

# Equality of Opportunity Committee

## **Inquiry into the impact of Welsh Government policy on the accessibility of transport services for disabled people in Wales**

### **Response from Disability Wales**

This paper is being submitted to the committee as evidence of the impact of Welsh Assembly Government policy on the accessibility of transport services for the people of Wales. Disability Wales was pleased to receive an invitation to submit evidence. The evidence we provide has come directly from our members via email, enquiries and/or posts on Facebook. Member's comments provide examples, which illustrate the impact Welsh Assembly Government policies have for disabled people when travelling by public transport. We ask the committee to listen to our members' experiences, take note of the barriers still faced by disabled people and to ensure the involvement of disabled people when planning future access improvements to Welsh Assembly Government policies.

Disability Wales recognises that at the heart of full inclusive participation in society is the right to access all public transport. Inaccessible transport remains a significant barrier to independent living for many disabled people. Our members' have identified access to public transport as one of the core principles of Independent living. Disability Wales participates in a number of transport working groups such as the Welsh Assembly Government's Blue Badge steering group and Arriva Trains Wales Disability Panel. Disability Wales recently produced a rail policy (to be ratified) and have arranged a Transport Seminar on 21<sup>st</sup> October 2010: Ticket to Ride: – Where are we going with access to rail travel. <http://www.disabilitywales.org/2094>

The findings from the Disability Wales Streets Ahead Campaign (September 2009) suggested that transport was a barrier preventing disabled people accessing their local high street shops and services. Accessibility of train stations are particularly important as this could affect the success of the climate change agenda, where the general public are encouraged to leave their car at home and use more sustainable modes of transport. Accessibility of train stations is important as this will give disabled people the choice to leave their cars at home and use public transport more regularly.

Disability Wales members' have encountered a number of access barriers when travelling on public transport.

Disability Wales responded to National Assembly for Wales Equality of

Opportunity Committee Inquiry into Accessibility of Railway Stations in which we fed in members' comments and experiences of rail access barriers throughout Wales.

The main barriers included:

- Inadequate provision of disabled bays at many rural train stations. As accessibility of railway stations improves, so too must the number of disabled parking bays available at those station car parks.
- Footbridge only access to smaller rural platforms is very common, often being the only method available to get to other station platforms.
- Physical barriers such as train carriage height and the age of the carriage; many routes have old rolling stock which are not wheelchair accessible with their narrow aisles and lack of disabled toilet.
- A lack of lifts at a train stations means that wheelchair users cannot access the stations and even if lifts are present there are often limited hours in which the lifts can be operated. Many lifts do not operate in the evenings due to fears of vandalism.
- Assisted Passenger Reservation Service (APRS) – disabled people having to give 24 hours notice when booking assistance prevents spontaneity of travel and choice for many disabled people who require assistance when travelling by train. The fact that disabled people who require assistance have to give 24 hours notice in advance of travel is a huge barrier. This process is extremely restrictive and takes away spontaneity and independence.

For Disability Wales' full response see:

[http://www.assemblywales.org/bus-home/bus-committees/bus-committees-other-committees/bus-committees-third-eoc-home/bus-committees-third-eoc-inquiry/eoc3-inq\\_rail/eoc3-rail\\_ing-response/eoc3-rail\\_ing-rs58.htm](http://www.assemblywales.org/bus-home/bus-committees/bus-committees-other-committees/bus-committees-third-eoc-home/bus-committees-third-eoc-inquiry/eoc3-inq_rail/eoc3-rail_ing-response/eoc3-rail_ing-rs58.htm)

**Please summarise your experiences as a disabled traveller.**

- **How easy do you find it to travel locally and nationally?**

Bus Travel – The lack of low level buses especially in rural areas are a major concern for many disabled people.

Some local areas have an accessible alternative to public transport – e.g. Barbara bus in Gwynedd (North West Wales) <http://www.barbarabus.com/> other areas have no accessible alternatives to public transport. Initiatives like the Barbara bus and similar schemes running in the Pembrokeshire area (South West Wales)

[http://www.pembrokeshiretransport.co.uk/content.asp?nav=688,735&parent\\_directory\\_id=673](http://www.pembrokeshiretransport.co.uk/content.asp?nav=688,735&parent_directory_id=673) are the exceptions not the norm. In Rhondda Cynon Taff there is a bus service called Accessible Caring Transport which aims to provide community transport services and schemes to disabled people and

older people. <http://www.shape-it.org/Community/TravelTourism/TransportRCT/AccessibleCaringTransport.aspx>

For a number of disabled people, public transport is their preferred or only option of transportation. Some appreciate the low costs of using public transport and relief at not having to look for suitable parking spaces; while others endeavour to do their part in combating climate change. Accessible transport is crucial for these people to live independently in their communities and to be able to fully access the services which they require. Some disabled people do not own a car or are unable to drive and so for these people their reliance on public transport is even greater.

Buses and trains, in particular, are paramount in enabling disabled people to live independently in the community being able to access a range of services. Not all disabled people have access to a private vehicle therefore solely rely on public transport as a means of getting from a to b.

Bus access barriers include:

Stepped entry: older buses have stepped access these are more common in rural areas because in these areas bus operators are more likely to use older vehicles. Wheelchair users are unable to use many buses in rural areas because stepped access makes it impossible. Many other disabled people with mobility impairments also find stepped access very difficult to negotiate when boarding the older vehicles.

Low height of bus stops: in rural areas, bus stops are often very low which results in a high step being needed to get on to the bus. Many ambulant disabled people find that when alighting from buses, the high step down also causes problems for them too.

Limited number of wheelchair spaces available on the bus: having only one or two wheelchair spaces on low floor buses means that a group of wheelchair users are not able to travel together.

People with motorised scooters are often denied boarding on low level buses as some bus companies do not allow them onto their bus. Conditions of carriage are only displayed on some buses and while there is usually a maximum allowed weight, some motor scooters are heavier than the conditions of carriage allow. Each bus company has their own policies relating to carriage of motor scooters; however most do not allow them on board.

Many disabled people encounter harassment on public transport which can range from verbal taunts to physical assault. People with learning difficulties, in particular, experience abuse mentioned above when travelling on buses and trains.

Another enquiry to Disability Wales highlighted that other bus companies are not allowing small scooters' onto their buses. A passenger who regularly used her electric scooter on her weekly shop had been refused entry onto the bus with the scooter when her local bus provider changed. Some bus providers have a maximum weight allowance and a company policy not to carry scooters.

Disability Wales receives a number of enquiries relating to low level bus travel. For instance there was an enquiry from a resident highlighted that a local bus company did not provide any wheelchair accessible buses and the service has become very poor.

Bus companies are correctly stating that legally they do not need to have all their fleet fully accessible until 2020, but some companies are using the deadline as an excuse for continued poor services for disabled travellers. Bus services in rural areas are more likely to have stepped access because rural bus companies use older vehicles in their fleet; it would not be cost effective to upgrade their buses to match access requirements. Bus drivers' failure to lower ramps for wheelchair users who wish to board their local buses have come to our attention via members' enquiries. Examples include:

In a Valley's area, a passenger informed us that she has had to wait for up to two hours for a bus she could access to arrive.

Another member commented that a bus driver told her that the ramp was broken and she therefore had to wait for the next bus to take her into town.

The speed in which bus drivers pull away from the kerb has been highlighted. A passenger from Cardiff had various complaints relating to the bus drivers' attitudes. His wife (also disabled) fell when the bus departed too quickly before she reached her seat; again it was other passengers who came to her aid not the bus driver.

Taxi Voucher scheme: taxis are expensive and as such are often of limited use to the majority of disabled people living on low incomes. Disabled people will not spend money on taxis which are inaccessible. It is worth noting however that for some disabled people taxis provide their only form of independent transport.

Due to the cost of paying for taxis for rural distances it means that only a very small proportion of necessary journeys can be funded. The allocation of vouchers to disabled people will deplete with a few 10-mile or 15-mile journeys. Disabled people living in rural locations often live many miles from the 'local' amenities such as shops, banks, cafés and dentists etc, thus making even essential journeys costly.

#### Blue Badge Parking

Parking charges for Blue badge holders vary across Wales. There is no uniform policy. Each local authority control their own parking rules and regulations in council owned car parks. In Neath and Port Talbot the Council

do not charge blue badge holders when parking in council owned car parks. While in Merthyr there are no reductions for blue badge holders and people are charged the full fee to park. Other local authorities do not charge blue badge holders the same fee to park as non disabled drivers however a charge is made. Swansea for example charges a discounted rate as long as the Blue Badge holder is parked in a blue badge space. Charging blue badge holders to park in council owned car parks is a continuing issue especially at a time when local authorities are facing budget cuts and are looking at ways to save money.

Disability Wales does not agree with blue badge parking charges. Charging blue badge holders to park is seen by some Local Authorities as a quick fix to ease budgeting constraints. Many disabled people have significantly lower incomes than non disabled people and often rely on benefits. A parking charge for Blue Badge holders could force disabled people to stay at home instead of travelling into town because they can not afford the cost of parking. Disabled peoples' right to independent living would be affected as many would not be able to travel when or as often as they wish, especially when public transport is not always a viable alternative to their own cars as many buses and trains are inaccessible, and taxis are costly.

Disability Wales welcomes the recently announced expansion of Blue Badge eligibility criteria which is currently undergoing a consultation stage. More disabled people will be able to benefit from Blue Badge ownership and the concessions allowed such as parking nearer shops and services.

Across all modes of transport there are barriers to information this includes when a disabled traveller is planning a journey and during the journey itself.

A member commented;

“All information should be fully accessible and pictorialised for people with learning disabilities to understand using inclusive communication tools.”

Information should be fully accessible to travellers with sensory impairments too. Visually impaired and hearing impaired travellers should not be overlooked. Signs should be non-colour contrasting, large print, using clear font and situated at an appropriate height. Information should be provided in a tactile format such as Braille which should be made readily available.

Travel information should be provided in an accessible format. Internet travel websites that enable travellers to plan their journey should be screen reader compatible, clear font and have a non-colour contrasting background/text options.

Member comments include;

“The train timetable board on the platform was too high up, I couldn't see the train information, being deaf it meant that it was the only way I could be sure of the train times to plan my journey. I trust my eyes

not my ears.”

Disability Wales stress the need to address the lack of visual and audible information on trains and buses and train and bus stops, these are vital sources of information for Deaf, hearing impaired, visually impaired people and others. We have already seen an improvement on trains and some buses in city centre areas however this work must be progressed across the whole of Wales.

**• What factors have made it easier to travel? For example, what difference have concessionary travel cards and community transport services made to you?**

Concessionary travel brings many benefits to its recipients and the wider population. The concessionary travel scheme enables disabled people to actively contribute to the Welsh economy, utilising public transport to access employment, education, health and leisure services, and participating fully in society.

- A free bus pass enables many disabled people to travel to and from their place of work. Without this concession many would not have the available funds to pay for their travel. This could lead to more people staying at home and remaining solely reliant on benefits, which would have a detrimental effect on the wider economy.
- The Welsh Assembly Government is fully committed to improving the skill base of the Welsh population. Concessionary travel opens up education and development opportunities for many people so that they can contribute to and benefit from the skills agenda.
- For many disabled people who require access to health services the concessionary scheme is vital. Without the concessionary passes the cost of hospital travel could lead to missed appointments due to unaffordable bus fares which would be detrimental to disabled peoples health.
- The Welsh Assembly Government’s own strategy, Climbing Higher, aims to mobilise the citizens of Wales through increased physical activity. Removal/limitation of the concessionary scheme would exclude many disabled people from taking up leisure services, which may be essential to their physical health and hugely beneficial to their psychological wellbeing. Many disabled people need support to enjoy swimming, using a gym and so on, and the concessionary pass makes taking a companion possible. As independent access to, or use of, many such facilities is unreasonably difficult, if not impossible, penalising a disabled person by making it too expensive to take a companion would mean that they could not continue to reap the

benefits, or experience the enjoyment, available to non disabled people on the basis of personal choice.

The concessionary travel scheme is an invaluable asset to disabled people and underpins the right to independent living set out in 'Article 19' of the '*UN Convention on the Rights of Persons with Disabilities*'. The Government's own adoption of the Social Model of Disability and its support for the Convention is undermined by seeking powers that could potentially abolish this scheme.

Members' comments include:

"Without the pass 'H' would not have as much freedom and independence as she has at the moment as she would always have to rely on her family to do anything. 'H' is unable to work so she does not have a lot of money to play with but the bus pass allows her to roam"

"I have epilepsy and so have periods when I cannot drive. I live in a semi-rural area, and have to travel as part of my job (or I don't work). Last time this happened, 12 months' ago, the bus pass was a great help as taxis are extremely expensive"

"The concessionary travel scheme meant that I could continue with my work. Although travel by public transport took far longer, it was possible in most cases."

Companion bus passes:

The use of the companion concessionary bus pass seems to be misunderstood by some bus companies and their drivers.

A parent of a disabled son stated that his son has a bus pass which includes a carer/companion and that his father did go with him for the first few weeks to the centre that his son travelled to. After that, his son was able to do the journey on his own and this happened for weeks before one bus driver told him he had to get off the bus because he didn't have his carer/companion with him.

- **Have you had any particular problems or good experiences relating to a particular mode of transport, e.g. buses, coaches, trains, taxis?**

Members' have had more not so good experiences than good experiences when travelling on all modes of transport, but especially on buses and trains in particular.

Good experiences:

Wheelchair access to buses; on a positive note some bus drivers, it seems, have been trained to use ramps and are confident / happy to assist wheelchair users to board their bus as observed in the Caerphilly area.

Bad experience:

Unfortunately negative attitudes and unhelpful staff are seemingly all too prevalent.

A member's experience of using their concessionary bus pass.

"Generally bus drivers were great but I experienced a couple of occasions when I was questioned (as to why I used the concessionary pass) as I do not have a visible disability (epilepsy) and generally I'd say I don't look over 60 - a bit humiliating. The down side is that I live in a rural area, so I couldn't go anywhere after about 5.30 in the evening, and journeys which take 30 minutes by car could take 2-3 hours by bus because of connection waits."

The following is another example of how Disability Equality Training would benefit all management and customer facing staff across all transport modes.

Access to Bus services.

Where a bus pulls in at a bus stop has been a cause for complaint. A passenger from Cardiff had various complaints relating to the bus drivers' attitudes. His first complaint relates to bus drivers failing to stop at his bus stop because he is unable to put his hand out (due to a stroke). Also the bus drivers are not pulling in close enough to the kerb; therefore he has a big step down onto the road when getting off the bus. He noted the bus drivers' unhelpful attitude and that it was other passengers that came to his aid when these incidents occurred.

Rail travel and staff attitude.

A member commented "I get very cross at the attitude of some of the station staff and am made to feel as if I am a bother to them"

Another member was faced with negative staff attitude too at railway stations.

"I asked if the guard could help me with my luggage off the train, (and I had assistance booked) his reply was: - 'What do you think I am, social services!!!' I have been told on another occasion, 'Sorry madam we don't have porters any more' and left to struggle alone".

- **How well integrated are transport services in your area? (For example, are there good links between bus and train services and are you able to park at or near your local bus stop or railway station if you need to)**

Many rural trains do not have accessible parking bays in their car parks mainly due to their small size. In train station car parks where there are accessible parking bays there are only a very limited number of spaces.

At park and ride sites disabled people's access requirements must not be overlooked. There must be dedicated accessible parking spaces available on site, accessible transport (bus & train) to and from shopping centres; drop



off points located near to the shop mobility scheme. There should be more information available in accessible formats; this applies to both paper information such as leaflets and online information. Online and paper information should be accessible to all disabled people. Also there should be visual display and audio announcements of trains at railway stations and at bus stops providing real time information. Car park attendants and transport staff should be appropriately trained to understand disability equality issues and able to provide assistance if required.

Rail replacement coach provision must be accessible for disabled travellers. Information should be made available at the time of booking passenger assistance if a rail journey involves a rail replacement service. Disabled people must be aware of such factors when booking a journey on public transport so that they do not become stranded at a station due to the inaccessibility of the rail replacement coach service.

- **What experiences have you had as a disabled pedestrian? The Committee is particularly interested in 'shared spaces' where pedestrians, cyclists and motorists use the same surfaces.**

Disability Wales supports the "Say no to Shared Streets" campaign, comprised of a consortium of national disability organisations, led by Guide Dogs UK.

City centres such as Cardiff encourage Pedestrianisation of the City centre in the evenings whereby pedestrians can enjoy the nightlife without the fear of being knocked over and to reduce traffic build up in and around the City centre. Time restrictions are placed on car entry along certain city centre roads after a certain time. A Disability Wales member mentioned disabled people wishing to enjoy a night out are unable to park near venues in the evening due to road closures. Limiting the number of cars able to enter the City centre may be good for the environment but it impacts on the number of Blue Badge parking spaces available. Road closures in the evening limits disabled people's ease of access to local shops and services. Disabled people have social lives too and at the moment prevented from going out to the town due to lack of accessible parking. These factors should be considered and addressed when developing sustainable travel towns.

Reservations have been raised about the reliance on eye contact between pedestrian and driver to establish who has right of way would mean that visually impaired pedestrians could be put in serious danger. The layout of the shared space area does not have conventional feel of pavements and kerbs that distinguish between road and pedestrian walkway. Guide dogs are trained on conventional roads and use kerbs to mark roads from pavements i.e. safety from potential hazard. Similarly visually impaired people who use sticks hit kerbs and by doing that distinguish between pavement and road. On Shared surfaces there are no clear distinctions between pavement and road. Visually impaired people and hearing impaired people would have to contend with access barriers when navigating shared

surfaces such as impatient drivers. Both impairment groups could have accidents due to not being able to see / hear approaching traffic.

· **How do your experiences in Wales compare with your experience of travelling in other countries?**

Members who live close to the boarder with England have stated that it would be an improvement if they could use their concessionary pass in England. "It would sometimes be more useful if the pass would allow more use in England."

At the moment Welsh concessionary passes can be only used on buses that start and finish their journey in Wales.

The fact that in Wales there are no time restrictions as to when you can use concessionary passes is positive. Many disabled people use the bus to travel to hospital appointments or wish to travel early in the day to avoid busier periods when staff assistance could be harder to find.

Disability Wales member's comment;

"I'd be grateful if you could point out to WAG that many disabled people travel because they have to; it's not just about fun days out. I travel as part of my job, I can't do my job without travelling, and I believe that WAG and Westminster are rather keen that disabled people should work"

**2. To what extent are you aware of the powers devolved to Welsh Ministers and the Assembly that could have an impact on the accessibility of transport services in Wales?**

Concessionary bus passes.

Provision of concessionary bus passes for disabled people and subsequent companion passes have enabled more disabled people to travel, work and live independently in the community. The provision of concessionary bus passes promotes the 'One Wales 2006' 'Principles of social justice, sustainability and inclusivity - of the whole of Wales and for all its people'.

The concessionary travel scheme enables disabled people to actively contribute to the Welsh economy, utilising public transport to access employment, education, health and leisure services, and participating fully in society; thereby promoting inclusion.

It has been raised that some disabled people would like to be able to use their free concessionary bus passes when travelling by train too.

Blue Badge provision

The announcement and implementation of an improvement to the Blue Badge eligibility criteria that allows for more disabled people to receive the Badge is welcomed. The 5 year implementation strategy is a long process however Disability Wales agrees with proposals that will allow more young

children within the scope of the Blue Badge scheme. We also welcome the fact that the Welsh Assembly Government has given priority to areas of the action plan that can be delivered quickly.

The assessed criteria could go further. It also needs to reflect the impact of environmental factors which affect mobility i.e. uneven surfaces, gradients, steps plus the weather. In addition, there is an impact in relation to a related activity for example carrying shopping, pushing a buggy etc.

#### Regional Transport Plans

There was little mention of access barriers faced by disabled people and possible solutions in Regional Transport Plans. It is not apparent as to whether disabled people have been involved in the development of Regional Transport Plans and if so, it has been very limited. The content of the regional transport plans lacks recognition of the needs of disabled people and it seems that disability has been somewhat overlooked in the walking, cycling and climate change agenda. The same is true of the National Transport Plans too.

Planned improvements must be accessible for all disabled people. Local disabled individuals and groups representing a range of impairments should be consulted and actively engaged/involved in the decision making and planning process for each project.

#### National Transport Plan

The Welsh Assembly Government must ensure that the integration of transport modes is fully accessible to disabled people living across different parts of Wales (both rural and urban areas). To ensure the successful integration of these transport modes the current inaccessibility of public transport must be addressed. The accessibility of **all** public transport for disabled people is of paramount importance; however, accessibility is barely mentioned in the National Transport Plan.

- The Wales Transport Strategy (*One Wales: Connecting the nation*) – relaunched in May 2008 explicitly addresses equality issues and transport.
- Its implementation and ongoing monitoring of One Wales: Connecting the Nation. The Wales Transport Strategy priorities.
  - Improved transport accessibility goes beyond enhancing current provision.
  - This requires that people are not disadvantaged by the design, accessibility and availability of facilities and services – or by poor physical access to different types of transport or by the way information is provided and communicated. It also means paying attention to the issue of actual and perceived safety and security on the transport system because some people are deterred from using the network by such concerns.

The National Transport Plan places emphasis on the importance of walking and cycling and climate change agenda. Although these issues are of course important the plan does not acknowledge that disabled people would require an accessible alternative to walking and cycling. The National Transport Plan encourages people to abandon their cars and use public transport. For many disabled people their car is the only source of independence and freedom of movement due to the fact that public transport is not always accessible.

Full Equality Impact Assessments should be comprehensive with full consideration given to the needs of disabled people. Disabled people and their organisations should be fully involved in Equality Impact Assessments. In previous equality impact assessments there have been gaps in analysing the impact of a policy on disabled people.

National Station Improvement Plan Plus  
Welsh Assembly Government increased funding to improve accessibility of **all** railway stations throughout Wales. This is a positive step which will benefit disabled travellers sooner than was originally planned.

The National Station Improvement Programme is managed by Network Rail and delivered regionally. It was launched in 2007 by the Department for Transport (DfT). The broad aim is to create a lasting difference to railway stations across England and Wales. National Station Improvement Programme Plus builds upon the National Station Improvement Programme by delivering further enhancements appropriate to the commitments to the people of Wales.

Additional funding meant that project delivery has been speeded up. A faster timescale will benefit disabled people because their journeys would become more accessible on all modes of transport sooner rather than later.

To conclude:

Disabled people lack confidence in using public transport services due to the physical and communication barriers encountered, lack of assistance and negative attitudes of staff. Disability Wales still receives reports of transport operator staff displaying discriminatory attitudes and behaviour towards disabled people, The Equality Act (2010) has replaced the DDA from October, however much of the statutory duties will remain. Without significant improvements to this current situation, it is highly unlikely that Blue Badge users using personal transport will positively choose to transfer to public transport as an alternative mode. These concerns mean that there is less choice for disabled people to adopt sustainable behaviours.