

# **Consultation 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.

Agree.

We would like to see an increased emphasis on pavements and dropped kerbs due to the inconsistencies experienced by disabled people. Poor or inconsistent pavements and dropped kerbs can limit accessibility for disabled people who want to be actively mobile (e.g. disabled cyclists, wheelchair users).

The updated guidance should make reference to disabled cyclists, particularly with regard to:

- Access to buildings (especially cycling facilities) which must adequately cater for the needs of disabled cyclists and users of non-standard cycles; and
- Staff training which must include an element on the needs and access requirements of disabled cyclists (e.g. the fact that most disabled people find cycling easier than walking, with many using a cycle as a mobility aid).

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.

Agree.

We are generally opposed to shared space schemes that force a mix of cars, cyclists and pedestrians to interact (e.g. Exhibition Road in London). Such schemes do not fully take into account the needs of cyclists and we are concerned that visually impaired pedestrians could also encounter difficulties and will be deterred from venturing through such places.

The 'level surfaces' concept is a fantastic design solution for wheelchair users, people with reduced mobility, older people and anyone using mobility aids. However,

we also recognise that there is a need for compromise when designing such infrastructure and would advise that, where level surfaces are engineered, they make better use of visual contrast and cues, which can help many disabled people to navigate around the public realm.

We would push for enforceable national standards regarding limiting street clutter (eg: A-boards) as part of ensuring all have safe access to the public realm.

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.

Agree. We have a number of detailed recommendations for how cycling infrastructure (and accompanying standards) can better meet the needs of disabled cyclists, which can be found in our <u>Guide to Inclusive Cycling</u>. However, a summary of our key recommendations for the updated LTN 2/08 are outlined below, taking each existing chapter in turn:

"General design parameters"
We strongly recommend that this be updated to incorporate Highways
England's Cycle Design Vehicle concept (see Interim Advice Note 195/16).

The passage on cycle parking for non-standard cycles should be strengthened and made more explicit. We recommend that where new cycle parking facilities (built to national standards) are installed, 5% of all spaces should be allocated for use by disabled cyclists - matching equivalent provision for disabled car drivers.

## "Signing issues"

We recommend that the existing "CYCLISTS DISMOUNT" sign be updated to take into account the needs of disabled people who use their cycle as a mobility aid (and for whom it may be physically impossible to dismount & walk their cycles). We suggest that this could be amended to "CYCLISTS DISMOUNT (EXCEPT DISABLED CYCLISTS)" for this purpose.

The cycle symbol features a standard two-wheeled bicycle: therefore cycles, and the activity of cycling, have become synonymous with two-wheeled bicycles. This creates an unhelpful impression on the general public that unless one can ride on two wheels, they cannot cycle. We suggest that

alternative symbols reflecting the wider cycling community (e.g. disabled, family and freight cyclists) are also considered for use in future.

## "Network management"

When a cycle route or general carriageway is temporarily closed, then an alternative route should be signposted that will not involve steps or rely on dismounting and walking. Whenever possible, there should be enough advance notice of a closure for cyclists to decide upon an alternative route. It is not sufficient to rely upon signage for motorists, since a route that is closed to motorists may still be passable for cyclists. Where the alternative route involves walking up a curb, a ramp should always be provided, with adequate width for non-standard cycles and with due care given to not creating excessive camber (as this would potentially cause a three-wheeled cycle to overturn).

## "Reducing vehicle speeds on cycle routes"

Currently, some cycle lanes with bus stop bypasses can have a narrow width, with high vertical kerbs to slow cyclists on approach to the rear of the bus stop. The width and restricted corner radii, and the high kerbs, can create a barrier to those riding wider cycles. Bypasses need to be designed with regard to those using wider and heavier cycles with a lower level of manoeuvrability, using a forgiving kerb edge that is chamfered. We recommend further trials, involving both disabled cyclists and disabled pedestrians, in order to develop fully satisfactory solutions to the issue of safety and perceived safety for vulnerable pedestrians. An audio message on buses should alert all passengers to the fact that they are alighting on a bus stop island. Similarly, technical solutions should be developed to help alert cyclists to the fact that pedestrians are going to be crossing the cycle lane, without the use of existing signalised crossings.

Speed humps/speed tables are problematic due to the inconsistency of design and execution. Where they are excessively high or feature straight edges (often cobbled) they can cause handcycles and recumbent tricycles to 'bottom out' and experience discomfort. Speed cushions are particularly problematic because they can create unavoidable cambers which can cause three wheelers to tip over. Cycling *between* speed cushions is the most stable solution but can force cyclists into dangerous cycling positions. Traffic islands and chicanes creating pinch points can be difficult for those using wider cycles to negotiate. The sinusoidal design should be the <u>only</u> design used for speed humps - covering the full width of a carriageway.

We strongly recommend that this be updated to incorporate Highways England's Cycle Design Vehicle concept, which includes technical recommendations for the required widths and turning circles of non-standard cycles.

## • "Off-road cycle routes"

The length of climbs, as well as the gradient, is important for disabled and older cyclists. Some will have difficulty with the approach to a river bridge, or exiting an underground subway, for example. Three wheelers are particularly adversely affected by steep cambers and can end up in the gutter or even overturn. A maximum cross fall of 1:40 is recommended for paths used for cycles. Steps should never be used for bridges that are on cycle or pedestrian routes. Ramp gradients should be minimised wherever possible on general routes intended for all cyclists, without assuming that cyclists will push/walk their cycle if the gradient is too steep. Paths used for cycling should have the gentlest camber possible to facilitate comfortable and safe cycling, whilst allowing for drainage. Where there is inadequate space for a gentle ramp, a lift should be provided, with adequate measurements to fit the Cycle Design Vehicle (with preference for cycle on, cycle off designs [not necessitating turning around]).

It is not recommended to have any barriers along a path that is used by cycles. If it is necessary to prevent access for livestock, use cycle- and wheelchair-friendly cattle grids. In addition, provide a firm, smooth path section and gate for those who are able to operate gates (it must not be assumed, however, that a disabled person will always be accompanied by someone who can operate the gate mechanism for them). Opening mechanisms should be able to be operated by a recumbent handcyclist and gates must be able to swing in either direction so a disabled cyclist can always push it open without having to dismount.

## "Junctions"

Wider cycles such as handcycles and tricycles require a wider lane and turning circle. Also, as they often provide a lower seating position, they may be less visible. Disabled cyclists need more space around them to allow drivers to see them. Approaches to junctions and crossings need to be perpendicular for visibility.

Buttons at pedestrian crossings may be out of the reach of cyclists who are low to the ground (recumbent cyclists), or positioned so close to the road that a handcyclist will have to put their front wheel into the road to reach the button. They should be positioned in a way that is reachable by all cyclists.

With regards Advance Stop Lines (ASLs), disabled cyclists often need to generate greater momentum when setting off from a stationary/standing position. This is especially the case for those who are unable to ride out of their saddle or who power their cycle by hand. Cyclists who are lower to the ground often feel vulnerable at ASLs, as they fear they are less likely to be seen by vehicles stationed behind and to the side. Where possible a system of separate signals and traffic stages (minimum 10 second gap) should be used, affording all cyclists more time to get away safely and ahead of traffic. Design solutions should also be developed for a balancing aid at traffic lights, to be used by cyclists who require a physical prompt/assistance when pushing off from a stationary position at a red light.

## "Cycle parking"

We recommend that where new cycle parking facilities are installed, 5% of all spaces should be allocated for use by disabled cyclists - matching equivalent provision for disabled car drivers.

Cycle storage units, such as lockers and hangers, often exclude disabled cyclists because they are too small to accommodate the dimensions of non-standard cycles. Given the expense of non-standard cycles (an average e-assist recumbent trike would cost over £2,000) it is not surprising that many become a particular target for cycle thieves. Having access to step-free, safe, secure storage facilities is vital for disabled cyclists. Many existing cycle storage units could be adapted or retrofitted to accommodate larger cycles. Buddy schemes, where disabled and non-disabled cyclists are paired up to share the same cycle storage space, could also be trialled as part of a wider community initiative.

#### "Public transport integration"

In order for disabled cyclists to feel confident in completing a journey by cycle it is essential that all forms of transport are integrated and made accessible (esp. trains). Where rules exist permitting the storage of wheelchairs and mobility scooters onboard public transport, the same rules should apply (where physically possible) to disabled cyclists who use their cycle as a mobility aid.

In general, we would also like to see the update of LTN 2/08 acknowledge the fact that many disabled people use their cycle as a mobility aid, and that reasonable adjustments must be put in place to ensure disabled cyclists are not discriminated against.

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.

Agree.

With regard to bus stop bypasses, an audio message on buses should alert all passengers to the fact that they are alighting on a bus stop island.

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.

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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.

Agree.

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.

Agree.

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.

## Somewhat agree.

We would make a further recommendation that the scope of the review be extended to consider the design of a separate Blue Badge for disabled *cyclists*. The purpose of such a scheme would be to give disabled cyclists a valuable form of identification, which could be used to:

- (a) Permit disabled cyclists to cycle considerately in non-cycling areas (such as 'cyclists dismount' zones) when using their cycle as a mobility aid; and
- (b) Reserve allocated cycle parking spaces that have been designed for use by non-standard cycles / close to amenities.

Such a scheme could be developed in collaboration with local police forces, CCGs, community and disability groups.

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.

## Agree.

As part of the Access for All programme, we would like to see efforts made to ensure that disabled people who use their cycle as a mobility aid (and therefore unable to dismount, walk, push or wheel their cycle) are given special permissions in relation to railway stations, namely that they are permitted to: (i) cycle considerately on train concourses; and (ii) where physically possible, store a non-standard cycle (e.g. tandem, tricycle) onboard a train.

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?

There is generally not enough information for disabled passengers.

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?

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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?

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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.

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.

Agree.

As already mentioned, we would like to see provision made for the storage of non-standard cycles onboard trains when used by a disabled person as a mobility aid. Providing an attractive, whole-journey experience is crucial to encouraging more disabled people to cycle, who often rely on multiple modes of transport to get around (disabled people are more likely to be adversely affected by a lack of integrated transport modes as they already have to go to considerable lengths to plan a journey).

Moreover, a recent audit that we conducted of the Disabled People's Protection Policies (DPPPs) of all major Train Operating Companies (TOCs) in England and Wales found that only one out of twenty-five TOCs appeared to have a policy permitting the storage of non-standard cycles onboard. This severely limits the type of journey that disabled cyclists can undertake.

Data should be collected on the experiences of disabled cyclists in accessing train stations (when using their cycle as a mobility aid) and when trying to store a non-standard cycle onboard a train.

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?

As already mentioned, many disabled cyclists encounter difficulties when accessing rail facilities and services. This could be, for instance, being asked to dismount a cycle on a train concourse (when using it as a mobility aid) - which is a particularly common experience for those with hidden disabilities, or who are not instantly visibly disabled - or being unable to store a non-standard cycle onboard a train carriage. From evidence we have gathered from disabled cyclists across the UK, it is clear that policies relating to rail access for disabled cyclists are hugely inconsistent.

We would recommend that all Train Operating Companies are required to update their Disabled People's Protection Policies (DPPPs) to take into account the needs of disabled people as cyclists.

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.

Agree.

We would recommend that more is done to improve the availability and amount of wheelchair space provided on buses.

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.

Agree.

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.

As well as improving disabled people's access to car parking, we would like to see equivalent measures taken to improve access to - and the allocation of - inclusive *cycle* parking.

The Department for Transport should review inconsistencies in the application of Blue Badge concessions (e.g. in Outer London Boroughs). Boroughs where Blue Badge holders are not allowed to park in residents permit bays create huge barriers for disabled drivers (especially those who work but also those who need to drive in order to access parks, greenways, less hilly areas etc. so they can unload their mobility aid and be physically active) due to the proliferation of CPZs.

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.

## Agree.

We would also like to see disability equality training extended to cycle services providers and as part of national cycling programmes (e.g. Bikeability) so that staff are aware of the needs of disabled cyclists, young and old.

Equally, we would recommend that an element on inclusive cycling be included in the training programmes of all train and station operators, ensuring that they are aware of the needs of disabled people as cyclists (e.g. the fact that many disabled people use their cycle as a mobility aid and may be physically unable to dismount on a train concourse).

For similar reasons, such training should be extended to town planners, designers, civil engineers and transport professionals – ensuring that the built environment caters for the needs of disabled cyclists.

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.

There remains very little understanding of the fact that many disabled people can (and do) cycle, and that many disabled cyclists use their cycle as a mobility aid. This is particularly so with regards to the rail sector, for reasons already mentioned.

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)?

Many disabled cyclists are not visibly disabled but find cycling easier than walking, and as such use their cycle as a mobility aid – this could be because of frailty, balance, pain or breathing difficulties. Using a cycle rather than a mobility scooter enables them to remain physically active. However, many such disabled cyclists encounter difficulties when using the transport system due to a lack of awareness of this issue amongst transport staff. It is therefore crucial that inclusive cycling be incorporated into the training programmes of all transport bodies which is, in turn, codesigned with disabled cyclists.

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.

Agree.

As part of this research we ask that the experiences of disabled cyclists in accessing rail travel also be considered. Namely, we would like any research conducted by the ORR and Transport Focus to examine the experiences of disabled cyclists in relation to:

- (a) Access to rail stations and concourses, when using a cycle as a mobility aid;
- (b) Access to rail services when requesting the storage of a non-standard cycle onboard; and
- (c) Access to, and the availability of, inclusive cycle hire at train stations.

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.

Agree.

Same as above.

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?

In order for disabled cyclists to feel confident in completing a journey by cycle it is essential that all forms of transport are integrated and made accessible, especially trains. Where rules exist permitting the storage of wheelchairs and mobility scooters onboard public transport, the same rules should apply (where physically possible) to disabled cyclists who use their cycle as a mobility aid.

Alongside this, where cycle hire at rail stations is currently available, the provision of non-standard cycles should be included as part of the offer. Without access to such a facility, disabled cyclists are further denied the opportunity to travel spontaneously and to complete a journey.

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?

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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.

Agree.

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.

This is often a long, complicated and confusing process for many disabled people, and so we welcome any measures that will improve the overall functionality and accessibility of the service.

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?

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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.

Agree.

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.

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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.

Agree.

The Stations Made Easy tool should be broadened to include information on the availability of inclusive cycle parking i.e. the number of stands allocated for use by non-standard cycles.

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.

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, crossmodal assistance card?

We would like to see a disabled cyclists' Blue Badge piloted and rolled out nationally, entitling disabled cyclists to specific exemptions and permissions, and which should be accompanied by appropriate training and guidance for transport staff.

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

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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.

Greater investment is needed for inclusive cycling hubs (places where disabled people can go to cycle in a supportive environment, away from traffic). They are required in every part of the country to ensure that disabled people are never far from an easily accessible opportunity to discover or rediscover cycling. Hubs also provide a space for disabled people to develop social networks, thus reducing social isolation. Therefore, local authorities should be encouraged to seek out and develop strategic partnerships with local cycling and disability groups to develop hubs wherever there is an identifiable need.

Where cycle storage facilities are shared between local neighbours, a buddy scheme involving the pairing up of disabled and non-disabled cyclists should be trialled as part of a wider community initiative.

Existing inclusive cycling 'buddying schemes' should be expanded (e.g. Hackney's 'Ride Side by Side' cycle taxi service, which supports older people and people with mobility issues who actively want to get somewhere). Likewise, emerging buddying schemes should be identified and explored, such as tandem cycle programmes that partner visually impaired people with a lead rider, enabling those who might not be able to cycle independently to enjoy the benefits and the thrill of cycling.

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.

Agree.

As part of broadening their offer and as a way of encouraging active travel, it is essential that Mobility Centres – in partnership with Motability and other providers (and based on the advice of disabled cyclists) – extend their range of services and products, to include non-standard and adapted cycles. Wheels for Wellbeing would be happy to assist to this end.

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.

Mobility Centres should be encouraged to offer cycling as an alternative form of (active, sustainable and non-polluting) travel for older people who are no longer able to drive. Many schemes, such as the 'Ride Side by Side' cycle taxi service previously mentioned, already exist to support older people with everyday travel. Greater investment in e-cycles will also allow older people to stay physically active in life for longer, as such technology reduces the physical effort required to cycle.

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

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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.

Other mobility options for disabled people besides mobility scooters should be considered – dependence on mobility scooters alone does nothing to reduce levels of physically inactivity, which is especially prevalent amongst the disabled population. However, the concept of cycles as mobility aids has failed to find its way into law, with disabled cyclists continuing to face harassment, penalisation and even the threat of prosecution for using their cycle as a mobility aid – all as a result of opting for a more active and healthy lifestyle. This leads to a steady increase in mobility scooter use as people who become unable to walk in comfort see no other option, whereas many could in fact continue to travel actively for many years through cycling. We believe that developing a disabled cyclists' Blue Badge provides a possible policy solution – putting cycles on a level playing field with wheelchairs and mobility scooters.

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.

Agree.

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.

Agree.

As part of the data collected on attitudes and behaviours around transport issues, we would like to see more information gathered around disability and cycling, for which there is currently little or none.

As well as cognitive, behavioural and mental health impairments, DPTAC and the DfT should develop research to better understand the issues faced by people who suffer from pain and fatigue conditions.

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.

Agree.

We welcome the government's commitment to promote the use of e-cycles, which open up cycling to a wider demographic. We know that this technology has huge benefits for older and disabled people as it reduces the stresses and strains of a journey. However, greater investment in e-cycles (including subsidies and investment for e-cycle hire) is needed in order to make the technology a more affordable and attractive option. Though we recognise the possible benefits that automated vehicles offer for disabled people, we believe that investment directed towards such vehicles (and Ultra Low Emissions Vehicles) would be much better spent on e-cycles and measures to encourage disabled people to stay physically active in life for longer. Moreover, from a financial perspective, investing in e-cycles would be more beneficial for the Treasury as both a cheaper alternative to automated vehicles and as a way of saving the NHS and social care services money by keeping disabled and older people physically and mentally healthy.

Inclusive cycling should be incorporated into the Department's 'Mobility as a Service' model, which should include the development of an inclusive cycling app. This could, amongst other things, provide disabled cyclists with:

- Live, real-time information on inclusive (and non-inclusive) cycling routes in their area, which would allow disabled cyclists to plan spontaneous, stress-free journeys;
- A map detailing all existing (and available) inclusive cycle parking;
- Up-to-date information and contact details of the nearest inclusive cycling hub; and
- Up-to-date information on Train Operating Companies' policies regarding the storage of non-standard cycles onboard trains.

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.

Agree.

Besides the Equality Act 2010 (and accompanying PSED) local authorities should also be aware of their duty to improve public health, as laid out in Section 12 of the Health and Social Care Act 2012.

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.

Agree.

To truly capture all transport undertaken by disabled people, it is vital that cycle trips made by disabled people are also included as part of these measurements.