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(MACS)**

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Accessibility Action Plan Consultation
Department for Transport

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MACS Response to the DfT Accessibility Action Plan Consultation

Please find enclosed a response to the Department for Transport Consultation on Accessibility Action Plan provided by the Mobility and Access Committee for Scotland (MACS).

Should you require any additional information, please do not hesitate to contact me.

Kind regards,

Aga Lysak
MACS Secretary
Transport Scotland

Department for Transport, Accessibility Action Plan Consultation - Response by Mobility and Access Committee for Scotland (MACS)

Introduction

MACS welcome the opportunity to comment on this draft document. Our response begins with the 'Consultation Questions' and then moves on to comment on the relevant 'Proposed Actions'. We provide detailed responses to questions where members of MACS have particular insights and experience, and more general responses to others.

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?

Not Applicable.

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 comment on two main issues: firstly booking of special assistance services via airlines/tour operators/travel agents; and secondly, lack of information about opening hours of passenger assistance service at 22 out of 30 airports.

Special Assistance Services at airports are important for accessible air travel to continue. Airports have been rated by the Civil Aviation Authority in Accessible Air Travel: Airport Performance Report 2015/16 (Civil Aviation Authority, 2016) and Airport Accessibility Report 2016/17 (Civil Aviation Authority, 2017). Performance is variable between airports. Special Assistance Service suppliers have good and poor airports. OCS Group UK Ltd currently provide assistance to passengers with reduced mobility at Birmingham Airport rated Very Good, three airports rated Good (London Gatwick Airport, Bristol Airport and Liverpool Airport) and two airports rated Poor (Manchester and East Midlands).

Accessible air travel requires authentic engagement with organisations representing disabled people, innovation and change in the special assistance booking system and commitment to equality of customer experience of air travel.

Evidence from disabled people about information transfer support the view that the current system related to air travel – including airports, airlines, aircraft designers, travel agents, tour operators, ground handling companies and retailers – is fragmented offering an unequal customer experience to disabled passengers.

Disabled individuals give details face-to-face to travel agents or online at time of booking flights that is lost through translation into a four-letter coded category (IATA codes) and a limited number free-text characters passed across to airports no more than 36 hours prior to passenger travel.

This information system has operated in the air travel industry with little change to codes since the 1970s.

Two individuals, a passenger of height 1.93m in an electric wheelchair and a passenger of height 1.61m in a self-propelled wheelchair may be both coded WCHR with the few characters of free-text allowed in the system left blank. It could be the case that the coding used was WCHC meaning Wheel chair completely. This fails to take into account size of chair required.

This places barriers to accessible air travel by disabled passengers who have provided relevant details pre-flight to agents and airlines and to special assistance services at airports.

There are four codes relating to mobility WCHR, WCHS, WCHP, WCHC relating to the individual as well as three codes WCMP, WCBD, WCBW relating to the wheelchair and battery. There is no agreed code for identifying a passenger with an assistance dog. Code DPNA meaning 'Disabled Person Needing Assistance' identifies passengers with hidden disabilities including dementia, autism and schizophrenia.

Time spent by a disabled passenger waiting in a special assistance reception for equipment or special assistance staff may erode time available to have refreshments airside. This also results in lost revenue for retailers and frustration for travellers.

An individual who self-propels in their own wheelchair who is given a portering assistance service of being pushed in a wheelchair around the airport not being offered equality of experience. This equates to a loss of independence and could be easily rectified at low cost.

Airports, airlines, travel agents, tour operators, ground handling companies and organisations representing disabled passengers could re-design the current information system of making a special assistance request to deliver accessible air travel with the equality of customer experience of air travel for all.

Susan Morris (MACS member) has investigated the opening hours of special assistance services published on airport websites and found that only 8 out of 30 airports published availability information as follows:

- Cardiff Airport and Southampton Airport state that they have a 24-hour reception for special assistance service.
- London Southend Airport special assistance service is open from 04:00 to 00:00 hours
- Liverpool Airport special assistance service reception is open from 04:00 to 23:00 hours
- Aberdeen Airport special assistance service is open from 04:00 to 22:30 hours.
- Leeds Bradford Airport special assistance service reception is open from 05:00 to 00:00 hours
- Inverness Airport special assistance service reception is open from 05:00 to 22:30 hours
- Belfast International Airport is open from 05:30 to 23:59 hours.

Suppliers would improve the accessibility of their special assistance service that

allows spontaneous travel and turn-up-and-fly special assistance by advertising their opening hours of receptions where staff are available for information.

Many suppliers publish a telephone e.g. a mobile telephone number, telephone number for the supplier's registered office or the airport's landline telephone number without stating opening hours for special assistance services information.

Airports could re-design their current website information regarding accessibility and special assistance services ensuring that essential information for disabled passengers is published and one-click away for online access.

We welcome the trend among UK Airports towards establishing Airport Access Forums.

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?

Not Applicable.

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?

Major terminals provide a range of facilities and services for disabled travellers; however smaller terminals have little or no provision.

A requirement should be put in place to require all terminals to develop and implement an action plan addressing the needs of disabled people. Transition between a terminal and road or rail public transport is an issue and should be addressed.

Assistance should be available to transfer a passenger from one means of public transport to another adjacent means.

Concession ticketing is available for qualifying travellers, but on many ferries this is not available on line or by phone, meaning that a disabled person has to physically go into a terminal to buy a ticket. Likewise combined rail and ferry tickets are not available, as one organisation does not recognise the concession cards of another organisation.

There is a need for accessible toilets on ferries ('changing places' toilets where there is space)

Braille/ tactile plans of a ferry should be made available for visually impaired travellers.

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?

MACS recognises the importance of “accessible” toilets. However, it should be noted that wheelchair accessible toilets may not be universally accessible; for example, visually impaired people often find it harder to navigate in larger, open spaces over a confined unit.

Also, elderly people with mobility problems may find it easier to use a regular toilet facility - with adaptations like handrails - and this must be considered in their design.

There is an anomaly of some disabled people being unable to travel first class on some train lines. MACS is preparing information on this based on lived experience.

The vast majority of people with physical mobility problems do not use wheelchairs. They may or may not use walking aids but they will often have difficulty accessing facilities such as toilets and catering facilities which involve long distances from compartments and if walking is severely restricted it will be even more difficult to move about moving trains.

Messages on trains are often inaudible even to those with no hearing impairments and therefore checks should be undertaken to ensure that the conductor's announcements can be heard throughout the train.

There needs to be a greater recognition of people with anxiety, stress or other hidden conditions, who may find travelling very frightening and need to be reassured through announcements if they are travelling alone.

When focusing on communication, MACS is concerned that there is no mention of non-mobility related disabilities, such as cognitive impairments.

Space has become an issue on many trains. While the number of disabled and elderly passengers is increasing, so too is the number of passengers travelling with bikes, big baby buggies etc. all competing for space.

It is not unusual to find the same small carriage next to the accessible toilets to be occupied by one or more wheelchairs, or mobility scooters and several bikes.

Then a parent with a buggy boarding the train and looking for a space creates a difficult and uncomfortable situation for all involved. Serious consideration will have to be given as to how trains are designed and how best to accommodate competing demands on limited space.

Regular announcements could be made to prevent these spaces being used inappropriately allowing them to be kept free for disabled travellers.

The consultation document refers to accessibility of both trains and stations but the emphasis in the sections seems to be on trains.

Clear signage, way finding, audible information, and frequent places to stop and rest or sit, non-slippery surfaces etc are very important in stations.

It is important to note that just because a station complies with current accessibility legislation this does not mean that it is automatically accessible to everyone.

Accessible booking systems, intermodal change and access to/from rail stations, etc all need to be considered too.

This includes being able to book eligible companions to assist the traveller when

booking online or at ticket machines.

Many platforms have a significant gap between them that creates a barrier to access to the train especially on those trains used for longer journeys. These are very difficult for people with limited mobility and there are often then steep steps to negotiate to get on to the train.

Although there are accessible toilets in many stations, they are often poorly signposted and then when found are locked and it is unclear who to approach to have them opened. If you have difficulty reaching a toilet because of physical disabilities or you have a condition which requires you to reach a toilet quickly you don't then want to find out that you have walk some distance again to find someone to unlock it.

Better signposting and clear instructions as to how they are accessed should be easily visible.

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)?

MACS recognises the significant improvements in the levels of understanding of staff providing assistance to people with disabilities – especially to people with visible mobility or obvious sensory problems.

Further training is required, however, about less obvious disabilities like dementia, autism, learning difficulties and mental health conditions.

Personal experience of MACS members has raised a number of issues:

- Lack of assistance between modes of transport. Failure to realise that there is a problem and take responsibility for resolving it. This is particularly apparent when services arrive once staff are off duty.
- Connections between trains when one train arrives late and passengers are advised that the other (maybe the last of the day) has been kept waiting but they will have to run to catch it.
- Worry about connections being made as missing the connection could result in an overnight stay where no provisions have been made for accommodation.
- Operators maintaining a bad weather policy where passengers can be assured of assistance if a service is cancelled.
- Limited or no assistance during the journey impacting on the traveller's experience.

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)?

We believe that disability awareness should be seen as part of, and developed within, good 'customer care'. Many people have what is termed 'invisible disabilities' and there are also many people who would not regard themselves as disabled but who need extra time and care to complete a task.

Consultation Question 8:

As a passenger or organisation representing disabled people, what is your experience of trying to travel spontaneously?

MACS consider that one way of improving spontaneous travel is to simplify and rationalise the various systems for concessionary cards to include an Assistant Companion when necessary.

This would certainly improve the fast and efficient travel of people with visual and hearing impairments, or with learning disabilities, who require an Assistant Companion but do not require station staff assistance with ramps etc or an accessible seat.

There are significant barriers for disabled passengers wishing to travel spontaneously who require assistance from station or on-board staff. This is usually because of the notice period required to book assistance in advance of travel.

One challenge is the different notice periods required by different operators, despite the fact that, for Rail in any case, the assisted travel system Passenger Assist is centralised with real-time input into the main system when an assistance request is logged.

At present the minimum notice period is 3 hours, however this often does not work in practice due to delays in communicating the specific assistance requirements, times and passenger details to individual stations. This is often done overnight meaning that passengers who choose to book assistance on the day of travel, even observing the required notice period, may find that their requirements have not been communicated to the station or service on which it is needed.

Conversely, from the viewpoint of maximising the effective use of staff time, it is not easy for passengers to cancel or change assistance requests in the event their plans change.

Therefore staff may expect passengers who do not arrive, but have not been able to cancel the assistance booked. It would be helpful if measures were put in place to provide greater direct access to the assistance reservation systems, particularly for the cancellation of assistance booked.

This would free up staff resources so that more passengers can be assisted spontaneously.

There are also major barriers to travelling spontaneously when boarding from unstaffed stations; namely, how to communicate with staff on board the service on which they want to travel. This is currently not possible as communication is necessary via a customer service number, whose staff often report that they do not

have the facility to relay messages to on-board staff.

So those wishing to travel spontaneously from an unstaffed station, but who require assistance, must travel to a manned station at their own cost.

This is prohibitive particularly in rural areas or during periods of inclement weather.

Ferries that provide lifeline services to island communities should be required to facilitate spontaneous travel options for cars and their drivers in the event of an emergency journey to the mainland being required. The driver should be required to provide evidence of the need to travel urgently and space on the ferry should be found for them.

There needs to be a drive to simplify journeys and connections (inter modal) including good way-finding to give confidence to individuals to undertake spontaneous and where appropriate independent travel.

Consultation Question 9:

As a transport operator or provider, what is your experience of enabling spontaneous travel for disabled people?

Not Applicable.

Consultation Question 10:

As a passenger or organisation representing disabled people, what is your experience of using Passenger Assist?

Passenger Assist is a very helpful service but needs to be advertised better so that more people are aware of it. We are conscious that in the coming years a growing number of elderly passengers will require assistance and this will definitely need to be addressed in future planning for Passenger Assist.

Passenger assist should also be available to transfer a passenger between one mode of transport to and adjacent mode, e.g. train to taxi, ferry to train as well as “on board” i.e. during the journey.

The app available to booking staff is very welcome and perhaps there could be a prompt for booking staff to tactfully ask customers if they need any help; “how can I help you today?”

An increasing number of disabled people are using mobile devices as an alternative to home computers to access information and manage travel on the go. At present the only way of booking assistance via a mobile device is via convoluted navigation through operators’ sites that are not often designed for viewing on smaller or touch screens.

A Passenger Assist application would solve some of these challenges provided rigorous accessibility testing was undertaken on all major operating systems. Such an application, if combined with the ability for passengers to ‘log in’ to their account would also make it more attractive for passengers who travel on the same routes frequently (commuters) to book assistance.

At present this must be done for each journey even if making the same journey each

day. This understandably can prove tedious, particularly as there is always a need to verify all security and account information at the start of each call. Such a system would also solve the challenge of ad-hoc cancellations, currently requiring telephone contact and thus proving challenging for users with a hearing impairment or for short notice cancellations.

Consultation Question 11:

When you purchase a ticket using a vending machine, what has been your experience of accessibility?

There is typically little or no accessibility provision to support disabled people using ticket machines across all transport modes. This includes bespoke ticket machines and those providing a rendering of an existing ticket booking system (e.g. access to the transport provider's website).

MACS members have yet to find a ticket machine that is accessible by visually impaired passengers: i.e. one which provides spoken feedback (text to speech) that would allow a blind or severely visually impaired person to use ticket machines independently.

The only other options for these passengers at present is to seek staff assistance to use the machine (which has safety and security implications regarding the handling of cash or payment cards); purchase tickets at a ticket office (not an option for unmanned stations); or use the transport providers' website from a device equipped with a screen reader.

We have not encountered any instance of ticket machines offering the ability to conduct a transaction by voice, useful for those with dexterity impairments or for whom use of a touch screen is not possible.

It should be noted though that were such a facility to be offered, adaptations to ensure privacy and to safeguard against background noise introducing errors into the transactions would have to be implemented. This option also provides possibilities for offering a multi-lingual experience.

Given that talking ATMs are now available, is there any scope to provide a similar facility on the rail network?

We also wonder whether there could be a mechanism for sound to be incorporated into ticket machines so they could perhaps be voice activated? This might be something that could be explored in initiatives such as those suggested in Action 15.

Although there are instances of ticket machines offering large print displays, these are the exception rather than the norm and there is rarely the option to adjust font size, color or contrast whilst using the machine. This imposes limitations for visually impaired users, but also the elderly or those on the dyslexic spectrum who find displays with many lines of small text challenging.

More generally, there are a wide number of instances of ticket machines being situated in positions that make them difficult to use in various adverse lighting conditions including those involving bright sunlight.

In particular many machines are not fitted with non-reflective displays which may prove challenging for many users including those not identifying with a disability.

It may seem an obvious point but ticket machines should be situated at an appropriate height for wheelchair users. The design should ensure that privacy is maintained especially for those using bankcards to complete transactions.

We would also like to see machines providing clear ticketing options, which highlight the most affordable fares. These should be tested with users experiencing dyscalculia or similar.

Ticket machines should be intuitive to avoid the drain on staff resources that problems using them create.

It would be interesting to investigate the extent to which user testing is conducted with ticket machines under a variety of circumstances prior to implementation.

In addition to ticket machines being fit for purpose or accessible to disabled users, it is also essential to ensure that they are easy to use in terms of number of steps needed to complete a transaction, simplicity of language and clarity of available options to avoid misinterpretation.

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.

Please see comments in response to Action 30 below

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.

Yes, we think that a national assistance card is desirable; this was one of the recommendations made by delegates at the Mental Health Transport Summit London 2016 hosted by Department for Transport, DPTAC, Mental Health Action Group and Anxiety UK.

A national assistance card is a relatively low cost solution for transport operators to make reasonable adjustments with individuals travelling with hidden disabilities.

The impact of such a card would require a single application multi-modal transport system card supported by clear training standards for staff in neurodiversity, disability awareness and mental health first aid across all transport modes.

Communications about the national assistance card scheme must be inclusive and accessible by using appropriate images, content fonts and iconography.

Equality legislation requires every transport operator to make reasonable adjustments for non-visible disabilities and hidden impairments ('hidden disabilities').

Individuals with mental health conditions that have an adverse effect on their ability to carry out normal day to day activities such as travelling are the largest disability group in the UK.

Customer service staff are generally untrained for the neurodiversity of the general

population travelling in the UK. National award schemes are available in autism, dementia and in mental health first aid.

Business Disability Forum's survey of December 2016 found that hidden disabilities overlooked in customer service are dyslexia, dyspraxia, autism, ADHD, speech and language impairments and dyscalculia.

Individuals with symptoms related to cancer, HIV, multiple sclerosis, chronic obstructive pulmonary disease, bowel conditions, epilepsy and heart conditions will require reasonable adjustments to be made for travelling well door-to-door in a multi-modal transport system.

Below is the personal experience of a MACS member who a registered blind person using a long cane:

"I personally do not generally feel the need to communicate my disability to transport staff as the long cane is a widely recognised symbol of this disability, although admittedly not to the same extent as the guide dog. I find that, particularly for those staff, who have had little exposure to UK disabled society, the long cane can sometimes be confused with a mobility aid to support walking or frailty. In this instance, we feel that it would be beneficial for disability awareness training to emphasise the ways in which people with a variety of disabilities use aids to support independent mobility, as well as their limitations. Having said this it should also be reiterated that not everyone with a disability uses or requires a visible aid, hence the term 'hidden' disability. The impact of different environmental conditions on disability should also be stated, e.g. natural vs artificial lighting, background noise or crowded surroundings."

"A reduced awareness of the latter points above means that occasionally there is a need to explain to staff the ways in which my disability restricts my mobility and the ways in which staff can help. For example, despite using a long cane it is still helpful for staff to describe obstacles in my path of travel, e.g. standing passengers, luggage or sign posts, as I may collide with these despite using a mobility aid. The same applies to disability awareness amongst passengers. For example, it may sometimes be necessary for staff to explain my disability to passengers when accessing seating provision for disabled people. This is particularly common when passengers have used the seating to benefit from extra legroom or space for luggage. They often may not understand that despite not having a physical impairment, access to disabled passenger seating provision is necessary to allow for easier orientation and access to lavatory facilities or exits, especially on busy or 'standing room only' services".

"I find this is a more common challenge on services that do not allow for seat reservations to be booked in advance and where there is therefore no designation as to when seats have been pre-allocated".

"Despite using Passenger Assist to great general benefit, I find specific needs over and above the general disability label are not often communicated to staff. For example, I am unable to visually identify staff or distinguish body language and therefore depend on verbal communication to know when they are trying to get my attention. Despite this I have had several instances of being left behind at unmanned rail stations because the guard was unsure of my intention to board. It is likely they may have tried to attract my attention verbally, but that I did not hear them

over the sound of the train. Such relatively minor, yet significantly impacting issues are not noted within the Passenger Assist system and despite asking for notes to be added to my assistance requests, these are often ignored. Further and as referenced above, staff who regularly encounter the same passengers may not appreciate the impact of conditions varying from one day to the next on the level of assistance required or the need for more intuitive support.

“I have not used a tool to communicate my needs to transport staff, partly as I am unaware of any tool that is widely recognised across transport modes, or even across a wide enough geographic area to be beneficial. Whereas a number of schemes are present, these are not generally communicated to disabled passengers through mainstream media. This therefore relies on passengers to source information themselves through disabled people’s organisations or, as often happens, discover such schemes accidentally through staff rather than as a preconceived decision at the time travel is considered. The Thistle Card is an example of this. Having said this, even where tools are generally available or provided statutorily, these are not always recognised for what they are by staff. The symbol indicating visual impairment on the National Entitlement Card is an example of this. I have experienced a number of occasions where staff recognised the card as an exemption from fares but not as an indication of the nature of my disability, despite both featuring on the card. There is therefore a widely held view that whereas new initiatives to describe or communicate disability may be helpful, this is diluted by the number of initiatives present and the additional need for staff training to appreciate them. It would therefore be better for there to be fewer initiatives present with broader recognition. I therefore feel that a broader, more widely accepted assistance card would be beneficial if combined with the phasing out of some of the existing systems. Such a card should have widespread publicity including through mainstream media, social media and travel booking systems, healthcare providers and local authorities. There should be clear boundaries in the event that some providers or transport sectors are excluded from supporting the card and these should be communicated widely and frequently to passengers, staff and transport providers. It would also be useful, where specific elements of the card exist representing specific disabilities, these are incorporated into smart ticketing or concessionary travel passes in order to potentially reduce the number of cards that need to be carried or presented by passengers.”

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.

Not Applicable.

Consultation Question 15:

How can the Department for Transport support Community Transport Operators further?

MACS is aware of and values the contribution made by community transport (CT) operators throughout the UK. As outlined in the consultation document, these

schemes may be the only transport available to disabled people enabling them to combat isolation by socialising, attending health appointments and shopping.

Most CT operators in Scotland (more so than in England) are small, many having only one vehicle and relying on volunteers to drive them. Many receive no funding from the public sector but raise funds locally and collect fares and charges from passengers to cover costs. Very few CT operators in Scotland compete for tender contracts.

We are therefore concerned that the letter on Community Transport regulation and licensing issued by Stephen Fidler of DfT on 31 July has created confusion and worry to many CT groups and could seriously undermine provision of CT across the country.

While the implications of the DfT position are not clear, one interpretation is that any group charging more than nominal fares can no longer operate under Section 19 and 22 permits, as has been the norm for the past 30 years, and would be required to have a PSV licence.

We do not accept that this is necessarily the legal position, but such requirements could result in many of the smaller operators having to close down.

We therefore look forward to the forthcoming consultation, which we hope will provide greater clarity on the point of law.

Further, it may be time for a wholesale review of the provisions of the 1985 Transport Act that govern community transport operations.

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.

MACS have already raised the need to update 'Inclusive Design' through DPTAC and other channels. It is extremely unfortunate that this publication has not been updated since 2005, given the many innovations in transport and mobility which have taken place since then, including for example, electric vehicles, 'smart' technology and cycle infrastructure.

Inclusive Design has been influential in many Scottish as well as UK guidance (e.g. 'Roads for All') and we would like to see more urgency in updating "Inclusive Mobility" guidance and a firm commitment to a date for publication of a revised version as soon as is practical.

With regard to tactile paving, MACS supports the review of existing guidance regarding tactile paving to ensure it meets the highest possible standards.

It should be noted that a uniform approach to tactile paving is significantly important for users to be able to interpret crossing points and align themselves properly.

With regards to ensuring conformity MACS would highlight the findings of the *Mohammed Mohsen Ali Vs Newham London Borough Council* case. While this case doesn't set a precedent for future interpretation of guidance on tactile paving, it

certainly made a strong case for keeping narrow definitions to ensure conformity across the country.

For individuals who use tactile paving because of sensory impairments the development of new styles of paving can be confusing, especially if these are significantly different to those used commonly across the country at crossing points and other locations.

MACS was a contributor to the 2015 consultation on The Interim Changes to Tactile Paving. Now as then, while we agree with a difference of over 50% tonal contrast in bubble tactile at controlled crossings we again raise caution in scrapping the red tactile paving because we can find no evidence of any research that can alleviate our concerns that some people with dementia, Alzheimer's, some mental disabilities and learning disabilities may regard the red tactile paving with a 'safe place to cross'.

Consequently, we would ask that more research is undertaken before any further changes are made to the guidance on tactile surfaces to ensure that all people with disabilities are considered.

This needs to include meaningful consultation with persons with disabilities who have learned how to independently navigate areas using recognised tactiles and way finding including those who would not readjust to changes and as a result may lose independence.

We also support that any guidance ensures that raised junctions or otherwise 'flat' crossing points are accompanied by tactile paving so disabled people know where it is safe to cross.

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.

The DfT will be aware that Transport Scotland asked Edinburgh Napier University and the Scottish Disability Equality Forum (now Disability Equality Scotland) to organise a seminar on shared space in April this year, following a petition to the Scottish parliament.

The report of that event can be accessed here; <http://accessibletravel.scot/shared-spaces-seminar-2017/>.

Transport Scotland's Accessible Travel Team followed this by facilitating a summit session on 26th October 2017 to gain further information particularly focusing on challenges and solutions.

The key message is that the design of all public spaces (not only 'shared space') needs to consider the needs of a range of users at the outset; an 'inclusive design' approach is the best way to avoid some of the problems and conflicts which have become associated with the shared space concept.

We support efforts to develop agreement on best practice in this area, including specifically the CIHT initiative.

We would stress and highlight the benefits of meaningful engagement and consultation as early as possible with interested groups who represent persons with disabilities.

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.

MACS supports this action. Cycling infrastructure has significantly changed since 2008 and there is substantial funding into new infrastructure. Updating this guidance would be a good opportunity to ensure the cycling provision meets the highest standards for not only cyclists but also other road and path users, including people with disabilities.

However, Cycling by Design is already being refreshed by Transport Scotland, as it is a devolved function.

There are a number of key considerations with regard to cycle infrastructure and how people with disabilities encounter it that could be considered by a design guidance note for local authorities implementing new schemes or upgrading old ones. The following is a non-exhaustive list of some of these concerns/requirements:

- Minimum width standards for those using bicycles should ensure it meets a minimum width of individuals who may use tricycles.
- Shared pathway/cycling routes must have an upstand showing linear delineation of at least 60mm (Research by The Guide Dogs for the Blind Association (Guide Dogs))
- Pedestrian crossing points of cycle lanes should have tactile paving for those with visual impairments.
- For shared pathways contrasting colour paving should be used in addition to rather than only using painted symbols.
- Pinch points for cyclists can be created where pedestrian refuge crossing points are utilised on busy roads and there can be demand for removal to ease cycling. However these crossing refuges are extremely useful for pedestrians, especially those with limited mobility who may find themselves requiring more time to cross a road than others.
- Barriers and other methods should be used on shared pathways, especially on downhill sections, to ensure slower speeds of cyclists.

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.

The Equality Act (2010) requires bus operators to anticipate and respond to the needs of disabled passengers. MACS notes that the Bus Services Act 2017 requires bus operators to offer transport accessibility that will positively impact the level of service that disabled passengers receive.

Under current EU rules, disability-awareness training of onboard staff is a requirement for bus operators from 1 March 2018.

MACS support the policy objective of ensuring that bus drivers are equipped with the

knowledge and skills to assist disabled passengers.

The Accessible Information Requirement does not change the need for this measure.

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

Current bus services are not providing disabled passengers with the necessary information to make informed choices about their travel arrangements door-to-door.

Real-time accessible information while onboard bus services is essential for independent travel including interchange within a multi-modal transport system.

The alternatives for disabled passengers may be transfer to taxis, time-inefficient door-to-door journeys, stalled journeys or abstaining from travel due to barriers.

MACS holds the view that engagement and purposeful conversations with disabled communities including adults, young people and children with vision and hearing loss as well as learning disabilities and mental health conditions is essential to ensure universal design of onboard bus information as accessible to all groups of disabled passengers.

MACS support the recommendation that UK Government coordination of back office accessible information functions is required to limit duplication, omissions and complexity for application developers. This should also reduce the burden on bus operators and applications for exemptions from smaller bus operators from provision of accessible information.

The Equality Act (2010) is clear in its legal requirements made on all bus operators regarding transport accessibility for all groups of disabled passengers. Disabled passengers have been expected to wait until the market provides a solution. The Bus Services Act 2017 intends that information about bus routes, timetables, fares, tickets and punctuality, will be accessible to all passengers enabling them to make more informed travel choices.

Mandating the Accessible Information Requirement should deliver real-time information onboard bus services to all.

Many islanders rely on ferries for their access to mainland services including medical and social activities. With this in mind we would like to see ferries and their terminals included in this action.

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.

MACS is pleased that action will be taken on the issues of refusal of assistance dogs and initiatives to increase accessible vehicles.

A recent report showed that 40% of people travelling with assistance dogs had at

some point had a taxi driver refuse to take them.

The key to improving this would be a robust way of complaints being acted upon by the licensing authority. However as those reporting non-compliance would likely have to submit the taxi/PHC licence number this could prove difficult if they are blind or partially sighted.

Increasing the number of accessible vehicles is also an important issue, however specifying one model of accessible vehicle can cause problems, as those designed to carry wheelchairs are not always accessible to those who have other mobility problems.

MACS members have also raised the issues around pick up and drop off points used by Uber-type services. Taxi ranks are felt to be safer but cannot be used by private hire vehicles. This issue is particularly relevant to blind and partially sighted people who need reassurance that they have been left at a safe location.

For all of the above issues the key is to have robust regulations and policing.

Unfortunately as many local authorities have experienced budget cuts and have had to reduce staff they may be unable to properly enforce regulations.

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 strongly support this.

Legislation has long been in place to require the provision of wheelchair accessible taxis and it is very regrettable that practical measures and regulations have not been implemented to put Section 165 of the Equality Act into effect across the country.

The regulatory system needs to encourage the availability (whether taxis, or private hire vehicles) a variety of vehicles, as this diversity of provision is required to meet the diversity of access requirements of disabled people (both using, and not using wheelchairs).

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.

Blue badge eligibility criteria is a matter devolved to the Scottish government.

However, disability benefits will not be devolved until the year 2020 so in the interim close dialogue must be undertaken between the Scottish Government and the DWP to achieve this aim. The Scottish Government has already extended the eligibility criteria for a blue badge to include people with a diagnosed mental disorder, who are not aware of the danger from traffic. The extension has been introduced on a pilot basis, however the Working Group overseeing the pilot recommended its implementation on a permanent basis.

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.

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).

MACS welcomes Action 9 on the allocation of funding to provide additional accessible toilet spaces at stations – but we are concerned that this will be “subject to...funding”. We know from disabled people that access to good toilets is an essential part of a comfortable journey (see our response to Consultation Question 5).

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.

MACS agrees with this pilot. Increasing the availability of train toilets will be very useful. MACS considers that using upcoming franchising opportunities is a very good way to allocate further investment here.

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).

MACS looks forward to the ORR research being published and acted upon.

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.

MACS agrees that exploring “alternative journey options” is a useful and probably cost effective way of ensuring that disabled people can rely on making journeys where accessibility is difficult to achieve on a planned journey. Versions of this scheme have been operated successfully provided by rail operators in Scotland. Journeys should be as simple as possible with linked passenger assist services and/or good way finding.

MACS would request that the number of journeys booked by rail but undertaken by alternative modes by disabled travellers is monitored and measured to evidence the level of alternative provision. This data could be utilized to identify barriers to rail travel and seek solutions to remove these barriers and increase rail travel.

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.

We agree it would be useful to use dynamic notifications on the Stations made Easy website of the availability of accessibility features at stations.

However, adequate user testing would have to be conducted to ensure web content is accessible to all including those using screen readers or Braille displays and other platforms.

It would be most useful if this could be communicated using SMS linked to the Passengers specific journey. For zero rated bookings the Passenger Assist details could be used.

This would allow real time communication of issues to passengers and would ensure devices that are accessible and usable by the passenger receive the messages.

Action 14: We are also exploring with RDG how notifications of such incidents can be provided to passengers as early as possible.

We agree that it will be important to provide notification of problems with accessibility features on journeys at the earliest possible stage. Consideration must be given to passengers with hearing loss here.

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.

MACS thinks it is a great idea to encourage innovation and forward thinking about improving accessibility in a cost effective way. We would stress that this should be done from the earliest possible stage.

MACS' experience is that the most useful and cost effective way of introducing accessibility features in trains and stations is by considering inclusion and consulting about accessibility from the earliest stages of design – rather than having to add costly retrofits at a later stage.

Action 16: We are also investing in a new rail innovation accelerator which will look at how the availability of facilities can be improved.

Any investment which will look at how station facilities can be improved will be welcome – taking into account the point stressed above re Action 15.

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).

Noted and welcomed.

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.

MACS agrees that the ORR should be supported to look at and act upon performance data of how rail operators are meeting the required legal standards.

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.

Noted.

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.

MACS is aware of the problems in ensuring compliance as outlined in the draft proposal. Members of MACS have in the past asked DVSA about their involvement in the maintenance of wheelchair lifts and have had a very detailed response.

Apart from roadside spot checks, which are infrequent their involvement would be annually when the vehicle is presented for its test.

Ensuring vehicles compliant with PSVAR are used on public services could be difficult to police as outlined in our response to enforcing taxi regulations.

At the moment there seems to be no standard procedure to allow the public to report suspected non-compliance.

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.

Action Point 21 — Refusal of Assistance Dogs in Taxis

Duplication of Questions 5/6.

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.

Parking enforcement in Scotland is a devolved issue and MACS is working with the Scottish Government to ensure the best proper solutions for disabled people are considered. However, we are willing to work with DPTAC in sharing our expertise in this area

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.

MACS welcomes work already undertaken to improve disability awareness training in buses and taxis. Invisible disabilities, as outlined in the draft proposal, are the most difficult for drivers to comprehend.

In many areas of Scotland a card has been made available that the passenger can show to the driver to alert them to their special circumstances and needs (Thistle Card). This has gone some way to improve awareness of invisible disabilities.

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.

Noted.

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.

MACS supports this approach.

Action 26: ORR will publish the results of its large programme of research looking in depth at accessibility and assistance in 2017.

Noted.

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.

Noted. MACS welcomes sight of the report and findings.

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.

Previously commented.

Action 29: DfT is also exploring with RDG how notifications of such incidents can be provided to passengers as early as possible.

Previously commented.

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.

MACS welcomes the development of any processes which will assist with consumers in enforcing their rights or receiving adequate redress where performance or assistance is not delivered to the expected standard.

In developing any type of Alternative Dispute Resolution (ADR) scheme in transport the department will have to consider numerous key factors to ensure such a scheme is robust and gains trust and respect from consumers.

MACS would favour a one stop shop Ombudsman service to deliver ADR across transport modes. This could be one general provider or a set of providers split by mode of transport they cover.

We do not support a multi-provider service model, as this will introduce inconsistencies in the way complaints are dealt with and fees charged.

It will also allow for shopping around by service provider to find an ADR provider that may operate best in their interest in terms of costs, decision making bias rather than in the consumers.

Given that many transport operators receive at least some level of public subsidy we believe they should meet a set standard of ADR provision.

This would be best handled and delivered through one Ombudsman.

All providers should ensure that they are compliant with ADR regulations through the Chartered Trading Standards Institutes certification scheme.

The department will also have to consider who will act as the competent authority under ADR regulations, this could be the department itself, or in the case of regulated transport areas the relevant regulation body.

Firstly it must be free at the point of access to consumers.

There is significant evidence to suggest that charging for access to such a scheme can impact substantially on the number of consumers accessing ADR.

This impact is most acutely felt by consumers already financially or otherwise stretched and who are likely to be the individuals most likely to face wider disruption to their lives by not being able to access redress free of charge.

Often it can be argued by operators or firms that introducing fees to ADR schemes is to reduce the number of vexatious complaints, however this is not borne out by evidence.

There is, for example, no significant issue with vexatious complaint volume handled by the Financial Ombudsman Service (FOS). In their 2014/2015 annual report FOS noted that less than 6% of complaints they handled (a proportion of which were submitted by claims management firms rather than individual consumers) were considered "frivolous or vexatious".

It should also be noted that there is a common misconception by some firms as to the fact there is not a difference between vexatious claims that need not be considered and complaints that are not upheld but nonetheless serve scrutiny.

Rather than relying on consumer fees at the point of access to fund an ADR scheme in transport it should be based on the "polluter pays" model. This would be funded through industry with those with cause for the most complaints funding the work of the ADR provider.

It is disappointing that the CAA has established schemes of redress that in some cases charge consumers £25 a time to resolve disputes.

MACS believes that the charging of fees will incentivise some airlines to deal with complaints inadequately in internal processes, knowing that many consumers will not take complaints to the next stage when faced with the barrier of a fee.

While these fees may be smaller than taking court action their existence means that the quoted aim of encouraging individuals to take more complaints and enforce their rights is not going to become a reality. Fee-free to the consumer ADR operates currently in many consumer markets with high success rates (e.g. Energy, Telecoms and Finance).

In order to gain trust amongst consumers it would be preferable for the results of ADR to be binding on providers.

This would allow for consumers to enter into such schemes knowing that the third party decision will actually result in action rather than further dispute.

However results should not be binding on consumers so they can take further court action if required. This is necessary in cases where there could be a human rights review or other liable partners, such as credit providers, where cases may be taken up.

Making decision binding on consumers could result in restricting the rights they already enjoy rather than furthering these rights.

MACS supports the development of Online Dispute Resolution (ODR) methods to allow for consumers to quickly and effectively access ADR.

However in recognition of challenges faced by some individuals it is imperative that other methods of complaint, whether by post or phone should be accepted. There should also be provision for a third party advice agency or advocate to instigate a complaint on behalf of a client in cases where they need support to do so.

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.

MACS is pleased that work will be undertaken with CPT to increase the level of accessibility on their services; however we are extremely disappointed that Paras 4.24 to 4.27 of the consultation document would appear to accept that the current Public Service Vehicle Access Regulations are fit for purpose; we do not believe this to be the case.

The current specification for “accessible” coaches allows the inclusion of steps that are a barrier not only to many disabled people but also to other protected categories included in the Equality Act, i.e. older people, pregnant women and parents of young children.

Coaches are also used on many commercial local registered bus services between large towns and cities. In many places this is the only public transport provision between local communities.

The introduction of wheelchair accessible coaches by 2020 solves part of the problem for wheelchair users but as the lifts cannot be used for standing passengers, many will remain isolated without a service.

The European Accessibility Act is an EU response to the UN Convention on the Rights of Persons with Disabilities (UNCRPD). The EU body ratified the Convention, as did many of its member states including the UK.

The current EU Disability Strategy sets out that the EU needs to improve accessibility and access to assistive technology and transport.

It also impacts on procurement that is of particular relevance to public transport in rural parts of the UK.

As things stand, coach operators use the current PSVAR as the standard when stating their vehicles are accessible because they have a bus/coach with DDA certification.

Surely, at the very least PSVAR should be reviewed to bring certification in to line with the requirements of the Equality Act 2010 and the European Accessibility Act that has been ratified by the UK.

MACS is also concerned by the expectation that the problem can be solved by local authorities using their Public Sector Equality Duties.

The only statutory requirement for the provision of transport by a local authority is transport of entitled children to and from school.

Some of these services may also be registered local bus services.

In urban and peri urban areas single and double decker buses may be used on these contracts, however in rural areas where distances can be longer the local authority contract specification is likely to require seatbelts for all pupils and single deck vehicles to avoid tipping in severe weather. Generally coaches are used on rural school transport services because of this.

Where local authorities fill gaps in public transport provision these are likely to be between school contract work and the cheapest option is to use the vehicle that has come off a school contract, i.e. a coach.

Unless PSVAR is modified to specify fully accessible low floor access to at least part of the vehicle then access will continue to be denied to many of those covered by the

Equality Act (2010) living in rural areas.

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 it's take up and use.

Noted.

Action 33: We will continue to identify and support initiatives for promoting and supporting travel training, mentoring and buddying schemes.

We welcome and encourage this action and would be interested in participating as appropriate.

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

MACS supports the promotion of mobility centres but feels that a much more innovative approach must be taken because of the geographical spread of population.

In Scotland there is only one Mobility Centre, at Astley Ainslie hospital in Edinburgh.

This means that someone travelling from the Northern or Western Isles for an assessment may be travelling up to 24 hours and be away from home for three or four days, such is the remoteness of many areas of Scotland.

Traveling from Inverness to Edinburgh means a round trip of over 300 miles and between 8 to 10 hours of travel.

Travelling these sorts of distances is, more often than not, too much for a disabled or older person to travel on public transport so alternative methods of delivery must be sought, perhaps in identifying some satellite centres that at present do not exist in Scotland.

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.

While MACS supports the promotion of alternative methods of transport to driving, we nevertheless feel that a more diverse approach needs to be taken in Scotland because of the large rural spread of the population.

Alternative methods of transport are much more difficult to identify in the remote rural areas of Scotland than in the rest of the UK. There are many areas of Scotland with the only alternative to driving is by bus and that can often be only one per day or indeed one per week with in some cases no return available the same day.

We would suggest that more investment in community transport could go some way

to alleviating the problems of finding alternative methods in the more remote areas of Scotland.

It is likely that community transport would have to be subsidised more heavily than it is at present.

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.

Any guidance being introduced must be welcomed but serious consideration must be given to what is available in specific parts of the country. What is available in the cities will not be available in the large rural hinterlands of Scotland.

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.

While MACS agrees with training for people using scooters, the method of service delivery is impractical given the distances that many have to travel in Scotland.

We would suggest that some of the better-run shopmobility schemes could be an alternative and in essence become satellite centres for training in the use of electric scooters.

Shopmobility schemes, like the one in Perth, do not hire scooters to anyone who has not undergone training and offer that training to anyone who requires it.

Shopmobility schemes could be a feasible solution to the specific geographic problems that people in Scotland face in trying to get to the only Mobility Centre in the country.

However, this will necessitate a much higher level of financial support than is received at present.

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 welcome and encourage this action and would be interested in participating as appropriate. It will be important to take account of the implications of this work for distinctively Scottish transport issues, such as island/rural travel.

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.

MACS welcomes the impending legislation to reduce the amount of pavement parking in Scotland.

As MACS has made clear in previous submissions, we welcome any moves to

reduce the amount of pavement parking being carried out across Scotland with a consistent approach.

MACS continues to be concerned that some areas do not have Decriminalised Parking Enforcement (DPE) which means that many parking violations are not enforced.

In order to ensure successful management of pavement parking, full DPE will be required across all local authorities with sufficient resources to ensure any traffic orders are robustly enforced.

Road departments should also ensure that parking provision is adequately considered through the planning process to ensure that no new developments, residential or commercial, are under-resourced of parking to the point where pavement parking is the only option.

The Scottish Government is presently investigating ways to manage more effectively the Road Traffic Orders that are required to enforce parking in Scotland.

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.

We welcome and encourage this action and would be interested in participating as appropriate.

Action 41: By 2018, we will commission research quantifying the economic, social and commercial benefits of making passenger transport more accessible.

We welcome and encourage this action and would be interested in participating as appropriate.

Action 42:

Duplicate of Action 15.

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.

Noted.

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.

This is an extremely important action that MACS fully supports.

It is essential that the accessibility/inclusion implications of all transport development and innovations - such as Mobility as a Service models or Connected Autonomous Vehicles - are considered at the earliest stage.

It would also help if the Department were to use competition processes to increase awareness of the obligations one potential bidder to meet the requirements of the 2010 Equality Act.

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.

Noted.

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.

Noted.

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.

MACS supports wholeheartedly any campaigns or education processes that are put in place to educate local authorities and the public in general of implications of the Equality Act 2010, including the Public Sector Equality Duty.

We would draw attention in particular to an apparent lack of clarity at present on the obligations of local authorities under the Act to take reasonable measures to meet the mobility needs of disabled people with regard to the design and management of streets and other public spaces.

A poor environment on the pavement or of road crossings etc can be a major barrier not only to 'pedestrian' travel, but also to other modes, such as bus, train and indeed private car.

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 welcome and encourage this action and would be interested in participating as appropriate.

Linda Bamford, National Convener

A handwritten signature in black ink, appearing to read 'Linda Bamford', written in a cursive style on a light-colored background.

On behalf of the Mobility and Access Committee for Scotland (MACS)