Accessibility Action Plan Consultation –
Nottingham City Council (Transport Strategy) response

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.

Action 1: Agree
The City Council welcomes the proposed update of the "Inclusive Mobility Guidance" as this will provide an update to this guidance on light of a substantial change in attitudes regarding street design in recent years.

We would like it noted that the poor implementation of the "inclusive mobility guidance" could contribute to "street clutter" of the street environment of bollards, railings and tactiles, which can lead to issues of legibility and make the street scene difficult to navigate for some users. This should not be the intention of the guidance. However, the good implementation of the guidance can help reduce street clutter, such as reducing tactile paving areas to the minimum and avoiding the reliance on the use of bollards and guardrailing in favour of other forms of street furniture or improved design.

Regarding implementation of this guidance, central government should be aware that due to the sheer number of assets that such guidance relates to, that the new guidance should relate to new infrastructure, as retro-fitting any proposed changes to this guidance in the short to medium term will be prohibitive to local authorities.

Action 2: 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.
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.

Action 2: Agree
The City Council welcomes continued work relating to shared space. However, any proposed guidance should be flexible to consider the designing of such areas as part of placemaking and not lead to substantial "clutter" of the space.

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.

Action 3: Agree
The City Council is currently developing its Local Cycling and Walking Infrastructure Plan (LCWIP) and would welcome guidance relating to the provision of cycling facilities. However, it should be recognised that cycling will use a combination of on-road, on-pavement and off road facilities which

will have different types of infrastructure provision dependent on type of facility provided, especially regarding the issue of segregation/shared cycle facilities when utilising pavement space. However, in the design of these facilities, the guidance note must consider that in many locations, that space can be limited, and therefore would like some flexibility with regard to local provision, alongside the balancing of a reduction of street clutter.

We have a cycle design guide and are keen to innovate and design cycle facilities, which will encourage a step change in cycling numbers. This means our cycle facilities must not be a barrier to people with disabilities who wish to use footways, shared paths and bus services. However, it is also important to us that we design cycle facilities that can be used by people with disabilities and the elderly. This means we need to consider adapted bikes, recumbents, tricycles, cargo and electric bikes in the design process.

Our LCWIP is joint with D2N2 partners and we will look at how we can roll out the design standards from Nottingham Cycle Design Guide across the D2N2 area. We will continually review and update the Design Guide to ensure it recognises best practice. However the DfT should also review all design guides available home and abroad as there needs to be more flexibility, innovation and promotion.

From our discussions with disability groups such as those supporting blind and partially sighted people is that when we change a road layout or allow cyclists to use a one-way street we ensure they are consulted and they can input at the design stage. However it is also important to engage after the scheme is complete. These organisations will take people and talk through road layouts with them as part of training in methods such as long cane. When a road layout is changed they will sometimes add the new route to the training schedule.

More vulnerable groups are already less likely to cycle due to a number of possible barriers, including physical/design barriers. For example, those who are positioned lower to the ground (eg. Recumbent users) may be less likely to be seen by vehicles behind or to the side of them. Longer ASL's and early start signals may provide a small benefit in some cases, but ASL's are commonly ignored by motorists and early start signals need sufficient time for people with a disability to generate momentum to get away from vehicles around them (Wheels for Wellbeing recommend 10sec minimum). People who, due to their impairment use a non-standard cycle, would benefit from better quality infrastructure.

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.

Action 4: Agree
The City Council welcomes guidance regarding the provision of audible and visual information. However, it should be noted that Nottingham City Transport, one of the major bus providers within Nottingham, already provides such information on all of its bus fleet. However, it is recognised that such information provision can require significant investment from the bus operator across its own bus fleet, and any changes that might be required to regulations for existing systems would require substantial investment.

We would suggest however, that Nottingham City Transport audible and visual information is an example of best practise.

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.

Consultation Question 1:
The City Council feels that the national bus concession in England does succeed in supporting the local transport needs for most disabled people. In addition to the National Scheme, Nottingham City Council also provide additional travel benefits for Nottingham city residents: Free travel on the tram at all times, free travel on both bus and tram Park and Ride, plus free travel on buses before 09.30am and after 11pm Monday to Friday.

Government may want to consider inclusion of free travel on buses before 9.30am and after 11pm Monday to Friday in the national scheme. It is becoming increasingly difficult to provide this travel as budgets continue to be squeezed. This travel which is provided on a discretionary basis by Nottingham City Council, is really valued by our citizens and the local community. It can be the difference between a disabled person taking employment, both paid and voluntary, reduces the anxiety of making medical appointments and can help them live a complete social life.

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.

Action 5: Agree
We would also want the issue of wheelchair refusal to also be considered alongside assistance dog refusal. This is because we have received anecdotal evidence of some people being refused access onto taxi due to the type of wheelchair that can be carried on wheelchair accessible vehicles. This can cause confusion for both taxi drivers regarding which types of wheelchairs are allowed, along with disabled passengers.

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.

Action 6: Agree
The City council recently released a revised Taxi Strategy in Nottingham, which identified that whilst all Hackney Cabs are wheelchair accessible, no information is available regarding Private Hire Vehicles (PHV).

The Taxi strategy for Nottingham is available here:

https://www.nottinghamcity.gov.uk/media/456172/taxi-strategy-feb17.pdf

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.

Action 7: Partially agree and partially disagree
The authority welcomes a review of Blue Badge eligibility, with the aim of providing consistent guidance across the country.

Dependent on the outcome of this review however, it should be noted that a widening of scope of blue-badge holders would result in changes in demand for blue badge/disabled parking facilities. Therefore, we would ask that alongside this review, that guidance relating to disabled parking standards be also considered to ensure that areas can cater for changes in blue-badge uptake.

However, there is concern regarding the consideration of the link to disability benefits. The Blue-badge scheme has traditionally been provided to individuals with specific mobility needs that require use of a car. It should be clear that not all disabled individuals are likely to claim disability benefits, but still have impairments that would be eligible to the blue badge scheme. We would not want to see the blue-badge scheme restricted to those only on disability benefits.

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.

Action 8: Agree
The access for all programme has seen significant progress with rail stations improved to cater for those with disabilities. However, it is recognised that some of the “quick wins” are likely to have been undertaken in previous rounds of Access for All, meaning more expensive schemes are now required to enable full access to platforms. Alongside this, schemes also have to be sympathetic in many cases to conservation areas and listed buildings (which many stations are).

This is about not only disability but also improved access for cyclists and pedestrians. The current process which sees money which is allocated to increase cycling to stations is only allocated to TOCs via ATOC. It should be jointly allocated with highway authorities to improve routes to stations ensuring collaborative working between organisations.

In Nottingham, the two railway stations (Nottingham and Bulwell) both have step-free access to platforms, although the routes to these stations can be convoluted and not direct. However, in the wider conurbation, some rail stations do not have step free access, which we would welcome improvements to. We would also welcome minor improvement packages as part of the access for all programme including the installation of Customer Information Screens (CIS), benches/seating areas and waiting shelters, all of which are low expenditure, but achieve high value for money in terms of user benefits.

Need to recognise end to end journeys and parking – non standard cycles typically used by some disabled people are generally quite expensive and larger than the dimensions of standard bicycles. They therefore require different dimensions for secure cycle parking and storage. Most station parking doesn't cater for these types of bikes.

Similarly, much of the existing rolling stock will does not have sufficient space for bikes generally, but in particular, there is no storage for recumbents, hand cycles, cargo bikes, trikes etc. on board.

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?

Consultation 2:
No comment.

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?

Consultation Question 3:

The majority of this question we cannot provide comment on as a local authority. However, the city is located close to East Midlands Airport, and surface access to the airport can be one of the barriers that disabled people have, especially when accessing the airport using public transport.

As with allot of UK airports, the location is served by many coach operators, which are high-floor vehicles, catered for long distance travel. Whilst the airport is also served by vehicles with low-floor vehicles, the high-floor coaches can be restrictive for those in wheelchairs or limited mobility. This means that access by public transport for some users might be restrictive.

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?

Consultation Question 4:
No comment.

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 (from2019 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.
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.

Action 9: Agree
This is welcomed – Nottingham City Council has fifteen "Changing Places" toilets, which have enough space for disabled people and their carers, and additional equipment beyond most disabled toilet facilities, including a height adjustable changing bench and a hoist.

More details can be found here:
http://www.nottinghamcity.gov.uk/community/changing-places-toilets/

Whilst it may not be practical for this type of facility to be provided in every case, we would like careful consideration as to the type of disabled toilet facilities that are provided on the rail network.

Action 10 to 17: Agree

Action 18: Agree
We would ask however that this should not just focus on compliance of RVAR or PRM TSI requirements and should look at accessibility of rail vehicles from a wider perspective, such as toilet availability by train vehicle

Action 19: Agree

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?

Consultation Question 5:
It is noted that audible announcements can vary in quality due to the maintenance of the speaker system within individual carriages on a train – in some cases these can be completely inaudible, or cut-out on an intermittent basis, through to being too quiet or too loud.

Alongside this, there is a substantial lack of visual information regarding routes being available, particularly on older rolling stock. Whilst some of this rolling stock is likely to be eventually be withdrawn, it is noteworthy that some vehicles, even after refurbishment, have limited visual information provided (such as class 153 and class 156 vehicles).

Accessible toilets on trains can in some instances, be locked out of use due to maintenance issues or issues relating to retention tanks. This is less of an issue on main long distance services, as other toilets may be available on the train to utilise if one is locked out of use (Providing access through

the train is possible). However on many other rural services, where 1 or 2-carriage trains are used, there is only one available toilet to use on the train, and this can cause issues when not available.

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.

Action 20: No comment

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.

Action 21: Agree
We would ask that the issues of disabled access to taxis is looked at in a wider context opposed to just looking at the issue of assistant dogs. In particular the issue and confusion surrounding the types of wheekchair's and other assistive items that are used. This is a particular issue relating to private hire, which may have different policies regarding the carriage of these items between different firms which may cause confusion.

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.

Action 22: No comment

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 23: Agree

Our local bus operators all offer extensive disability awareness and equality training but we welcome any further support that can be provided in this area.

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 24: Agree

Additionally would want consideration given to this training to be written into rail franchise specifications as a commitment to staff training on these issues.

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.

Action 25: No comment

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.

Consultation Question 6:
As a personal observer regarding experiences regarding the understanding of staff, it is felt that the overall understanding relating to those who have physical disabilities are much more understood compared to those with "hidden" disabilities. So a person in a wheelchair is more likely to have any requirements understood and assistance provided to by staff, compared to those who have less outwardly recognisable conditions.

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)?

Consultation Question 7:
Individuals with less visible disabilities should be eligible for participation in Travel Training groups and other support packages regarding confidence building in using public transport.

An example of good practise used by some travel training groups relating to blind and partly sighted customers is the provision of laminated cords that individuals can hold up at bus stops indicating where they are wishing to travel so that the bus driver can see where the individual is trying to get to.

One of the main issues that individuals with "hidden" disabilities is that of lack of understanding towards those individuals or their carer. Training is required for operators relating to these conditions, along with the possibility/recognition of a national assistance card (as discussed in consultation question 13).

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.

Action 26: Agree

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.

Action 27: Agree.
We would like to see such research carried out on a regular basis to understand trends in terms of access to transport for disabled people travelling on the network. This should not only by about compliance with various standards, but also about the experience of the use of these facilities.

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?

Consultation Question 8:
We do not have specific comments regarding this, other than to state that ideally, there should be an aim that spontaneous travel should be normal for all individuals when travelling on public travel, and that measures should be in place so that booking in advance is not required.

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?

Consultation Question 9:
We do not have specific comments regarding this, other than to state that ideally, there should be an aim that spontaneous travel should be normal for all individuals when travelling on public travel, and that measures should be in place so that booking in advance is not required.

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.

Action 28 and 29: Agree

However, in many cases, this is already taking place on the Rail Network. Where step-free access is not presently available, the rail operator will usually provide a taxi or alternative means to the nearest available step-free station, although unless this is pre-booked in advance, can cause a significant delay in travel for that individual. Whilst we agree that, the scope of this should be wider for example, to cover accessible toilers.

One possible solution would be to utilise existing passenger information systems that indicate length of trains and in some cases, how crowded trains are, as a way of indicating the facilities available on the train if this is relayed in real time.

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.

Consultation Question 10:
N/A.

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?

Consultation Question 11:
Most ticket vending machines at rail stations now feature a touch screen, which may be difficult for some users. Due to the complexity of ticket types and how these vending machines work, there may be cases where individuals require audible options at these machines or require staff assistance.

Delivering the smart ticketing programme will be advantageous to a large number of disabled people. However, the use of the smartcard readers and “touch in/out at barriers may cause problems with some people with mobility issues. Ideally, such systems should be “cross-compatible”, so that different cards can be used over the full public transport network. Other methods of scanning the card may want to be considered for some users opposed to a card.

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.

Action 30: No comment

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.

Consultation Question 12: No comment.

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.

Action 31: Agree

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.

Action 32: Agree

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?

Consultation Question 13: No comment

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?

Consultation Question 14:
We would welcome any particular additional assistance provided for those with a "hidden" disability, but would want further clarifications regarding the operation and administration of a national assistance card, as the requirement to provide such a card may require substantial administration.

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.

Action 33: Agree
Travel training schemes that are provided by some local authorities can already assist those to undertake trips on the public transport network. Locally, Nottingham has a Travel Training scheme along with journey buddying and public transport standards developed in partnership with RNIB.

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

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Action 34: Agree with caveats.
A distinction needs to be made between shopmobility and mobility centres that will be promoted. There is a risk that these two different centres will cause confusion against the existing shopmobility brand that is present.

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

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Action 35 and 36: Agree with caveats
We would like further information as to how these centres are to be funded longer term regarding the running of these hubs especially with the increase in demand these mobility centres are seeing.

Consultation Question 15:
How can the Department for Transport support Community Transport Operators further?

Consultation Question 15:
The Department for Transport has previously run grant funding for Community Transport to support such services. We would welcome the extension of support for community transport services in future years on a longer term basis.

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.

Action 37 and 38: Agree

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.

Action 39:

The wider process relating to Traffic Regulation Orders (TROs) and issues relating to pavement parking needs to carefully consider the location and road types along with parking levels. Whilst tackling pavement parking will aid many disabled users using the footpath, this may disadvantage residents with mobility issues that may need to travel a greater distance from their house to reach their car if parking is restricted on some roads. This also needs to consider the risk of impeding traffic flow if parking persists, for example on bus routes. There are also issues relating to enforcement of such parking over such large areas of the highway network in an effective manner.

We would welcome the survey, but would state that there is a balance to be made regarding such parking between pavement users and residents parking, and that discretion and flexibility should be made regarding the types and levels of enforcement that should be made by local authorities, whilst recognising that pavement parking does cause conflict.

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.

Action 40 and 41: Agree

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.

Action 42, 43 and 44: Clarification required
Whilst this may be a reference to the Accelerating Innovation in Rail (AIR) announced in September 2017, this is not specific to accessibility measures. We would welcome any specific proposals relating to accessibility measures.

The increasing availability and decreasing costs of e-bikes should be recognised, as a potential mobility aid for disabled and older people. Investment in a scheme to reduce the cost (like the cycle to work scheme) should be considered. This could be offset by wider benefits that increased physical activity would bring for physical and mental health. More investment in e-bikes will help make them more affordable and attractive as has been shown by the investment in ULEV's.

We would welcome the opportunity to work with the Department on promoting the use of electric pedal cycles in particular amongst the elderly or disabled groups.

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.

Action 45 and 46: No comment.
Action 47: Agree.
The local authority currently undertakes Equality Assessments when undertaking policy decisions and funding bids. There is also a Disability Employees network that provides input relating to issues surrounding accessibility.

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.

Action 48: Agree
We would particularly welcome a time series to effectively monitor trends as a result of proposed policy changes.

However, whilst we would welcome this data being looked at, there is a risk that especially at lower geographies (e.g. below Local Authority/District level), that low sample sizes and limited information may not provide a reflective picture regarding such trends (for example, data extracted from the National Travel Survey).