?

In relation to disabled people accessing public transport in Wales we highlight the following issues:

- **Accessibility:** - Physical access encompasses access to bus and rail stations plus physical access to the carriages and busses. This goes beyond ramped access to trains and provision of lifts. Accessibility also includes ample disabled parking bays at car parks at rail and bus stations, tactile paving and colour contrasting flooring included in station designs.
- **Access to information / communication** is crucial when travelling on public transport. It is paramount that information is made available in accessible formats particularly when there are disruptions to services as this is when disabled people feel that information is most lacking. Provision of real time information in both visual and audio formats is essential.
- **Attitudinal barriers** of public transport staff whether they are helpline staff, assisted passenger reservation service staff or customer facing staff at bus or train stations affect the travel experience of disabled people. How staff members engage with disabled travellers and their knowledge of disability affects disabled persons confidence to travel. Disability Wales's members do have some positive experiences of staff assistance when travelling but more commonly have negative experiences.
- **Affordability** of public transport especially the high cost of coach, taxi and rail fares this is an extremely important issue due to the detrimental effect of the Coalition Government welfare reforms and also comes at a time where local authority services are being cut. Disabled people are facing income reduction at a time where public transport fares are increasing which will further limit disabled peoples' choice of public transport due to cost of travel. This

could lead to disabled people becoming increasingly reliant on private vehicles to venture into the community thus limiting opportunities to live independently.

Reliability: - Some bus service providers have a mixture of low level entry and stepped entry buses in their fleet running in rural, town and city areas. Just because an inward journey may be accessible it doesn't necessarily mean that for the journey back home there will be an accessible low level bus. This is particularly true in rural areas. One member's experience led to them being stranded in the town centre due to the lack of availability of accessible buses for their return journey. They had to travel home in a taxi.

How far are they addressed by the change of priorities within the NTP?

Reference 2 'Continuing to improve provision of travel information' is welcomed however we recommend that disabled people with various impairments are engaged with in relation to access to information. There are many disabled people who do not have access to the internet therefore the emphasis of promoting online information services should not overlook 'hard copy' information resources.

Reference 7 'Continue to plan strategic modal interchanges' it is crucial to incorporate accessible designs to ensure disabled people are fully able to negotiate any planned interchanges independently. Disabled people should be involved at the start of the planning stage. Access statements should be submitted with any plans submitted to local authority planning departments.

Reference 8, 9 & 11 all link to the walking and cycling strategy. Before implementing, any strategy robust equality impact assessments have to be carried out. Disabled people should not be excluded or made to feel like pariahs if their impairment limits their ability to walk or cycle and they have to rely on private transport.

Reference 15, 17 and 19 relate to community transport. Many disabled people who cannot access public transport often use community transport. The main issue is accessibility of community transport, i.e. the space and seating numbers, limiting the size of wheelchairs a vehicle can carry, limiting the capability of transporting mobility scooters due to lack of room in the vehicle and the cost of the journey. Disabled people have concessionary passes however these are not accepted when travelling on community transport as a rule where an alternate flat fee is charged.

Reference 23 relates to National Station Improvement plan. The funding from this has seen a number of train stations successfully adapted to ensure disabled access to some platforms if not whole stations. For example provision of step free access to platforms, tactile flooring and colour contrasting information signs. However there are many other train stations in Wales, particularly rural train stations that are still not accessible for disabled people. Train station adaptations are not happening fast enough for many disabled people.

Commitment to free concessionary travel on local bus services for disabled people, reference 28, is again welcomed. However not all disabled people are able to utilise their free passes and companion passes due to inaccessibility and infrequency of local bus services in their area. Therefore they still have to pay to use accessible modes of transport. In general any decisions that could affect disabled people must undergo rigorous equality impact assessments before implementation.

How far does the changes in the priorities within the NTP address and strike the appropriate balance between the strategic priorities stated in the Wales Transport Strategy namely:

- a) Reducing greenhouse gas emissions
- b) Integrating local transport
- c) Improving access between key settlements and sites
- d) Enhancing international connectivity
- e) Addressing safety and security

A) Reducing greenhouse gas emissions. Disability Wales strongly supports initiatives to cut carbon footprints. However reasonable adjustments should be made to ensure disabled people are fully included and are able to utilise any proposed alternatives to reliance on privately owned vehicles. There is a need to involve disabled people in developing initiatives to avoid any unintended consequences.

b) Integrating local transport systems is of vital importance to improve the quality of the public transport system. However, disabled access should not be overlooked. Part M of the building regulations 2010 and BS 8300 minimum standards should be adhered too at the planning and design stage of integrating local transport, enhancing international connectivity and improving access between key settlements and sites. It is worth noting that minimum standard guidance and good practice can and often do differ. There is often a difference of opinion between what constitutes reasonable adjustments. What adjustments are reasonable to officials may not be reasonable to disabled people and vice versa this is why engagement is crucial.

c) Many key settlements and sites come under CADW jurisdiction and may be listed. However reasonable adjustments are still legally required to be made to include disabled visitors. Robust access statements and equality impact assessments should be carried out before any access improvements are made, making sure to engage with disabled people from the start of the design process.

d) Enhancing international connectivity. Access to the built environment and access to public transport combine. For example reliable, regular and accessible public transport coupled with fully accessible transport interchanges allowing for smooth time efficient changes / integration between modes of transport would make a difference to international connectivity for example Wales to Ireland - Fishguard trains - Ferries to Ireland and Wales to the world - trains / busses to Cardiff Airport. Reliability and disabled accessibility is key for both transport routes.

e) A very high number of hate crimes against disabled people are committed on public transport.

The EHRC, Hidden in Plain Sight Report, September 2011 found that "Disabled people told us travelling on public transport is a 'hot spot' where incidents of verbal and physical abuse from other travellers are commonplace. Sometimes the abuse came from staff. Other times staff did not intervene to prevent harassment. Some disabled people stated in the report that by using an aid such as a cane or walking stick, wheelchair or a guide-dog they feel highly visible and vulnerable at unstaffed stations."

Safety concerns of disabled passengers and lack of security is a great barrier for disabled people, fear and bad experiences discourage many disabled people from travelling on public transport. Another EHRC report from 2009 highlighted "Disabled people are at higher risk and experience greater levels of targeted violence in comparison to non-disabled people. Within the disabled

population, people with learning disabilities and/or mental health conditions experience higher levels of targeted violence”.¹

NTP prioritised to tackle poverty, increase well being and assist economic development. How far does the change in priorities within NTP contribute to achieving these objectives and are they consistent with those included in the Wales Transport Strategy?

Tackling poverty: – disabled people are facing uncertain futures due to welfare cuts and due to the axing of vital services. The commitment to maintain concessionary travel and the commitment to improve community transport is very welcome indeed. However blue badge parking charges is a sensitive issue which has not been addressed in the transport plan. Blue badge holders paying for car parking in council owned car parks is contentious because there is not a uniform policy across Wales. Local authorities manage their own budgets and therefore decide whether to charge blue badge holders or not. This inconsistency and the insistency of charging blue badge holders to park at all should be looked into at a national level.

Blue badges are a necessity not a luxury. At a time of welfare reform from the UK Government, when disability benefits are being reduced, more disabled people will be pushed further into poverty. Charging blue badge holders to park will be a further barrier for those with limited funds available. Local authorities are increasingly implementing parking charging policies at a time where disabled people will have less money due to the welfare reforms and substantial benefit cuts, but at the same time are expected to pay more. It is worth noting that Wales has the highest number of people claiming Disability Living Allowance²

Increase well being

If public transport was fully accessible to all disabled people without having to book 24 hours in advance for assistance (as is the case with Assisted Passenger Reservation Service) if disabled bays were of ample quantity and blue badge holders were not charged to park, this would greatly reduce disabled peoples anxiety when venturing out in the community.

Assisting economic development

Shops and businesses looking to boost their economy in these tough times should be looking to the “blue pound” as a way of attracting more customers. Disabled people do have some money to spend and choose to spend it in premises they are physically able to access and where they are treated with respect. Also the ease of travel to shops and services influences where disabled people shop. An out of time retail park with ample disabled bays enabling disabled people to park close to shops for free will fare better than smaller retailers along local high streets where disabled car parking is often at a premium with strict time limits and where disabled parking often incurs a fee.

Are the priorities contained in the ministers statement the correct objectives for Welsh transport policy?

Yes, however disabled access should go beyond physical access; the walking and cycling strategy / plan should be mindful not to exclude disabled people because their impairment prevents them

¹ Equality and Human Rights Commission, 2009, Disabled people's experiences of targeted violence and hostility.

² Equality Issues in Wales: a research review. EHRC 2009

http://www.equalityhumanrights.com/uploaded_files/research/11_equality_issues_in_wales_-_a_research_review.pdf

from cycling and walking and they have to rely on public transport or private car ownership to get from a to b. The necessity to use 'less green' modes of transport should not be frowned upon but accommodated and given due regard in the implementation of any walking and cycling strategy.

How far does the prioritised plan meet the WG's obligations in relation to sustainability and equality?

Alternatives to travelling into town centres by car such as 'park and ride' must be accessible to disabled people. For example bus shuttle services from park and rides to town centres must be low level and have ample wheelchair space and disabled allocated seats. The frequency of park and ride bus services is also an important issue along with reliability. Both are important in establishing and maintaining user confidence. At park and ride car parks there must be an ample number of accessible parking bays and any signage/information needs be available in accessible formats..

Sustainable modes of public transport such as low carbon buses have quieter engines. Guide-dogs for the Blind have actively that these types of buses are too difficult to hear on approach which makes them a particular hazard to visually impaired and blind pedestrians.

Framework for Action on Independent Living

The development of an Independent Living Framework was announced in October 2010 by the Welsh Government Minister in charge of equalities, Jane Hutt.³

The Welsh Government is developing a Framework for Action on Independent Living, for publication summer 2012. The Framework will set out the action to be taken to promote the rights of disabled people to live independently and exercise the same choices as other citizens. It will contribute to the Welsh Government's Strategic Equality Plan and support its efforts to mitigate the effects of the UK Government's welfare reform plans.

The Framework will build on the Manifesto for Independent Living produced by Disability Wales, which identified priorities in relation to:

1. Advice, information and advocacy
2. Accessible and supported housing
3. Choice and control in personal care
4. Person-centred technology
- 5. Barrier-free transport**
6. Social, economic and cultural inclusion
- 7.

The Framework is being developed in partnership with Disability Wales and other organisations, and by engaging directly with disabled people.

Transport is a key priority area. *Manifesto for Independent Living: Call to Action 5*

A barrier free transport system, including all modes of transport

"74% of adults with impairments experienced restrictions in using transport compared with 58% of adults without impairments"

(Life Opportunities Survey, Office for National Statistics, 2010)

³ <http://wales.gov.uk/newsroom/equalityanddiversity/2011/111020ilf/?lang=en>

“Public transport by bus (there are very often no train services in a number of rural areas) is often inaccessible to certain passengers because they have no low level entry and the local authority is yet to complete the provision of raised bus stops. This means that the only mode of transport available to many people is their car or expensive taxis.”
(DW Member comment, January 2011)

Accessible transport is essential to Independent Living. Many disabled people use public transport to shop, attend hospital appointments, socialise and work. Without access to trains, buses and accessible parking many disabled people are excluded from their community.

Despite significant improvements to the public transport system many barriers still exist, e.g. limited travel options, lack of accessible and up-to-date information, physical, attitudinal and communication barriers, and charging for Blue Badge parking.⁴

The Welsh Government will produce an overall report on the findings gathered from round table discussions and sub theme working group research to create the Framework for Action on Independent Living. There are working groups covering six sub themes and key priorities, regional meetings, national steering group running from February and March 2012. The Framework will be completed by July 2012 to launch in the autumn.

⁴ Disability Wales Independent Living Manifesto 2010. <http://www.disabilitywales.org/independent-living>