

Mobility and Access Committee for Scotland (MACS) Main Committee meeting

Minutes of meeting held on Tuesday 17 January 2017
Conference Room 2, Victoria Quay, Edinburgh

Present:

Linda Bamford, Convener (LB)
Marsali Craig (MC)
Anne Findlay (AF)
Heather Fisker (HF)
Sheila Fletcher (SF)
David Hunter (DH)
Susan Morris SM)
George Mowat-Brown (G M-B)
Hussein Patwa (HP)
Fraser Sutherland (FS)
Jane Steven (JS)
Hillary Stubbs (HS)
John Whitfield (JW)

Secretariat:

Graham Thomson (GT) –	MACS Sponsor
Aga Lysak (AL) –	Secretariat
Robert Wyllie (RW) –	Transport Scotland
Marketa Fuskova (MF) –	Transport Scotland
Karl Zaczek (KZ) -	Transport Scotland

In attendance:

Éilis Murray Palantypist

Apologies:

Cecil Meiklejohn (CM)
Keith Robertson (KR)

Agenda Item 1. Welcome and Apologies

1.1 LB welcomed all attendees to the first meeting chaired by her, especially two new members appointed on 1 January – AF and G M-B. She also expressed her gratitude to Jill Mulholland for her work as a Sponsor of MACS and who left the team at the beginning of January. She welcomed GT, who is acting Head of Transport Accessibility and Road Safety Branch and stepped in as MACS Sponsor.

1.2 Apologies were noted as above.

Agenda Item 2. Introductions around the table

2.1 The Convener invited all around the table to briefly introduce themselves:

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- a) LB - has experience of working with NHS Scotland for over 30 years and is enthusiastic about working in partnership, which, in her opinion, should be embedded in all aspects of work. She briefly stated her background at a strategic level within the Scottish Ambulance Service and her involvement in Accident and Emergency Service Delivery and the Patient Transport Service both of which resulted in her working in various areas of Scotland during her career.
- b) GT – has been with Transport Scotland for over four years and previously held responsibility for MACS, hence is familiar with MACS’ work. He is also responsible for the Blue Badge Scheme, which will be of particular interest to MACS members.
- c) KZ – is a Team Leader for MACS Secretariat. He joined the team in November 2016 and has 15 years’ experience in civil service. He previously worked in a variety of roles including Health, Ferries and Integration Divisions.
- d) MC – is a qualified social worker and solicitor. She is heavily involved in MS Society Scotland and has a wide personal experience of travelling as a wheelchair user across the UK. She was initially primarily responsible for Ferries Workstream, however now is leading the Rail Workstream.
- e) G M-B – is heavily involved in Open University, with an interest in Arts. He authored several medical publications and has written on the history of transport in Scotland.
- f) SF – had been working for the Community Transport Association for over 30 years and has recently moved on to focus on community transport independently. She has experience in working in road design. She is a frequent public transport user and has first-hand experience as a carer for disabled people on public transportation.
- g) JS – is a qualified nurse, social worker and health visitor. She is a successful entrepreneur and has used her skills to obtain grants for community transport in her local area.
- h) JW – was born with severe hearing loss and has been registered blind for over 30 years. He is heavily involved in Deafblind Scotland (DbS) and focuses on health related issues to make NHS services accessible for all. His work with DbS involves a considerable amount of travelling, especially on train.
- i) FS – works as a Policy Team Leader for Citizen Advice Scotland (CAS) and takes particular interest in transport issues. He is passionate about protecting vulnerable consumers, including those with a disability.
- j) SM – has academic research experience in social and behavioural sciences. She works as a lecturer at Open University and is currently gaining qualifications to become a clinical psychologist.

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- k) HP – is a self-employed accessibility consultant with a background in Business Management, Innovation & Change and Internet Information Systems with e-Business. He is passionate about traveling by rail and integrating technology to make journeys as accessible as possible. He is also involved as a volunteer in Royal National Institute of Blind People (RNIB) and several other organisations promoting accessibility.
- l) HF - works as a Project Manager for Independent Living in Scotland (ILiS) She sits on a variety of boards and focuses on developing policy at strategic level.
- m) DH – has 12 years’ experience in managing accessible transport services, was a Director for Transport for All. He is a self-employed consultant, particularly interested in walking. He is involved in a charity promoting everyday walking, Living Streets, which also ensures that all streets are fit for walking. He was a full-time volunteer with Manchester Community Transport before becoming the first Director of the London Dial a Ride Users Association.
- n) HS – has over 30 years’ experience in working in local government in regeneration and planning and redevelopment. Later she supported disabled students in gaining their degree. She has particular interest in ferries.
- o) AF – is a clinical doctor with a wide experience worldwide, including Afghanistan and Pakistan. She is a member of several tribunals, including the Mental Health Tribunal for Scotland.
- p) MF – is a member of the Accessibility Team and also supports MACS Secretariat.
- q) AL – is acting as MACS Secretary and is first point of contact for members. She is also involved in the Blue Badge and Accessible Travel Policy areas.
- r) RW – is a policy official responsible for implementation of the Accessible Travel Framework and blue badge policy area. He also oversees MACS Secretariat.

2.2 The Convener thanked all and advised that questions would be taken under Agenda Item 4.

Agenda Item 3. Minutes of the previous meeting, matters arising and action points

- 3.1 The minutes of the Committee meeting held on 18 October 2016 were agreed as a correct record, subject to the following amendments suggested by SF:
 - a) paragraph 2.2.c - to amend “sight” to “site”
 - b) paragraph 2.4.f – AS to replace with GD
 - c) paragraph 5.1.d – to amend “section” to “sector”.

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Action 1: Secretariat to publish minutes on website.

3.2 No matters arose from the previous meeting that were not to be considered as part of the action points.

3.3 It was noted that most actions points from the meeting held on 18 October 2016 were completed with the exception of the following, where updates were provided:

Continued action points from meeting held on Tuesday 19 April 2016

Action point number	Minute reference	Action	Update	Follow up required
8	5.2	Planning & Infrastructure Workstream to contact TS policy division about PRMs and increase in Aberdeen Airport Drop off charges	The Committee noted this was ongoing.	Yes
9	5.2	Planning & Infrastructure Workstream to consult DPTAC about definition and remit of PRM service at UK airports	The Committee noted this was ongoing.	Yes, HF to liaise with CM
10	6.4	Planning and Infrastructure, and Bus and community transport workstreams to submit finalised work programmes	The Committee noted this was ongoing.	Yes, HF to liaise with CM

Action Points from meeting held on 18 October 2016

Action point number	Minute reference	Action	Update	Follow up required
8	6.7	Rail Workstream to write to ScotRail requiring clarification on progress on implementing comments made at the SEG.	In progress – discussions taken place with ScotRail official	Yes
10	6.13b	Workstreams to discuss the action plan on improving health care transport and report back to the Convener.	In progress	Yes, HF to liaise with CM

Agenda Item 4. Convener Update

4.1 The Convener spoke about organisational aspects of the Committee and suggested a review of the current arrangements to explore new ways of working and supporting one another. She highlighted the importance of partnership and team work as well as planning and measuring the Committee's remit, priorities, aims and objectives. To discuss MACS development in detail, the Convener suggested holding a couple of board development days a year. She confirmed that for this purpose a meeting room in VQ is provisionally held for 8 March and invited members to express their opinions. The following comments were made:

- a) SF welcomed the development seminars as a great opportunity to focus more on planning and progress of the Committee.
- b) JS was also very supportive of the proposal and highlighted the importance of training and guidance, especially in maintaining consistency in representing the range and variety of impairments. She pointed out that the Committee is not a lobbying body and suggested that development in how to advise the Minister without lobbying could be beneficial. She agreed with the Convener that internal communication is crucial, particularly when dealing with cross-cutting issues affecting more than one mode of transport and consequently requiring workstreams' cooperation and joint working. Hence she suggested allocating additional time for workstreams meetings to enable detailed discussion.
- c) LB reiterated the need for reviewing the culture of working together to enable efficient planning and delivery of the outcomes. She also mentioned the Accessible Travel Framework and asked about MACS' role in its delivery. GT confirmed that the Framework is currently in the implementation phase and MACS involvement and assistance in turning issues into actions is crucial.
- d) SM also expressed her support for Committee development as well as personal development for each member
- e) HP said that he strongly supports workstreams working together as many cross-cutting issues affect more than one workstream, giving the Edinburgh Roseburn-Leith Walk cycle route as an example. But he stated that it was important for workstreams to have autonomy too.
- f) HF acknowledged the gaps between workstreams' capacity (where much advice was given to transport providers rather than Government) and the fact that travel should be perceived as a door-to-door journey rather than through the mode of transport; however she felt that adjustments could be made and successfully implemented without drastic changes to the committee's structures. She also pointed out that not all impairments are equally represented by the Committee - in particular more consideration should be given to hidden and learning disabilities.
- g) HS welcomed the training day proposal and felt that the way of looking at the journey as a whole should be reviewed closely to allow gaps to be addressed.

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She also pointed out that the balance between reactive and proactive ways of working should be reviewed. She suggested a two-day event which would cut down on travel, especially for those based in rural or remote areas of Scotland, but also would enable the members to socialise and enhance the team's bonds.

- h) DH expressed his support for the development day ideas and pointed out that this could be an excellent tool to address the gaps in discussion on how to work and how to evaluate the quality of work. He also suggested that the MACS' profile and awareness of its remit should be expanded. He felt that the Minister's expectations of MACS' advice should be explored and reiterated that lobbying must be avoided. He noted the importance of proactive ways of working and developing the ability to work strategically by influencing nationally on the basis of understanding local issues. He gave the Edinburgh Roseburn-Leith Walk cycle route and KR's involvement in Cycling by Design through local participation as an example of this.
- i) JS underlined MACS participation in various projects, especially in assessments of main train stations across Scotland. However she felt that on several occasions the engagement should have started earlier to avoid wrong decision making and failing in accessibility. She highlighted the benefits of building strong personal relationships with partners as well as the Minister and suggested inviting the Minister to one of MACS meeting.

Action Point 2: Secretariat to invite the Minister to a MACS meeting.

4.2 The Convener thanked all for their opinions and asked for any additional suggestions and ideas on the development day's Agenda to be submitted by 30 January.

Action Point 3: Members to provide comments on the content of the development day by 30 January.

4.3 The Convener provided an update on her attendance at the NTS Review Partnership Group on 12 January, which was the first meeting she attended as a MACS Convener. She referred that the main purpose of the group is to review its scope and remit, which is scheduled to be done in four stages over two years, with meeting taking place quarterly. A briefing report will be forwarded for members' information.

Action Point 4: Convener to forward to members a report summarising the NTS Review Partnership Group meeting.

4.4 JS noticed that the NTS review survey currently open for responses is not widely available and the questions themselves are very general. LB clarified that the survey is a part of the early engagement stage targeting the key stakeholders only and the full public engagement will take place later this year. JS suggested that MACS should consider the survey questions even if no formal response is required, to establish a common point of view. GT supported the suggestion of a proactive

approach and setting up objectives so MACS' voice is heard among others responding to the consultation.

4.5 G M-B asked about MACS' role and contribution in changing legislation. He pointed out that currently many UK accessibility regulations are dependent on EU legislation, however in the event of Brexit, many aspects of the UK/Scottish law would need to be replaced. JS confirmed that MACS opinion and advice is taken into account and does indeed influence changes; however she acknowledged that the engagement process does not always start early enough.

4.6 The Convener also briefly spoke about the current workstream membership and asked the Leads for their draft list of achievements for 2016/17 for the annual report, and workstream work plans for 2017/2018, to be submitted before 8 March. This would facilitate discussions at the development day. She pleaded for avoiding acronyms for the benefit of new members of the Committee.

Action Point 5: Workstream Leads to provide list of achievements for 2016/17 and draft 2017/2018 work plan for their workstreams. Work stream update by 28th Feb 2018 and forward work plans for the 8th March 2017 Committee development day.

Agenda Item 5. Secretariat Update

5.1 At this point the Convener welcomed and introduced John Roskell, a member of public who attended the meeting as an observer.

5.2 RW took questions on Paper 5. In discussion the following points were made:

- a) A demand for a badge under the extended criteria is lower than some may have expected, and it was noted that a high proportion of applications were submitted on behalf of boys who are on the autistic spectrum. He informed that the Working Group, consisting of representatives from local authority, COSLA, healthcare professionals and disabled people's organisations, will meet on 31 January to make a final assessment of the evaluation and seek to reach a conclusion on introducing the eligibility criteria on a permanent basis. SF asked why autistic groups responded more than others suggesting lack of awareness of the existence of the pilot as a possible reason. However RW said that information about the pilot had been distributed equally to organisations across the range of targeted groups, who should then circulate the information further. GT confirmed that organisations that represented people with autism and their carers had been primarily the most interested group in extending the eligibility criteria and this may provide an explanation for the higher number of applications. HF welcomed the extension of the pilot emphasising the importance of gathering further evidence and expressed her disappointment that the awareness of the pilot was so low. RW reiterated that the communication strategy is going to be discussed on 31 January. MACS is represented on the Working Group by Cecil Meiklejohn.
- b) AF asked about any plans for the blue badge criteria to be revised in terms of social security benefits and RW confirmed that this aspect will be a subject to consultation with the Working Group next week. He also ensured that the

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engagement with colleagues in the benefits section has already been established in light of the social security devolution of powers.

- c) JS pointed out that several accessibility issues had been identified at Edinburgh Gateway Station. These include stations being missed; lack of connectivity from North of Scotland to Edinburgh Airport as only three trains from North stop there a day. SF pointed out that this additional stop adds on to the duration of the journey causing later arrival at Waverley. She therefore suggested amendments to the timetable so the services could departure earlier to accommodate the extra stop without impacting on the arrival time. Also, it was identified that the taxi drop-off point is too far away from the station and the toilet doors are too heavy to be opened by a wheelchair user¹. The consensus was reached that all issues relevant to accessibility should be flagged up with Chris Clark as Transport Scotland's Rail Accessibility Manager.

Action Point 6: Rail Workstream to contact Chris Clark regarding Gateway Station.

- d) HS said she was still waiting for an update from the Ferries Team on the Dunoon ferry tender. RW promised to pursue the response.

Action Point 7: Secretariat to contact Ferries Team and pursue the response on Dunoon ferry tender.

- e) JW observed that the fact that the national entitlement card providing concessionary travel is now smart enabled is not currently widely known and highlighted the importance of raising awareness on that subject.
- f) G M-B asked if concessionary cards could be standardised across all modes of transport, however RW confirmed that the National Concessionary Travel Scheme had one smart card, which was being revised. This formed part of a programme of work to introduce more integrated and smart ticketing, such as the Saitire card. This programme of work was led by the Concessionary Travel and Integrated Ticketing Unit in Transport Scotland. Members noted a number of Regional Transport Partnerships were introducing the Thistle Assistance Card to provide a consistent assistance card across Scotland, leading from the example of SEStran.
- g) DH asked for a briefing on implications for concessionary travel and the blue badge scheme on the new vision for social security in Scotland.

Action Point 8: Secretariat to arrange a speaker on implications for concessionary travel and the blue badge scheme on the new vision for social security in Scotland.

- h) DH was also pleased to note the amendment to the Traffic Signs Regulations and General Directions 2016 (TSRGD) that could have the effect of decluttering streets. Initiatives like the CIHT awards for decluttering street

¹ See Agenda Item 6.13

should be noted and praised by MACS. GT noted powers were now devolved to Scotland to amend the TSRGD in future. It was agreed decluttering was an important issue and that KR be invited to raise it with Transport Scotland roads officials, perhaps under the auspices of the Roads for All forum. However, HF asked that potentially negative implications of removing signage (including those flagged up in RNIB guidance) be considered before action is taken.

Action Point 9: DH to speak to KR to raise decluttering issue via Roads for All Forum.

Agenda Item 6. Workstream Reports and Oral Updates

6.1 The Convener noted eleven written updates from workstreams about their work in the previous quarter. She invited members to speak to these papers.

Item 6a: Neatebox App-Controlled Pedestrian Crossing Trial

6.2 HP explained how this customer service app enables visually impaired people to send information regarding their position, requirements, etc. from their phone.. Following members' questions it was agreed HP would approach the company to enquire about the cost of the device and will raise the question of safety with them as an opportunity to find out more about the implications of this kind of technology in general.

Action Point 10: HP to enquire about the price for the Neatebox product.

Item 6b: Community Transport Association Conference

6.3 SF spoke to her report which focused on UBER. She confirmed that UBER provides accessible taxis and HP pointed out that the company's app is accessible for screen readers. HP asked if there are any incidents known which would indicate safety concerns for disabled people using this mode of transport. SF noted that both drivers' and customers' performance can be monitored and tracked to ensure safety. Members noted this paper, and confirmed this gave another example of how the implications of technology for accessible travel needed to be monitored by the Committee

Item 6c: Road Maintenance Review Stakeholder Group

6.4 This paper was prepared by KR and there were no comments from members.

Item 6d: Scottish Roads Expo

6.5 DH provided a verbal update to his report to say that he will receive an update on integrating rail with other modes in due course. From the Expo he learned that a lot of money was involved in City Deals and the potential for this money to be used to improve accessibility shouldn't be ignored.

6.6 SF pointed out that due to the fact that bus stations in Scotland are privately owned, their accessibility assessments are not feasible ? standardised, which results in no control over standards and consistency in providing assistance for customers with additional requirements. Therefore, city bus stations could be an area where City Deals – with their focus on collaboration between the public and private sectors – could improve accessibility, if handled correctly.

Item 6e: Meeting with Calum Smith, Edinburgh City Council

6.7 JS expressed her delight that MACS' suggestions regarding the position of the taxi rank at the Haymarket Station had been taken into account. DH asked to be included in any future updates as he is particularly interested in that subject through Living Streets. HF pointed out that this project could be used as an example of what can be done at the strategic level in terms of sharing good practice and broadening lessons learned instead of focusing on local issues.

Item 6f: EGIP – Queen Street Area Passenger Forum.

6.8 In noting this paper, SF expressed her concerns about the lack of a waiting area at the station and JW, who attended the meeting, confirmed that this issue has already been raised and is being pursued.

6.9 HF asked about the surrounding streetscape, where accessibility improvements needed to be made. JW confirmed discussions were ongoing involving Glasgow City Council on this issue.

Item 6g: 9th Annual Scottish Rail Conference

6.10 The only issue arising from this paper was raised by HF, who enquired about the devolution of Network Rail to the Scottish Parliament and RW advised that the Secretariat had nothing to add to the Minister's statements.

Item 6h: Upstream Conference

6.11 SM spoke to her paper on the attendance at the UPSTREAM event, which she found very useful and valuable. She noted that the future of the UPSTREAM project is unknown due to the lack of funding. She also pointed out that impairments like dementia or autism are not very much catered for by the Committee and suggested this should be reviewed.

6.12 MC welcomed enthusiastically the proposal of colour-coding for the return tickets and JS pointed out that clarification on who is taking forward the standard travel cards would be beneficial. SF praised the value of the Thistle Assistance Card in this context, which although is not yet used at a national level, it has been significantly improved since its introduction and can be adapted for use of people with dementia. No further issues were raised by members.

Item 6j: Edinburgh Gateway Interchange Station Opening

6.13 HP spoke to his paper on the Gateway station and expressed his disappointment with the level of its accessibility. He also apologised for not making it explicit in the report that MC was also present at the opening ceremony and contributed to the station's assessment. A number of issues were identified, including poor acoustic and those already mentioned under Agenda Item 5.2b. It was recognised that many of the above problems could have been avoided, had the consultation started earlier in the planning process. It was reiterated that the Rail Workstream will contact Chris Clark to address them as Transport Scotland is sponsoring the project, implemented by Network Rail (Action Point 6).

6.14 DH suggested addressing these issues in Annual Report to make the Minister aware of the failure in early engagement; however GT suggested approaching a Transport Scotland official, Chris Clark in the first before considering whether to raise issues through the Annual Report or directly with the Minister.

Item 6j: Consultation on Transport Scotland's Rail infrastructure Strategy from 2019

6.15 JW spoke to his report on the above event noting it was not a good opportunity for a constructive discussion. The Committee noted this update without comment.

Item 6k: Meeting at Waverley Station

6.16 SF asked if a substitute has been agreed to replace John Ballantine at the Waverley Access Group mentioned in this paper. It was confirmed JS already had links with Network Rail contacts, including Jo Noble. It was agreed the Secretariat should contact Network Rail to confirm MACS attendance at all future meetings.

Action Point 11: Secretariat to contact Network Rail to confirm MACS attendance at all future meetings on Waverley.

6.17 JS pointed out that the location of the taxi rank is still not convenient and plans for change result in moving the location of the Blue Badge parking. It was also noticed that the street lights on Market Street are very poor making it very difficult for visually impaired people to move around. Parking at Calton Road was recognised as more convenient and accessible; however it was acknowledged that its existence is not widely known.

6.18 HP apologised for not submitting two more reports, due to health condition and promised to provide them for the next MACS meeting. These may also be circulated by correspondence before the next meeting.

Action Point 12: HP to submit two outstanding reports.
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Agenda Item 7. Any Other Business

7.1 The Convener reiterated the importance of maintaining the consistency of reports provided and asked for members to use the agreed report template.

7.2 She also proposed to hold MACS meetings in 2018 a week later to avoid clashing with school holidays and the dates were agreed as: 23 January, 24 April, 24 July and 23 October.

7.3 HF asked to include the name of the workstream in the report template and distribute the template to all members.

Action Point 13: Secretariat to update the report template to include the name of the workstream and circulate to members.

7.4 It was also requested to distribute a copy of the expenses form, list of confirmed meetings dates in 2018 and a members' contact list.

Action Point 14: Secretariat to distribute a copy of the expenses form, list of confirmed meetings dates in 2018 and a members' contact list.

7.5 JS enquired about the Office of Rail and Road (ORR) Consultation on the scope of regulation for some categories of licence holder for Complaints Handling Procedures and Disabled People's Protection Policies (DPPP)² and asked if there is a dedicated team producing a response. She emphasised that MACS' opinion is to recommend taking Option B - the light touch regulation, which includes submission of Complaints Handling Procedures (CHPs) and Disabled People Protection Policies (DPPPs), reactive monitoring by way of complaints but no collection of core data or inclusion within the Measuring Up Report.

7.6 GT ensured that he will consult policy colleagues to establish if a response is being produced on behalf of Transport Scotland and will advise MACS if their response is also required.

Action Point 15: GT to establish if Transport Scotland is preparing a response to the ORR consultation.

7.7 HF advised that a "Fairer Scotland for Disabled People"³ plan has been published, which is the Scottish Government delivery plan to 2021 for the United Nations Convention on the Rights of Persons with Disabilities, which mentions the Accessible Transport Framework.

² Available at <http://orr.gov.uk/consultations/open-consultations/consultation-on-licence-outliers>

³ Available at <http://www.gov.scot/Resource/0051/00510948.pdf>

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Mobility and Access Committee for Scotland

Continued action points from meeting held on Tuesday 19 April 2016

Action point number	Minute reference	Action	Update	Follow up required
8	5.2	Planning & Infrastructure Workstream to contact TS policy division about PRMs and increase in Aberdeen Airport Drop off charges	Ongoing	Yes
9	5.2	Planning & Infrastructure Workstream to consult DPTAC about definition and remit of PRM service at UK airports	Ongoing	Yes
10	6.4	Planning and Infrastructure, and Bus and community transport workstreams to submit finalised work programmes	Ongoing	Yes

Action Points from meeting held on 17 January 2017

Action point number	Minute reference	Action	Update	Follow up required
1	3.1	Secretariat to publish minutes on website.		
2	4.1.i	Secretariat to invite the Minister to a MACS meeting.		
3	4.2	Members to provide comments on the content of the development day by 30 January.		
4	4.3	Convener to forward to members a report summarising the NTS Review Partnership Group meeting.		
5	4.6	Workstream Leads to provide list of achievements for 2016/17 and draft 2017/2018 work plan for their workstreams.		

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Action point number	Minute reference	Action	Update	Follow up required
6	5.2.b	Rail Workstream to contact Chris Clark regarding Gateway Station.		
7	5.2.d	7: Secretariat to contact Ferries Team and pursuit the response on Dunoon ferry tender.		
8	5.2.g	Secretariat to arrange a speaker on implications for concessionary travel and the blue badge scheme on the new vision for social security in Scotland.		
9	5.2.j	DH to speak to KR to raise decluttering issue via Roads for All Forum.		
10	6.2	HP to enquire about the price for the Neatebox product.		
11	6.16	Secretariat to contact Network Rail to confirm MACS attendance at all future meetings on Waverley.		
12	6.18	HP to submit two outstanding reports.		
13	7.3	Secretariat to update the report template to include the name of the workstream and circulate to members.		
14	7.4	Secretariat to distribute a copy of the expenses form, list of confirmed meetings dates in 2018 and a members' contact list.		
15	7.6	GT to establish is Transport Scotland is preparing a response to the ORR consultation.		

Secretariat
January 2017

