

Consultation Response: National Transport Delivery Plan 2022

– Deadline 11.10.2022

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Organisation: Learning Disability Wales

This is a response on behalf of the Engage to Change Project.

Funded by the National Lottery Community Fund, Engage to Change sets out to find employment for young people with a learning disability, autistic spectrum disorders, or specific learning difficulties aged 16-25 in Wales. It uses a supported employment methodology and job coaching. Project partners are:

Learning Disability Wales, a national charity representing the learning disability sector in Wales. Learning Disability Wales works with people with a learning disability and their families, Welsh Government, local authorities, disabled people's organisations and the voluntary sector to create a better Wales for all people with a learning disability. Learning Disability Wales is the lead partner for the Engage to Change project.

Other project partners are: two supported employment agencies, Agoriad Cyf and Elite Supported Employment and the National Centre for Mental Health (NCMH) at Cardiff University, our evaluation partner.

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Our response

We are happy to see an update and concrete delivery plan for this important strategy. Accessible transport is vital to making sure people with a learning disability can take part in every part of society.

When the original consultation was published in 2019, we responded to it as the Engage to Change consortium. Our main points in the response were

- We believe that overall, this is a promising policy document with the potential to have a positive impact on the lives of people with learning disabilities and/or autism in Wales.
- It would be good to make clear that the long-term goals of the transport system should not only be to ensure it is accessible to people but also to allow accessible participation in all spheres of life including employment, leisure activities and civic engagement.
- Another way to make sure that the transport system is inclusive for disabled people is to make sure disabled people are involved in every level of work within Welsh Government and transport systems. We recommend the implementation of supported employment programs for this purpose.
- In order to make sure that transport systems are truly accessible for people with a learning disability and/or autism we recommend the Welsh Government offers travel training to those who need it.
- While we agree that environmental concerns are of vital importance, we believe Welsh Government could do more to ensure that disabled people are not disproportionately disadvantaged through environmental policies.
- It is disappointing that this consultation itself was not conducted in a more accessible format.

We are happy to see a strong focus on wellbeing in this proposal and to see such an extensive delivery plan that acknowledges the importance of public transport to people's participation in society. We are also very happy to see there is an easy read version of this document available. However, we do have some concerns about the relative lack of accessibility within the draft.

In our last response we also raised several specific points on how to make transport in Wales more accessible. We would have liked to see more commitment to making services accessible in this draft of the document. In the section for each mode of transport there is a commitment to make these services more accessible with some examples of steps that have already been taken. We would like a plan like this to give accessibility a more central place and to see accessibility measures prioritised. The following comments would, in our opinion, make this proposal stronger

- The plan does not give concrete measures on how the success of the plans will be measured. There is a very welcome commitment in the section on taxis and private hire vehicles to make sure the number of accessible taxis is not reduced. But in the other sections there are few concrete measures. We would like to see similar commitments to not causing unintended adverse effects through any of the other measures in the plan. For example, measuring delays might be problematic if it means that staff operating buses or trains are less willing to make

adjustments for disabled people that might be a contributing factor to delays.

- In the original consultation you wrote about the Performance Boards you are planning to establish saying that these boards will “welcome challenge” in order to review the policy. We commented that it was important that disabled people (and indeed people from other marginalised groups) have direct roles in this. It was further important that if disabled people were asked to give their time and expertise to evaluate Welsh transport schemes that they are well compensated for this financially. We are disappointed to not see any further information on how these boards are to be chosen in this proposal.
- In our earlier response we suggested integrating travel training for people with a learning disability and/or autistic people into your plans. We are disappointed to not see any commitment to one-on-one support which would help individual disabled people use transport better.
- This proposal has a strong focus on encouraging active travel and protecting the environment. We agree that protecting the environment and supporting sustainable forms of transport are of vital importance. However, in our last response we argued that the draft could be doing more to safeguard the rights of disabled people in order to avoid issues of eco-ableism. Eco-ableism occurs when changes to protect the environment or fight climate change are put into place without taking accessibility issues into account and disabled people are thus disproportionately disadvantaged¹. For example, while it is good to encourage walking and cycling, we would have liked to see an acknowledgement that changes made to accommodate the eco-friendlier forms of travel should never disadvantage disabled people in their transport needs. We would still like to see an acknowledgement and a commitment to safeguarding the rights of disabled people.

¹ A good definition of eco-ableism and many practical examples, including ones about transport, can be found here:

Wright, Elizabeth (2020): Climate Change, Disability, and Eco-Ableism: why we need to be inclusive to save the planet, The UX Collective, <https://uxdesign.cc/climate-change-disability-and-eco-ableism-why-we-need-to-be-inclusive-when-trying-to-save-the-88bb61e82e4e>