

ATW15 RNIB 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: RNIB Cymru | Evidence from: RNIB Cymru

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RNIB Cymru consultation response to the Public Accounts and Public Administration Committee's consultation on Active Travel in Wales

About RNIB Cymru

RNIB Cymru is the largest sight loss charity in Wales, and we provide support and services to blind and partially sighted people, as well as their families, friends, and carers, to help improve lives and empower people to living well with sight loss and retain independence. We work in partnership with public, private and third sector bodies across Wales to deliver projects, training, services and give information, advice, and guidance.

We raise awareness of the issues that blind and partially sighted people face every day and challenge inequalities through campaigning for social change and calling for improvements to services. Whether you have full, some, little or no sight, everybody should be able to lead independent and inclusive lives, without facing inequity and discrimination.

Background

Walking is key to getting exercise, staying connected with family and community, getting to work, and accessing key services such as healthcare. For those unable to drive, walking is likely to be the main means of transportation, and in combination with public transport, is essential for independence. However, while people with sight loss should be able to travel on foot safely and with ease and confidence, we know they face unacceptable barriers during their journeys.

The Welsh Government's new active travel delivery plan, including any perceived gaps in coverage

We believe that there are significant gaps in the Welsh Government's new Active Travel Delivery Plan regarding inclusion and engagement. It is imperative that the plan has deeper emphasis on inclusive designs and meaningful engagement with disabled people to ensure the infrastructure is accessible and safe for everyone.

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

The developing role of Transport for Wales as part of the delivery arrangements for active travel

Transport for Wales is essential in delivering inclusive active travel schemes. Their Accessibility and Inclusion Panel (rail) highlights their commitment to accessibility.

To be effective, Transport for Wales needs dedicated resource to ensure active travel schemes are safe and accessible for all. They have the chance to lead the creation of inclusive designs that work for everyone. A standardised approach can help local authorities build accessible and safe travel infrastructures, benefiting all users, including those who are blind or partially sighted.

Opportunities for improved mainstreaming of active travel considerations in wider policy and programmes

It is important for active travel routes to enable pedestrians and cyclists to navigate safely through their communities and between different modes of transport. Blind and partially sighted individuals depend on safe routes and consistent accessibility features, such as tactile paving and signal-controlled crossings, to travel independently. Consequently, certain environmental features like continuous footways, temporary crossings, and shared-use spaces can pose significant risks and disrupt journeys.

The work around the upcoming **Bus Bill** presents an opportunity to integrate active travel considerations into broader policy. While local authorities will continue to be responsible for providing and maintaining bus stops, bus stations, and bus priority infrastructure, it is essential for the Welsh Government to collaborate with local authorities to ensure the accessibility of bus infrastructure is taken into account alongside changes to bus service delivery.

We're pleased that TfW is developing national bus stop infrastructure guidance to ensure consistent standards at bus stops and stations across Wales. RNIB Cymru has published its **'Key Principles for Inclusive Street Design'**, which provides a checklist of considerations which councils and street designers must ensure they are embedding into street design, including safe pedestrian spaces, detectable kerbs, uncluttered pavements,

and accessible crossings. We recommend that the TfW uses RNIB Cymru's Key Principles when developing this guidance.

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

The Welsh Government's Active Travel Board has been advancing active travel policies and infrastructure over the past 18 months. Their efforts include removing barriers on routes in Flintshire to ensure accessibility for disabled people. We recommend establishing a similar accountability arrangement at the CJC level to monitor inclusive design compliance locally and regionally.

The Welsh Government's active travel spending and how it is distributed and prioritised between different schemes and types of intervention

When local authorities apply for active travel funding from the Welsh Government, a more stringent approach should be taken to evaluating the applications. Before granting Welsh Government funding, there should be a mandatory requirement for local authorities to demonstrate that they have followed Active Travel Guidance and conducted a thorough Equality Impact Assessment (EqIA). The EqIA should include details on how relevant stakeholders and individuals with lived experience were involved in developing the proposal, and how any negative equality impacts have been mitigated. This funding condition should apply to all Welsh Government funding pots to ensure consistency. If evidence is not provided, then the applications should not be considered for funding.

While Welsh Government has adopted this approach for the Active Travel Fund, there needs to be greater consistency. If funding conditions are not standardized, non-inclusive designs that do not follow guidelines may still receive approval from other funding sources.

We would like this approach to be mirrored at CJC level.

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

We are concerned that the shift to regional transport planning could result in increased capacity constraints and a decrease in the budget for conducting engagement and consultation with people with protected characteristics. This approach is necessary to ensure robust EqIAs are carried out and to minimise the risk of inaccessible and unsafe active travel designs being installed.

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

RNIB Cymru does not believe that the current Active Travel Act is fit for purpose. Active Travel maps continue to be inaccessible, and when local authorities and Active Travel officials provide active travel maps in inaccessible formats, they are failing to comply with

the Public Sector Equality Duty which requires public information produced by local authorities to be accessible.

When schemes are comprehensively assessed for inclusivity, there is a significantly reduced risk of financial waste or design issues affecting disabled people. Implementing accessible consultation and engagement practices is crucial for developing an effective and inclusive Active Travel route.

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

When designing active travel infrastructure, it's important to understand how blind and partially sighted people navigate our streets. Blind and partially sighted people memorise safe routes and rely on consistent environmental features, such as detectable kerbs, tactile paving, audio signals, or rotating cones at accessible crossings. As a result, it is incredibly dangerous when active travel infrastructure does not have these vital accessibility features built in. Likewise, mixed-use spaces, such as bus stops where passengers must cross a cycle track to access the bus are incredibly dangerous. Pedestrians need logical and connected pedestrian-only routes to take them safely from the start to the end of their walking journeys.

Case study: Bus Stop Boarders

We have gathered evidence during focus groups and listening sessions with blind and partially sighted residents and visitors to Cardiff. They have shared with us their experiences of using the bus boarder designs and their experiences are overwhelmingly negative.

One participant offered a deeply troubling insight into how they have had to constantly change which bus stop they used as they were being remodelled and learned to avoid the bus boarders, but “could not describe the terror they felt” when they accidentally missed their intended stop and had to get off the bus at Dumfries Place with a young infant. All commented on how these designs lack accessibility features they could use to help with orientation, and for the participants with very low to no vision, there's nothing to tell them that a cyclist is coming towards them.

Inclusive design is better design for everyone: people with sight loss, other disabled people, older people, carers with children, and ultimately for all who wish to use our streets.

RNIB recommends:

- All pavements, walkways and routes pedestrians would use kept free for pedestrians only – i.e., they always separated from cyclists and vehicles by a detectable kerb (minimum 60mm upstand).
 - Pedestrian only routes to take people safely from the start to the end of their walking journeys (for example, from shops or residential areas to public transport).
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- Roads and cycleways have accessible, signal-controlled crossings so pedestrians can cross safely.
- Transport hubs like train stations, bus stops, and community facilities are easily accessible for everyone.
- Access for disabled people travelling in cars or taxis maintained on pedestrianised or low-traffic routes.
- New designs or proposed changes comply with existing Active Travel guidance on accessibility. For example, do they provide good colour contrast and is tactile paving correctly installed in a way that minimises potential negative impact on disabled people?
- New designs or proposed changes been consulted on and undergone robust Equality Impact Assessments.
- Accessibility issues highlighted in the consultation or Equality Impact Assessment processes to be resolved.
- Residents to be informed of changes made to their local area, including those who need information in alternative formats.

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

Very little has been done to engage with disabled people on Active Travel. As mentioned earlier in this response, blind and partially sighted people rely on consistent environmental features to make journeys safely and independently. This means that sudden, unexpected changes to the environment, such as new active travel routes that lack the necessary accessibility features, can disrupt journeys and put people's safety at risk. The only way to make active travel schemes and infrastructure inclusive and safe is to involve disabled people in the design at the earliest possible stage. All communication and consultation must be accessible, for example through audio files, telephone calls, tactile maps, photographs, braille, large print).

Utilising the trusted links between blind and partially sighted organisations and the sight loss sector is also advised to keep people updated on the timeline and scale of the project.

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

It's crucial to ensure proposed designs are as accessible as possible from the beginning. It is a legal requirement under the Equality Act 2010 that public consultations on any new street and public realm proposals run by or on behalf of councils must be accessible.

An informed understanding of the range of access needs of those with protected characteristics, including age, parenthood and disability – including the distinct needs of blind and partially sighted people – will improve designs at the development stage and help avoid lengthy public consultations and expensive retrofitting at later stages. Meaningful engagement with disabled people is not just about meeting minimum accessibility requirements but can include organising site visits and opportunities for feedback from local disabled people from the earliest stage of design.
