

## **DfT Accessibility Action Plan Consultation Response**

### **West Yorkshire Combined Authority**

#### **DRAFT v1: Subject to approval of West Yorkshire Transport Committee (17 Nov 2017)**

West Yorkshire Combined Authority (WYCA) welcome this consultation on the Draft Accessibility Action Plan and the opportunity to provide feedback.

WYCA's Transport Strategy sets out a vision and framework to deliver a world-class, modern, integrated transport system. A good transport system needs to be accessible to all to connect people to jobs, education and training and reduce social exclusion to provide more inclusive growth.

Adopted in 2016 by the Leeds City Region Enterprise Partnership (LEP) and WYCA, the Strategic Economic Plan (SEP) details how we will work with businesses, the public sector and voluntary and community organisations to develop the economy. The vision is to deliver a "globally recognised economy where good growth delivers high levels of prosperity, jobs and quality of life for everyone". We are developing a new approach to inclusive growth which is about ensuring that good jobs are accessible by our transport system to everyone including the most disadvantaged groups and those with disabilities.

Good progress has been made on delivering a more accessible transport system across West Yorkshire but more investment is needed in improvements which meet user needs are required to reduce barriers to travelling. Taking into consideration our aging population and those with long term health conditions, the number of disabled people is increasing. It is important that we not only remove physical infrastructure barriers to travel, such as being unable to get from one station platform to another, but also the pre-journey planning and sourcing of information before and during their journey and advice that give people confidence to be able to travel independently. This is where new technologies can help if we have the right open data and investment.

To meet the wide variety of needs, it is important to ensure a range of service provision is available. As the bus service is the most used form of public transport, we are engaging with bus operators in West Yorkshire to address potential barriers to travel by bus. The importance of community transport, taxis and private hire to many disabled people should not be underestimated and we would encourage the Department to further the Total Transport concept linking the various forms of para-transit.

Referring to the rail station access mentioned above, since the Access for All programme began in 2006, 150 accessible stations have been delivered nationally. In West Yorkshire WYCA has welcomed this funding programme contributing to 4 of our stations now having accessible routes to platforms and another 3 stations identified within the extended programme with schemes currently in development. Outside of this funding programme WYCA are in the process of developing station access improvement schemes at another 3 stations with funding identified as part of the Leeds Public Transport Investment Programme (LPTIP). This progress, while it is good news, does however mean that West Yorkshire still requires investment to make them stations accessible. WYCA's aspiration is for all stations to be accessible and we therefore encourage the Government to make more funding available to allow improvements delivered in a shorter timeframe.

WYCA participated in a DfT Transport Accessibility Plan Consultation Workshop in Leeds on 31 October 2017. This was a useful opportunity to share views and contribute to group discussions on transport issues. Attendees included transport providers, local authorities as well as disability stakeholder organisations and people with a disability. The key themes from the workshop included:

- Need for consistency – in the built environment, vehicle design, facilities, customer interfaces, customer service / staff training, concessionary travel offer (in terms of geography, time restrictions and across modes)
- Importance of inclusive design/co-design approaches – to both the physical environment and processes
- Need for accessibility training for scheme designers, engineers, decision makers, managers etc.
- Importance of fully accessible journeys/ of first and last mile: “journeys don’t just start and end at the stop or station’. Includes pedestrian environment and obstructions, information throughout journey (including AV on buses, audio at stops and stations), wayfinding and orientation, assistance, facilities
- Barriers to spontaneous travel (rail) and issues around both low awareness and trust and confidence in assistance services
- Challenges of both shared space and quieter vehicles (including buses) for people who are blind and visually impaired
- Importance of awareness and attitudes of transport staff and of other passengers
- Accountability/complaints handling – low awareness, perceptions of poor response/outcomes

WYCA hopes that the consultation response below provides a helpful viewpoint from a West Yorkshire perspective which will assist and help to influence the shaping of the Accessibility Action Plan.

Item 1.13 Figure 3 on page 14 refers to ‘where those with mobility difficulties only make 62% of trips compared to those without. This could be a range of reasons including physical access difficulties, or anxiety about the attitudes of transport staff or passengers.’ A range of other things are a factor – the need to carry equipment, pain, tiredness, access to medication, physical accessibility of the destination, weather and availability of toilets.

Page 19 Tactile paving

**Action 1:** We will commission a research project to scope the updating of the 'Inclusive Mobility' guidance by the end of summer 2017. As part of this project we will also examine updating our guidance on the use of tactile paving surfaces. We will then consider the recommendations and determine a way forward.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

WYCA would welcome an update of the Inclusive Mobility Guidance, including guidance on addressing the accessibility needs of a wider range of disabilities.

Additionally, it would be of benefit to include guidance and best practice examples on the following areas:

- Adoption of inclusive design principles, involving disabled people

- Provision of real time and audio information at bus stops/shelters
- Provision of audio information in transport interchanges to facilitate wayfinding
- Consider Widening of scope of review to consider other street design issues? In light of emerging guidance e.g. cycling (London cycle design standards, DMRB IAN 195/16 etc), Manual for Streets ½
- Ensure review considers interactions with other users generated by new street layouts e.g. cyclists, or others on wheeled modes (scooters, mobility scooters)
- In general, support review of guidance on tactiles and other design features to reduce number of examples of inconsistent or poor interpretation of guidance – e.g. excessive use of tactiles, or use of wrong type, it does not reflect many situations – existing shared use pedestrian/cyclist provision. Also guidance on the positioning of dropped kerbs sits in an idealised environment (very compact junctions, small radii) so this makes the guidance difficult to apply in practice. The various recommended minimum/maximum parameters do not actually add up to the ‘full footway’ e.g. recommended footway gradients at dropped kerbs (5%max) and desirable level area behind the dropped kerb (1000m) and 0.6 max upstand – given the typical kerb height is 100mm, if 5% max gradient is applied, this means that the ‘ramp’ area needs to be 2m in width + 1m level areas behind and you need a minimum footway width of 3000mm, not 1.5. This in turn means that the guidance cannot be full and successfully applied to retrofitting existing residential streets.
- Suggest that this and other street design and use aspects are picked up in their own category – there is a need to improve the pedestrian environment especially for people with mobility issues
- Physical accessibility also includes kerbs/pavement parking, obstructions (signs, utility infrastructure, bollards, location of street furniture, parking) and clearways

For example, in West Yorkshire:

- Real time information screens at stops are audio enabled, triggered by key fobs and will shortly also be Bluetooth enabled
- All stops and shelters have QR codes/NFC tags linked to real time information

Page 21 Shared space

**Action 2:** We will continue our involvement with CIHT (Chartered Institution of Highways and Transportation) on their work on shared space. After we receive their report by the end of 2017, we will consider the recommendations and announce how we will take them forward.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

WYCA welcome this.

We would support the development of an approach that can meet all users’ concerns e.g. including cyclists and people with visual impairment. There is a current lack of national guidance results in location solutions being put forward with different interpretations of delineation of ‘safe pedestrian area’. This may be developed in consultations with local groups representing disabled people but may be difficult to interpret for disabled people, especially blind and partially sighted people, unfamiliar with the area if the solution deployed lacks standard, familiar, nationally recognisable elements.

Page 21 Cycling Infrastructure

**Action 3:** We will refresh our guidance in Local Transport Note 2/08: Cycle Infrastructure Design to ensure that local authorities can continue to design good, safe and inclusive schemes that work for everyone in accordance with legislation.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

WYCA welcome the update to this guidance with feedback from districts that it is incredibly welcome. Implementing new cycling infrastructure such as segregated cycle tracks and 'superhighway' style infrastructure has thrown many challenges around designs around bus stops and elective designs around pedestrian crossings that are inclusive. This was particularly pertinent to the layout of tactile paving where the new infrastructure intersected formal pedestrian crossing facilities, but also where single use met with shared facilities. It will also be useful to have national standard for delineating the difference between footway and cycle track (e.g. minimum kerb height or standard of delineating). Again, having a national solution that can be replicated throughout the country and that reflects a variety of conditions on the highway will be invaluable.

It is important that this is not just about the interface between disabled people and cyclists but the importance of cycles as mobility aids in themselves.

Page 22 Audible and Visual announcements on buses

**Action 4:** We will work with disabled people, the bus industry and the devolved administrations, on the Regulations and guidance which will implement the Accessible Information Requirement on local bus services throughout Great Britain, helping disabled passengers to travel by bus with confidence.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

Feedback from disabled passengers in West Yorkshire indicates that the provision of audio visual information on buses is a key priority. WYCA welcomes the introduction of national standards in this regard. Locally we have been working with bus operators to ensure new buses entering service are equipped. This will be of assistance not only to people with visual impairment but to other disabled people (wheelchair users are obliged to travel on a bus backwards and therefore may find it difficult to identify the stop they need early enough for the driver to stop) and to others simply unfamiliar with the route.

There is the potential for a range of different audio visual products to be procured as a result of this action – WYCA would welcome the development of guidance on the specifications of AV systems – using principles of inclusive design, and in consultation with disabled people.

The Transport Direct journey planner (no longer live) had the facility to plan accessible journeys, including step free access/interchange as well as gradients. This level of accessible journey planning data does not appear to be available on other local or national journey planners.

Ability to board buses is very important along with powers to enforce bus stop clearways.

**Consultation Question 1:** How well do you feel the national bus concession in England succeeds in supporting the local transport needs of disabled people, and how might it be improved? Please be as specific as possible in your response

The national bus concession supports those disabled people in urban/ suburban communities who need to access town and city centres after 0930. It is less effective for those living in communities with a limited bus service and for those whose preferred destinations are not met by the local bus network. The rigidity of a national scheme does not allow regional determination of the most effective way of supporting disabled people's travel needs and costs.

The requirement for people with disabilities to pay full fare if travelling before 0930 has been identified in the Leeds Transport Conversation 2017 and other local consultation exercises as a barrier to disabled people accessing education and employment opportunities and medical care. Whilst local transport authorities have the powers to extend local schemes into the morning peak, under current local government funding restrictions, they are unlikely to be able to afford to do so. The ability to introduce local flexibility into the ENCTS scheme (for example a low flat fare all day) could facilitate better targeting of this area of support for disabled people.

WYCA would recommend a review of the statutory eligibility to address the inconsistency in decisions on who qualifies for a pass in different areas. In particular, the 'refusal of driving licence' category is the most open to interpretation.

Additionally, acceptable sources of evidence can differ from area to area, making it more difficult for customers to successfully apply in some areas compared to others.

Updated and more detailed guidance and clarity would be welcomed on assessing eligibility and on acceptable sources of evidence for the different eligibility categories. For example:

- Current guidance refers to using evidence from Local Authority databases of people with learning disabilities - in many areas, these no longer exist
- Some areas accept letters from social workers in support of applications from people with a learning disability, whilst others do not. Clearer guidance would be welcome, on who can certify eligibility
- Applications are increasingly received from people with mental ill health, including anxiety and depression. These are assessed under the refusal of driving licence category. Clearer, more explicit guidance is needed to enable a more consistent approach to assessing applications under the refusal of driving licence category.
- Some areas (not in West Yorkshire) have stipulated that people applying under the category 'refusal of driving licence' must be of a legal age to drive – whilst others do not. This minimum age limit is not stipulated in DfT guidance, and WYCA would not support adoption of a minimum age limit for this category.

**Action 5:** We will review and consult on best practice guidance for taxi and PHV licensing authorities, which will include strengthened recommendations on supporting accessible services, including on the action that licensing authorities should take in response to reports of assistance dog refusal. This guidance is expected to be published in 2017.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

WYCA supports this action. There is a need for uniformity of standards as private hire companies increasingly operate outside their licencing authority area.

Page 25 Increasing availability and accessibility of taxi and private hire vehicles

**Action 6:** We will seek to increase the number of accessible vehicles through appropriate recommendations to taxi and PHV licensing authorities in our draft revised best practice guidance.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

WYCA supports this action. . There is a need for uniformity of standards as many private hire companies increasingly operate outside their licencing authority area.

Page 26 Reviewing the Blue Badge scheme

**Action 7:** We will review, in co-operation with DPTAC and others, Blue Badge eligibility for people with non-physical disabilities. This will include considering the link to disability benefits.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

WYCA supports this action. Whilst WYCA does not have direct involvement in the Blue Badge scheme, a blue badge is a passporting criteria for the disabled concessionary travel pass. As such, an extension of the blue badge scheme to incorporate people with non-physical disabilities could simplify the concessionary pass application process for those customers – removing the requirement to provide additional evidence. In particular this would be welcomed by people with dementia.

Item 4.56 on page 27 refers to ‘There still remain stations being inaccessible to people with disabilities - and indeed to those travelling with baby buggies or heavy luggage’. People travelling with bikes could also be added to this list.

Page 28 Railway station improvements

**Action 8:** We will continue to roll-out station access improvements for which funding has been allocated, and deliver the Access for All programme in full, building on the significant progress that the programme has already made. We will continue to seek to extend the Access for All programme further in the future.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

WYCA supports this action. Currently no funding is available beyond March 2019 allowing the continuation of the Access for All programme. More funding is required to make all West Yorkshire stations fully accessible to modern standards. It is frustrating that the availability of funding and the high cost of delivering this type of station enhancement means that slow progress is being made. Requests to make our stations step-free are frequently received and it is disappointing that WYCA is often unable to provide a positive response that improvements will be delivered in the short term. The extension of the access for all programme would be welcomed and WYCA would also like to see other opportunities being made available for match funding to allow new scheme development to be possible with other funding partners. It would also be beneficial to see the extension of the Access for All to improve accessibility of the physical environment around stations. This could include crossing, dropped kerbs to link with residential areas/service areas and infrastructure to facilitate interchange between modes including access to/from bus stops.

**Consultation Question 2:**

**As a passenger or an organisation representing disabled people, what is your experience of information and guidance setting out the rights of disabled persons or those with reduced mobility when travelling by air?**

We have listed some questions below which you may find helpful in responding. However, the list is not exhaustive and you should not feel restricted to the themes below.

- Is there enough information available regarding your rights as a disabled or less mobile passenger when travelling by air?
- Is the existing information and guidance clear and understandable, or is it too technical? For example, could the wording be improved? If so, how?
- Are there any particular areas where you feel there is too little information available? Is the existing information focused on certain areas while leaving gaps in others, or is there a balance?
- Is the existing information easy to access/find? If not, what could be done to make the information easier to access?

In your opinion, which organisation (e.g. the Government, a consumer rights advocacy, a disability organisation, etc.) would be most appropriate to provide information and guidance in this area? Why?

N/A

**Consultation Question 3:**

**As an industry representative or a service provider in the aviation sector, what is your experience of guidance regarding your obligations when providing services to disabled persons or those with reduced mobility when travelling by air?**

We have listed some questions below which you may find helpful in responding. However, the list is not exhaustive and you should not feel restricted to the themes below.

- Based on the existing guidance, do you know what is expected of you when providing services to disabled persons and persons with reduced mobility?
- Is the guidance detailed enough? Is there enough information available?
- Is the existing information easy to access/find? If not, what could be done to make the information easier to access?
- What could be added to the guidance to make it easier for you to provide services to disabled persons and persons with reduced mobility?
- Are there any specific areas that you feel are not adequately covered in the existing guidance? Are there any areas that you feel the existing guidance is placing too much emphasis on?

N/A

**Consultation Question 4:**

**As a passenger or an organisation representing disabled people, what are your experiences with maritime passenger services when travelling by sea, in particular are there any issues where you feel more could be done to improve accessibility for passengers with disabilities or with reduced mobility?**

Page 34 Improving accessibility and passenger experience on board trains

**We are committed to improving the travelling experience of people with disabilities using facilities on our trains and stations. We have summarised all the relevant actions from across this consultation here:**

- **Action 9:** Subject to the finalisation of the Statement of Funds Available (in October this year), Government will allocate funding to provide additional accessible toilet facilities at stations as part of the next rail funding period (from 2019 onwards).
- **Action 10:** From October 2017, DfT will fund a pilot to explore opportunities to improve train tanking facilities and increase the availability of train toilets. Building on the learning from this and industry-led research in this area, we will consider how best to allocate further investment, beginning with upcoming franchising opportunities.
- **Action 11:** ORR will publish the results of its large programme of research, looking in depth at accessibility and assistance, in 2017. It is expected that the results will provide a snapshot of industry performance and include industry level recommendations to take forward (further information on the research is provided in Section 7 on Spontaneous Travel).
- **Action 12:** DfT is exploring with the Rail Delivery Group (RDG) the ability for train operators to provide 'alternative journey options' if the journey becomes unsuitable – for example, if the only accessible toilet on a train goes out of use unexpectedly.
- **Action 13:** We are exploring with RDG the possibility of placing dynamic notifications on the Stations Made Easy web pages, of the availability of accessibility features on trains.
- **Action 14:** We are also exploring with RDG how notifications of such incidents can be provided to passengers as early as possible.
- **Action 15:** We are working with the Rail Safety and Standards Board (RSSB) to launch an innovation competition in September 2017, which will find solutions to reducing the cost of accessibility improvements at stations, including the availability of accessible toilets. This competition will also focus on making improvements aimed at those with hidden disabilities.
- **Action 16:** We are also investing in a new rail innovation accelerator which will look at how the availability of facilities can be improved.

WYCA supports these actions.

The ORR research will be a useful evidence base when published providing an insight into how operators are performing as little information is currently available.

WYCA welcomes the proposed innovation competition funding being made available. There is a need for accessible toilet facilities to be provided at more stations, particularly at stations currently with no toilets facilities at all. The opportunity to provide more Changing Places toilet facilities should also be considered. Could this also include the availability of waiting rooms? These are routinely closed at smaller stations from about 6pm; in case of a delayed/cancelled train the lack of availability of safe, dry waiting facilities has particular impact on disabled people.

Page 38 Continuously improving the passenger experience

**Action 17:** We will commission research, which will be published by 2018, to measure the impact for passengers of work to improve rail vehicle accessibility since the introduction of Rail Vehicle Accessibility Regulations (RVAR) and the introduction of the Persons of Reduced Mobility Technical Specification for Interoperability (PRM TSI).

**Action 18:** By the end of 2017, we will publish performance data on accessible features on trains, and details of any remedial action necessary to improve both the quality of the data reported and any areas of poor performance.

**Action 19:** We will also share the performance data reported to us with ORR, to inform any action they take to ensure operators are meeting their legal requirements to comply with accessible rail vehicle standards.

**We would welcome your feedback. Do you agree or disagree with the actions proposed? Are there any other areas which require further attention? Please explain why.**

WYCA supports these actions. The research to be published will provide useful data on the impacts of improvements implemented including how well the industry is doing in terms of improving the journey experience for passengers and where more improvement is needed. Will this include enforcement in privately owned car parks?

Page 38 Continuously improving the passenger experience

**Consultation Question 5:**

**When you use a train, what has been your experience of accessibility equipment, such as the passenger announcements (either audible or visual), accessible toilets or manual boarding ramps, or other accessibility features)?**

For example, do you find this equipment reliable, and if not, how could train operators better ensure reliability or assist you?

N/A

Page 39 Ongoing accessibility of buses and coaches

**Action 20:** We will support the DVSA in its activities to communicate with operators on, and incentivise prompt compliance with, PSVAR, and to take decisive action where this does not happen. We will expect the DVSA to report annually on the action taken.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

WYCA supports this action and publication of an annual report by DVSA on the enforcement of vehicle compliance checking.

Page 40 Refusal of assistance dogs in taxi

**Action 21:** We will review, with Government partners and stakeholders, the reasons why some taxi and PHV drivers refuse to transport assistance dogs, and identify key actions for local or central government to improve compliance with drivers' legal duties.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

WYCA welcomes this action.

Page 40 Monitoring abuse of disabled parking spaces

**Action 22:** We have begun publishing enforcement newsletters aimed at local authorities (i.e. all Blue Badge teams and parking teams) to promote enforcement success stories and good practice, in order to help encourage better enforcement of disabled parking spaces. We will also continue our regional engagement workshops with local authorities and will work with DPTAC on both initiatives.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why**

WYCA support the promotion of good practice.

Page 44 Training and education

**Action 23:** We will work with the bus industry, DPTAC, Driver Certificate of Professional Competence (Driver CPC) training accreditors and the DVSA to seek to ensure that the training of bus drivers in disability awareness and equality reflects the Department's recently developed best practice guidance, and that appropriate arrangements are in place before such training becomes mandatory in March 2018.

**Action 24:** We will support the Office of Rail and Road (ORR) in its monitoring of disability equality and awareness training undertaken by train and station operators.

**Action 25:** We will encourage taxi and private hire licensing authorities to promote disability awareness and equality training for licensed taxi and private hire drivers, and recommend, in our draft best practice guidance, that such training be mandated in their licensing policies.

**We would welcome your feedback. Do you agree or disagree with the actions proposed? Are there any other areas which require further attention? Please explain why.**

A consistent and coordinated approach to the provision of training would be welcomed.

Disability awareness training for transport staff is consistently highlighted as a key issue by older and disabled people.

There are examples of good practice across the country where transport operators and providers have worked with disability organisations to enhance disability awareness training.

Discussions locally with disability organisations and transport providers have indicated that:

- Online 'short film' training resources enable disabled people to be involved in delivering/producing training, and can be operationally easier for providers to share with staff than traditional classroom based training.
- Disability awareness training could focus on a 'key principles' approach.
- Raising awareness of hate crime should be included in disability awareness training content for transport providers.

It would be beneficial and cost effective to develop a national shared training resource.

WYCA supports action 25 and would stress the need for a uniform standard mandated in licencing policies given many private hire companies increasingly operate outside their licencing authority area and there is concern that some drivers seek to obtain licences from those authorities who impose lower standards.

Page 44 Training and education

**Consultation Question 6:**

As a transport user, what has been your experience of using transport services? In particular, how would you assess the levels of understanding of transport providers and staff of the needs of disabled people (i.e. those with cognitive, sensory or physical impairments including dementia, autism or mental health conditions)?

**We would welcome any experiences (positive or negative) that you wish to provide.**

N/A

Page 44 Training and education

**Consultation Question 7:**

What additional action could Government, regulators or transport bodies take to ensure that transport providers and staff have a better understanding and awareness of the access and

information needs and requirements of passengers or transport users with less visible disabilities (i.e. those with sensory or cognitive impairments including dementia, autism or mental health conditions)?

Highways designers, transport planners and engineers may also benefit from disability awareness training in the context of the built environment.

It would be helpful to have an evidence base of the needs and requirements of people with less visible disabilities as well as what works in addressing those needs.

Page 47 Spontaneous rail travel

**Action 26:** ORR will publish the results of its large programme of research looking in depth at accessibility and assistance in 2017.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

WYCA welcomes the publishing of the results of the ORR research programme. It would be helpful for research to include the impact of situations where disruptions occur at the start of or during journeys e.g. rail cancellations/replacement bus services and provision of information/assistance and accessibility of alternative transport provision. There is currently little information available about the level of satisfaction with the passenger assistance provided by the train operators as part of Disabled People's Protection Policy (DPPP). This research will be a useful evidence base to help operators identify the gaps and areas for improvement as well as giving some transparency to others.

Those currently not traveling by train may not be aware that the passenger assistance service is available. Information about the service on operator websites and apps could be more prominent as well as better promotion through other channels outside of the rail industry.

Page 47 Spontaneous rail travel

**Action 27:** We will report on the progress of its joint research with Transport Focus, to identify the challenges inhibiting passengers from travelling, by the end of 2017.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

WYCA welcome this joint research with Transport Focus which will provide a useful evidence base. Identifying the barriers impacting on journey experiences will help the industry to focus and plan for making improvements in the future. Knowing what is or isn't working well will also help improve future scheme design and stop the same mistakes being made again.

Page 48 Spontaneous rail travel

**Consultation Question 8:**

**As a passenger or organisation representing disabled people, what is your experience of trying to travel spontaneously?**

- What steps could transport providers and operators take to promote or reduce restrictions to spontaneous travel?
- What action could Government, regulators, transport operators or providers take to increase spontaneous travel?

N/A

Page 48 Spontaneous rail travel

**Consultation Question 9:**

**As a transport operator or provider, what is your experience of enabling spontaneous travel for disabled people?**

- What steps have you taken to enable spontaneous travel for disabled passengers?
- What action could Government, regulators or other bodies take to help support you to provide spontaneous travel for disabled passengers?

N/A

Page 49 Passenger Assist

**Action 28:** DfT is exploring with RDG the ability for train operators to provide 'alternative journey options' if the journey becomes unsuitable – for example, if the only accessible toilet on a train goes out of use unexpectedly.

**Action 29:** DfT is also exploring with RDG how notifications of such incidents can be provided to passengers as early as possible.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

WYCA welcomes these actions. It would be helpful if the 'alternative journey options' could also consider when rail replacement buses are to be used, such as instances when they are ordered due to service disruption and not just planned ahead for use during engineering works. Providing better information, quicker at stations allow people to be able to make informed decisions about options for onward journeys. Smart media is also continuing to change and develop and this should also be explored.

Page 49 Passenger Assist

**Consultation Question 10:**

**As a passenger or organisation representing disabled people, what is your experience of using Passenger Assist?**

We would welcome ideas on what further developments could be made to the Passenger Assist system to make it more attractive to users with accessibility needs; particularly those who currently choose not to travel by train.

N/A

Page 50 The future of rail ticketing

**Consultation Question 11:**

**When you purchase a ticket using a vending machine, what has been your experience of accessibility?**

For example, do ticket machines provide clear information? Are you able to book the correct ticket?

Are there any particular issues that we need to consider when designing or delivering smart ticketing programmes?

Feedback from members of a local Dementia Engagement and Empowerment Project (DEEP) group highlighted the confusion and stress arising from using a train station ticket barrier which had three different ticket reading/scanning options to deal with paper tickets, barcodes and smart cards.

Self-service ticket machines should ensure that visual displays adhere to accessibility guidelines, including visual contrast for people with visual impairment. The positioning of machines also

greatly impacts of the visual display. Uncovered machines on platforms need to be able to visually function well with the different light levels and sun glare throughout the day.

Page 53 Information on rights

**Action 30:** We will work with representative bodies (e.g. the Confederation of Passenger Transport (CPT) and the Rail Delivery Group (RDG)), and will support the work of regulators (such as the Office of Rail and Road), to encourage greater promotion of information about the rights of disabled travellers and what they are entitled to expect in terms of service and facilities, as well as developing easier ways to register complaints when things go wrong.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

Disabled passengers locally have highlighted the rights of disabled travellers and what they are entitled to expect in terms of service and facilities as a key issue. Greater information and awareness around this issue would be welcomed.

Feedback indicates that disabled passengers are not always aware of complaints procedures, can find them inaccessible or have little confidence that anything will change as a result of complaining. Easier and accessible ways to register complaints would be welcomed.

Page 53 Information on rights

**Consultation Question 12:**

We would welcome views, particularly from disabled passengers, on the current systems for resolving transport disputes, and whether processes could be further improved.

Not aware of any feedback from Transport Focus with regard to transport complaints which have been escalated to them locally not being satisfactorily resolved.

Page 54 Information on accessibility levels

**Action 31:** We will work with transport authorities and representative bodies (e.g. CPT and RDG) to encourage the provision of better information about levels of accessibility on vehicles and services, so that disabled people can make informed choices about their journeys. This will include issuing guidance concerning the provision of information about the accessibility of bus services.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

WYCA would welcome real-time accessibility information. The more information available to the passenger enables them to make informed journey decisions. There are separate issues in the different types of vehicle stock for both train and bus fleets being used at any one time and passengers not knowing what type of vehicle stock will be forming the service they plan to use. The information about opportunities to board e.g. with a wheelchair or mobility scooter will be useful in facilitating travel. Many people are unaware that some scooters can be carried on public transport and consequently they find it difficult to use public transport as the distance to/from the bus stop may be prohibitive. Additionally, as buses currently carry only one wheelchair, advance information whether the bus can or cannot accommodate a wheelchair user on board, when the next service is due and whether there is a wheelchair space available will be welcomed.

Page 55 Disabled Persons Railcard

**Action 32:** We will support the work of the RDG and ORR to encourage further promotion of the benefits of DPRC in order to further increase its take up and use.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

WYCA agree with the proposed action to encourage further promotion of the Disabled Persons Railcard. West Yorkshire Disabled Passes include half-fare, off-peak travel in West Yorkshire. The Disabled Persons Railcard encourages rail travel including long distance journeys.

Providing more clarity for providers as well as passengers is also to be encouraged. See answer to consultation Question 14 below.

Page 56 National Assistance Card or other assistance for people with less visible disabilities

**Consultation Question 13:**

**As a person with a hidden or less visible disability or impairment, or in an organisation representing people with hidden disabilities, we are keen to receive your views on the desirability and feasibility of introducing a national assistance card.**

**We have listed some questions below which you might find helpful in responding. However, the questions below are not exhaustive and you should not feel restricted by them:**

- Do you have a hidden disability or impairment? If yes, do you feel the need to communicate your needs to transport staff?
- What has been your experience of communicating your needs to transport staff or fellow passengers?
- Have you ever used a tool to communicate your assistance needs to transport staff? What did you use? What has your experience been?

Do you have any views on the merit or not of introducing a national, cross-modal assistance card?

N/A

Page 56 National Assistance Card or other assistance for people with less visible disabilities

**Consultation Question 14:**

**As a transport operator or provider, we are keen to receive your views on the desirability and feasibility of introducing a national assistance card.**

**We have listed some questions below which you might find helpful in responding. However, the questions below are not exhaustive and you should not feel restricted by them:**

- Do you currently offer an assistance card, badge, lanyard or other tool to enable passengers with hidden disabilities to alert your staff to assistance needs?
- Do you have any views on the merit or not of introducing a national, cross-modal assistance card?

Are there any practical or other considerations needed for the introduction of a cross-modal national assistance card?

There are a range of different assistance cards for bus travellers in circulation in West Yorkshire, including those produced by bus operators by the Combined Authority. Feedback from passengers indicates that these are welcomed and well used. For consistency and ease of understanding and recognition, a national card covering all modes would be welcomed.

The 'orange wallet' scheme – a bright orange bus pass wallet for disabled passengers – has also had positive feedback from disabled people in West Yorkshire. The orange wallet is another way of quickly enabling a bus driver or other transport staff to see that the customer has a disability and may need assistance.

Page 57 Travel training, buddying and mentoring schemes

**Action 33:** We will continue to identify and support initiatives for promoting and supporting travel training, mentoring and buddying schemes.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

In West Yorkshire, the Combined Authority has worked closely with local learning disability organisations and self-advocacy groups to understand and address some of the barriers to travelling. Initiatives have included guided tours of bus stations to familiarise people with sources of assistance and information and provide reassurance. Feedback from participants has indicated that this has increased their confidence in travelling and using the bus station.

There are a number of 'Safe Places Schemes' across the country. These provide an invaluable level of support and reassurance to disabled and vulnerable people when they are out and about. Support for the development of a national approach to Safe Places would be welcomed, including awareness raising and provision of guidance on how to establish a scheme.

Page 58 Mobility Centres

**Action 34:** We will highlight and promote the work of Mobility Centres, and identify ways to support the ambition of the Driving Mobility network to increase the services it provides in response to the growing ageing population and become community style 'hubs' for older and disabled people.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

Driving is not the only means of maintaining independent mobility. Wheels for Wellbeing remove barriers to cycling supporting disabled people of all ages and abilities to enjoy the benefits of cycling. More support should be provided for those who cannot drive.

Page 59 Advice on when to stop driving

**Action 35:** Over the course of the next two years, Mobility Centre 'hubs' will promote the public and private transport options available in each region to those considering giving up driving or those who have been advised to cease driving.

**Action 36:** By the end of 2018, Driving Mobility will produce guidance to support families concerned about an older person's driving ability, along with information on alternatives to self-driving.

**We would welcome your feedback. Do you agree or disagree with the actions proposed? Are there any other areas which require further attention? Please explain why.**

WYCA supports these actions to make support available and help promote public transport use. There is currently a lack of guidance and support for drivers and family members with regards to knowing when to stop driving. Better promotion of public transport as an alternative could encourage this modal shift.

Page 60 Community Transport

**Consultation Question 15:**

How can the Department for Transport support Community Transport Operators further?

Community Transport provides a vital service especially for those people who cannot access mainstream public transport, yet it does not enjoy the stability of funding sources provided to registered local bus operation (BSOG, concessionary fares etc)

The Department's intervention to support Total Transport was short term and did not enable authorities like WYCA to develop a co-ordinated approach across our major conurbation. WYCA

would recommend a cross Departmental approach to co-ordinating transport spend in the health and social care sectors to enable a more holistic approach to accessible transport. Volunteer car services for people with disabilities are a vitally important element of the Community Transport provision. WYCA would support national initiatives to recognise the importance of these schemes and to encourage and incentivise volunteering.

Page 61 Mobility scooters

**Action 37:** We will work with Mobility Centres and the British Healthcare Trades Association (BHTA) on promoting the need for training of scooter users and providing facilities for such training.

**Action 38:** We will identify and promote pushchairs, prams and scooters most appropriate for public transport, working closely with the British Healthcare Trades Association and transport providers, by 2018.

**We would welcome your feedback. Do you agree or disagree with the actions proposed? Are there any other areas which require further attention? Please explain why.**

WYCA agree with the proposed actions. It should be recognised that providing off carriageway space for e.g. cycles can also produce safe space for mobility scooters. Action 38 is supported as there is much uncertainty as to which scooters can be taken on buses and trains. Users need access to independent information about what their device will enable them to do – this includes opportunities to use on public transport as well as ability to tackle challenges in the on-street environment, for example gradients.

Item 8.48 on page 61 refers to £3.8 billion of funding between 2016-17 and 2020-21 for pavement maintenance. Perhaps ring-fencing some of this funding may help target access improvements. Leeds City Council highlighted that they run a programme of user led interventions that can demonstrate success in increasing users' ability to get out and about, access local services and public transport. Local Cycling and Walking Infrastructure Plans will help identify core walking zones so additional funding/ring-fenced funding could be locally applied for areas that are particularly 'walkable' facilitating social inclusion.

Page 61 Unauthorised pavement parking

**Action 39:** We will begin a survey to gather evidence and identify examples of improvements that could be made to the wider process for making Traffic Regulation Orders, by autumn 2017. This evidence will help inform our approach to tackling pavement parking.

**We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

WYCA supports the evidence gathering survey. In addition to the obstruction caused by unauthorised pavement parking, it results in damaged uneven flagstones leading to risk of injury and increased maintenance demands. Any changes to traffic regulations in this regard would need to be supported by effective enforcement.

National legislations reflecting the standard practice in London, where pavement parking is prohibited throughout would be the most appropriate solution.

It has been raised that should 'no pavement parking' Traffic regulations Orders be introduced on some streets, this would implicitly legitimise pavement parking where such orders are absent to the detriment of disabled people. A more universal prohibition, with exceptions where infrastructure permits, may be a more appropriate way forward.

This is a difficult balance to achieve as many residential street function as shared space (albeit with a 'safe parking' area on the footway, with no 'safe pedestrian area') which raises concerns from people with limited mobility, including blind and partially sighted people. Yet without taking up some of the pavement many disabled people with no off-street parking would find it difficult to park their vehicle close to where they live, reducing their ability to go out for the fear of not having anywhere to park when they return. Therefore a prohibition to pavement parking would also increase demand for the provision of off street parking/re-housing which would require funding.

Page 64 Strengthening our evidence base

**Action 40:** In 2017, we will commission research to further understand the barriers to travel for individuals with cognitive, behavioural and mental health impairments, to help us to develop potential measures to improve accessibility.

**Action 41:** By 2018, we will commission research quantifying the economic, social and commercial benefits of making passenger transport more accessible.

**We would welcome your feedback. Do you agree or disagree with the actions proposed? Are there any other areas which require further attention? Please explain why.**

WYCA agree. Feedback indicates that negative attitudes of other passengers can be a barrier to travel. This applies to all disabled people, including those with cognitive disabilities and with hidden disabilities.

There is a need to address prejudice and negative attitudes towards disabled people generally – not just in the context of public transport.

Future considerations:

- Electrically Assisted Pedal Cycles – Research on a disabled / adaptive cycle.
- Connected and Autonomous vehicles – Impact of autonomous vehicles on people with disabilities navigating street environment.

Page 67 Wider accessibility innovation

**Action 42:** DfT is working with the RSSB to launch an innovation competition in September 2017, which will find solutions to reducing the cost of accessibility improvements at stations, including the availability of accessible toilets. This competition will also focus on making improvements for those with hidden disabilities.

**Action 43:** We are also investing in a new rail innovation accelerator which will look at how the availability of accessible facilities can be improved.

**Action 44:** We will ensure that DfT innovation competitions highlight the need for prospective funding recipients to consider accessibility within their project proposals, where projects impact on transport users.

**Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.**

WYCA agree with the proposed actions. The Rail Accessibility Competition is welcomed, however the timescales for applications is tight with only 2 months available between the application launch and submission deadline. It will be difficult for interested parties to identify solutions and gain support/approval of co-funding streams in such a short period of time.

WYCA would welcome greater awareness, sharing of good practice and an evidence base of what works in innovative and technological developments which increase accessibility of the public transport system. Considerations about techniques for navigating future city streets: quieter, more conflict, elimination of clutter, alternatives to kerb navigation and different feature types (like light segregation).

Page 69 Inclusive policy making

**Action 45:** We will develop and deliver (with input from DPTAC) training for civil servants in the Department to include the law and good practice with respect to disability awareness and equality issues.

**Action 46:** We will work with the Welsh Government and the Minister for Equalities to understand the impact of the introduction of these new powers in Wales, and their potential applicability to the English jurisdiction.

**Action 47:** We will support work with local authorities to raise their awareness of the Public Sector Equality Duty under the Equality Act 2010 in relation to local transport and transport facilities.

**We would welcome your feedback. Do you agree or disagree with the actions proposed? Are there any other areas which require further attention? Please explain why.**

WYCA supports proposals to raise awareness of the Public Sector Equality Duty in relation to local transport and transport facilities.

Page 70 Measuring delivery of outcomes

**Action 48:** We will develop, in consultation with DPTAC, effective ways of measuring travel patterns and trends among disabled and older people over time as a basis for targeted policy initiatives.

We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.

WYCA agree. It would be helpful to include qualitative feedback on barriers to travel, what measures lead to increased ability/willingness to travel. Useful to measure difficulties in negotiating streetscape.