

Consultation Response Form

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Organisation (if applicable): Engage to Change project (Learning Disability Wales, All Wales People First, Agoriad Cyf, ELITE Supported Employment, Cardiff University – National Centre for Mental Health)

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Key Points:

- 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 programmes 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.

Q1: Do you agree with our long-term vision?

Strongly agree Agree Neither agree nor disagree

Disagree Strongly disagree Don't know

No opinion

Please provide your comments:

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. This might mean not just improving existing transport but creating more routes/ higher frequency public transport.

Q2: Do you agree with our 20-year ambitions?

Strongly agree Agree Neither agree nor disagree
Disagree Strongly disagree Don't know
No opinion

Please provide your comments:

Q3A: Do you agree with our 5-year priorities?

Strongly agree Agree Neither agree nor disagree
Disagree Strongly disagree Don't know
No opinion

Please provide your comments:

Q3B: Do you think that we have the right number of priorities or should these be further refined? If so, do you agree with the following three priorities:

1. We will reduce the need to travel.
2. We will encourage modal shift – when people need to travel we will encourage them to take fewer car journeys and use sustainable forms instead through supply of better services, and stimulating demand for them through behaviour change measures.
3. We will adapt out infrastructure to meet the challenge of climate change, and ensure our transport system is well-maintained, safe and accessible.

Please provide your comments:

Q4: We have identified high level measures to aid us to capture our overall progress. Are these the right measures?

Yes No

Can you suggest others?

Overall, the measures seem appropriate, however there is some caution necessary here in that some of the measures might have unintended consequences. 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. It is therefore necessary that journeys are timed in such a way that disabled people have ample time to use the services.

It would also be good to add a measure on whether disabled people and other marginalised groups feel that the transport available is enabling them to participate in wider society.

Q5: Do you think we should include specific targets for more people to travel by sustainable transport?

Yes No

Do you have any suggestions for how we should do this?

Q6: We have identified a set of actions to deliver the draft strategy. Are they the right actions?

Yes No

Are there others that you can suggest?

The actions generally seem good, although we would like to have accessibility, not just of transport itself but also of participation in society more generally, stronger

enshrined as a key principle here. There are a few specific points:

- On p.59 you write that you will “welcome challenge” and “establish a performance board” in order to review the policy. It is important that disabled people (and indeed people from other marginalised groups) have direct roles in this. It is further important that if disabled people are asked to give their time and expertise to evaluate Welsh transport schemes that they are well compensated for this financially.
- On p.60 you write about how you will research the choices people make and involve people with different protected characteristics. Listing these protected characteristics however you do not mention disabled people. It is important that disabled people are included in this and that people with a variety of conditions and impairments are included.

Q7: We have set out mini plans for each transport mode and sector. Have we identified the key issues for each of these?

Yes No

Do you have any comments on these?

The plans for different transport forms seem good and they seem well connected to one another too. Due to limited opportunities for public transport in North Wales in particular many disabled people are reliant on private and individual forms of transport.

Where new transport routes are going to be established or frequency of services increased it is worth looking into developing new synergies that allows different groups of people to share transport.

Q8: We have shown how transport will use the 5 ways of working set out in the Well-being of Future Generations (Wales) Act 2015. Do you agree with this approach?

Yes No

Do you have any comments?

Q9: If charges for road use were to be introduced to help meet goals for cleaner air, a safe climate and better health, how can this be done in a way that’s fair to everyone?

Question on the Integrated Sustainability Appraisal

We have also published an Integrated Sustainability Appraisal (ISA). The aim of this is to ensure that the Wales transport strategy has considered the impact of transport on the environment, health, equalities, Welsh Language, rural issues, children and young people, economic development as well as wider sustainability issues, within the context of the national well-being goals in the Well-being of Future Generations (Wales) Act 2015.

Q10A: Do you think the Integrated Sustainability Appraisal Report identifies the most important sustainability effects for transport?

Yes No

Q10B: Are there any gaps?

Q10C: Do you have any comments on the findings of the report?

Question A: We are under a duty to consider the effects of our policy decisions on the Welsh language, under the requirements of the Welsh Language (Wales) Measure 2011.

We would like to know your views on the effects that draft strategy would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Question B: Please also explain how you believe the draft strategy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Question C: We have a duty to consider the impact of our policies on people or groups who share protected characteristics.

Do you think this draft strategy will deliver positive benefits for people who share protected characteristics? If so, which are the most important?

- The plans to extend public transport and to make it safer, more reliable and affordable will greatly benefit disabled people in general and people with a learning disability in particular. People in North Wales in particular will benefit greatly from more reliable and accessible transport.
- 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. In section 5.5 (p.55) you write about how Welsh Government is going to “build skills and capacities” within Welsh Government and delivery partners. We strongly suggest building in supported employment programmes within these structures that enable people with a learning disability and/or autism into employment. Supported employment is a truly individualised approach where the individual talents, motivations and other aspects of the individual are assessed to see what type of job, work environment and support needs they may have. With a presumption of employment, supported employment moves to find a job, workplace and social setting that matches the characteristics of the individual. As people with a learning disability and/or autism face barriers to finding, learning and keeping a job, job coaches can assist the person with the process of applying and interviewing for jobs, or can advocate with the employer on their behalf to secure a job. Job coaches can enter the workplace with the person to train them to do their job effectively and also support the employer and their staff to work with the individual, leaving the person independent in their job and their employer with competency to support any additional needs they may have¹.
- We also recommend integrating travel training into your proposal. For many people with a learning disability and/or autism, transport and difficulties accessing it pose a major obstacle to participation in all spheres of life. In order to make transport accessible, Welsh Government should consider offering travel training to groups who need it. Travel training is often delivered as a series of processes aimed at ensuring an individual is able to

¹ More information on job coaching in Wales can be found here:

Beyer, Steve (2019): Engage to Change briefing: What policy changes are required to provide people with a learning disability or ASD equal access to the labour market in Wales?, available online:

<http://www.engagetochange.org.uk/wp-content/uploads/2020/02/Engage-to-Change-Progress-so-far-and-what-we-have-learned-2019.pdf>

make a journey independently and safely. It may include teaching a variety of new skills including reading a timetable, keeping safe, telling the time, appropriate behaviour and money skills. Without travel training, transport systems will remain inaccessible to some of the most vulnerable people in Wales.

Question D: Do you think the draft strategy could have a negative impact on some people or groups who share protected characteristics? If so, what are they and how can we prevent those?

We welcome the reference to disabled people in several parts of the proposal and the explicit plans to consult with and take into account the needs of disabled people in transport. There are several explicit concerns we have:

- We agree that protecting the environment and supporting sustainable forms of transport is of vital importance. However, we think 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 disadvantaged². 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 more eco-friendly forms of travel should never disadvantage disabled people in their transport needs. On p. 66 you write that you will “give priority to active travel in our investment decisions.” This should be amended to include a commitment to only eschew other options if disabled and other marginalised people will not be further disadvantaged through this.
- Similarly, some of the proposals put a strong emphasis on individual choice. You write that Welsh Government will find out why people make the choices they make in order to encourage behavioral change. It would have been good to show a better understanding here that not everyone has a lot of choice in what transport they use.
- Avoiding eco-ableism is important both in terms of not unreasonably impacting the lives of disabled people in practical terms (such as reducing the availability of accessible parking and routes for the creation of bicycle paths) as well as avoiding shame and stigma for using less environmentally friendly transport measures when necessary.
- We are disappointed to see that the consultation itself was not made accessible to people with a learning disability. There was no real easy-read version made available. The version that was called “easy-read” was not written in the easy read format. It also only covered a fraction of the original

² 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>

consultation and the questions at the end of it were different. Instead of asking people using this document about what they thought of the policy document they were asked to report on their own experiences of transport. Thus, while giving the impression of accessibility this easy-read document actually made taking part in the consultation more inaccessible for people with a learning disability, by mis-informing readers about the content of the consultation.

- It would have been good to offer the consultation document in smaller files. The policy document was a 110 page pdf file with pictures on almost every page. A file of this format would be difficult for some computers to handle and thus would pose a challenge for economically disadvantaged people.

Question E: Are there any further comments that you would like to make on Llwybr Newydd: a new Wales transport strategy?

Please enter here:

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: