# RNIB Cymru response to consultation on improving local bus services in Wales

24 May 2017

## 1. About RNIB Cymru

RNIB Cymru is Wales’ largest sight loss charity. We provide support, advice and information to people living with sight loss across Wales, as well as campaigning for improvements to services and raising awareness of the issues facing blind and partially sighted people.

If you have sight loss, buses can be a lifeline, connecting you to your local community and enabling you to travel independently. However, problems using local bus services are one of the issues raised most frequently with RNIB Cymru. People with sight loss experience a wide range of problems when using bus services in Wales and this has led some to stop using buses altogether. Others say that they go out less often than they would like, or that when they do they have to prepare themselves for high levels of stress and inconvenience. As is recognised in this consultation document continued inaccessibility to public transport continues to impose barriers on people’s ability to live their lives independently (p.4). This is simply not acceptable.

Sight loss is linked to age; the older you are the more likely you are to be living with sight loss. Around 1 in 7 people over the age of 65 and 1 in 3 people over the age of 85 in the UK are living with sight loss. As the population ages, the number of people with sight loss will increase. Many will also have other long term health conditions, including mobility issues, making it even more of a challenge to get out and about. Older blind and partially sighted people often rely heavily on public transport. If older blind and partially sighted people are to avoid isolation, maintain social networks and independence it is crucial that transport is made as accessible as possible and that local bus services are protected.

RNIB Cymru is part of Welsh Government’s Accessible Transport Panel, and we have welcomed the positive engagement there has been via this forum on accessibility issues. We hope that there will also be the opportunity for ongoing dialogue with Government on the issues raised in this response following the consultation period.

## 2. Response to consultation questions

We have not answered all of the consultation questions, only those of most relevance to people with sight loss.

**Q4. Integrated ticketing arrangements enabling passengers to travel by bus or by rail in any area in Wales will help deliver our metro programmes and improve transport accessibility. Should local authorities and the Welsh Government have the power to set up regional and national ticketing schemes?**

Blind and partially sighted people are often reliant on public transport, and we agree that more integrated ticketing arrangements has the potential to improve accessibility. RNIB Cymru believe that integrated ticketing will enable blind and partially sighted people to make journey’s involving several modes of transport and interchanges more easily. We believe that a more standardised national approach would be easier for passengers to understand.

**Q7. Do you agree that the Welsh Ministers should establish the quality of local bus services to be met by issuing statutory guidance after consultation with stakeholders? If you do not agree, please explain why.**

RNIB Cymru support this proposal. It is important that passengers with sight loss can experience a standard quality of service throughout Wales, as opposed to pockets of good practice in local areas. RNIB Cymru responded to Welsh Government’s 2016 consultation on Voluntary Welsh Bus Quality Standards. We would like to see the issues identified in our 2016 consultation response included in the proposed new statutory guidance. We would be happy to facilitate further discussion with blind and partially sighted people in Wales to inform the development of such guidance.

**Q8. Do you agree that the Welsh Ministers should issue statutory guidance after consultation to establish the quality expectations for infrastructure (bus stops and bus shelters) and the display of accessible passenger information? If you do not agree, please explain why.**

RNIB Cymru support this proposal. Transport infrastructure plays a key role in enabling people with sight loss to travel independently. The location of bus stops and shelters and the environment around them can determine how easily, or even whether, they are able to access bus services. For example, a frequent problem for people with sight loss is the pavement furniture that often lines the route near bus stops and that can create an additional hazard when getting on and off the bus. RNIB surveys in 2012 and 2014 found that half of respondents said they’d collided with obstacles on the pavement that obstructed the exit doors.

Welsh Government will already be aware of the issues that occurred in the development of the bus interchange in Aberystwyth, which resulted in an environment that was very difficult for people with sight loss to navigate, and put them in danger. Following a sustained campaign by Guide Dogs and RNIB Cymru, working with local blind and partially sighted people, there was remedial work to improve accessibility. This occurred despite legislative requirements, such as the Equality Act, which should have prevented this happening. We would therefore welcome statutory guidance that would establish clear expectations of standards for infrastructure and prevent situations like this occurring.

We recommend that statutory guidance should include the following factors:

* Proximity of the bus stop or bus shelter to safe road crossings (including controlled crossings) and the distance from junctions;
* The condition of the pavement including the width of the pavement, provision of dropped kerbs and appropriate tactile warning surfaces. Consideration should also be given to the presence of grass verges which may be wet and slippery;
* The likelihood of attracting cars to park inappropriately, and block access to buses and the use of measures to prohibit parking, and monitoring by parking enforcement officers;
* The design of the bus shelter itself, including using appropriate colour contrast on bus shelters, so that glass and metal structures stand out from their surroundings to maximise visibility;
* Use of planters and seating should not obstruct access to the bus stop or shelter or reduce visibility. Manifestations on the glass should adhere to Department for Transport guidelines;

We would also welcome clear quality standards for the display of passenger information. The majority of people with sight loss cannot access standard print information. Some of the specific issues reported to RNIB Cymru in using bus services are difficulty reading timetables or information at bus stops, difficulty reading route information on the front of buses. We would therefore recommend that any standards include recommendations that bus timetables and numbering should be in large clear font and be appropriately colour contrasted to its’ background. Height, size and location should also comply with current Department for Transport guidelines.

## 3. Further information

For any further information, please contact Tess Saunders, Policy and Campaigns Officer: [tess.saunders@rnib.org.uk](mailto:tess.saunders@rnib.org.uk) or 029 2082 8562.