



Irish Wheelchair Association

Submission to:

Department of Transport

Review of **Transport Access for All**

the Transport Sectoral Plan under the
Disability Act, 2005.

Promoting Equality



Irish Wheelchair Association

Promoting Equality

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.

Introduction

The accessibility of public transport for people with disabilities has become increasingly important in order to provide a society with equal rights. The 'Accessible Public Transport – A View of Europe Today- Policies Laws and Guidelines 2008' outlines the clear role each of the 27 EU member states, including Ireland, has in promoting the social integration and active participation in society of people with disabilities. Clearly, each member states achievements will have far reaching and lasting impact on people with disabilities right to independent living, employment and social inclusion.

It is for these reasons that the Department of Transport's 'Transport Access for All' Sectoral Plans objectives must be advanced, as they are central to achieving full equal citizenship.

In line with the consultation paper's lead questions, IWA will highlight the gaps in current provision under the plan and forward measures that will support independent travel and promote the social and economic inclusion of people with disabilities in Irish society.

The submission will focus on the issues under the following headings:-

- Sectoral Plan a Prerequisite to Inclusion
- Gaps Emerging in the Sectoral Plan
- Outstanding Issues
- Integrated Approach to 'Transport Access for All'
- Monitoring and Evaluation of the Plan.

Sectoral Plan a Prerequisite to Inclusion

Access to transport is well documented as a key factor in overcoming exclusion, isolation, and poverty. The correlation of accessible transport with the employment of people with disabilities is highlighted in research by NDA, Combat Poverty and Equal Opportunities for People with Disabilities; A European Action Plan 2003. The removal of barriers such as transport is critical to opening up opportunities to enter or return to the workforce.

The United Nations Convention on the 'Protection and Promotion of the Rights and Dignity of Persons with Disabilities' identifies transport as a barrier to independent living. People with disabilities are, and must be viewed as, part of the general travelling public.

Governments regularly examine the profile of the population in order to plan. In regard to disability, the profile is changing as there is now a direct correlation between ageing and disability. People are living further into old age which calls for an accessible transport system that enables all people to live active, healthy and independent lives.

Gaps Emerging in the Sectoral Plan

IWA welcomes the positive changes that have resulted from the Department of Transport's Sectoral Plan however further accelerated progress is required.

In this section we have taken each transport mode and by identifying critical gaps in the plan, priorities have emerged. The advancement of these priorities will ensure the implementation of best practice in standards and critically increase the capacity for travel of people with disabilities.

A general theme of 'connectivity' between planning and implementation is consistently highlighted in the priorities. This will be explored further in the document.

Priorities for Transport Sectoral Plan

Private Operated Buses

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

Future Planning

- **Accessible Park and Ride facilities.**
- **Integrated accessible ticketing and information.**
- **Future upgrading of the bus fleet to incorporate up-to-date adaptive technology.**
- **Increased capacity for wheelchair passengers.**

Priorities for Transport Sectoral Plan

Accessible bus stops on Dublin Bus routes.

- **The rate of accessible bus stops coming on stream needs to be substantially increased to reach the 2012 target of a fully accessible service.**
- **Introduction of an enhanced tendering system that promotes a unified approach to the upgrading of bus stops amongst all local authorities. Immediate action needs to be taken on this issue.**
- **Improved cross departmental communication and planning with all stakeholders.**

Priorities for Transport Sectoral Plan

Inter City Bus Coaches.

- **The provision of accessible bus/ coach stops on all Bus Éireann services to be delivered by 2015.**
- **The promotion of cross departmental communication and planning with all stakeholders to ensure the Sectoral Plan targets and timelines are met.**

Priorities for Transport Sectoral Plan

Rail Services

- **Incorporation of innovative environmental solutions that meet the practical daily access requirements of people with disabilities.**
- **Continued upgrading of accessibility features of all railway stations and trains.**
- **Devise and implement an efficient system for the deployment of portable ramps, this is particularly relevant on urban services.**
- **Review issues surrounding unmanned train stations for people with disabilities.**
- **Provide disabled passengers with facility to book on line any assistance that is required e.g. ramps etc.**
- **Prioritisation of accessibility issues in Connolly Station e.g. currently wheelchair users cannot depart or arrive on the Dart service.**

Future Planning

- **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.**
- **Integrated accessible ticketing and information.**
- **Accessible Park and Ride facilities.**
- **Refurbishment of train stations that meet highest standards of accessibility.**

Priorities for Transport Sectoral Plan

Taxi

- **The creation of a five year plan commencing in 2008 with a minimum target of 20% accessible taxi fleet by 2012.**
- **Subsidies made available to in excess of 700 taxis per annum over a five year period.**
- **The development of an accessible taxi operator's database.**
- **Tendering policy development to ensure that only accessible taxi companies are awarded state taxi contracts.**
- **The establishment of a Disability Users Group as recommended in the Sectoral Plan.**
- **The provision of transport services for people, who will not be able to access taxis as per the specifications soon to be introduced. Many of these people have a very high level disability.**
- **The provision of fare subsidies to disabled passengers.**
- **Carry out accessibility audits of taxi ranks.**

Priorities for Transport Sectoral Plan

Rural Transport Programmes

Many Rural Transport Programmes continue to use vehicles which are not accessible.

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

Outstanding Issues

Specific aspects of the Sectoral Plan have received no attention or progress which is of grave concern, they are; the Parking Permit Scheme and issues in relation to disabled motorists and passengers.

Parking Permit Scheme

Irish Wheelchair Association has issued EU Disabled Persons Parking Permits on behalf of the Minister for Transport since 1997.

In order to address the many issues that have arisen in relation to the scheme the Department of Transport, in September 2006, made the commitment to carry out a review of Parking Permits in the Sectoral Plan. This step was announced by the Minister of Transport at Dáil Question Time:-

'the present statutory scheme for grant and use of Parking Permits is under review in my department in consultation with the relevant bodies with a view to strengthening the provisions further and to ensure that the scheme is confined strictly to those who meet the restricted mobility criterion'.

Minister of Transport, Martin Cullen, Dáil Debate Vol. 625 10/10/2006.

To date the review has not taken place.

In support of the promised review IWA compiled its own review on the current system for issuing Parking Permits and its related issues. The report put forward a series of recommendations to protect and advance the scheme. The Review was presented to the Minister Noel Dempsey in 2007.

IWA review highlighted the following Issues and concerns that surround the Parking Permit Scheme. There is a need to:-

- **Address the significant increase in requests for Parking Permits.**
- **Address the need for increased number of Accessible Parking Spaces.**
- **Review the Medical Criteria attached to the scheme.**
- **Review the validation period of a Parking Permit.**
- **Address the abuse and fraudulent use of the Parking Permits Scheme.**
- **Introduction of measures for the enforcement of legislation in relation to the scheme.**
- **Development of a coordinated approach with all parties involved in the Parking Permit Scheme.**

Disabled Motoring Issues - Motorist and Passengers

The absence of policy development and guidelines in relation to disabled motoring issues has emerged as a critical gap in the Sectoral Plan.

Since the 1960's, the IWA has been delivering driving tuition and assessments services to people with disabilities. During this time, we have ensured that thousands of disabled motorists with disabilities have learned to drive or returned to driving through the use of adapted vehicles. IWA Mobility Centre also provides advice on a range of relevant motoring issues.

The private car has become in many cases people's only mode of transport, whether as a driver or passenger. This is due to a number of significant factors; the nature of a person's disability, inaccessible environments and inaccessible public transport modes. The private car offers people with disability the only real alternative to accessing transport.

Figures from the Central Statistics Office indicate that almost 10 per cent of the population have a disability of some nature. This statistic outlines the large number of people who will potentially present to driving schools or specialised service providers as a disabled driver or passenger.

In recent years, the UK has taken a proactive approach to addressing the issues attached to the field of disabled drivers and passengers. Fifteen specialised Mobility Centres nationwide are integrated into the UK driver licensing structure; these centres can assess drivers with disabilities and then make a recommendation to the UK Licensing Authority on the driver's ability. DPTAC also provides advice on a range of disabled motoring issues while ensuring standards of best practice are adhered to.

The review process needs to prioritise disabled motoring issues. The nature of these issues clearly calls for input from the Road Safety Authority.

Therefore IWA recommend the establishment of a Disabled Motoring Section within the Road Safety Authority to:-

- Develop and implement assessment standards for assessing people with disabilities.
- Develop and implement driving tuition standards for people with disabilities.
- Establish two national mobility centres for the assessment of elderly and disabled drivers.
- Integrate the two centres into the state's driver licensing system.
- Award accreditation to the driving assessment procedures.
- Provide an advice service to disabled motorists.
- Develop quality control systems for adaptation firms.

Integrated Approach to 'Transport Access for All'

The immediate stated role of 'Transport 21' investment programme is the improved accessibility in all aspects of travel across the state. 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 in planning and delivery will ensure a transport system that is easy and convenient for people with disabilities to use.

Therefore, the implementation of the Sectoral Plan calls for an integrated approach to critical aspects of the plan namely the:-

- **Connectivity of different transport modes**
- **Environmental access**
- **Policy development**
- **Implementation of the plan between Government Departments and Local Authorities.**

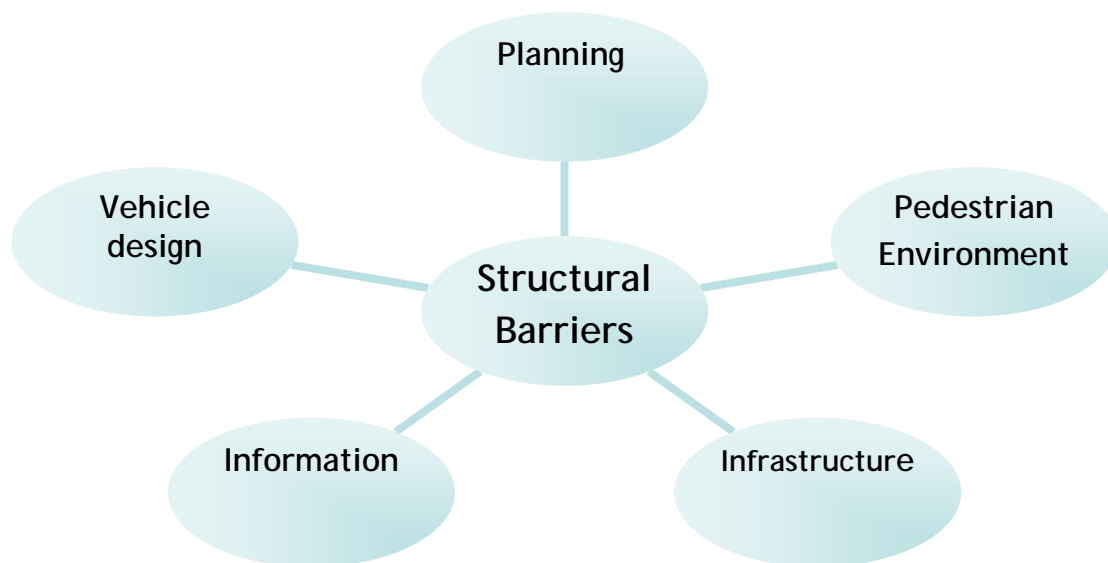


Diagram 1. An integrated approach to meeting the challenges posed by structural barriers.

Connectivity of Transport Modes

The Sectoral Plan must not fall into the trap of viewing each transport mode as a separate entity. The transfers and interchanges between transport modes must be connected in the plan. A wheelchair user, for example, needs to know that every stage of a journey involving; taxi, train and bus is manageable and connected and can therefore facilitate a door to door journey.

The lack of a cohesive approach to the connectivity of transport modes is hindering the use of public transport for many people with disabilities. For example, a person will need an accessible taxi in order to get to the station to use the new accessible Bus Éireann coach. The UK approach achieved this by setting the same dimension and performance indicators for the transport modes of rail, bus and taxi.

Integrated Approach to Environmental Access

The role of the Department of Environment is integral to the successful delivery of objectives in the Sectoral Plan. Most people will start and finish a journey as a pedestrian. The pedestrian environment however, often causes the first obstacle in a person's journey. It is therefore essential that an accessible pedestrian environment is developed in line with transport objectives.

An accessible Pedestrian Environment calls for

- **The implementation of Universal Design to serve all citizens.**
- **An accessible pedestrian environment that facilitates continuous travel by people with disabilities.**
- **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 environments where pedestrian areas and pathways are free of obstructions, parked vehicle, street furniture, etc.**

Information

Barriers to accessing information about travel and transport were reported by people with disabilities. An integrated approach will ensure:-

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

Integrated Approach to Policy Development

'Toward a barrier free Europe for people with disabilities, 2000', stresses the importance of how policies and laws in relation to disability are developed and dealt with in the light of equal opportunities and right to participation.

Ireland, in accordance with best international practice, chose the path of mainstreaming in response to addressing disability issues. Adopting a mainstreaming strategy through the Disability Act 2005 implies the integration of the disability perspective into every stage of policy process from; design, implementation, monitoring and evaluation, all with a view to promoting equal opportunities for people with disabilities.

However gaps are emerging in mainstream policy development. We are clearly not at a stage where equity of access for all citizens is a seamless principle of policy development at national and local level. The mainstreaming of disability issues into all community policies and development of actions needs to be enhanced, only then will policy work impact on the quality of lives for people with disabilities.

Integrated Approach between Government Departments and Local Authorities

One of the major challenges facing the timely delivery of the Sectoral Plan objectives is the lack of a cohesive approach by Government agencies and relevant stakeholders. Improved structures of communication and planning are required to be developed between all parties in order to lift the existing barriers to progress. Meeting these challenges and exploring a more integrated approach will have tremendous benefits in meeting timelines, increasing passenger capacity and in providing a premier service to the travelling public. IWA has highlighted this as a priority under 'Gaps in the Transport Modes' section. In particular the communication channels between the Department of Transport and the Department of Environment and Local Authorities needs to be streamlined. We would strongly recommend that this review examines how increased cohesion can be delivered in this area.

Sustainable transport

Sustainable transport was specifically raised in Question 6, under Issues for Consideration in the review. IWA contributed to the consultation process with a submission to the Department of Transport 2020 Vision–Sustainable Travel and Transport. In the document IWA called for a vision that moves beyond compliance with legislation to accessibility becoming a seamless principle of sustainable travel and transport. The submission specifically contributed to raising issues of the Mobility Management of the Private Car.

The Department's consultation document placed 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, which may result in exclusion from society and detrimental to a person taking up employment.

The future realisation of travel and transport being fully accessible may give some people with disability 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.

Future development in the planning of transport must ensure:-

- **People with disabilities vital dependency on the private car as a primary transport option must be taken into consideration in strategies for sustainable planning.**

The importance of disabled parking bays was also a feature of the submission and reinforced IWA's call for a Review of the Parking Permit Scheme and its related issues.

Monitoring and Evaluation of the Plan

IWA has called for the establishment of an independent monitoring body. This body would be responsible for examining the Sectoral Plan's targets and time frames in regard to criteria, quality, standards and value. Ultimately, the body would be effective in measuring the effectiveness of targets at end-user point and delivery. An additional benefit of an independent body would be the enhanced communications between government agencies and all stakeholders in the execution of the Sectoral Plan in an efficient and unified approach.

DPTAC in the UK offers a model for consistency, in how best to be effective. DPTAC as a committee has the executive capacity to give advice to the government in setting standards of best practice as well as monitoring the targets and performance indicators in the implementation of the government's accessible transport plan. Additionally, as a body they provide information to passengers and ensure information is mainstreamed.

To fulfil a similar role PTAC would need to be restructured under new terms of reference to allow it to be in a position to monitor arrangements and set standards of best practice in order to secure the rights of people with disabilities.

The improved executive capacity of PTAC would:

- Create an independent body to drive forward the action plan.
- Create an independent monitoring body.
- Create a platform in which to bring stakeholders together including Government Department's, Local Authorities, an invited expert in the field of accessible transport and people with disabilities.
- Create a formal setting for an integrated approach to policy development.
- Strengthen cooperation between all interested parties.
- Reinforce the active role of Disability User Groups.

Complaints Mechanism

All operators now have a process in place to deal with passenger concerns or complaints. IWA would recommend that the processes are reviewed in terms of being user friendly and have access to accessible formats i.e. internet information and free phone number. The complaints mechanism needs to be standardised between all public transport modes and include a structure that brings complaints dealing with accessibility matters directly before an independent body. This information would be informative to the monitor process and highlight recurrent issues that emerge through the complaints procedure. The independent body would therefore recommend systemic changes in response to these issues. It is a concern of

the IWA that systemic issues may be overlooked if accessibility concerns or complaints are handled on a case by case basis by different bodies.

Conclusion

The Review of the 'Transport Access for All', the Transport Sectoral Plan under the Disability Act 2005 is an opportune time in which to acknowledge and build on the achievements made to date. IWA's submission has endeavoured to highlight priorities that need to be advanced to secure an accessible public transport system. The incorporation of this submission's priorities will support the Department's strategic development in reaching the shared vision of accessible transport for all Irish citizens.