

**National Assembly for Wales**  
Equality of Opportunity Committee

Inquiry into the Accessibility of Railway  
Stations in Wales

October 2010



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**National Assembly for Wales**  
Equality of Opportunity Committee

**Inquiry into the Accessibility of Railway  
Stations in Wales**

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## **Equality of Opportunity Committee**

The Equality of Opportunity Committee is appointed by the National Assembly for Wales to consider and report on the relevant duties contained in the Government of Wales Act 2006 placed on the Assembly, the First Minister, Welsh Ministers or the Commission.

### **Powers**

The Committee was established on 26 June 2007 as one of the Assembly's scrutiny committees. Its powers are set out in the National Assembly for Wales' Standing Orders, particularly SO 17. These are available at:  
**[www.assemblywales.org](http://www.assemblywales.org)**

### **Current Committee Membership**



**Ann Jones**  
**(Chair)**  
Vale of Clwyd  
Labour



**Mohammad Asghar**  
South Wales East  
Welsh Conservative Party



**Veronica German**  
South Wales East  
Welsh Liberal Democrats  
(since 6 July 2010)



**Janet Ryder**  
North Wales  
Plaid Cymru



**Joyce Watson**  
Mid and West Wales  
Labour

The following Member was also a member of the Committee during this inquiry:



**Eleanor Burnham**  
North Wales  
Welsh Liberal Democrats  
(until 6 July 2010)

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## Chair's Foreword

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I was pleased when Members of the Equality of Opportunity Committee asked if we could conduct an inquiry into the accessibility of railway stations in Wales. As a frequent rail passenger, I have witnessed on many occasions the difficulties experienced by other travellers, not just those with a disability, but parents with young children or people struggling with heavy luggage.

We heard from many people, some who came and gave evidence in person to the Committee and others who took the time to respond in writing to our call for evidence, of the problems they experienced with footbridge only access to platforms, unreliable lifts, large gaps between the train and platform and inaccurate information. I would like to thank everyone who provided us with evidence, as without their input we would not have been able to consider these issues in such detail.

The current level of accessibility to railway stations in Wales is unacceptable, and whilst we recognise and welcome the improvements that have taken place, we feel that much more could, and should, be done to improve the accessibility of railway stations in Wales.

I hope that the recommendations made by the Committee in this report will help to improve access to rail travel for all people in Wales.



**Ann Jones**  
Chair

## **The Committee's Recommendations**

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The Committee's recommendations to the Welsh Government are listed below, in the order that they appear in this report. Please refer to the relevant pages of the report to see the supporting evidence and conclusions:

**Recommendation 1.** The Committee recommends that the Welsh Government should incorporate station accessibility issues into the specifications for the next round of the Wales and Border franchise. The specifications should define the expected standards of accessibility that should be prioritised during the lifetime of the franchise. Such standards could be defined for individual stations, or groups of stations, and could be based on a range of factors including passenger requirements, levels of station usage and expected costs.  
(Page 21)

**Recommendation 2.** The Committee recommends that the Welsh Government continues to seek to influence the UK Government to prioritise accessibility improvements in Wales when setting Network Rail's outputs and funding for the 2014-18 period.  
(Page 21)

**Recommendation 3.** The Committee recommends that the Welsh Government should seek to ensure greater integration between the rail network and other modes of transport. This would potentially assist disabled people to transfer from one type of transport to another.  
(Page 21)

**Recommendation 4.** The Committee recommends that greater emphasis be placed on publicising the existence of the APRS, as well as providing greater clarity as to the services it offers.  
(Page 25)

**Recommendation 5.** The Welsh Government should consider including a formal measure of disabled passenger satisfaction with APRS, and station staff, in the next franchise round.  
(Page 25)

**Recommendation 6.** The Committee recommends that the Welsh Government encourages local authorities and other public bodies in Wales to work with the rail industry to improve the take-up of disabled people's railcards.  
(Page 29)

**Recommendation 7.** The Committee heard evidence regarding a perceived lack of information, such as posters and leaflets in stations, in relation to accessibility issues. The Committee recommends that sufficient information on accessibility issues is made available to disabled people in a range of formats. (Page 30)

**Recommendation 8.** The Committee recommends that service quality issues be incorporated into the specification for the next round of franchises. Bidders for the franchise should be expected to outline their service quality targets, and indicate how they intend to monitor their performance in this area, potentially through tracking passenger perceptions. (Page 30)

**Recommendation 9.** The Committee recommends that the reasons for the delays in delivering the Access for All programmes are clarified, and any lessons incorporated into the planning process for future improvement schemes. (Page 33)

**Recommendation 10.** The Committee recommends that all stakeholders explore methods by which the existing involvement of disabled people in planning and monitoring accessibility issues could be deepened. (Page 35)

# **1. Introduction**

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1. As a result of concerns raised with individual Members regarding the limited levels of accessibility at many railway stations in Wales, the Equality of Opportunity Committee agreed to undertake an inquiry to look at the range of difficulties experienced by both disabled and non-disabled people in accessing rail facilities and what might be done to improve the situation.
2. This report details the Committee's conclusions and recommendations for improvement based on the evidence taken.

## 2. Terms of Reference

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3. The Committee agreed the following terms of reference for the inquiry:

To explore actions the Welsh Government and other key organisations could take to improve the accessibility of railway stations in Wales.

The inquiry will consider the following:

- the range of difficulties experienced by both disabled and non-disabled people as a result of:
  - inaccessible platforms and other station areas;
  - inaccessible facilities, such as toilets or information services;
  - problems in getting from the platform onto the train and vice versa; and
  - stations that are unstaffed or have a limited staffing;
- the arrangements put in place by Arriva Trains Wales to help people overcome these difficulties;
- the pace at which improvements to the accessibility of stations is taking place;
- actions taken by the Welsh and UK Government in order to improve station accessibility in Wales; and
- suggested areas of intervention for the Welsh Government and others.

### 3. Regulatory and Legal Framework

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#### Rail Regulation

4. Since the 1990s, the UK rail network has been operated by a number of companies with specialities including:
  - infrastructure;
  - franchised passenger services that operate within a defined region or route;
  - open access passenger services that can operate across franchise boundaries;
  - freight services; and
  - provision of rolling stock.
5. Network Rail owns the railway infrastructure in Wales. This includes stations, track, trackside equipment, bridges, tunnels and land. Authority over Network Rail remains a non-devolved matter. Network Rail is funded by the UK Government through five year funding periods, known as control periods. Targets are specified by the UK Government through the High Level Output Statement, although the Welsh Government is consulted.
6. In Wales, the franchise holder is Arriva Trains Wales (ATW). ATW operates passenger services and leases stations in Wales from Network Rail. The exception to this is Fishguard Harbour, which is leased from Stena Line. These leased stations are all managed by ATW. Other companies provide train services in Wales but do not manage stations. For example, Virgin Trains runs services along the North Wales coast to Holyhead.
7. ATW was awarded the Wales and Border Franchise in 2003. The franchise runs to 2018, subject to performance review assessments. The franchise agreement outlines the level of services that are to be provided but does not commit ATW to carry out accessibility improvements.
8. Subsidies for ATW services in Wales are now provided by the National Assembly for Wales. Subsidies for ATW services wholly in England are provided by the Department for Transport.

## **Legal Context**

9. The law governing access to public transport including rail vehicles / trains and access to railway stations is covered by primary and secondary legislation. Further details are contained in Annex A which sets out the legal context.

10. In general terms, a transport service provider is acting unlawfully if they discriminate against a person. This includes:

- refusing to provide any service to a person;
- offering a service at a lower standard to a person; or
- offering a service on different terms to a person because of their disability.

11. Therefore, transport service providers are legally obliged to consider their policies, practices, and procedures to ensure that access to any service they provide is available to people with disabilities. This includes support services needed to provide the transport eg railway stations, stops, and timetables.

12. Transport service providers are also legally required to make 'reasonable adjustments' to ensure that their services are fully accessible to disabled people. This duty relates to rail vehicles and stations.

## 4. Role of the Welsh Government

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13. Although significant aspects of railway policy are non-devolved, Welsh Ministers do have powers that could, in principle, be used to improve the accessibility of railway stations in Wales. The Railways Act 2005 gave new powers to Welsh Ministers. Under the Act, Welsh Ministers are joint signatories with the Secretary of State for the Wales and the Borders Franchise. The Act also enables Welsh Ministers to:

- give financial assistance to any organisation for the purpose of developing Welsh railways (including Network Rail and Train Operating Companies (such as Arriva Trains Wales)) – this includes the power to fund new services as well as new rail infrastructure or improvements to existing infrastructure (including stations);
- publish guidance jointly with the Secretary of State in relation to, and make any proposals for, closures of services or facilities that it funds;
- designate, where applicable, new services it funds as experimental for a trial period of up to five years.

14. The Department for Transport Access for All Scheme is the main source of funding to improve the accessibility of stations in England and Wales. Funding is also provided through the National Stations Improvement Programme (NSIP), which is funded by the Department for Transport and delivered by Network Rail

15. The Welsh Government has committed £1 million over three years to the NSIP programme and works with the Department for Transport and Network Rail to deliver the Access for All Small Schemes programme.

16. In his evidence to the Committee, the Deputy First Minister and Minister for Economy and Transport said:

“The first thing that we need to recognise is where responsibility lies. As this is not a devolved issue, the primary responsibility lies with the Department for Transport, but the day-to-day work is delivered either through Network Rail or those companies that run stations on its behalf. So, where there are programmes that Network Rail funds, it is our vision

to supplement its funding. We are not able to devote substantial sums, but we would want to do that where we can. Clearly, our vision would be that, where substantial improvements to stations are undertaken, they would then be fully accessible and fully compliant with the Disability Discrimination Act 1995. Where we have been responsible for building new stations, particularly on the Ebbw Valley line, for example, and in other places, we have made sure that they are fully accessible. However, the reality is that most stations in Wales are not – I think that around 50 per cent are not accessible. Our aim is to substantially improve on that, by working with Network Rail and supplementing the funding with some of our own.”<sup>1</sup>

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<sup>1</sup> RoP [ para 9], 22 June 2010, Equality of Opportunity Committee

## 5. Accessibility of Services

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### Current levels of accessibility

17. Railway stations in Wales are owned by Network Rail but most are managed by Arriva Trains Wales (ATW) which was awarded a 15 year franchise in December 2003, subject to five-year Performance Review assessments.

18. Arriva Trains Wales operates 244 stations, 218 (90 per cent) of which are in Wales.

19. The Arriva Trains Wales *Guide for Customers with Disabilities*<sup>2</sup> provides details of the accessibility of the stations operated by the company. The guide states that the majority of stations are either unstaffed or have 'limited staffing' which means there is only a ticket office facility at the station and the staff there are not trained or permitted to undertake any physical assistance.<sup>3</sup>

### Barriers to accessibility

20. There was a general perception amongst disabled passengers' representative groups that, whilst improvements had been made in some areas, significant barriers remained in place that prevented disabled people from fully accessing railway stations.

21. According to Joseph Carter of the MS Society:

“There is a real fear and perception, even if the final destination station is somewhere accessible... about what would happen if someone was stranded, if the lift was not working, or if there were no staff. So, there are some real physical barriers and there are also emotional barriers due to bad experiences.”<sup>4</sup>

22. Andrea Gordon of Guide Dogs for the Blind told the Committee:

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<sup>2</sup> Arriva Trains Wales *A Guide for Customers with Disabilities* (Valid until 1 September 2010)

<sup>3</sup> Ibid, 6.1

<sup>4</sup> RoP [para 6], 20 April 2010, Equality of Opportunity Committee

“With regard to the impact of the difficulty that we have in accessing rail stations, it is hard to put into words how intimidating some rail stations can be .....”<sup>5</sup>

23. The Committee heard that accessibility was not just an issue for people with a disability. Many older people, people with young children or heavy luggage also experienced difficulties.

24. In their written submission to the inquiry, the Friends of Chirk Railway Station drew attention to the very steep staircase on the south to north platform:

“With more and more people holidaying in this area, the hauling of heavy cases up and down the stairs is a major problem. Those who travel with babies or toddlers in buggies also have a problem, especially descending the steps. An accident just waiting to happen.”<sup>6</sup>

### **Accessibility of platforms**

25. With only 16 per cent of stations having part access to the platforms for wheelchair users and 34 per cent having no access, the Committee received many examples of difficulties in getting from the entrance of the train station to the platforms.

26. Many respondents highlighted problems at specific stations where there was footbridge only access to the platform.

27. According to written evidence from the Mid and West Wales ME Group regarding Machynlleth station:

“There doesn’t appear to be a way to change platforms other than via the bridge, which has many steps to overcome. Staff can be very helpful, but they are not always available.”<sup>7</sup>

28. The Committee heard of similar problems at Hawarden, Wrexham, Port Talbot, Neath and Chepstow, to name just a few.

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<sup>5</sup> RoP [para 90], 20 April 2010, Equality of Opportunity Committee

<sup>6</sup> Equality of Opportunity Committee, *Inquiry into the Accessibility of Railway Stations*, Written Evidence from Friends of Chirk Station, EOC(3) RS45

<sup>7</sup> Equality of Opportunity Committee, *Inquiry into the Accessibility of Railway Stations*, Written Evidence from the Mid and West Wales ME Group, EOC(3) RS43

29. Whilst Andrea Gordon highlighted the difficulties encountered by a blind or visually impaired person, using Cardiff Central as an example:

“There are a number of bus lanes ... across the front of the station entrance. They are an absolute nightmare for a visually impaired person to negotiate. It is very difficult to know which direction the buses are coming from or going to. There is inconsistent use of tactile paving. At some points, there is a tactile indicator to tell you that you are stepping out into the road, but at other points there is no such indicator.”<sup>8</sup>

30. And once inside the station, the situation was no better:

“the whole frontage of Cardiff station is quite wide. If you can imagine it, there are a number of doors that you can go through. Depending on which door you use, you then have to find the ticket barrier. It is a very wide, open concourse, and there is no navigational aid, even to find help..... The whole approach to the station, and how you get to the point where you might get help is, in a sense, very tricky.”<sup>9</sup>

31. We were told that lifts only operated at certain times of the day and could be unreliable.

32. Although, in his oral evidence, Ian Bullock, Customer Services Director for Arriva Trains Wales advised the Committee that this was an area where efforts were being made to improve the situation:

“Back in March 2008, we installed what we call remote-control lift devices. Until that point, after the station staff had left, the lifts were locked and you could not use them. There have been technical issues with that system and there have also been problems with the lifts themselves failing..... To be fair to Network Rail, repairs are normally done within 48 hours, but it is still a problem during those 48 hours. I can give the Committee an assurance that we are continuing to try and improve the process of the remote controlled lifts and we spend a lot of time and effort on that.”<sup>10</sup>

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<sup>8</sup> RoP [para 97], 20 April 2010, Equality of Opportunity Committee

<sup>9</sup> RoP [para 97], 20 April 2010, Equality of Opportunity Committee

<sup>10</sup> RoP [para 42], 8 June 2010, Equality of Opportunity Committee

33. The Committee also heard that disabled passengers were often forced by the lack of accessibility to disembark at a station before their intended destination and then use a taxi to travel to their intended destination under the Assisted Passenger Reservation Service.

34. According to the Neath Port Talbot Disability Network:

“If a wheelchair user wanted to travel into Port Talbot Station at 6pm on a Sunday evening they would have to travel to alternative stations – Neath or Bridgend and then have a taxi to Port Talbot. Many members feel this is unacceptable.”<sup>11</sup>

### **Accessibility of trains from the platform (and vice versa)**

35. Low platform heights were identified as a particular problem, with 12 per cent of stations in Wales having platforms that did not allow wheelchair access from the train and vice versa.

36. The Committee received many examples of the difficulties caused by the large gap between the train and the platform and also the narrowness of the step. In written evidence, Jill Edge told us:

“I am disabled and have mobility problems. I travel independently without my wheelchair and just about manage to get on and off the trains but I often have to ask other passengers for assistance. Sometimes the distance between the train and the platform is just too great for me to manage on my own.”<sup>12</sup>

37. However, it was acknowledged that some improvements had been made in this area, particularly with the development of the platform hump scheme.

38. Gary Tordoff, Route Enhancement Manager for Network Rail, told the Committee:

“The other thing that we have tried to do – we are working towards this with the Welsh Assembly Government – is to roll out platform hump schemes. These are partially raised areas of the platforms, or humps, whereby we can try to improve

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<sup>11</sup> Equality of Opportunity Committee, *Inquiry into the Accessibility of Railway Stations*, Written Evidence from Neath Port Talbot Disability Network, EOC(3) RS23

<sup>12</sup> Equality of Opportunity Committee, *Inquiry into the Accessibility of Railway Stations*, Written Evidence from Jill Edge, EOC(3) RS20

accessibility – although they do not give level access – at a reasonable cost.”<sup>13</sup>

39. This was confirmed by the Deputy First Minister and Minister for Economy and Transport in his written evidence to the Committee:

“Under NSIP+, working in partnership with Network Rail and ATW we are delivering a low cost but durable solution to historic stepping height problems across rural rail routes in Wales. Initially, an easier access installation (hump) was installed at Aberdyfi in December 2009 and is enormously popular with train users. It has successfully completed its pilot period and is now a confirmed long-term installation. A second installation at Valley on Anglesey was completed May 2010. I shall announce the details of the roll out of this programme in the near future. Each location will be subject to a detailed community consultation as were Aberdyfi and Valley, where there were 100% supportive consultation responses. In addition, ATW will be undertaking this year a complementary package of off-platform access improvements where humps are being installed. Again, I shall announce the details in the near future.”<sup>14</sup>

### **Accessible toilets**

40. At present, 89 per cent of all stations in Wales do not have wheelchair accessible toilets.

41. The Committee also heard concerns regarding hygiene; toilets often being locked on unstaffed platforms due to vandalism and drug taking; and problems encountered when disabled toilets are located within single sex toilets, meaning that helpers cannot provide assistance.

42. In his oral evidence, the Minister acknowledged that the lack of accessible toilets was a problem and outlined planned developments to improve the situation:

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<sup>13</sup> RoP [para 24], 8 June 2010, Equality of Opportunity Committee.

<sup>14</sup> Equality of Opportunity Committee Paper EOC(3)-09-10, *Inquiry into the Accessibility of Railway Stations*, Submission from the Deputy First Minister and Minister for the Economy and Transport, 22 June 2010

“We recognise that this is a major issue. There are a number of schemes where we have made this a priority. For example, in Prestatyn, where we have improvements and a toilet that is DDA compliant. There are also proposals for Llanelli, Llandudno Junction and Machynlleth, and other stations are in the pipeline. We recognise the importance of having accessible toilets that are DDA compliant. Where we can, we will ensure that they are introduced and brought into use.”<sup>15</sup>

43. David Sindall, Head of Disability and Inclusion at the Association of Train Operating Companies (ATOC), told the Committee:

“There is a problem with toilets on stations. We know that people would like to see more toilets on stations. The ‘Better Rail Stations’ report published earlier in the year highlighted the need for improved facilities at stations. In terms of accessible toilets, there are issues to do with exposure to vandalism, for example, and the requirement to ensure that toilets are kept safe and that people can use them. The way that most train operators get around that is by installing locks sanctioned by the Royal Association for Disability and Rehabilitation on toilets to ensure that they are protected. As you heard in earlier evidence to this committee, it is an area where Arriva Trains Wales is keen to make improvements and where the facilities need to get better.”<sup>16</sup>

### **Car parking**

44. A number of witnesses drew attention to the limited number or complete lack of disabled parking spaces at many stations across Wales.

45. In his oral evidence, Tony Wiggins from the MS Society, told the Committee:

“With Cardiff being the main rail station in Wales, the amount of parking places for disabled people is extremely restricted and it is annoying, on occasions, when you go there and find that there is a builder’s van or another type of van parked

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<sup>15</sup> RoP [para 110], 22 June 2010, Equality of Opportunity Committee

<sup>16</sup> RoP [para 131, 8 June 2010, Equality of Opportunity Committee

there. Once I have got my chair out of the car and gone to pay, I find that I cannot reach the pay and display machine.”<sup>17</sup>

46. According to Arriva Trains Wales, the UK Department for Transport code of practice specifies that at least five per cent of all car parking at stations be reserved for disabled people. Ian Bullock told the Committee:

“The 18 managed car parks are inspected on a daily basis for the occupancy of the disabled spaces..... we look at how many times they are fully occupied and if more than 10 per cent are occupied according to our observations, then we will put in additional disabled spaces. We have recently put additional spaces in at Bridgend, Ludlow and at Cardiff Riverside car parks. That was all done on the basis of our monitoring.”<sup>18</sup>

47. In relation to the difficulties experienced by Tony Wiggins in reaching the pay and display machine, Mr Bullock said:

“I read the comments that suggested that someone had problems accessing the machine at Cardiff. We asked NCP to check that and there is one machine that is non-compliant, which it will address for us because it is mounted too high. So, we have noted that and we will sort it out.”<sup>19</sup>

48. Witnesses also highlighted the importance of transport integration and the need for different transport systems to work together.

49. The Committee felt strongly that the current level of disabled people’s accessibility to railway stations in Wales is unacceptable. It was particularly concerned to hear some of the witness statements relating to difficulties faced by disabled individuals seeking to access facilities such as toilets, lifts and platforms. Whilst the Committee welcomes the improvements that have taken place, it believes that much more could, and should, be done to enhance the accessibility of railway stations in Wales. However, it recognises that as much of the network dates to the Victorian era, a full upgrading of all stations would be prohibitively expensive. A process of prioritisation would thus be necessary, especially given the current financial climate.

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<sup>17</sup> RoP [para 31], 20 April 2010, Equality of Opportunity Committee

<sup>18</sup> RoP [para 86-87], 8 June 2010, Equality of Opportunity Committee

<sup>19</sup> RoP [para 87], 8 June 2010, Equality of Opportunity Committee

**Recommendation 1.** The Committee recommends that the Welsh Government should incorporate station accessibility issues into the specifications for the next round of the Wales and Border franchise. The specifications should define the expected standards of accessibility that should be prioritised during the lifetime of the franchise. Such standards could be defined for individual stations, or groups of stations, and could be based on a range of factors including passenger requirements, levels of station usage and expected costs.

**Recommendation 2.** The Committee recommends that the Welsh Government continues to seek to influence the UK Government to prioritise accessibility improvements in Wales when setting Network Rail's outputs and funding for the 2014–18 period.

**Recommendation 3.** The Committee recommends that the Welsh Government should seek to ensure greater integration between the rail network and other modes of transport. This would potentially assist disabled people to transfer from one type of transport to another.

## 6. Staffing and Assistance

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### Staffing

50. Witnesses from disabled people's representative groups stated that whilst many staff were helpful, significant problems remained with a small number of staff.

51. According to Rhyan Berrigan of Disability Wales:

“The onus is on the disabled person to try to find someone rather than members of staff willingly coming forward to ask whether assistance is required. Members say that it is common that staff find it a pain, and the disabled person feels that he or she is a nuisance. They should not have to feel like that.”<sup>20</sup>

52. Although in contrast, Tony Wiggins, MS Society, told us that in his experience he had always found most station staff to be quite helpful and quite kind.

53. One view that was commonly held by the majority of respondents was the limited availability of staff to provide assistance at stations.

54. According to the MS Society, 83 per cent of all stations in Wales were unstaffed and of those that were staffed, only six were fully staffed on a 24 hour basis. Most 'staffed' stations are staffed in the hours when trains are due to arrive. However, the late running of a train means that disabled passengers are arriving at a station that is unstaffed.

55. In response to Members' questions regarding staffing levels, Ian Bullock, Arriva Trains Wales, told the Committee:

“Staff are tremendously expensive. Just to give the Committee some kind of feel for it, if we were to put one member of staff on each of our stations in Wales, it would cost about £5 million a year. So, it is about using the resources that we have to the best effect. There are, particularly across Wales, areas where the staff currently undertake duties in which we can better focus and highlight their customer service skills. It has certainly been our policy to increase staff numbers. Some train operators have taken a different view, but we have not gone

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<sup>20</sup> RoP [para 8], 20 April 2010, Equality of Opportunity Committee

down that route. However, I accept that we must make the staff that we have as visible and as helpful as possible.”<sup>21</sup>

56. Another issue raised by a number of witnesses was the need for all staff to undertake disability equality training.

57. Michael Vaughan, Arriva Trains Wales, confirmed that every member of staff received disability awareness training as part of their induction, and for customer-facing staff, there was a schedule of refresher training, which took on board the experiences of all the staff who had been trained in the previous 12 months.

58. David Sindall told the Committee about a training DVD produced by ATOC which drew on the experiences of disabled passengers that had been used by a number of train operating companies. ATOC had also launched a new online training resource around passenger assistance, developed by a company called Wideaware, which was run entirely by disabled people, and firmly believed that using disabled people as trainers and training advisers was a good way forward.

### **Assisted Passenger Reservation Service (APRS)**

59. All train operating companies participate in the Assisted Passenger Reservation Service, which allows passengers to book assistance at stations and also to check the accessibility of stations before they travel.

60. Concerns raised with the Committee regarding the sService included:

- poor communication between the phone assistance line and the train stations;
- complications when travelling to locations outside the Arriva Trains Wales franchise area; and
- limited publicity of the availability of the service, particularly on mainstream websites like the National Rail Enquiries site.

61. The issue of booking in advance was also raised by a number of witnesses. Many felt it removed spontaneity and reduced independence.

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<sup>21</sup> RoP [para 40], 8 June 2010, Equality of Opportunity Committee

62. Rhyan Berrigan of Disability Wales told the Committee:

“If a non-disabled person said, ‘Today, I am going on a day trip to Bath’, they can just go to Bath. If a wheelchair user or someone with mobility problems says, ‘I have to go to Bath and I have to book the staff there to meet me’, that takes away their independence.”<sup>22</sup>

63. While in her written evidence to the Committee, Elizabeth Dumayne asked:

“I do not know what procedure is in place should a disabled person have to make an emergency journey and be unable to give advance notice of departure or arrival.”<sup>23</sup>

64. In response, David Sindall, ATOC, said:

“There is an awful lot of mythology around passenger assistance; there are an awful lot of misconceptions. For example, the requirement to book 24 hours ahead – that is a recommendation, simply because we want to ensure that people who want to make a journey can make those journeys. Booking in advance enables us to check out those facilities. As you will know, if the destination station is not accessible, we take the passenger to the last accessible station on the journey and provide them with a taxi. The problem is that taxi provision across Wales and across Great Britain as a whole is not uniform, so booking an accessible taxi is not always possible. Booking in advance enables us to put those facilities in place.”<sup>24</sup>

65. Ian Bullock, Arriva Trains Wales, acknowledged that APRS did not always deliver but outlined measures that had been put in place to try and improve the service:

“We currently handle around 31,000 APRS reservations on our network each year, so even a failure rate of 0.5 per cent is too many because that means that we have let down a few hundred people. Over the last couple of months, we have implemented

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<sup>22</sup> RoP [para 48], 20 April 2010, Equality of Opportunity Committee

<sup>23</sup> Equality of Opportunity Committee, *Inquiry into the Accessibility of Railway Stations*, Written Evidence from Elizabeth Dumayne, EOC(3) RS31

<sup>24</sup> RoP [para 160], 8 June 2010, Equality of Opportunity Committee

a ring-back system for 10 per cent of the people who book through our journey care system. We get their direct feedback on how we can improve, and we will act on that feedback to ensure that we improve the system. However, there is recognition in the industry, and not just within ATW, that we sometimes over-promise and under-deliver on APRS.”<sup>25</sup>

66. Simon Pickering of Passenger Focus told the Committee that he thought that APRS was essentially very good, as it enabled all passengers to physically access the network and provided a legal requirement for passengers to be able to travel from their station of choice to their destination of choice. He did feel that one of the biggest weaknesses of the system was that it was not well publicised. He also thought it would benefit from the introduction of a computerised system to run APRS throughout the UK, as this could reduce issues associated with moving between franchise areas and make it easier to track overall performance.

67. The Committee was concerned to hear witness statements on problems faced by some passengers in relation to station staff and the APRS. It considers that resolving these problems should be a high priority, although the Committee does recognise that considerable resources and effort has been invested in staff training, and the operation of the APRS.

**Recommendation 4. The Committee recommends that greater emphasis be placed on publicising the existence of the APRS, as well as providing greater clarity as to the services it offers.**

**Recommendation 5. The Welsh Government should consider including a formal measure of disabled passenger satisfaction with APRS, and station staff, in the next franchise round.**

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<sup>25</sup> RoP [para 92], 8 June 2010, Equality of Opportunity Committee

## 7. Information and Publicity

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### Publicity of the services available for disabled people

68. The Arriva *Guide for Customers with Disabilities* highlights a number of arrangements put in place by the company aimed at assisting disabled people.<sup>26</sup> Examples include:

- customer service staff offering advice to disabled passengers who pre-book on the most suitable station for them;
- the availability of ramps in larger staffed stations;
- customers who are unable to get off at their chosen station can travel to the nearest suitable station and return to their original destination at no extra cost. If no train is suitable or available a taxi is provided at no extra cost;
- station lifts, where they exist, have all been adapted so that customers can use them at any time.

69. However, witnesses from organisations representing disabled people suggested there was little publicity of these services and information relating to disabled access more generally.

70. Joseph Carter, MS Society, told the Committee:

“Within its stations, Arriva has clearly spent a lot of money on its own marketing ..... but you never see any posters advertising disabled access.”<sup>27</sup>

71. Rhyan Berrigan from Disability Wales said that there had been some significant developments in information on accessibility but this was not widely known about:

“This is not something that was broadly advertised, but in the last six months or so, Network Rail has added Stations Made Easy to its website. That allows disabled passengers to map out their journeys and to see the setup of a particular station. That is for the whole country, not just for Wales. That is good because you get pictorial information for a certain area, and you can navigate around a certain spot or a particular station. I

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<sup>26</sup> 6.1. Arriva Trains Wales *A Guide for Customers with Disabilities* (Valid until 1 September 2010)

<sup>27</sup> RoP [para 62], 20 April 2010, Equality of Opportunity Committee

found that very useful. However, this was not advertised broadly; it just appeared. I also found that it was not immediately obvious on the site, but it is there. It is a good step in the right direction, but you would not know about it unless you were looking for it.”<sup>28</sup>

72. Another facility available but not widely known about was the Disabled Persons Railcard. The card cost £18 for one year or £48 for three years and entitled the holder to 1/3 off most rail fares throughout Great Britain. According to David Sindall of ATOC:

“One reason most disabled people do not have a Disabled Persons Railcard is because they do not know about it, so raising awareness of the fact that the product exists is important.”<sup>29</sup>

73. He told the Committee that ATOC had recently tried to develop a local authority partnership programme, whereby vouchers could be exchanged for Disabled Persons Railcards, but

“not many local authorities were interested in doing that.”<sup>30</sup>

74. According to Passenger Focus and Guide Dogs for the Blind, there was very little information available for people with sensory impairments, and David Sindall of ATOC told the Committee that:

“..there is also a need for funding to go into working directly with organisations such as those that work with people with learning disabilities, for demonstration projects, to see what works for them, and how situations can be improved. However, at present, there is a shortage of funding for that kind of project.”<sup>31</sup>

### **Provision of train information at stations**

75. There was general agreement that the standard of train information provided at railway stations could be improved.

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<sup>28</sup> RoP [para 67], 20 April 2010, Equality of Opportunity Committee

<sup>29</sup> RoP [para 172], 20 April 2010, Equality of Opportunity Committee

<sup>30</sup> Ibid

<sup>31</sup> RoP [139], 8 June 2010, Equality of Opportunity Committee

76. Norman Moore, Wales Council for the Deaf, told the Committee:

“At the moment, we have visual indicator equipment. Most stations have them, but they are not always up to date and sometimes they are broken. The big issue is when there is a delay. The indicator may be able to tell you that there is a delay, but not how long it will be.”<sup>32</sup>

77. John Welsman, Guide Dogs for the Blind, added:

“.. it is not only deaf people, such as those Norman represents, who would benefit from visual information. Quite a significant proportion of the blind and partially sighted population can still see information boards, so it is as important for them as it is for deaf people.”<sup>33</sup>

78. David Sindall, ATOC, told the Committee that there had been improvements in the provision of better passenger information systems in recent years as a result of the small schemes fund.

79. While, Ian Bullock, Arriva Trains Wales said:

“We are aware that one of the things that customers want is customer information systems (CIS) on the station. We start from quite a low base – only 77 stations have CIS at the moment – and the first tranche of NSIP will deliver 56 more stations. In tranche 2, which will be announced shortly, we hope to complete CIS at every station.”<sup>34</sup>

80. A number of complaints were also received about the timeliness and quality of microphone announcements.

81. In his written evidence to the Committee, Mike Brain said that where there was a platform change, particularly if there were more than two platforms, there seemed to be insufficient time after the audio announcement to find the new platform.

82. This point was supported by Guide Dogs for the Blind. John Welsman told the Committee:

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<sup>32</sup> RoP [128], 20 April 2010, Equality of Opportunity Committee

<sup>33</sup> RoP [131], 20 April 2010, Equality of Opportunity Committee

<sup>34</sup> RoP [16], 8 June 2010, Equality of Opportunity Committee

“A lot of blind and partially sighted people’s anxiety and stress comes from announcements being made 30 seconds before the train comes in. I appreciate, from a technical standpoint, that sometimes the train operator or Network Rail have no option but to make that announcement when they do, but they then possibly need to allow more time before the train departs.”<sup>35</sup>

83. He also raised the issue of announcements being made by people who were not competent in the use of microphones or did not speak slowly and clearly.

84. David Sindall, ATOC, suggested a possible solution to this might be greater use of automated announcements:

“Automated announcements tend to be clearer and tend to have a clarity to the voice that is consistent, whereas individual humans tend to have varying levels of voice, diction, clarity and so on, which creates problems.”<sup>36</sup>

## **Ticketing**

85. Andrea Gordon, Guide Dogs for the Blind, highlighted the difficulties buying a ticket via a touch screen system presented to people with a visual impairment and recommended that there should be “a facility to buy tickets on board the train if these are only accessible via a touch screen.”

86. The Committee was concerned to hear that a lack of publicity was affecting the take-up of the disabled persons railcard. Overall, it appeared to the Committee that the provision of information regarding accessibility issues was sometimes inadequate. As well as the relative lack of awareness of the disabled persons railcard, there also appeared to be a lack of clarity amongst users as to the features of the Assisted Passenger Reservation Service.

**Recommendation 6. The Committee recommends that the Welsh Government encourages local authorities and other public bodies in Wales to work with the rail industry to improve the take-up of disabled people’s railcards.**

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<sup>35</sup> RoP [134], 20 April 2010, Equality of Opportunity Committee

<sup>36</sup> RoP [144], 8 June 2010, Equality of Opportunity Committee

**Recommendation 7. The Committee heard evidence regarding a perceived lack of information, such as posters and leaflets in stations, in relation to accessibility issues. The Committee recommends that sufficient information on accessibility issues is made available to disabled people in a range of formats.**

**Recommendation 8. The Committee recommends that service quality issues be incorporated into the specification for the next round of franchises. Bidders for the franchise should be expected to outline their service quality targets, and indicate how they intend to monitor their performance in this area, potentially through tracking passenger perceptions.**

## 8. Improvement Programmes

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87. There are three main improvement packages currently in place in Wales. These comprise the National Stations Improvement Programme (NSIP), the Small Schemes Access for All programme and the Larger Stations Access for All. Funding is provided by the UK Department for Transport, with some support from the Welsh Government. An application for convergence funding is currently underway for a new National Stations Improvement Programme.

88. Although the Welsh Government has no statutory obligations in this area, the Deputy First Minister and Minister for Economy and Transport stated in his written evidence to the Committee that the current level of accessibility to stations in Wales is ‘unacceptable’ and that:

“the Welsh Assembly Government believes that investing in improved accessibility is the right thing to do. Improving railway accessibility is the highest priority for rail improvements identified in the National Transport Plan. My priority is to help people where it matters most.”<sup>37</sup>

89. The schemes are delivered by Network Rail and the Train Operating Companies, and there has been concern among these companies at the relatively slow pace of some schemes delivered by Network Rail.

90. In their written evidence to the Committee, ATOC stated:

“There is considerable frustration within TOCs concerning the slow rate of delivery of Access for All improvements by Network Rail. However, we remain committed to working with Network Rail so that more stations can be made accessible to disabled passengers.”<sup>38</sup>

91. A point, supported by the South East Wales Transport Alliance (SEWTA) in their written evidence:

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<sup>37</sup> Equality of Opportunity Committee Paper EOC(3)-09-10, *Inquiry into the Accessibility of Railway Stations*, Submission from the Deputy First Minister and Minister for the Economy and Transport, 22 June 2010

<sup>38</sup> Equality of Opportunity Committee Paper EOC(3)-09-10, *Inquiry into the Accessibility of Railway Stations*, Submission from the Association of Train Operating Companies, 8 June 2010

“... it is a fair assessment that SEWTA and its local authorities, and the eventual beneficiaries at stations identified for Access for All funding, find that there is a time lag between the announcement of an award of funding to actual construction work beginning on the ground. At Abergavenny for example, the announcement was made in 2008 and yet it is now looking likely that work will only commence in 2011.”<sup>39</sup>

92. Gary Tordoff, head of the Access for All programme for Network Rail, admitted that the programme had been slow to get started:

“It is a fairly substantial programme of work. It is nearly £400 million worth of work. It was a programme of works that was new to the way that Network Rail did things. Therefore, we were trying to get started, and the difficulty was that when we originally started the programme of work, we could not physically work on some of the stations that were selected by the Government. Therefore, it took a while to get the programme up and running..... the programme encountered quite a lot of problems at the front end. There was quite a steep learning curve in terms of how we got started and it took us probably 18 months to catch up.”<sup>40</sup>

93. However, on a more positive note, he advised the Committee that:

“All of the schemes in Wales, under the current programme, will be completed before the end of 2013, which was not the original request from the Department for Transport, which had schemes running quite late, up to 2015.”<sup>41</sup>

94. The Committee welcomed the improvements that had been carried out to date and noted the commitment of the Welsh Government to continue investing in accessibility. However, the Committee was concerned to hear of the delays that have affected the Access for All programme, delivered by Network Rail and part funded by the Welsh Government.

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<sup>39</sup> Equality of Opportunity Committee, *Inquiry into the Accessibility of Railway Stations*, Written Evidence from the South East Wales Transport Alliance (SEWTA), EOC(3) RS53

<sup>40</sup> RoP [para 49], 8 June 2010, Equality of Opportunity Committee

<sup>41</sup> RoP [para 50], 8 June 2010, Equality of Opportunity Committee

**Recommendation 9. The Committee recommends that the reasons for the delays in delivering the Access for All programmes are clarified, and any lessons incorporated into the planning process for future improvement schemes.**

## **9. Involvement of Disabled People in Planning**

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95. Whilst all witnesses agreed on the need to involve disabled people in planning improvements, the perceptions of how effective this was varied.

96. It was pointed out by Disability Wales that although consultation mechanisms were in place, these often did not go far enough in terms of engaging with disabled people. Disability Wales also stated that whilst local access groups have been used to assist in planning improvements (such as the ‘hump’ in Aberdyfi), they could be used more. At present, there was a risk that the opinions of local access groups may be heard, but not understood.

97. Passenger Focus stated that whilst it involved disabled people’s representatives with accessibility audits on stations with planned redevelopments such as Chester and Crewe that acted as ‘gateways’ to Wales, it had not been involved in any such audits in Wales itself. Although they did meet with Disability Wales reasonably regularly, as well as some of the other groups, and keep them abreast of survey results and the work they were doing.

98. John Welsman told the Committee:

“As Guide Dogs for the Blind is the primary mobility provider for blind and partially sighted people, we are an organisation that the rail operators, train operating companies and Network Rail – this has started happening with Network Rail – can come to talk to us to ensure that any of the provisions that they could be making are made in co-operation with the relevant organisations.”<sup>42</sup>

99. Andrea Gordon also talked about a piece of work, commissioned by the Deputy First Minister and Minister for Economy and Transport, that Guide Dogs for the Blind and the Royal National Institute for Deaf People were involved in and would result in the production of a report focused on people with sensory impairments and setting out recommendations for good practice for all public transport providers.

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<sup>42</sup> RoP [para 171], 20 April 2010, Equality of Opportunity Committee

100. Whilst Arriva Trains Wales advised that they had established a specific Disability Panel to capture the experiences and feedback of disabled travellers and to provide a forum where disability issues and policies could be considered and discussed in more detail.

101. The Committee welcomed the fact that some consultative fora existed, but felt that the effectiveness of such arrangements needed to be kept under constant review.

**Recommendation 10. The Committee recommends that all stakeholders explore methods by which the existing involvement of disabled people in planning and monitoring accessibility issues could be deepened.**

## 10. Conclusions

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102. There was general agreement amongst witnesses that, whilst improvements had been made, significant barriers still prevent disabled people from fully accessing railway stations. These barriers can include some platforms and trains being inaccessible to wheelchairs, a lack of clear audio-visual information and a relatively low level of awareness of initiatives such as the Disabled Persons Railcard.

103. Whilst a number of improvements are being planned and delivered, there does not appear to be a consensus between key industry and government stakeholders as to what levels of accessibility should be achieved in the longer term. Defining this could enable decisions to be taken as to, firstly, what schemes could be prioritised for development and, secondly, how such schemes could then be prioritised for support. However, these decisions may be influenced by a range of factors including the current financial climate and the need to maintain a balance between the accessibility and affordability of rail travel.

104. The Committee notes that improved accessibility measures can help other passengers as well as disabled people. For example, improved lighting can help with safety issues, improved platform and train accessibility can help people with prams and pushchairs, whilst better signage and information provision can make it easier for all passengers to access services.

105. The Committee welcomes the improvements that have taken place in recent years. These include the 'platform hump' scheme that allows wheelchair access to the train, the 'stations made easy' website and a variety of schemes at individual stations. It also notes that there appears to be a consensus amongst stakeholders regarding the desirability of further improving general levels of accessibility. The Committee hopes that the recommendations that it has made as part of this report will help to achieve this aim.

## **Annex A - Legal Context**

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### **Rail Vehicle Accessibility**

Rail vehicles fall into two main categories:

- light Rail Vehicles;
- heavy Rail Vehicles.

Light rail vehicles include metro, underground, tram systems and trains which are not used on Network Rail infrastructure.

Heavy rail vehicles include trains used on Network Rail infrastructure.

The law covering rail vehicle accessibility is contained in various pieces of legislation including:

- The Equality Act 2010;
- The Railways (Interoperability) Regulations 2006;
- The Technical Specification for Interoperability for Persons with Reduced Mobility 2007;
- The Railways (Interoperability) (Amendment) Regulations 2007;
- The Railways (Interoperable Rail System) Regulations 2008;
- The Rail Vehicle Accessibility (Non Interoperable Rail System) Regulations 2010;
- The Rail Vehicle (Applications for Exemption Orders) Regulations 2010.

The Equality Act 2010, which replaces the main provisions of the Disability Discrimination Act 1995 (as amended), imposes a duty on a transport service provider to make 'reasonable adjustments' to ensure that their services are fully accessible to disabled people, so that disabled people are not at a substantial disadvantage compared to non-disabled people when using their services. This duty relates to accessibility to rail vehicles and railway stations.

The duty to make 'reasonable adjustments' may include:

- providing a service in a different way or making changes to the way services are provided;
- offering extra help such as requiring station or train staff to assist people with mobility impairments;

- adding auxiliary aids or equipment to existing vehicles, priority seating, and contrasting handrails.

Under the Regulations outlined above certain trains are required to have wheelchair spaces, accessible door controls, accessible toilets, and wheelchair compatible doorways.

The Equality Act 2010 includes provisions dealing with rail vehicle accessibility, compliance certification, enforcement regime, penalties for non-compliance, and requires the UK Government to make Rail Vehicle Accessibility Regulations for certain rail vehicles ensure that:

- disabled customers can get on and off regulated rail vehicles safely and without unreasonable difficulty;
- by 1 January 2020 all rail vehicles must comply with accessibility standards or have an appropriate exemption;

Exemption Orders can be made authorising a regulated rail vehicle to be used for passenger services even though it does not comply with accessibility standards. The procedure for making Exemption Orders is prescribed by the 2010 Act.

The Rail Vehicle Accessibility Regulations focus on access to trains, not access to stations.

## **Accessibility to Railway Stations**

The law dealing with accessibility to railway stations was contained in Part III of the Disability Discrimination Act 1995 (as amended) the majority of which has been superseded by the Equality Act 2010, which covers discrimination in the provision of services as outlined above and enshrines a right for disabled people to access rail services, and ensures that disabled people must not be at a substantial disadvantage compared to non-disabled people when using rail services. Transport service providers are under a general duty to make “reasonable adjustments” to the way that their services are provided to ensure the accessibility of those services.

European accessibility standards were introduced in July 2008. These cover rail vehicles and stations on the Trans-European Network, which includes some lines in Wales. Obligations regarding disabled passengers also arise under the provisions of the EU Passenger Rights Regulation, introduced in December 2009.

The Railways Act 1993 (as amended) places an obligation on the UK Department of Transport to publish a code of practice for protecting the interests of disabled passengers. The “Accessible Train and Station Design for Disabled people: A Code of Practice”, was published in 2008 to incorporate the European accessibility standards. All station and train operators are required to follow its provisions.

Each passenger train and station operator requires an operating licence. These licences include a condition that requires operators to establish and comply with a Disabled Persons Protection Policy, which outlines how services will be provided to disabled passengers. The ATW policy is submitted annually to the Welsh Government and the UK Department for Transport.

## **Annex B - Witnesses**

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The following witnesses provided oral evidence to the Committee on the dates noted below. Transcripts of all oral evidence sessions can be viewed in full at <http://www.assemblywales.org/bus-home/bus-committees/bus-committees-other-committees/bus-committees-third-eoc-home.htm>

### **20 April 2010**

Rhyan Berrigan	Disability Wales
Andrea Gordon John Welsman	Guide Dogs for the Blind
Joseph Carter Tony Wiggins	MS Society Cymru
Norman Moore	Wales Council for the Deaf

### **18 May 2010**

Simon Pickering Ashwin Kumar	Passenger Focus
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### **8 June 2010**

Ian Bullock Michael Vaughan	Arriva Trains Wales
David Sindall	Association of Train Operating Companies
Mike Goggin Gary Tordoff	Network Rail

### **22 June 2010**

Ieuan Wyn Jones	Deputy First Minister and Minister for the Economy and Transport
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## **Annex C - List of written evidence**

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The following people and organisations provided written evidence to the Committee. All written evidence can be viewed in full at <http://www.assemblywales.org/bus-home/bus-committees/bus-committees-other-committees/bus-committees-third-eoc-home.htm>

<b>Date</b>	<b>Organisation</b>	<b>Reference</b>
20 April 2010	Disability Wales	EOC(3)-06-10(p1)
20 April 2010	MS Society Cymru	EOC(3)-06-10(p2)
20 April 2010	Guide Dogs for the Blind	EOC(3)-06-10(p3)
20 April 2010	Wales Council for Deaf People	EOC(3)-06-10(p4)
18 May 2010	Passenger Focus	EOC(3)-07-10(p2)
8 June 2010	Arriva Trains Wales	EOC(3)-08-10(p1) EOC(3)-08-10(p1a)
8 June 2010	Network Rail	EOC(3)-08-10(p2)
8 June 2010	Association of Train Operating Companies	EOC(3)-08-10(p3)
22 June 2010	Deputy First Minister and Minister for the Economy and Transport	EOC(3)-09-10(p1)

## Annex D – Consultation Responses

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The following people and organisations responded to the call for evidence. All responses can be viewed in full at

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-other-committees/bus-committees-third-eoc-home.htm>

EOC(3) RS01	Caerphilly People First
EOC(3) RS02	B Jessica Jarvis
EOC(3) RS02	B Jessica Jarvis – Additional Information
EOC(3) RS03	Flt Lt D I Kilgore
EOC(3) RS04	Wales Council for Deaf People
EOC(3) RS05	Helen Hill
EOC(3) RS06	Carol Gilogly
EOC(3) RS07	Eileen Cottey
EOC(3) RS08	Cllr Richard White
EOC(3) RS09	Briton Ferry Town Council
EOC(3) RS10	Professor Robert Moore
EOC(3) RS11	Benita Afan Rees
EOC(3) RS12	Mike Brain
EOC(3) RS13	Linda Payne
EOC(3) RS14	G Lynton Jones
EOC(3) RS15	Wildmill Communities First
EOC(3) RS16	Colin E Antwis
EOC(3) RS17	Interlink
EOC(3) RS18	Cliff Croft
EOC(3) RS19	Pontarddulais Town Council
EOC(3) RS20	Jill Edge
EOC(3) RS21	Llandyfaelog Community Council
EOC(3) RS22	Wheelrights
EOC(3) RS23	Neath Port Talbot Disability Network
EOC(3) RS24	Better Trains for Chepstow Team
EOC(3) RS25	Rhyl Town Council
EOC(3) RS26	Bryn y Cwm Transport Working Group
EOC(3) RS27	Colin L Hughes
EOC(3) RS28	Chris Lerway
EOC(3) RS29	Llangynog Community Council
EOC(3) RS30	Caldicot Town Council
EOC(3) RS31	Elizabeth Dumayne
EOC(3) RS32	Monmouthshire Disablement Association

EOC(3) RS33	Montgomeryshire Alliance of Neurological Groups & Organisations (MANGO)
EOC(3) RS34	North Pembrokeshire Transport Forum
EOC(3) RS35	ARRIVA Trains Wales
EOC(3) RS36	Taff Ely Access Group
EOC(3) RS37	Community Transport Association Cymru
EOC(3) RS38	Pembrokeshire Access Group
EOC(3) RS39	Llangunnor Community Council
EOC(3) RS40	Mary Jones
EOC(3) RS41	Chepstow Town Council
EOC(3) RS42	Chirk Town Council
EOC(3) RS43	Mid and West Wales ME Group
EOC(3) RS44	The South West Wales Integrated Transport Consortium (SWITCH)
EOC(3) RS45	Friends of Chirk Station
EOC(3) RS46	M Davies
EOC(3) RS47	Association of Train Operating Companies (ATOC)
EOC(3) RS47a	Association of Train Operating Companies (ATOC) - Additional Information
EOC(3) RS48	Sarah Jane Griffiths
EOC(3) RS49	Equality and Human Rights Commission
EOC(3) RS50	Passenger Focus
EOC(3) RS50	Passenger Focus - Additional Information
EOC(3) RS51	ARK - Ecodesign Centre
EOC(3) RS52	Railfuture Cymru Wales
EOC(3) RS53	South East Wales Transport Alliance (SEWTA)
EOC(3) RS54	Chester Shrewsbury Rail Partnership
EOC(3) RS55	John Day (MANGO)
EOC(3) RS55	John Day (MANGO)- Additional Information
EOC(3) RS56	AGE Cymru
EOC(3) RS56	AGE Cymru - Additional Information
EOC(3) RS57	Shotton Community Association
EOC(3) RS58	Disability Wales
EOC(3) RS59	Lindsay Loxton
EOC(3) RS60	Deputy First Minister and Minister for the Economy and Transport - Additional Information