

**Officer response submitted on behalf of the council to DfT's Draft Transport Accessibility Action Plan [TAAP] consultation**

**Key** – shaded Actions are not the direct responsibility of the council as the Highway Authority and therefore do not necessarily require or include a full response.

Section	DfT TAAP Actions	Officer comments/suggestions
<b>Consistency in Accessing Transport Services</b>	<b>Action 1:</b> 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.	<b>Agree, and welcome the update of this important and comprehensive 2005 publication which is considered to be long overdue, but request that the timescale is accelerated. Although its role in the Planning process is recognised, this guidance should be significantly strengthened and promoted to ensure that accessible design and provision is integral to the consideration and delivery of development proposals, both on- and off-site.</b>
	<b>Action 2:</b> We will continue our involvement with CIHT 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.	<b>Agree, and welcome this work which needs to include the direct involvement of all relevant groups / vulnerable users e.g DpTAC, RNIB.</b>
	<b>Action 3:</b> 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.	<p><b>Agree, and have the following further comments and suggestions:</b></p> <ul style="list-style-type: none"> <li>• Whilst the Traffic Signs Regulations and General Directions 2016 allows the use of low level cycle signals, there is no guidance on how to use them e.g the use of a signal box sign under the Red Amber Green for designated turning movements. This is covered in the TfL guidance (Design and Installation of Low Level Cycle Signals, SQA-0651 - Issue: Draft) but it would be good if it could be included in the updated Cycle Infrastructure Design Local Transport Note.</li> <li>• The new London Cycle Design Standards are comprehensive and practical and an essential guide which the council use to inform its approach to various schemes. The standards, however, are obviously city-focused and not applicable to the majority of authorities. Therefore, the tools and techniques should be reviewed and adapted for rural, inter-urban and suburban areas e.g Cycling Level of Service [CLoS] assessments which are very difficult to apply outside London but could be a useful tool if it were adapted to other conditions/environments. Similarly the Degrees of Segregation for different street types is useful but could be expanded to cover a wider variety of street types found outside London.</li> <li>• In terms of construction, there are many new products available that offer advantages over the sealed surface approach recommended in the current note. For example,</li> </ul>

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<b>Consistency in Accessing Transport Services</b>		<p>Flexi-pave (KBI Ltd) is a long lasting durable surface that has minimal maintenance costs but is suitable for walking, cycling, wheelchair users and equestrians. It is also free draining and made from 50% recycled tyres and is therefore better for the environment. We have used this product for a 1.5km by-way on Drove Road in Woodingdean and plan to use it in future schemes. It is now also used throughout London and in many rural locations such as the Trans-Pennine Way. It is suggested that the new note should include a review of materials and their suitability in different environments. The council would welcome the opportunity to be used as a case study or best practice example.</p> <ul style="list-style-type: none"> <li>• The council installs cycle parking on the carriageway by designating a section of the highway as a Pedal Cycle Parking Place. This helps to remove street clutter from the footways which assists visually impaired pedestrians as well as improving access increased numbers of cycle parking facilities. This also demonstrates that the council's parking stock is managed and improved comprehensively and is made available or prioritised for all road-users.</li> </ul> <p>The council also considers that, although infrastructure is an important consideration in addressing accessibility and mobility issues, behaviour influencers ('soft measures') also need to be considered to maximise the use and effectiveness of improvements. For example:-</p> <ul style="list-style-type: none"> <li>• The council actively uses and promotes road safety campaigns aimed at all users that may impact on the safety of cyclists as vulnerable road users, such as the 'Share the Roads' campaign, and 'What Did I Miss?' distraction campaigns. Good cycle infrastructure must be combined with active promotion campaigns which are aimed at all road users, and encourages responsible road use.</li> <li>• The council also delivers a programme of adult cycle Bikeability training, which compliments and encourages use of good cycle infrastructure.</li> <li>• New Bikeshare 'hubs' are located in popular, but safe, positions across the city and encourage cycling for a whole journey, or part of one.</li> </ul> <p><b>General comments on Infrastructure:</b> Other organisations have delivered projects in the city through partnerships.</p> <ul style="list-style-type: none"> <li>• A partnership between Network Rail and DfT, for example, has made delivered improvements to train stations. The city has 8 rail stations: two are now Cycle Accessible and include measures such as wheel channels for bikes on footbridge stairs that allows easier access for cyclists.</li> <li>• The council's LSTF programme included objectives to encourage good accessibility for all as part of its</li> </ul>

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<b>Consistency in Accessing Transport Services</b>		<p>sustainable travel funded programme. During 2011-15 the programme focused on transport interchanges to deliver significantly improved accessibility at rail stations and bus stops. This has benefitted cyclists as part of measures to encourage 'door to door' journeys by different forms of transport. A residential shared, secure and covered cycle parking shelter in Shaftesbury Road was also delivered as part of the LSTF programme. It is now maintained by the local community.</p> <ul style="list-style-type: none"> <li>• Significant levels of funding from Cycling England, as part of the 'Cycle Demonstration Town' status in 2008, enabled a close working partnership with Southern Rail, the then rail franchise holder. This enabled a cycle hub to be built at the northern entrance to Brighton Station. The project would not have been developed and delivered without funding for a feasibility study from Cycling England, which then kick-started the partnership approach.</li> <li>• BHCC has enabled a large number of cycle parking schemes to be delivered by local businesses by allocating budget within its annual LTP capital programme since 2007. Small contributions incentivise/pump-prime and enable cycle parking projects, and encourage the private sector to invest more in its premises for the benefit of its staff, thus encouraging active travel and maximising the health benefits this brings.</li> </ul>
	<p><b>Action 4:</b> 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<sup>1</sup> on local bus services throughout Great Britain, helping disabled passengers to travel by bus with confidence.</p>	<p><b>Agree, and have the following further comments:</b></p> <p>The council and main local bus company, Brighton + Hove Bus &amp; Coach Co. [B+HB&amp;CCo] have worked in partnership to introduce 'next stop' audio and visual announcements on all vehicles and are introducing hearing loops in the driver's cab area. In partnership with the city council, on-street real time bus information signs can provide the information audibly as well as displaying it visually. In addition, additional audible announcements are given at certain bus stops, such as 'floating bus stops' where a cycle lane passes the nearside of buses in a lane separated from the general traffic. A disembarking "island" is provided and a safety announcement is given to ensure passengers are made aware and take extra care. This is for the benefit of both bus passengers and cyclists.</p> <p>The council also actively promotes the 'Helping Hand' scheme, devised by B+HB&amp;CCo and taken up by other local bus companies. Helping Hand offers practical yet discreet support for a passenger who wishes to highlight a need for assistance with their bus journey or may have a 'hidden' disability or condition.</p> <p>The council would welcome the opportunity to be used as a case study or best practice example for either of these initiatives.</p>

<sup>1</sup> The Bus Services Act 2017 creates powers to implement an accessible information requirement, mandating the provision on-board local bus services throughout Great Britain of audible and visible information identifying the respective route and each upcoming stop.

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<b>Consistency in Accessing Transport Services</b>	<p><b>Action 5:</b> 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.</p>	<p><b>Agree, and have the following further comments:</b></p> <p>The council has a policy covering refusals to accept assistance dogs and is enforced in line with the council's Licensing Enforcement Policy which includes prosecution.</p> <p>The council runs training for all drivers of accessible vehicles to ensure that passengers' needs and safety are identified and addressed and intends to provide this for all drivers. Brighton &amp; Hove City Council runs disability awareness training for all drivers of accessible vehicles. The Blue Book also contains a code of conduct to apply when working with vulnerable passengers. There is also a disability stakeholder group which is also consulted on new policies that may affect disabled people.</p> <p>At a wider level, there are local concerns that private hire vehicle and taxi drivers from outside the city do not have to adhere to the council's standards and that this also disrupts the local economy as it could render local businesses unviable for existing licence holders, or undermine the city's reputation in terms of providing accessible taxi services.</p>
	<p><b>Action 6:</b> 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.</p>	<p><b>Agree, and have the following further comments:</b></p> <p>47% of Brighton &amp; Hove's Hackney Cabs and 13% of Private Hire Vehicles are now wheelchair accessible vehicles. The council is working towards achieving a target of 50% of its fleet being wheelchair accessible vehicles and are awaiting further guidance from government.</p> <p>However, it is important to highlight that, in the context of fulfilling equalities and accessibility/mobility requirements, the council is aware that achieving this target could be considered to be at odds with its policies aimed at improving air quality by lowering emissions, as most wheelchair-accessible vehicles are diesel-fuelled.</p>
	<p><b>Action 7:</b> 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.</p>	<p><b>Agree, and have the following further comments:</b></p> <p>There is a clear need for a review of eligibility criteria for Blue Badges allocations. Therefore, the council would welcome being actively involved in reviewing and addressing this important, national matter. For example, eligibility could be linked to benefit eligibility, such as being awarded 12 points, in the 'planning and making a journey' section for the mobility component of a Personal Independence Payment [PIP] application. A PIP is only awarded to those people under 65.</p> <p>For those people over 65 there is not a benefit linked to mobility so an assessment would still be required. For this reason we would ask that careful consideration be given to how this could be applied to residents over 65.</p> <p>Direct access to the Government's DWP benefits system</p>

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Consistency in Accessing Transport Services		<p>would also be extremely useful as the burden of finding the correct documents often falls on family members or ‘unofficial carers’.</p> <p>Very clear guidance needs to be issued by the DfT about the impact assessments carried out including the impact on medical professionals and administration staff. Best practice desk assessment tools would help consolidate assessments across the country.</p>
	<p><b>Action 8:</b> 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.</p>	<p><b>Agree, and have the following further comments:</b></p> <p>Assessments of station ‘accessibility’ should be more thorough and extend beyond the boundary of the station by working with Local Authorities and relevant interest groups in order to identify issues, possible solutions and the responsible organisation or landowner. For example, where the railway severs local communities and/or the routes between them, the ‘Access for All’ programme should be more comprehensive and inclusive by not simply assessing and designating the station premises as being ‘step-free’, if the routes to/from them are not e.g station footbridges.</p>
Monitoring the Impact of Regulatory Compliance	<p><b>Action 9:</b> 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).</p>	<p><b>Agree.</b></p>
	<p><b>Action 10:</b> 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.</p>	<p><b>Agree.</b></p>
	<p><b>Action 11:</b> 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</p>	<p><b>Agree, and look forward to seeing the results of the research.</b></p>

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<b>Monitoring the Impact of Regulatory Compliance</b>	Section 7 on Spontaneous Travel).	
	<b>Action 12:</b> 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.	<b>Agree.</b>
	<b>Action 13:</b> 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.	<b>Agree.</b>
	<b>Action 14:</b> We are also exploring with RDG how notifications of such incidents can be provided to passengers as early as possible.	<b>Agree.</b>
	<b>Action 15:</b> 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.	<b>Agree.</b>
	<b>Action 16:</b> We are also investing in a new rail innovation accelerator which will look at how the availability of facilities can be improved.	<b>Agree.</b>
	<b>Action 17:</b> 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).	<b>Agree.</b>

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<b>Monitoring the Impact of Regulatory Compliance</b>	<p><b>Action 18:</b> 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.</p>	<p><b>Agree.</b></p>
	<p><b>Action 19:</b> 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.</p>	<p><b>Agree.</b></p>
	<p><b>Action 20:</b> 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.</p>	<p><b>Agree, and have the following further comments:</b></p> <p>The council is looking forward to receiving further government guidance on targets for the proportion of taxi fleets which should be wheelchair-accessible.</p>
	<p><b>Action 21:</b> 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.</p>	<p><b>Agree, but this action appears to repeat Action 5.</b></p>
	<p><b>Action 22:</b> We have begun publishing enforcement newsletters aimed at local authorities (ie 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.</p>	<p><b>Agree, and have the following further comments:</b></p> <p>The council has developed an award-winning 'Operation Bluebird' scheme by working with, and for, the surrounding Local Authorities and Sussex Police to enforce the misuse/abuse of disabled driver parking and Blue Badges. Along with successful prosecutions for persistent Offenders, Community Resolution Orders are used to educate and deter further misuse. Drivers are charged a £40 attendance fee to cover the cost of the course where they are shown a video explaining the impact Blue Badge misuse has on disabled drivers. This provides a cost effective, sustainable and proportionate response to tackling Blue Badge misuse. Very few drivers (less than 1%) re-offend and any that do reoffend have been prosecuted.</p> <p>The council employs two full-time Blue Badge investigators who work with Civil Enforcement Officers and the Blue Badge Administration Team to gather intelligence. The Blue Badge investigators also spend time on-street with Civil Enforcement Officers to further their skills regarding inspection and</p>

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		<p>retaining misused blue badges.</p> <p>In addition to this, Operation Bluebird has featured in the DfT newsletter as a success story and we have developed a blog called 'tacklingbluebadgemisuse.wordpress' for other local authorities who would like to use the same techniques. The council has also presented the concept at DfT regional meetings and various conferences, including Parking World, British Parking Association regional meetings and the National Counter Fraud Conference.</p> <p>There is a lot of interest in this scheme and it is considered to provide value for money financially. Given the interest from other Local Authorities, it is suggested that the DfT could provide further funding to produce a Community Resolution Orders video that could be used nationwide with a simple tool kit to complement this.</p> <p>The council would welcome the opportunity to be used as a case study or best practice example for these initiatives.</p>
<b>Training and Education</b>	<p><b>Action 23:</b> 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.</p>	<p><b>Agree.</b></p>
	<p><b>Action 24:</b> 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.</p>	<p><b>Agree.</b></p>
	<p><b>Action 25:</b> 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.</p>	<p><b>Agree, and have the following further comments:</b></p> <p>Equality training is an essential part of training and granting of a license to operate in the city, but this approach does not appear to be consistent in other parts of the country. The council runs training for all drivers of accessible vehicles to ensure that passengers' needs and safety are identified and addressed and intends to provide this for all drivers. Brighton &amp; Hove City Council runs disability awareness training for all drivers of accessible vehicles. The Blue Book also contains a code of conduct to apply when working with vulnerable passengers.</p>

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	<b>SUGGESTED EXTRA ACTION</b>	<i>In the context of training and education, it is suggested that the DfT also reviews the Highway Code to ensure that it includes the aspects of accessibility and mobility that all road users should be aware of, and comply with, when travelling/sharing the roads.</i>
<b>Spontaneous Travel</b>	<b>Action 26:</b> ORR will publish the results of its large programme of research looking in depth at accessibility and assistance in 2017.	<b>Agree, but this appears to repeat Action 11.</b>
	<b>Action 27:</b> 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.	<b>Agree, and look forward to the receiving the results of the research and whether these will inform or have particular implications for the needs of residents/passengers in the city.</b>
	<b>Action 28:</b> 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.	<b>Agree, but this action repeats Action 12.</b>
	<b>Action 29:</b> DfT is also exploring with RDG how notifications of such incidents can be provided to passengers as early as possible.	<b>Agree, but this action repeats Action 14.</b>
<b>Building Confidence and Empowerment</b>	<b>Action 30:</b> 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.	<b>Agree, but suggest this could be aligned/combined with Action 31 into a single action that refers providing <u>and</u> promoting travel information for disabled people.</b>
	<b>Action 31:</b> 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	<b>Agree, but refer to response to Action 30 above.</b>

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Building Confidence and Empowerment	people can make informed choices about their journeys. This will include issuing guidance concerning the provision of information about the accessibility of bus services.	
	<b>Action 32:</b> We will support the work of the RDG and ORR to encourage further promotion of the benefits of DPRC <sup>2</sup> in order to further increase its take-up and use.	<b>Agree.</b>
	<b>Action 33:</b> We will continue to identify and support initiatives for promoting and supporting travel training, mentoring and buddying schemes.	<b>Agree, and have the following further comments:</b>  The council actively promotes the 'Helping Hand' scheme, devised by B+HB&CCo and adopted by other local bus companies. 'Helping Hand' offers practical yet discreet support for any passenger who wishes to highlight a need for assistance with their bus journey.
	<b>Action 34:</b> 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.	<b>Agree but would make the following comment:</b>  The nearest Mobility Centres to the city are in Southampton and Kent, and therefore the services that these centres provide now or in the future could be more readily available to local people if a new centre was located in or near to the city/Greater Brighton City Region.
	<b>Action 35:</b> 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.	<b>Agree.</b>
	<b>Action 36:</b> 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.	<b>Agree.</b>
	<b>Action 37:</b> We will work with Mobility Centres and the British Healthcare Trades Association (BHTA) on promoting the need for training of scooter users and providing	<b>Agree.</b>

<sup>2</sup> Disabled Persons Railcard

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<b>Building Confidence and Empowerment</b>	facilities for such training.	
	<p><b>Action 38:</b> 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.</p>	<p><b>Agree.</b></p>
	<p><b>Action 39:</b> 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.</p>	<p><b>Agree, and have the following comments:</b></p> <p>The council fully supports the action taken so far to tackle irresponsible pavement parking and keep pavements safe and accessible for pedestrians. However, it is recommended that more should be done and at a quicker pace as this is a growing problem in Brighton &amp; Hove and has frequently been raised by many disability groups and residents locally, as well as by many councillors and local MPs. They have been requesting a simpler process and powers to tackle the issue, such as the effective outright pavement parking ban in London, on the basis that there is clear public expectation that local authorities should have powers to tackle pavement parking, in terms of both safety and mobility.</p> <p>It is noted that the action suggests that improvements could be made to the Traffic Regulation Order process. The main obstacle for councils, such as Brighton &amp; Hove, in tackling pavement parking is the cost of signage required by legislation to inform drivers of the boundaries of any pavement parking ban. For example, these can cost hundreds of pounds just to protect the pavement behind just one pedestrian crossing, making a citywide solution very costly.</p> <p>A more cost-effective way forward would be for the government to amend the TSRGD (Traffic Signs Manual) so that pavement parking throughout a Controlled Parking Zone, covered by a TRO, would ideally not require any signage, as is the case in London. Alternatively the pavement parking ban could be communicated to drivers through Controlled Parking Zone entry signs only, which would be far more viable for local authorities to introduce.</p> <p>A further option would be to decriminalise the offence of obstruction so that Civil Enforcement Officers could issue Penalty Charge Notices for 'obstruction' to replace Fixed Penalty Notices issued by the police. The police could also retain these powers if needed with a Fixed Penalty Notice taking precedence, as already applies to bus lane regulations.</p> <p>Any driver would have the right for an appeal to be considered by the Independent Traffic Penalty Tribunal. This would also have the considerable benefit of freeing up police time.</p>

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	<b>SUGGESTED EXTRA ACTION</b>	<b>Consideration should be given to the availability of and responsibility for operating Shopmobility services for local areas.</b>
<b>Strengthening our Evidence Base</b>	<b>Action 40:</b> In 2017, we will commission research to further understand the barriers to travel for individuals with cognitive, behavioural and mental health impairments, and help us to develop potential measures to improve accessibility.	<b>Agree, and look forward to seeing the results of this research and have the following comment:</b>  The council actively promotes the 'Helping Hand' scheme, devised by B+HB&CCo and adopted by other local bus companies. 'Helping Hand' offers practical yet discreet support for any passenger who wishes to highlight a need for assistance with their bus journey.
	<b>Action 41:</b> By 2018, we will commission research to quantify the economic, social and commercial benefits of making passenger transport more accessible.	<b>Agree, and look forward to seeing the results of the research and its recommendations on developing stronger Business Cases for funding applications.</b>
	<b>Action 42:</b> 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.	<b>Agree, and welcome the competition and look forward to the outcomes.</b>
	<b>Action 43:</b> We are also investing in a new rail innovation accelerator which will look at how the availability of accessible facilities can be improved.	<b>Agree, but appears to be a repeat of Action 16.</b>
	<b>Action 44:</b> 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.	<b>Agree, but we would expect this to be included within the completed Equalities Analysis for a project when it is undertaken.</b>
<b>Inclusive Policy Making</b>	<b>Action 45:</b> 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.	<b>Agree, and welcome the roll out of training to Local Authority level.</b>
	<b>Action 46:</b> We will work with the Welsh Government and	<b>Agree.</b>

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Inclusive Policy Making	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.	
	<b>Action 47:</b> 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.	<b>Agree, and welcome this joint working.</b>
Measuring Delivery of Outcomes	<b>Action 48:</b> 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.	<b>Agree, and look forward to receiving the results of the consultation.</b>

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DfT TAAP consultation questions	Officer responses/comments
<p><b>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 it might be improved? Please be as specific as possible</b></p>	<p>It is recommended that consideration should be given to the disabled person's concessionary bus pass being made available for use at all times of day, to help support disabled people who are travelling to and from work, but that any proposals to do so are supported by a comprehensive assessment of the potential financial implications for local authorities.</p> <p>It is recommended that consideration should be given to a 'Plus 1 companion' entitlement, to make it easier for disabled people to travel with any assistance or support that they may need (by taking someone with them free of charge, or at a reduced rate). Any proposals to do so should also be supported by a comprehensive assessment of the potential financial implications for local authorities.</p>
<p><b>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 of those with reduced mobility when travelling by air?</b></p> <p>Is there enough information available regarding your rights as a disabled or less mobile passenger when travelling by air?</p> <p>Is the existing information and guidance clear and understandable, or is it too technical? For example, could the</p>	<p>Not applicable – question directed at individual users or representatives of users.</p>

<p>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?</p>	
<p><b>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 of those of reduced mobility when travelling by air?</b></p> <ul style="list-style-type: none"> <li>• Based on the existing guidance, do you know what is expected of you when providing services to disabled persons and persons with reduced mobility?</li> <li>• Is the guidance detailed enough? Is there enough information available?</li> <li>• Is the existing information easy to access/find? If not, what could be done to make the information easier to access?</li> <li>• What could be added to the guidance to make it easier for you to provide services to disabled persons and persons with reduced mobility?</li> <li>• 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?</li> </ul>	<p>Not applicable – question directed at individual users or representatives of users.</p>
<p><b>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</b></p>	<p>Not applicable – question directed at individual users or representatives of users.</p>

<b>disabilities or with reduced mobility?</b>	
<p><b>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)?</b></p> <p>For example, do you find this equipment reliable, and if not, how could train operators better ensure reliability or assist you?</p>	Not applicable – question directed at individual users or representatives of users.
<p><b>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)?</b></p> <p>We would welcome any experiences (positive or negative) that you wish to provide.</p>	Not applicable – question directed at individual users or representatives of users.
<p><b>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 (ie those with sensory or cognitive impairments including dementia, autism or mental health conditions)?</b></p>	<p>It is recommended that the Government should consider the national introduction of a card assistance scheme similar to the ‘Helping Hand’ scheme:  <a href="http://www.buses.co.uk/page.shtml?pageid=1350">http://www.buses.co.uk/page.shtml?pageid=1350</a></p> <p>The Government could also explore and consider adopting the various approach used by the council for taxi travel, such as:-</p> <ul style="list-style-type: none"> <li>• Equalities training for all licensed taxi drivers (as included in the Blue Book guide).</li> <li>• The Taxi Licensing team work with local disability stakeholders groups, who are consulted on new policies that may affect disabled people.</li> </ul> <p>The council remains concerned that private hire vehicle and taxi drivers from outside the city do not have to adhere to the council’s standards and that this also disrupts the local economy as it could render local businesses unviable for existing licence holders, or undermine the city’s reputation in terms of providing accessible taxi services.</p>
<p><b>Question 8: As a passenger or organisation representing disabled people, what is your experience of trying to travel spontaneously?</b></p> <ul style="list-style-type: none"> <li>• What steps could transport providers and operators take to promote or reduce restrictions to spontaneous travel?</li> <li>• What action could Government, regulators, transport operators or providers take to increase spontaneous travel?</li> </ul>	Not applicable – question directed at individual users or representatives of users.
<b>Question 9: As a transport operator</b>	The council’s experience of enabling spontaneous travel is to

<p><b>or provider, what is your experience of enabling spontaneous travel for disabled people?</b></p> <ul style="list-style-type: none"> <li>• What steps have you taken to enable spontaneous travel for disabled passengers?</li> <li>• What action could Government, regulators or other bodies take to help support you to provide spontaneous travel for disabled passengers?</li> </ul>	<p>ensure that all forms of transport and travel are accessible to as many people as possible by delivering (or working in partnership to deliver). Examples include:-</p> <ul style="list-style-type: none"> <li>• real time passenger information signs at bus stops, rail stations, some supermarkets and cafes and at public buildings eg libraries;</li> <li>• infrastructure improvements such as bus stop build-outs and Kassel Kerbs to enable smooth/level boarding for people with mobility problems and the use of low-floor buses</li> <li>• a concessionary bus pass scheme which offers longer operating hours than other areas;</li> <li>• providing initial financial support to deliver Night Buses as an alternative to taxis, which are now running as commercial routes.</li> </ul> <p>It is recommended that the Government could consider developing funding grants to focus less on geographical areas and more on a city-wide approach to accessible transport. Ensuring that every bus stop has an effective Bus Stop Clearway is vital in providing accessible travel. Equally, ensuring that all pavements are unobstructed by vehicles and fully accessible, to provide access to and from the bus stop, will have wider benefits. Pavement cycling intimidates pedestrians, and in particular can deter disabled and older people from travelling independently. Developing a national approach to highlight and deal with this would be beneficial.</p> <p>The council financially supports some bus routes which are primarily deemed socially necessary, but these are not directed specifically at disabled users.</p> <p>The council also aims to make every bus stop fully accessible in terms of appropriate infrastructure and information.</p>
<p><b>Question 10: As a passenger or organisation representing disabled people, what is your experience of using Passenger Assist?</b></p> <p>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.</p>	<p>Not applicable – question directed at individual users or representatives of users.</p>
<p><b>Question 11: When you purchase a ticket using a vending machine, what has been your experience of accessibility?</b></p> <p>For example, do ticket machines provide clear information? Are you able to book the correct ticket?</p> <p>Are there any particular issues that we need to consider when designing or delivering smart ticketing programmes?</p>	<p>Not applicable – question directed at individual users or representatives of users.</p>
<p><b>Question 12: We would welcome views, particularly from disabled passengers, on the current systems</b></p>	<p>Not applicable – question directed at individual users or representatives of users.</p>

<p><b>for resolving transport disputes, and whether processes could be further improved.</b></p>	
<p><b>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.</b></p> <ul style="list-style-type: none"> <li>• Do you have a hidden disability or impairment? If yes, do you feel the need to communicate your needs to transport staff?</li> <li>• What has been your experience of communicating your needs to transport staff or fellow passengers?</li> <li>• Have you ever used a tool to communicate your assistance needs to transport staff? What did you use? What has your experience been?</li> <li>• Do you have any views on the merit or not of introducing a national, cross-modal assistance card?</li> </ul>	<p>Not applicable – question directed at individual users or representatives of users.</p>
<p><b>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.</b></p> <ul style="list-style-type: none"> <li>• 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?</li> <li>• Do you have any views on the merit or not of introducing a national, cross-modal assistance card?</li> <li>• Are there any practical or other considerations needed for the introduction of a cross-modal national assistance card?</li> </ul>	<p>Although neither an operator nor a provider of local bus services, the council would support the idea of introducing a national, assistance card for all forms of transport.</p> <p>The local example in the city of the ‘Helping Hand’ scheme includes both visible and ‘hidden’ disabilities or conditions e.g autism. Please see:-  <a href="http://www.buses.co.uk/page.shtml?pageid=1350">http://www.buses.co.uk/page.shtml?pageid=1350</a></p>
<p><b>Question 15: How can the Department for Transport support Community Transport Operators further?</b></p>	<p>Not applicable – question directed at individual operators.</p>

