

Accessibility Action Plan Consultation
Department for Transport
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Our ref: DfTAccessibilityAP-Sept-17
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Date: October 2017

Dear Sirs/Madam

Re: Draft Transport Accessibility Action Plan

Thank you for inviting comments on the DfT's Draft Transport Accessibility Action Plan. The comments in this response represent the views of Transport for West Midlands (TfWM) - the transport arm of the West Midlands Combined Authority (WMCA) and the wider WMCA.

We welcome the opportunity to respond to this consultation, given the strategic importance of this document and the key role accessible provision plays now, and in our future transport system. It is vital that our region is able to provide the necessary infrastructure and high quality transport links across its seven local authorities, around the wider West Midlands and also beyond.

In summary, the WMCA are supportive of the DfT's Draft Accessibility Action Plan and our key issues are outlined below:

Greater acknowledgement of the need for effective Transport Space Allocation Policies, to identify the different requirements of different road users and their street activities, including those most vulnerable of users,

Consideration be given to whether the English National Concessionary Scheme Travel Card requires renewing every three years, for those of pensionable age, or could an improved system be implemented,

Consideration be paid to taxi operators, who operate scheduled passenger services and clarity be provided on whether they should be subjected to the same regulations as bus operators,

Greater emphasis be placed on the importance of public transport integration and the role of high quality interchanges, to provide a seamless journey for the passenger,

And finally, greater consideration to be placed on Mobility as a Service, and its role in joining up a wide range of modes, schemes and payment approaches together with cycling where a range of innovative cycle schemes support people with disabilities.

West Midlands Combined Authority and regional transport matters

The West Midlands Combined Authority (WMCA), through its constituent authorities and three LEPs has led the way with stronger Governance and direction for transport and better coordinated investment ([West Midlands Strategic Transport Plan “Movement for Growth”](#)). We have new powers through the Mayor (such as the adoption of a 600km Key Route Network across the region with new coordination of traffic works, safety and performance management), a commitment to a £1.2bn HS2 Connectivity Package and a further £2bn transport infrastructure investment package, all of which will transform accessibility across our region.

The need for accessible provision is integral to our future transport system through such measures as accessible information provision, infrastructure design, comprehensive local network coverage, disability awareness and supporting services such as Ring and Ride and Community Transport. There is also great scope for a substantially increased role for walking, cycling and public transport, to provide the West Midlands with sustainable, effective local accessibility. Therefore our comments for each chapter are now outlined below:

4. Consistency in accessing transport services

Under Action 1, TfWM feel that the Tactile Paving Guidance should be updated to include guidance on internal environments such as rail and bus stations which is currently missing resulting in inconsistent approaches. The ‘Inclusive Mobility’ guidance is currently primarily focused on physical accessibility and should be updated to include guidance on a wider range of disabilities as well as the role of technology based solutions.

Under Action 2, TfWM feel that a more holistic approach to Shared Space needs to be explored in the plan. Across Birmingham and the wider West Midlands, a Transport Space Allocation Policy ensures we identify the different requirements of various road users and their street activities, including the needs of active travel users, public transport users, private hire vehicles and taxis, whilst also supporting those most vulnerable of road users.

Under ‘Bus Concessionary Fares’, TfWM feel that significant expenditure is wasted on the renewal process of English National Concessionary Travel Scheme, where individual travel cards are renewed every three years. This process is not only time consuming but bureaucratic and costs TfWM around £600K per annum. We therefore believe that the DfT should review the expiry date element for these cards, issued to people of pensionable age and working with the DfT, on these issues is very much supported by TfWM. Clearer guidance on eligibility, specifically in relation to hidden disabilities is needed to ensure consistency of application across England.

In terms of rail, the Access for All programme has played a major part in improving accessibility and TfWM fully supports any extension to this programme. The funding has

allowed 83.6% of our stations to be step free - not only benefiting disabled people or those with reduced mobility, but also people with children, heavy luggage, and some more elderly people. Therefore we hope many more stations in the region will become fully accessible as a result of the programme continuing. Since the Hendy Review of Network Rail's finances, the Access for All fund has been subject to some uncertainty. Nationwide, a number of schemes have been deferred to possibly as late as 2024. TfWM stresses the importance of protected investment aimed at making public transport more accessible, especially since many accessibility schemes are not commercial and therefore struggle to make a business case stand up purely on their own merits.

The role of taxis (either private hire vehicles or hackney cabs) can play a key role in supporting vulnerable groups access key services yet further ways this mode could complement the wider public transport network needs to be explored within the Action Plan. Additionally, information should be included on the destructive transport modes like UberPool and CityMapper who are already supporting groups of disabled people access key services and could provide for a more efficient way of supporting Local Authority transport. Yet at the same time, the Action Plan should ensure the importance of taxi operators, operating scheduled passenger services are subjected to the same registration/regulations as bus operators. Therefore we welcome the Action Plan to pick up upon these issues, especially as more community transport initiatives could fall under the role of the taxi in the future, as community transport initiatives continue to decline.

The Action Plan has the potential to set a cut-off date for when all taxi and private hire vehicles need to be fully accessible, like in the case of the bus and coach industry and fully address the importance of accessible taxis across our region - especially as this sector is a growing market amongst a range of vulnerable groups.

5. Monitoring the Impact of Regulatory Compliance

In terms of rail accessibility, TfWM welcomes research to measure the impact of work to improve rail vehicle accessibility but would also encourage work to identify ways that data can be used to improve the experience for disabled passengers, in line with recommendations outlined in ORR's "Improving access to rail information for disabled passengers" 2015 report.

In terms of 'monitoring abuse of disabled parking spaces,' an initiative operated through Coventry City Council, Appy Parking and Nwave includes an innovative parking app which helps to make finding an on-street parking space in Coventry simple, as a result of real time sensors. 'Appy Parking' shows available spaces in real time, along three of Coventry's busiest streets including all 36 disabled bays. This app has then helped eliminate the need to trawl the city's streets looking for spaces and informed disabled people of available spaces.

6. Training and education

TfWM fully supports further work with the bus, rail and taxi industry to implement good quality disability awareness training for drivers. There needs to be a stronger focus on achieving consistency in the quality, frequency and timing of the training delivery. Identifying effective monitoring mechanisms is crucial. Finally, the Framework developed from DPTAC is

comprehensive but would benefit from a revision to include more details on training elements in relation to hidden disabilities.

7. Spontaneous travel

In terms of spontaneous rail travel and the significance of Disabled People's Protection Policy (DPPP), TfWM feel more emphasis should be made on ensuring operating companies fully identify challenges disabled people encounter when travelling by rail and fully comply with their obligations to assist disabled passengers. Currently, the Action Plan fails to set clear operator targets including reducing the booking times for passenger assistance from 24 hours in advance to 12 hours or less and ensuring ramps and accessible toilets are available on all trains across the region. Despite positive actions noted in the Passenger Assist system, more committed targets should be set within the plan. TfWM would encourage exploring the use of technology to improve the passenger assist experience and encourage spontaneous travel. This becomes increasingly important given the reduction in station staffing levels over the past few years.

8. Building Confidence and Empowerment

In terms of the section 'future policy development' there needs to be more emphasis on the integration of public transport. Integrating rail connections with rapid transit lines for high volume corridors, together with local bus networks and active travel modes at quality interchanges, and ensuring one seamless journey for the passenger will help deliver high quality connectivity. However, currently in the plan this is missing as an ambition to promote wider accessibility.

9. Strengthening our evidence base

Within this section, the transport innovation examples appear limited and we feel much more case studies on innovative practices should come out from this chapter. We are in an age of smart technology and this is changing our customer behaviours and expectations to public transport. The Action Plan should therefore embrace smart technology to its full potential, increase uptake of new ticketing media and leverage the power of smart technology to improve accessibility on the transport network.

Within this section there is also no emphasis on co-ordinating and joining up of our transport services better to provide a seamless journey. The work of Mobility as a Service (MaaS) should be referenced much more throughout the Action Plan and not just under Demand Responsive Services. As the concept is about combining transportation services from public and private transportation providers through a unified gateway, which users paying from a single account as it joins up a wide range of modes and schemes including ride-sharing and e-hailing services, bike-sharing programs, and car-sharing services, as well as on-demand bus services with those transitional modes of travel like bus, rail and rapid transit. Therefore this area of work needs to be embraced throughout the Plan and not as a bolt on at the end.

Finally, we feel this chapter lacks the importance of embracing cycling and wider active travel modes. The Action Plan assumes people with disabilities travel on vehicles with motors and

four wheels. Yet many people with disabilities prefer trikes for transport and issues like cycle design, parking, access to stations and train carriage design should be all be accommodated and referenced within the Action Plan as options.

Additionally the DfT should be engaging with organisations like 'Cycling Projects' and 'Wheels for Wellbeing' on innovative cycling initiatives which support adults with disabilities and differing needs instead of remarking on E-Bikes only.

Delivery of the Accessibility Action Plan

We would like to further reiterate our support for a partnership approach with the DfT to address accessibility issues on the transport network and we would welcome further dialogue on potential future projects we could work in partnership on. If you have any further queries or require additional information, please do not hesitate to contact me.

Yours sincerely

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