



Irish Wheelchair Association

Submission to:

Department of Transport

2020 Vision–Sustainable Travel and
Transport

Promoting Equality Access



Sustainable Development that Promotes Equality Access

Introduction

Transport is one of the key challenges of sustainable development that is facing Ireland. It is well documented that if we continue at our present travel patterns, traffic congestion will increase, economic competitiveness will be lost, our quality of life and the quality of the natural environment will decline. Addressing these issues under the 2020 Vision – Sustainable Travel and Transport is essential for the development of the country.

Irish Wheelchair Association (IWA's) direct aim in contributing to this consultation process is to advance the vision and realisation of an all inclusive and accessible society. This submission outlines a vision that moves beyond compliance with legislation to accessibility becoming a seamless principle of sustainable travel and transport.

The Government's Sustainable Transport Action Plan must employ an equitable approach to all citizens, a common goal already outlined in the Council of the European Union Brussels, 26 June 2006, 'Commitment to Sustainable Development' states:-

'Sustainable development means that the needs of the present generation should be met without compromising the ability of future generations to meet their own needs. It is an overarching objective of the European Union set out in the Treaty, governing all the Union's policies and activities. It is about safeguarding the earth's capacity to support life in all its diversity and is based on the principles of democracy, gender equality, solidarity, the rule of law and respect for fundamental rights, including freedom and equal opportunities for all'.

The government's consultation document opens up the role travel and transport has to play in quality of life, employment, education, and social diversity. For people with disabilities this has particular significance as barriers to transport has led to social isolation and exclusion from equal opportunities.

In line with the consultations paper's lead questions, IWA will highlight the barriers and forward measures that will support independent travel and promote the social and economic inclusion of people with disabilities in Irish society.

Sustainable Development Policy Approach to Inclusion

It has long been recognised that accessibility for all in the human environment is a fundamental prerequisite of inclusion. Historically however, the mobility of people with disabilities was not an integral part of transport and environmental policy development. Without access to society at this basic level, people with disabilities could not obtain equal access to employment opportunities, education, social activities, daily living, health care etc. These social and economic barriers are contributory factors to the high levels of poverty experienced by people with disabilities. Transport is clearly an important enabler towards social and economic participation.

The Disability Act 2005 acknowledged transport as central to creating an equal society. The Department of Transport's Sectoral Plan under the Disability Act was drafted to introduce active measures to reduce the societal discrimination and isolation that people with disabilities face.

The government's development of a sustainable travel and transport plan is an opportune time in which to align the Department of Transport's Sectoral Plan. The vision promoted through these plans must inform further policy development and support the continuation of an integrated approach to planning. Only through such measures will years of inaccessible planning be reversed. Furthermore, an integrated policy development approach to sustainable planning will be effective in addressing the many associated social issues that continue to effect people with disabilities.

The challenge of an integrated policy approach is outlined by Comhar, Sustainable Development Council:-

'In Ireland, the transport sector has grown much faster than the economy as a whole and this growth has been accompanied by increasing problems like congestion, local air pollution and the effects of urban sprawl. Nevertheless, transport policy offers an opportunity for addressing a range of societal problems in tandem through a more integrated policy approach'.

Trends for 2020

Mobility Patterns

The consultation document raises a number of considerations resulting from the predicted trends for 2020. The changing demographics in the population will pose some interesting challenges for the mobility of all the community. The adoption of Universal Design would promote an inclusive approach to meeting these challenges. Universal Design is based on the principle that the design of products and services are usable by all people, to the greatest extent possible, without the need for adaptation or specialised design. Universal Design is literally "Design For All". Therefore the different facilities that may be required by a growing diverse population can be met i.e. for the elderly population, people with different physical and sensory disabilities, people who are temporally disabled and those with buggies and prams.

Raised expectations

The Department of Transport research highlights the changing mobility patterns of people. Though anecdotal, focus groups held by the IWA have indicated the changing mobility patterns of people with physical disabilities. One significant change is the considerable numbers of people with disabilities entering or returning to the workforce. Therefore, people with disabilities have considerable raised expectations; they expect equity of access to transport services. People with disabilities are and must be viewed as part of the travelling public.

Integrated Approach to Accessible Travel and Transport

The immediate stated role of Transport 21 investment programme is the improved accessibility in all aspects of travel across the state. The programme's broad scope is of vital importance to people with disabilities because if just one aspect of the journey is inaccessible then a person cannot travel. Therefore, through an integrated approach, transport vehicles, transport stations, ticket machines, platforms, parking etc. are made universally accessible. An integrated approach will deliver a travel and transport system that is easy and convenient for people with disabilities to use.

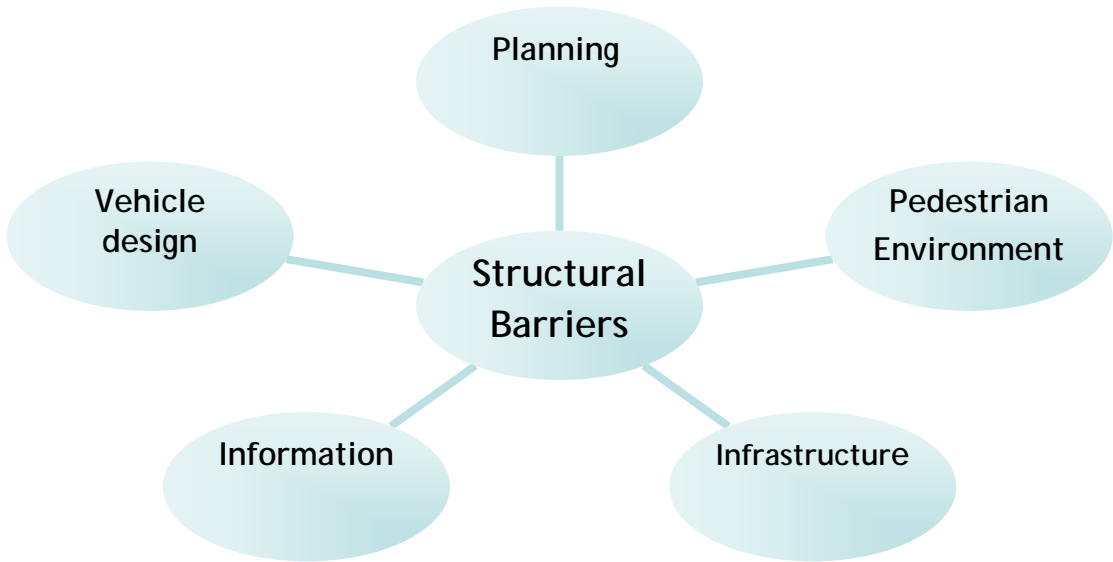


Diagram 1. An integrated approach to meeting the challenges posed by structural barriers.

How Can Travel and Transport Be Improved?

The Government's consultation document refers to facilitating a shift towards using public transport. However, through highlighting improvements under each transport mode the IWA submission focuses on the opening up of public transport services for people with disabilities as commuters.

How can Bus Transport be improved?

Urban Bus Services

- **Fully accessible bus service in operation.**
- **The 2012 target for the entire Dublin Bus fleet to be accessible is delivered.**
- **Increased capacity for wheelchair passengers.**
- **Accessible Park and Ride facilities.**
- **Integrated accessible ticketing and information.**
- **Future upgrading of the bus fleet to incorporate up-to-date adaptive technology.**

Private Operated Buses

- **All vehicles in operation under private urban bus companies to be accessible.**
- **Legislation drafted to ensure that contracts / licences are only issued to Private Bus operators who will provide an accessible service in line with Department of Transport's 'Transport Access for All' plan.**

Bus Stops

In order to make a transport network accessible a number of environmental factors need to be targeted. In regard to bus services this means complementary planning for the upgrading of bus stops. The rate of **upgrading** accessible bus stops needs to be developed in line with the accessible buses routes coming on stream under the Department of Transport' s Sectoral Plan. An amalgamated approach to these two areas would render the service open to a greater number of people with disabilities.

Bus Stops

- **Accessible bus stops.**
- **Prioritise upgrading schemes to improve the accessibility of bus services.**
- **Introduction of an enhanced tendering system that promotes a unified approach to the upgrading of bus stops amongst all local authorities.**
- **Improved cross departmental communication and planning with all stakeholders.**

Inter City Bus Coaches

- **Accessible features on all inter city buses / coaches.**
- **Accessible bus/ coach stops on all Bus Éireann inter city services.**
- **An enhanced tendering system that promotes a unified local authority approach to the upgrading of Bus Éireann inter city passenger stops.**
- **Enhanced policy to ensure private operators are contracted to provide an accessible service.**
- **The promotion of cross departmental communication and planning with all stakeholders.**

How Can Rail Services Be Improved?

Rail Services

- **Full access to all rail services.**
- **Future planning under Transport 21 needs to ensure new rolling stock is accessible and complements existing environmental access.**
- **Incorporation of innovative environmental solutions that meet the practical daily access requirements of people with disabilities.**
- **Devise and implement an efficient system for the deployment of portable ramps.**
- **Integrated accessible ticketing and information.**
- **Accessible Park and Ride facilities.**
- **Refurbishment of train stations that meet highest standards of accessibility.**
- **Structures to monitor and evaluate the refurbishment programme's capacity to deliver outcomes for disabled passengers.**

What Can Be Improved in the Pedestrian Environment?

Most people will start and finish a journey as a pedestrian. The pedestrian environment however often presents the first obstacle in a person's journey. It is therefore essential that the pedestrian environment is accessible for people with disabilities. A number of national and international guidelines and standards relating to the pedestrian environment exist. While some progress has been made, deficits in standards and implementation countrywide still remain. In planning for the environment the existing body of knowledge needs to be utilised in consultation with disability groups.

Pedestrian Environment

- **The implementation of Universal Design to serve all citizens.**
- **All elements that make up the pedestrian environment are accessible to facilitate continuous travel by people with disabilities.**
- **The pedestrian 'walking' environment is a user friendly design and includes larger and well maintained footpaths.**
- **Path gradients built to a standard that manual wheelchairs can negotiate easily.**
- **Road crossings built to standard with dropped kerbs for wheelchair users facilitating people crossing between roads and pathways.**
- **Barrier free environment where pedestrian areas and pathways are free of obstructions, parked vehicle, street furniture, etc.**

Additional Measures for an All Inclusive and Accessible Society.

Mobility Management of the Private Car

Traffic congestion and poor air quality resulting from the use of private motor car is causing considerable problems. The Department of Transport's consultation document places a lot of emphasis on the appropriate use of the car through the promotion of smarter car travel.

Many disabled people rely on the private car for most of their journeys due to a number of crucial factors which include; the nature of a person's disability, the lack of accessible transport and or an inaccessible environment. Recent advances in technology and design allow for private vehicles to be adapted to facilitate individual needs for the disabled driver or passenger. Imposed restrictions on the private car will have a huge negative impact on people with disabilities, resulting in exclusion from society and detrimental to taking up employment.

The future realization of travel and transport being full accessibility may give some people with disabilities a viable alternative to the private car. However, for many people with physical disabilities the car will simply be the only form of transport open to them.

Mobility Management of the Private Car

- **People with disabilities vital requirement for the private car as a primary transport option must be addressed in strategies for sustainable planning.**

Disabled Parking Bays

The importance of a disabled parking bay cannot be over emphasised as it is not just a matter of access to a larger parking space that enables a wheelchair user to embark and disembark from a vehicle. It is an issue of equality and opportunity, as this gives a person access to all aspects of life; work, social and daily living facilities.

Disabled Parking Bays

- **Increased number of disabled parking bays.**
- **Disabled parking bays that are supported by environmental access.**
- **Disabled parking bays at Park and Ride facilities.**

Interconnectivity of the Transport Network

Taxis

Department of Transport's 2006 Sectoral Plan acknowledged the very low level of Taxi / Hackney services available to passengers with disabilities and the immediate need to develop this transport mode.

Taxi

- **Equal access to taxi services nationwide.**

Rural Transport Programmes

The Minister of Community, Rural and Gaeltacht Affairs has highlighted the vital role the Rural Transport Initiative has played in counteracting social exclusion. In so many of Ireland's rural villages and town lands it remains the only transport service available to a community.

Unfortunately, many vehicles used in the pilot initiative, were and indeed remain, under the new Rural Transport Programme, totally inaccessible to people with disabilities. This is a significant factor that continues to attribute to the social exclusion of people with disabilities from Irish society.

Rural Transport Programmes

- **Expansion of an Accessible Rural Transport Service.**
- **Ensure service contracts awarded under the Rural Transport Programme provide accessible vehicles to the rural community.**
- **Address the deficit of inaccessible vehicles on mainstreamed rural transport routes.**

Information

Barriers to accessing information about travel and transport were reported by people with disabilities.

Information

- **Information available in accessible formats.**
- **Information access free of structural barriers.**
- **Route plans and timetables placed at a visual height for Wheelchair users.**

Planning

Several access barriers experienced by people with disabilities relate to the planning of public transport networks and services. Planning needs to give due consideration to the:-

Planning

- **The absence of public transport in some areas which restricts the mobility of people with disabilities, as it does for all passengers.**
- **Undersupply and overcrowding of vehicles; creates additional difficulties in embarking and disembarking during peak hours.**

Implementation of the Sustainable Transport Action Plan

Standards

Awareness amongst the government and society on the requirements and rights of people with disabilities is growing. A legislative framework is in place but this alone cannot guarantee improved accessibility. What is lacking in many cases is a framework for action to remove the barriers infringing on these rights. Therefore, the setting of standards that promote best international practice and the maximum enforcement of established standards is required to guide the Sustainable Transport Action Plan.

Monitoring and Evaluation of the Plan

Monitoring of the Sustainable Transport Action Plan needs to be prioritised. The establishment of an independent monitoring body would ensure transparency in examining the plans targets, time frames and evaluation of quality and value. Ultimately, the body would measure the effectiveness of targets at end-user point and delivery.

Alignment of the Government's Sustainable Transport Action Plan with Department of Transport's Sectoral Plans under the Disability Act 2005.

The consultation document draws attention to the need to align Local Authority strategies with those employed by the Department's Sustainable Transport Action Plan. Critically, this process must also ensure that the Department of Transport's Sectoral Plans under the Disability Act 2005 are also aligned into Sustainable Transport Action Plan. Enhanced communications with all stakeholders would guarantee an efficient and unified approach that promotes equal access.

Citizen Participation

Direct and meaningful consultation with people in partnership between all sectors of society needs to be maintained. Additionally, people will need to be fully informed on all options that are to be made available, in order to make more sustainable choices.

Irish Wheelchair Association's Recommends the Following Key Action's for the 2020 Sustainable Travel and Transport Action Plan.

Key Actions

- 1. Promote and develop equal access for people with disabilities in all aspects of the Sustainable Travel and Transport Action Plan.**
- 2. Align the Department of Transport's Sectoral Plans under the Disability Act 2005 with the Sustainable Travel and Transport Action Plan.**
- 3. Adopt an integrated approach that is executed in collaboration with all Local Authorities.**
- 4. Adopt and enforce the maximum of standards that ensure equal access to travel and transport.**
- 5. Embrace and utilise international best practice and technological advances in accessibility.**
- 6. Promote open consultation with disability groups through all stages of the planning and implementation process.**