

# TravelWatch NORTHWEST

Princess St Manchester: Tel 07807 768124  
 Email: [admin@travelwatch-northwest.org.uk](mailto:admin@travelwatch-northwest.org.uk)  
 Website: [www.travelwatch-northwest.org.uk](http://www.travelwatch-northwest.org.uk)  
 Correspondence address – 11 Harvelin  
 Park, Todmorden, OL14 6HX

***Winner of CILT award for best practice in passenger transport (2013)***

***promoting quality public transport.....***

Accessibility Action Plan Consultation  
 Department for Transport  
 Zone 2/14  
 Great Minster House  
 33 Horseferry Road  
 London SW1P 4DR

17<sup>th</sup> November 2017

Dear Sir/Madam

## **Accessibility Action Plan Consultation**

TravelWatch NorthWest is an independent Community Interest Company representing public transport users in North West England. We welcome the opportunity to comment on this consultation as follows.

### **Action 1**

Agree with this research project to allow better access to public transport.

### **Action 4**

Audio/visual systems are required on all buses as standard for **all passengers** not just those with disabilities and must not be not seen as an expensive “extra”. These systems are, in the main, shockingly absent in our region. The Transport for London system works well and is superior to many systems used on regional bus services. Standardisation is vital for passengers using these systems and they must be capable of supplying immediate information in case of disruptions to services. Also on this page, but not listed as an action, is that non-compliant vehicles should not be used in these circumstances except in an emergency.

There is no mention of real time information at bus stops – it is virtually non-existent in our region.

### **Question 1**

It is essential that the same criteria are used in all areas to provide a consistent entitlement. There is a need to remove any cross-border restrictions on all concessionary fares schemes, preferably with a UK wide scheme.

### **Actions 5 & 6**

This guidance should be replaced with statutory requirements.

**Action 8**

The number of stations without proper access is actually a disgrace. Many disabled and mobility impaired people are discriminated against, contrary to legislation. Current schemes are nowhere near sufficient to make real progress on station improvements. There is an urgent need for funding in contrast to the rather complacent tone of this consultation paper.

**Question 2**

Any information for disabled passengers should be available in multiple formats to cover all disabilities and also be readily available at all times. A disability group is vital in providing the necessary guidance with input from a consumer rights advocate.

**Question 4**

Ports and ships must have the same regulations as any other form of public transport, with additional regard paid to the dangers close to open water.

**Action 9**

Many stations even medium sized ones have no or substandard toilet facilities. We would want to see greater provision in general and any refurbishment of existing facilities must include disabled toilets.

**Action 10**

We agree that train tanking facilities should be improved and the availability of train toilets should be increased. There is a need for a standard seat/ number of toilets ratio - anecdotally there are probably too few now and their condition and operational functioning can often be suspect.

**Action 12**

This must be provided with minimal disruption to the passenger's journey and at no extra cost to the passenger.

**Actions 13 & 14**

These measures are welcome.

**Action 15**

We are not entirely comfortable with competition as the best use of resources. We would advocate the commissioning of conventional research.

**Actions 17 to 19**

These actions will only be worthwhile if action is immediately implemented to address any problems identified in the research.

**Question 5**

These facilities can be variable in delivery. Cross industry standards need to be implemented to prevent any ambiguity.

**Action 20**

Agree

**Actions 21 & 22**

Legislation must be enforced to provide passengers with assurance that their journeys can be completed without problems.

**Actions 23 to 25**

Agree.

**Questions 6 & 7**

The understanding of disabled passengers' needs is patchy and a properly constructed education programme should be introduced to address this.

**Actions 26 & 27**

We agree with these initiatives, but meaningful action must be taken when the results are known.

**Question 8**

Information to help potential passengers should be clear and readily available at bus, tram and rail stations, airports and sea ports. Appropriate information should also be shown in all publications and on web and social media sites.

**Actions 28 & 29**

Refer to actions 12 to 14.

**Question 10**

Uncertainty exists around the availability of this service when journeys involve unstaffed stations.

**Question 11**

Care must be taken to ensure that the screens are easily read with attention to the use of poorly visible colours which may confuse rather than be helpful, e.g. the use of light grey on Virgin Trains TVMs.

**Action 30**

Agree.

**Question 12**

The current complaints procedure can be complex and not passenger friendly, not just for disabled passengers, and needs to be streamlined with easy access to the relevant authorities. On bus services complaints procedures are particularly poorly publicised. We would like to see a notice prominently displayed in all vehicles used on Registered Local Services explaining how and to whom comments and complaints can be made and giving contact details of the appeals procedure. The Bus Appeal Body's current remit with regard to complaint handling is very limited. ***It is not a statutory body.*** We understand that its terms of reference only permit it to deal with complaints from bus users regarding specific incidents or operational matters such as running to time, charging the correct fare and the behaviour of staff towards passengers. It cannot deal with commercial or operational matters such as the level of fares, the level of service provided, or the routes taken by buses.

**Action 31**

We welcome this action. More attention needs to be paid to the complex matter of allowing certain mobility scooters onto public transport. Work needs to be undertaken with the manufacturers to implement a standard "permit to travel" system for those scooters which can be accommodated.

**Action 32**

Agree.

**Question 13/14**

A national assistance card is necessary to provide consistency for both operators and passengers. There are several schemes currently in operation, but some are better than others. An example of a system that works is that used by Brighton and Hove Bus & Coach which covers a large range of disabilities with an easy to use card scheme.

**Action 33**

Agree, but local disability action groups should be involved in promoting such schemes.

**Question 15**

The department should ensure that all community transport operators make their services available and well publicised to all members of the travelling public, not just members of a local club which discriminates against both able bodied and disabled passengers alike.

**Actions 37 & 38** - agree.

**Action 39**

Agree in general, but there is a particular problem of pavement parking on the approaches to many railway stations. Many station car parks are hopelessly oversubscribed and it would help if more spaces were provided. This is expensive as it would mean building vertically in many locations.

**Actions 40 & 41** - agree

**Actions 42 to 44**

See response to Action 15.

**Actions 45 to 48** - agree with these.

Thank you for the opportunity to respond

Yours faithfully

*John A Moorhouse*

John Moorhouse  
Company Secretary