

ATW12 Guide Dogs Cymru

Senedd Cymru | Welsh Parliament

Y Pwyllgor Cyfrifon Cyhoeddus a Gweinyddiaeth Gyhoeddus | Public Accounts and Public Administration Committee

Teithio Llesol yng Nghymru | Active Travel in Wales

Ymateb gan: Guide Dogs Cymru | Evidence from: Guide Dogs Cymru



We support the concept of a “Design Hub” within Transport for Wales, (TfW), but would like to see clear and unambiguous commitment to ensuring that the “Major” schemes on which it will advise will be assessed, from the outset, for accessibility to all pedestrians.

It is our experience that cycling is prioritised and that details like the location of controlled crossings, provision of tactile paving in the correct location, (particularly on continuous footways), are routinely overlooked.

Essential elements of inclusive design must be standardised, such as where there is no option but for a route to be shared with cyclists. These must be separated by a colour contrasted raised delineator,

not by a painted white line on the footway.

We have examples where shared routes have been created on footways that are too narrow to accommodate a vision impaired person working their Guide Dog or walking with a companion without straying into the cycle lane. The Active Travel Guidance is far too vague on this issue, so if this “Hub” is also to be responsible for revising it, this is an opportunity to clarify the minimum width of a footway where a shared route can be created. We note that it will “improve accessibility and remove barriers” but this must not just be taken to mean the sorts of barriers which impede cycling. We know that this is often the case, but barriers for disabled and vision impaired pedestrians can be inadequate lighting, or cycle stands which encroach onto the pedestrian footway and are dangerous for a

vision impaired person who could be hurt by pedals, wheels and handlebars protruding into their path.

A good **Equality Impact Assessment** should pick up on these sorts of issues, so, in the reference to training within the delivery plan, we strongly recommend that ongoing professional support is provided for local authority officers who are responsible for conducting them.

An EQIA is a legal requirement, but good examples are rare.

The training must be robust and easily accessible to local authorities so that new staff can access it as e-learning, as well as getting one to one support from TfW.

Opportunities for improved mainstreaming of Active Travel considerations in wider policy and programmes.

Response

The Travel Sub-Group of the Welsh Government's Disability Rights Task Force made recommendations for improving access to public transport and related infra-structure. The disabled people who shared their lived experience of using public transport gave many examples of the lack of connectivity between transport modes, e.g. proximity and accessibility of bus stops to rail station and the access challenges within transport interchanges. Overall, participants felt left behind by the whole ethos of Active Travel. It should be noted that the TfW Access and Inclusion Panel, made up of disabled people who are frequent train users, are increasingly being asked to comment on how best to connect Active Travel routes to transport interchanges.

A good example is the new Cardiff Bus Interchange where their involvement influenced the design of the building and connectivity to the rail station via Central Square. This process can be negatively impacted by a lack of joined up working between TfW and a local authority, which has, to some degree, been the case in Cardiff.

All partners involved in a development, particularly a transport interchange, must work together to achieve the best possible outcome, rather than allowing competing funding considerations to create divisions and delays.

The developing role of Transport for Wales as part of the delivery arrangements for Active Travel.

Response

We note, in the Delivery Plan, frequent references to supporting engagement with people with protected characteristics. There is no reference though to how this will be resourced or monitored.

Point 3.4.3 says

“We will also conduct specialist equality diversity and inclusion design reviews on selected schemes”, which is not very reassuring. Below, we describe a live example from Canton, Cardiff, where an active travel route has been developed without comment from vision impaired people, and which includes continuous footways with no tactile paving. Would this be a big enough scheme to attract one of the “specialist” reviews? EQIAS are a legal requirement for all schemes that impact on the public and if it had been done, it would show that a lack of tactile warning paving puts vision impaired pedestrians in danger as they have no way of knowing where the footway ends and the road begins.

Quote from Sian, Cardiff, Guide Dog Owner:

“I was visiting Canton in Cardiff, an unfamiliar part of Cardiff for an appointment. To assist me with navigation I used Google maps and Lazarillo app. I found myself walking along smooth pavements, but the apps were telling me I was crossing a road. Uri, my Guide Dog hadn't stopped or indicated a road. I became conscious of car engines at my side and became increasingly anxious. The paving had not changed and I couldn't feel tactile paving. It was just a continuous footway and the height didn't change. The colouring of the continuous footway was also the same colour as the pavement. Without a cane I had to ask my Guide Dog to find tactile rather than our usual kerbs command we use. He did his best but the tactile he stopped at seemed too far back from the sound of the vehicles and not where the apps said there was a road. The sounds were wrong. The light was wrong as there were buildings next to me, not open space to help orientate me where a road was. I had to just trust a car wouldn't come out of a side road and hit me so lost confidence in walking around. It was very confusing and unnerving. I was a bit frazzled when I eventually made it to my destination. I would not choose to walk around that area of Cardiff again as I felt it was unsafe and disorientating”.

We would like to know what will be done to ensure that the new Corporate Joint Committees are required to consider the views and priorities of disabled people. How membership is decided is not clear from the Delivery Plan but, unless there is a clear commitment to involving regional representation from disabled people, these will be yet another example of a failure to engage effectively and will perpetuate the disillusion disabled people feel with Active Travel.

The role and activities of the Welsh Government's Active Travel Board.

Response

Guide Dogs is a member of the Inclusive Active Travel Board and our experience is that this is very effectively supporting the main Active Travel Board to monitor compliance with inclusive design. We are not members of the main board, but we are very pleased that RNIB Cymru are represented by Kirsty James and that Kirsty co-chairs the Inclusive Active Travel Board. We hope to see the influence of the Inclusive Board grow as members work together and, hopefully, to see that the model replicated in regional CJCs, in whatever form works best and is most effective.

Certainly, there should be a means by which CJCs can feed any issues which are causing difficulties at a local level up to the Inclusive Board in order to ensure that learning and problem solving are shared.

The Welsh Government's Active Travel spending and how it is distributed and prioritised between different schemes and types of intervention.

Response

We have explained our concerns that the safety of pedestrians is sometimes overlooked in the delivery of Active Travel schemes. As the intention of Active Travel is to provide more safe traffic free routes between key destinations, funding these through parks and on footpaths should not be a priority. Green space such as parks should be reserved for enjoying outdoor space and not be made into racing tracks for cyclists. We wish to see more robust assessment and monitoring of Active Travel schemes to ensure that inclusive design is prioritised. We note plans to identify a town where a wide range of interventions will be exemplified, so this would be an opportunity to demonstrate best practise, to conduct "template" Equality Impact Assessments on real life examples and use these as training resources for professional development.

The extent to which local authorities are prioritising Active Travel and related investment, capacity constraints and potential impacts from an increased emphasis on regional transport planning.

Response

We are concerned that an increase in regional transport planning could result in less involvement from disabled people unless the requirement to involve them is spelt out from the start. We often hear that disabled people are “hard to reach”, but, where local authorities have developed a “forum”, or “access group” to facilitate engagement, there can be a productive dialogue. Cardiff council has successfully supported this model in the past, and there are a few other examples across Wales, such as Torfaen Access Group. However, to succeed, these require leadership and funding. We recommend that Welsh Government makes it clear that allocation of funds depends on the existence of an effective disabled peoples forum and that the terms of reference are underpinned by a co-productive approach and a commitment to make all meetings and all information accessible and inclusive.

Whether the **Active Travel (Wales) Act 2013** itself remains fit for purpose, including its requirements around Active Travel network mapping.

Response

We have made it clear in our response that we do not believe the current Active Travel Act is fit for purpose. Regarding the Active Travel maps, we have repeatedly stressed that these must be accessible, or another means found to engage with those who cannot interpret them, or who cannot see them. When local authorities and Active Travel officials dismiss our concerns, they are failing to comply with the Public Sector Equality Duty which requires public information produced by local authorities to be accessible.

Unfortunately, it is difficult and potentially expensive for a disabled person to take forward a legal challenge on these grounds, but we believe the Welsh Government must insist on compliance. If a local Access Forum was in place, which included people with a range of lived experience of disability, the plans could be discussed using a variety of methods including a site visit, to ensure they are fully understood.

We have examples of where this has been done successfully in Newport and Swansea, as well as many more when it has not even been considered. Inevitably, where schemes are fully appraised for an inclusive approach, there is far less risk of money being wasted and of some element of the design causing problems for

disabled people. In short, it's the best way to produce an effective and inclusive Active Travel route.

How best to drive behaviour change in support of active travel, and current barriers.

Response

Very little has been done to engage with disabled people on Active Travel. It is synonymous with fast, fit cyclists and unfortunately now, with reports from disabled people of being shouted at and bullied out of the way. We hear of vision impaired people who have been so intimidated by a close brush with a cyclist that they refuse to use the same route again. We know that others now feel that the pavement is no longer safe as they don't know if it is shared with cyclists and that elements of street design, introduced as part of Active Travel, cause them great difficulties. Among these are continuous footways, where tactile paving is sometimes totally absent and shared routes with cyclists which have no tactile and colour contrasted delineation.

The Welsh Government's Disability Rights Task Force sub group on travel has made several recommendations on how to address these challenges and we can only hope that they will be considered.

Ensuring active travel is accessible and inclusive, including around scheme design.

Response

We have already commented in detail on this challenge.

Improving monitoring and evaluation and the Welsh Government's plans for enhanced data collection through a new National Travel Survey.

Response

The current mechanisms for monitoring and evaluation are weak and not at all transparent. If disabled people are to invest time and energy into engagement, this must change.

Assessment of schemes against clear criteria, including early communication, the actual process of engagement, and reporting back must be robust. There should be a clear and accessible way for local disabled people to ask questions.

Regarding a survey, we hope that Welsh government would work with disabled

people's organisations to establish the best way to distribute a survey and the most accessible format.

Any other issues of concern in relation to delivery of the Welsh Government's active travel ambitions.

Response

We have no further comment.
