

Subject:	Response to Government consultation – Draft Transport Accessibility Action Plan		
Date of Meeting:	28 November 2017		
Report of:	Executive Director – Economy, Environment & Culture		
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Ward(s) affected:	All		

FOR GENERAL RELEASE**1. PURPOSE OF REPORT AND POLICY CONTEXT**

- 1.1 In August 2017 the Government's Department for Transport [DfT] began consultation seeking feedback on a draft Transport Accessibility Action Plan [TAAP] which sets out its proposals to improve the travel experience for people with disabilities. The draft TAAP covers a range of transport including aviation; rail; buses; and taxis, and also considers ways that it can improve public space to make it more accessible for people with disabilities. Appendix 1 of this report includes the officer response that has been prepared and submitted to the DfT in order to meet the extended consultation deadline of 22 November 2017.
- 1.2 The council's Local Transport Plan refers to and reflects the DfT's current TAAP and recognises that maintaining and improving connections within and between neighbourhoods can be achieved by improving accessibility and mobility. Creating accessible and inclusive neighbourhoods can help achieve benefits for many people, not just those who are disabled, elderly, or dependent on others for support or guidance. Improved environments that are designed by adopting the principles of integration, not segregation, can help create more cohesive communities where equality and mobility are at the heart of local neighbourhoods.
- 1.3 'Getting out and about in an accessible and clean city' to improve people's quality of life and general environment was a key focus of the Fairness Commission's Report in 2016. Its recommendations in this area were focused on the council's roles as the main licensing and enforcement agency to keep streets clear and accessible for people and also as a partner in delivering accessible transport and travel options across the city.

2. RECOMMENDATIONS:

- 2.1 That the Committee note the officer response submitted to the Government's Department for Transport on 17 November 2017 on behalf of the council in response to the consultation on its Draft Transport Accessibility Action Plan.

3. CONTEXT/ BACKGROUND INFORMATION

3.1 The council's corporate priorities include enabling people to have a good life by ensuring a city for all ages, inclusive of everyone and protecting the most vulnerable.

3.2 The council's approved 2015 Local Transport Plan includes 7 strategic goals, one of which is to 'Provide Equality, Mobility & Accessibility'. The primary objectives related to achieving this goal are defined as:-

- Increase the availability and accessibility of travel choices for everyone, especially the most vulnerable and those with the greatest need.
- Identify and overcome physical and social barriers to travel that prevent people from reaching essential and important facilities and services, and the city's green and open spaces.
- Provide better access to 'real-time' information for all local journeys.

3.3 Accessibility and mobility are also included as essential elements of policies within the council's adopted 2016 City Plan Part 1 e.g Policies CP9 Sustainable Transport; SA4 Sustainable Neighbourhoods; CP13 Public Streets and Spaces; and DA7 Toad's Hole Valley.

3.4 The consultation is structured on a number of broad themes which are:

- Consistency in accessing transport services
- Monitoring the impact of regulatory compliance
- Training and education
- Spontaneous travel
- Building confidence and empowerment
- Strengthening our evidence base
- Inclusive policy making
- Measuring delivery of outcomes.

3.5 It contains 48 actions and 15 consultation questions, although not all of these are directly relevant to the council's responsibilities as the Highway Authority or as a public service provider. The main thrust of the consultation responses submitted on behalf of the council can be broadly summarised and grouped as follows:-

What the council does well:

3.6 The main comments made include reference to work on Blue Badge enforcement; working in partnership to provide audible and visible public transport information for passengers; promoting use of the 'Helping Hand' scheme for bus travel; equalities training included in taxi drivers' Blue Book; enforcement of drivers' refusals to accept assistance dogs in taxis and private hire vehicles.

Requests for further guidance:

3.7 The main comments made include reference to the use of low level cycle signals; the difficulties in applying of London-based Cycle Design Standards to areas outside London; and the use of targets to increase the proportion of wheelchair accessible taxis.

Further review or inclusion required:

- 3.8 The main comments made include reference to the use of new materials such as 'flexi-pave'; the introduction of nationwide, best practice tools for the assessment of Blue Badge allocations; a more comprehensive approach and broader definition of "access for all" rail station improvements; the availability and operation of Shopmobility services; and the times of eligible use of a concessionary bus pass.

Concerns or conflicts:

- 3.9 The relevant comments made include reference to the increasing need for wheelchair accessible taxis, which are mainly diesel-powered, could be considered to be at odds with the aim of lowering vehicle emissions to improve air quality in the city; the application of lower standards relating to equalities and accessibility outside Brighton & Hove for private hire vehicles and drivers; lack of sufficient powers/legislation to decriminalise the offence of obstruction and tackle pavement parking.
- 3.10 The consultation response includes more specific commentaries on these and other issues and, where appropriate, suggests that the council would welcome the opportunity to be promoted or used as a best practice example or case study by the Government (possibly in the final TAAP document).

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 The only alternative to submitting a response to this consultation would be to not do so, or to await this committee's consideration and approval of a response, which would have not met the extended consultation deadline of 22 November 2017. Neither option is considered appropriate given the significance and implications of having an up-to-date national Action Plan that will then guide, influence or strengthen the work of the council in making the city's transport network and system accessible.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 The response to this consultation has been led by the City Transport Division and the document has also been circulated to all other Divisions within the Economy, Environment & Culture Directorate as well as all other council Directorates. It therefore incorporates or reflects suggested responses from other officers, where possible. The consultation has been brought to attention of the city's Transport Partnership in order to raise awareness of it and encourage responses, and the council's response was discussed at its most recent meeting on 14 November 2017.

6. CONCLUSION

- 6.1 It is considered essential that the council responds to this important, national consultation on accessibility and mobility matters that can directly affect or influence people's use of the transport network. Officers have therefore prepared and submitted a response to the consultation on behalf of the council in order to meet the consultation deadline of 15 November, in advance of this committee meeting. The council looks forward to the outcome of this consultation in terms of the additional information and improvements that it could result in for the city

and its communities, primarily for disabled people and those with 'hidden' disabilities or conditions which may affect their ability or propensity to travel.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 There are no direct financial implications associated with the preparation or submission of the officer response to this consultation or this report and its recommendations, as all activity has been undertaken within the existing revenue budgets available to the City Transport Division during 2017/18. The financial implications associated with implementing the findings of the consultation will need to be incorporated into ongoing revenue budgets or the capital scheme subject to approval at Policy Resources and Growth Committee.

Finance Officer Consulted: Gemma Jackson

Date: 02/11/17

Legal Implications:

- 7.2 There are no direct legal implications associated with the preparation or submission of the officer response to this consultation, or this report and its recommendations.
- 7.3 The Public Sector Equality Duty is part of the Equality Act 2010. It applies to public sector organisations, including councils, who are required to meet the needs of all individuals. This can involve the way the organisation works, when it is shaping policy and delivering services, and in relation to its own employees. Ensuring that people have full and convenient access to the city's transport network is therefore a key way in which the council can play its part in making society fairer by tackling discrimination and providing equality of opportunity for all.

Lawyer Consulted: Stephanie Stammers

Date: 02/11/17

Equalities Implications:

- 7.4 There are no direct equalities implications associated with either the preparation or submission of the officer response to this consultation, or this report and its recommendations. An Equality Impact Assessment [EqIA] would not usually be carried out in order to respond to a consultation.
- 7.5 However, the consequences of the outcome of the consultation will need to be reviewed and incorporated on a number of fronts in order to ensure that due regard is given to equalities issues (such as accessibility and mobility) that may arise during continued and future dialogue with the adjacent district and county councils and other local organisations about including transport, travel and highway issues. These could include the council's approach to strategy and policy development; its dialogue and engagement with partners and stakeholders; and the development and delivery of schemes and initiatives. A number of these issues are highlighted within the EEC Directorate Plan (2017-2020) and will be addressed by using data, engagement and EqIAs to identify differences in access or outcome for service-users relating to their legally

protected characteristics and prioritise areas for action to remove or reduce inequalities in access or outcomes. This should include: planning, completion, implementation and outcome monitoring in all services; implementation of budget EqlAs; engagement contributing to service improvement; defined priority gaps in outcomes being removed or reduced.

- 7.6 The DfT's consultation document was made available on its website in a number of formats including large print, easy read and BSL (British Sign Language).

Sustainability Implications:

- 7.7 There are no direct sustainability implications associated with either the preparation or submission of the officer response to this consultation, or this report and its recommendations. However, the increasing need for wheelchair accessible taxis, which are mainly diesel-powered, could be considered to be at odds with the aim of lowering vehicle emissions to improve air quality in the city

Corporate / Citywide Implications:

- 7.8 The council's corporate priorities include enabling people to have a good life by ensuring a city for all ages, inclusive of everyone and protecting the most vulnerable. Following or adopting the outcomes associated with the DfT's TAAP will ensure that the city and its transport network are fully accessible and enable people to have full mobility will help achieve this objective and support both the local economy and people's overall quality of life.
- 7.9 The council's corporate principles build on those shared by the city's partnerships, and include being 'citizen-focused' and 'increasing equality'. Regarding the latter, this consultation response will help the council to maintain a combined approach to the sustainability for the city which includes protecting the health and wellbeing of people and communities as well as the environment. It will also contribute towards improving our engagement with communities of interest and identity to foster good relations across the city, and tackle discrimination and prejudice.

Any Other Significant Implications:

- 7.10 There are no other significant implications associated with either the preparation or submission of the officer response to this consultation, or this report and its recommendations.

SUPPORTING DOCUMENTATION

Appendices:

1. Officer response submitted on behalf of the council to DfT's Draft Transport Accessibility Action Plan [TAAP] consultation

Documents in Members' Rooms

1. Government's Draft TAAP consultation document (August 2017) - also available via <https://www.gov.uk/government/consultations/draft-transport-accessibility-action-plan>

Background Documents

1. City Plan Part 1 (2016)
2. BHCC LTP (2015)
3. Brighton & Hove Fairness Commission Report (2016)