

Disabled Persons Transport Advisory
Committee

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Siwan Davies
Committee Clerk
Environment, Planning and Transport Committee
National Assembly for Wales
Cathays Park
Cardiff
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9 November 2001

Dear Siwan

**The National Assembly for Wales
Environment, Planning & Transport Committee consultation report
Policy Review of Public Transport**

The Disabled Persons Transport Advisory Committee (DPTAC) welcomes the opportunity to comment on the consultation report Policy Review of Public Transport.

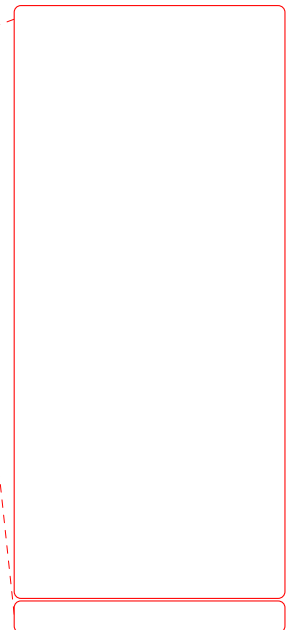
The attached paper provides advice on DPTAC's general principles in relation to public transport policies and how they might relate to Wales. We apologise for missing your deadline of 12 October.

We hope you will find our advice helpful but if there are issues which you wish to discuss further please do not hesitate to alert us.

Yours sincerely



Jane Wilmot OBE
Chair



Advice of the Disabled Persons Transport Advisory Committee (DPTAC) on:

The National Assembly for Wales Policy Review of Public Transport Consultation report

Introduction

1. The Disabled Persons Transport Advisory Committee (DPTAC) was established under the Transport Act 1985 to provide independent advice on the transport needs of disabled people.
2. DPTAC commend the Assembly's overall vision, welcoming accessibility and affordability as two of the four key objectives. We particularly welcome the aim for public transport in Wales to act as a positive lever for improving equality of opportunity and significantly improving levels of accessibility for disabled people. This response aims to highlight some areas that could help deliver this vision.
3. The purpose of this paper is therefore to set out some general guidelines which DPTAC recommends should be taken into account when establishing the transport framework to ensure accessibility for disabled people is built in through;
 - a. **Making access a condition of funding**
 - b. **Making use of available guidance**
 - c. **Ensuring awareness of the range of needs and solutions available**
 - d. **Involving disabled people.**
4. DPTAC's aims, objectives and principles can be found at Annex 1. Background on DPTAC's statutory role can be found in Annex 2.

Vision & Quality

5. DPTAC welcomes the vision for public transport to be integrated, accessible, affordable and a favoured mode of transport for the people of Wales. This should ensure that accessibility for disabled people is significantly improved, although the needs of disabled people who will never be able to use public transport, irrespective of the improvements in accessibility, must not be overlooked.

6. In considering the progress made in ten years, the National Assembly might consider using the findings of DPTAC's public attitude survey of disabled people to public transport, currently being conducted by MORI in England and Wales, as a baseline by which to benchmark progress. The report will be available in Spring 2002.
7. DPTAC welcomes the inclusion of accessible and reliable information, physical accessibility and effective staff skills within the elements of quality but assumes the list given in 3.4 does not represent any order of priority.
8. In terms of driving up quality, DPTAC would suggest that vehicle standards alone is an insufficient measure of the progress made in delivering accessible services to disabled people. It would be useful to monitor and encourage not only DDA compliant buses and trains (and eventually taxis), but also compliance with guidance in documents such as '**Inclusive Mobility**' (forthcoming from DTLR), **BS8300** (published by the British Standards Institute in October 2001) and the Strategic Rail Authority's Code of Practice on Train and Station Services for disabled people.
9. As mentioned above, changes in disabled people's attitudes to public transport over time will be another key indicator of the success of the policy in delivering accessible services.
10. If a 'Kite Mark' is developed [Recommendation 1], DPTAC would advise inclusion of the areas mentioned in paragraph 8, together with consideration of training of staff at all levels to deliver accessible services. Annex 3 details other guidance that might also be used in reaching the specification of minimum standards.
11. Affordability will be a key issue for many disabled people and the concessions for disabled people are to be welcomed. But free travel alone is not the only consideration. Of equal and of possibly greater importance will be ensuring services serve the facilities and destinations disabled people wish to go to and at the times they need to travel.
12. In relation to investment, the Government's ten-year plan for transport, **Transport 2010** stated:

"6.5 The Government is committed to public transport that is accessible to disabled people. The rate and level of new investment in this Plan will ensure that improvements in the accessibility of public transport are brought forward more quickly. Building in accessibility for all disabled people in all new investment is a condition of public money being spent.

Local authorities and transport operators should ensure that the transport needs of disabled people are factored into their plans and that the full benefits of improved public transport are accessible to all:

13. It goes on to state that the Government will be developing measures for evaluating accessibility and setting targets for the improvement in service delivery.

14. The effect of the commitment in paragraph 6.5 is that all transport projects seeking public funding, will be conditional on access for disabled people being included as an integral part of the submission. All bids will be monitored for compliance with this commitment and evaluated to ensure that full access was included.

15. The Government's ten year plan for transport committed the Government to developing measures for evaluating accessibility for disabled people. As stated in previous consultations, **DPTAC consider it essential that the National Assembly make a similar commitment to investment in accessibility in their transport framework for Wales.**

16. Building in accessibility for disabled people to new and existing transport services and facilities will enable more disabled people to travel in mainstream services, including rail, thereby reducing pressure on specialised services, such as Dial-a-Ride. In turn, this will enable those essential services to improve the quality of service they provide for more severely disabled people.

17. Improving the accessibility of mainstream transport will also make it easier for everyone to use, including those encumbered with heavy luggage, people with children etc. It is clearly more effective, and efficient, to design to include disabled people from the outset.

18. It is important that the public, including disabled people, should be engaged at all stages of transport development and improvement. However, disabled people should not be expected to be aware of the regulatory, legislative or technical requirements in providing advice on all the priorities and issues affecting access. The onus should be on those developing proposals to ensure they meet the needs of disabled people when developing their scheme.

19. Consultation with local disabled people should be supplementary to, and not a replacement for, national guidance, validated research and the expert evaluation of proposals and technical solutions to access barriers.

Many access problems can be created by well-intentioned measures that have unforeseen consequences for other travellers.

20. DPTAC recommends using local people to identify the local problems and priorities within the area but using recognised guidance and involvement in project teams of access specialists to recommend solutions. However, those seeking to involve disabled people need to ensure that they are representative of all disabled persons and inclusive of the full range of access needs. When seeking the views of local people, including disabled people, it is important to include the views of those who do not currently use public transport as well as those who do. Factors which influence people's non-use of transport will be important in assessing barriers to public transport.

21. Local access groups exist in many areas. A local access group typically exists to advise the local authority on access for disabled people in that locality. They are often run by volunteers with limited resources - offering to pay expenses will greatly assist in enabling disabled people to participate. The Access Committee for Wales can provide details for local access groups in Wales, they can be contacted on 029 2088 7325.

22. DPTAC stands ready to work in partnership with the National Assembly on the strategic guidance and direction of policy. However, DPTAC has limited resources and may not be best equipped to advise on how strategic policy relates to the priorities of localities within Wales in any more than general terms. In addition to the nurturing of local access groups, the National Assembly might consider requiring an advisory group to be established under any new organisational arrangements.

23. In organising any public consultation exercise the needs of disabled people must be taken into account. This may require making information available in a variety of different formats and media, for example on tape, and ensuring that venues for public meetings are accessible to disabled people, for example ensuring the availability of accessible parking places and providing sign language interpreters. Those running the session will also need to ensure disabled people are given opportunities to participate. DTLR will shortly be publishing guidance related to making the LTP process more accessible.

24. The European Conference of Ministers of Transport 'Charter on Access to Transport Services and Infrastructure' required all recommendations and budgets to include full accessibility to approved

standards or recognised best practice into the design and construction of projects. (Source: ECMT Charter, 1999). A copy of the Charter is attached.

25. DPTAC also believes that all those involved should have disability equality and awareness training related to the functions of their job.

26. Registered access consultants and access officers have experience and knowledge of the needs of disabled people in relation to transport and the built environment. Contacts are available from the National Register of Access Consultants (www.nrac.org.uk) and Access Association (Secretary: Sue Fox email: foxs.@walsall.gov.uk) These will be important skills to include in consortia (4.11).

Organisational Structures

27. It is not DPTAC's remit to comment on the need for a Passenger Transport Authority for Wales. However, if established it would need to set the strategic agenda to demonstrate the transport needs of all disabled people are met, that disabled persons needs are included in the development of any integrated public transport policy and by delivery at local level via Local Authority Transport Plans (LTP) and regional public transport strategies. The DTLR guidance on full Local Transport Plans set out criteria to be used in the assessments of the elements of the LTP dealing with disability issues which might represent a good starting point.

28. Although legislation and regulation relating to access for disabled people is largely retained by DTLR, the National Assembly has considerable influence over the outcome and progress in achieving change for disabled people in Wales through its investment decisions and guidance.

29. The National Assembly will also have a role in ensuring any funding it provides to those responsible for designing, constructing and managing transport projects and services fully incorporates the needs of disabled people to agreed national standards from the outset. It will be more expensive to make alternations at a later date, and funding may not be available.

Monitoring and Evaluation

30. DPTAC welcomes the proposals to involve passengers in the evaluation and monitoring of schemes and the transport framework. The attitude survey is one means of achieving this. In addition, DPTAC would suggest consideration of access audits of proposals and post-completion to

ensure delivery of accessibility considerations and identify areas for improvement. Mystery shopping is also a useful, but expensive, tool in establishing whether disabled people are able to use transport services and transport facilities as easily as anyone else. As noted above in point 20, it is important to consider ways of assessing the views of the non-users of public transport.

31. Evaluation should be undertaken to recognised standards and provide feedback for addressing common issues and problems. Accessibility for disabled people is an evolving science and good practice is constantly developing. Involving those with the skills and experience in access in the evaluation mechanisms, as well as passengers, will draw upon a wider pool of knowledge.

Summary

32. DPTAC welcomes the National Assembly's vision and aims in relation to public transport in Wales.

33. To secure accessibility for disabled people, DPTAC believes it is essential that accessibility is made a condition of investment and quality assessments, disabled people are involved at a variety of levels and that organisational structures and processes develop the skills and expertise necessary to deliver and monitor accessibility.

34. DPTAC's priority is to secure a commitment to make public funding conditional on access for disabled people being fully integrated in the proposals from the outset. This commitment would represent a step change in the accessibility for disabled people of transport services.

35. DPTAC stands ready to discuss with the National Assembly how it might most effectively develop its relationship to provide timely and credible advice that delivers real changes in the accessibility of public transport services in Wales.

Annex 1: DPTAC aims, objectives and principles

DPTAC aim, objectives and principles

Aim: DPTAC's overriding aim is to work for the achievement of a transport system and built environment which is fully accessible to all within the next ten years.

Objectives: To that end, DPTAC's objectives are;

- **To provide** timely, focused and credible advice to Government on the transport and built environment needs of all disabled people, the advice to be representative of the broad views of disabled people in Great Britain
- **To provide** guidance and advice to the transport and built environment industries and others on how best to meet the needs of all disabled people
- **To inform** disabled people of developments in accessible transport and the built environment
- **To promote** the interests of all disabled people in relation to transport and the built environment.

Principles: DPTAC's 4 principles are that;

- Accessibility is a condition of any investment
- Accessibility must be a mainstream activity
- Users should be involved in determining accessibility
- Accessibility is the responsibility of the provider.

Annex 2: DPTAC's role

The Disabled Persons Transport Advisory Committee (DPTAC) is an independent body advising the Government on the transport needs of disabled people. DPTAC provides expert advice and carries out independent research on disabled people and their interface with transport, with the aim of promoting a more inclusive society.

Since summer 2000, DPTAC has also been responsible for advising the Government on the built environment needs of disabled people, as recommended by the Disability Rights Task Force.

DPTAC was established under the 1985 Transport Act and held its first meeting in 1986. Jane Wilmot was appointed as Chair of DPTAC, together with twenty members, chosen to bring expertise on a broad range of issues and a critical overview of transport policy.

DPTAC's statutory remit is to consider matters referred to it by the Secretary of State, but it can also consider any other matter.

Under the Disability Discrimination Act 1995 : Part V the Secretary of State has a statutory duty to consult DPTAC on any proposed vehicle accessibility regulations and before deciding whether to grant exemptions from accessibility regulations made under Part V in respect of taxis, public service vehicles and rail vehicles.

Under Section 70 of the Railways Act 1993, the Rail Regulator has a statutory duty to consult DPTAC on his Code of Practice for passengers

DPTAC has no other specific statutory duty under the DDA but gives advice on Part III, which also applies to train operators as service providers in relation to stations and associated infrastructure.

Annex 3 References

The Building Regulations (Amendment) Regulations 1998 (SI 1998 No2561) – Price £1.10

New approved Document on Part M of the Building Regulations Part M: Access and Facilities for Disabled People 1999 Edition (ISBN 0117534692) – price £7.95.

A new deal for transport: Better for everyone, 1998 - Price £16.50

Transport 2010: The 10 Year Plan (particularly paragraphs 6.5-6.6) 2000 (also available at www.detr.gov.uk/trans2010/index.htm)

Code of Practice on Rights of Access to Goods, Facilities, Services and Premises (ISBN 011-271055-07) (1999 – to be replaced by forthcoming guidance from the Disability Rights Commission)

Transport Act 2000 - ISBN 0 10 543800 6

Railways Act 1993 (c. 43), ISBN 010544393X

Disability Discrimination Act 1995 (c50) - ISBN 0105450952

The Rail Vehicle Accessibility (Amendment) Regulations 2000

The Rail Vehicle Accessibility Regulations 1998 , ISBN 0 11 079652 7

The Rail Vehicle (Exemption Applications) Regulations 1998 , ISBN 0 11 079654 3

The Public Service Vehicles Accessibility Regulations 2000 , ISBN 0 11 099600 3

Above available from
The Stationary Office;
PO Box 29, Norwich, NR3 1GN, Telephone orders: 0870 6005522

Acts of Parliament and Statutory Instruments are available as priced publications from the Stationary Office. More recent Acts and Statutory Instruments are available at www.legislation.hmso.gov.uk

From Exclusion to Inclusion 1999 (also available at www.disability.gov.uk)

Guidance on the Methodology for Multi-Modal Studies

Available from
DTLR Local Transport Policy 5, Zone 3/18 Great Minster House, 76
Marsham Street, London SW1P 4DR or at www.detr.gov.uk/itwp/mms

A New for Trunk Roads in England: Understanding the New Approach to Appraisal, 1998

Available from
DTLR Highways Economics and Traffic Appraisal Division , Zone 3/08
Great Minster House, 76 Marsham Street, London SW1P 4DR
Tel: 020 79446176

Encouraging Walking: Advice to local authorities, 2000

Available from
DTLR Charging and Local Transport Division 3, Zone 3/25 Great
Minster House, 76 Marsham Street, London SW1P 4DR
Tel: 020 79442478
E-mail cycle_walk@detr.gov.uk

From Workhorse to Thoroughbred: A better role for Bus Travel, 1999

Guidance on Full Local Transport Plans, 2000

A Good Practice Guide for the Development of Local Transport Plans 2000

Older People: Their Transport Needs and Requirements, 2001

Above available from
DTLR Free Literature
PO Box No 236, Wetherby, LS23 7NB
Tel 0870 1226 236 Fax: 0870 1226 237

DTLR Mobility and Inclusion Unit publications:

Accessible Public Transport Infrastructure Guidelines for the Design of Interchanges, Terminals and Stops.

Guidance to Rail Vehicle Accessibility Regulations 1998

Guidance to Public Service Vehicle Regulations 2000

Social Exclusion and the provision and availability of Public Transport 2000

Parking for Disabled People, TAL4/95

Code of Practice on Access to Air Travel for Disabled People (forthcoming)

Inclusive Mobility; Guidance on Best Practice in Providing Accessible Pedestrian Environments and Transport Related Infrastructure (forthcoming)

Above documents available from
DTLR Mobility and Inclusion Unit, Zone 1/11 Great Minster House, 76
Marsham Street, London, SW1P 4DR
Tel: 020 7944 6100 Fax: 020 79446102
E-mail mu@detr.gsi.gov.uk

Code of Practice on Rights of Access to Goods, Facilities, Services and Premises

New edition forthcoming from
Disability Rights Commission www.drc-gb.uk

ECMT Charter on Access to Transport Services and Infrastructure
(European Conference of Ministers of Transport, 1999) included as Annex 4.
Also available from DPTAC Secretariat

BS8300 The design of buildings and their approaches to meet the needs of disabled people (www.bsi-global.com)

Available from
BSI Customer Services
389 Chiswick High Road
London W4 4AL

Tel 020 8996 9001 FAX 020 8996 7001
Email info@bsi-global.com

DPTAC publications

The design of large passenger ships and passenger infrastructure: Guidance on meeting the needs of disabled people. (DPTAC, 2000)

Annual Report 1999, 2000

Recommended specification for Buses Used to Operate Local Services. (DPTAC, Revised 1995)

Recommended specification for Low-Floor Buses (DPTAC, 1997)

Restrictions on Personal Vehicular Transport 1998)

Review of Voluntary Transport 1999

Above documents available free from
DPTAC Secretariat, Great Minister House, 76 Marsham Street, London
SW1P 4DR
Tel: 020 7944 8013 Fax 020 79446998
E-mail dptac@detr.gov.uk

Meeting the needs of disabled passengers (1999 draft) (new edition forthcoming see below) – 1994 version free

Train and Station Services for Disabled Passengers: a Code of Practice forthcoming

Guidance on Disabled Persons Protection Policies (forthcoming)

Strategic Rail Authority
55 Victoria Street, London, SW1H 0UE

Tel: 020 7654 6000
Fax: 020 7654 6010

*Reducing Mobility Handicaps – Towards a barrier free environment – Price £10 (to be replaced by the forthcoming DTLR Guidance: *Inclusive Mobility*)*

Photocopies of the above available from
The Institution of Highways and Transportation
6 Endsleigh Street, London, WC1 0DZ
Tel: 020 7387 2525 – Web www.iht.org.uk

Building Sight (RNIB, 1995) – Price £20

Sign Design Guide (JMU/Sign Design Society 2000) – Price £20

Design and Operation of Accessible Public Transport (Helios II, 1996) –
Price £10

Above documents available from
JMU Access Partnership
224 Great Portland Street, London, W1N 6AA
Tel: 020 73912035
E-mail jmu@rnib.org.uk
Web www.jmuaccess.org.uk

JMU Access Partnership has an office in Cardiff,
Tel 029 449591, email carol.thomas@rnib.org.uk

Cost 335 Passengers' Accessibility of Heavy Rail Systems

Available at www.cordis.lu/cost-transport/home.html

*Sense and Accessibility: How to improve access on the countryside paths,
routes and trails for people with mobility impairments.*

Countryside Agency Publications
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