

Disability Action Plan: Consultation Response

July 2023

About Transport for All

Transport for All is the only disabled-led group striving to increase access to all modes of transport and streetspace across the UK. We are a pan-impairment organisation, guided by the passionate belief that all disabled and older people have the right to travel with freedom and independence.

How the views of our community are obtained

Transport for All is the leading voice on accessible transport. We have 40 years of specialist knowledge of transport access, and a unique understanding of the needs and views of disabled travellers. As a membership organisation, we facilitate a network of over 1000 disabled people, gathering the perceptions and insights of those with lived experience of access to transport. Through our information and advice line we provide advice, support and education for over 250 disabled and older people each month.

Our answers to relevant questions

4b. If there is anything further that you would like the government to do to increase disability inclusion in climate adaptations and mitigations, or you would like to explain your answer, please do so here.

We strongly believe that there cannot be any climate mitigations that do not fully consider the needs of disabled people. Measures such as electric vehicle charging infrastructure have been rolled out widely with very little consideration for the accessibility of such services. We therefore urge the government to issue standards on codesigning any further climate adaptations with disabled people. This should always be a total process, from initial planning stages up to implementation, and monitoring of any initiatives after. Codesign refers to the practice of detailed consultation with disabled people, ensuring that our thoughts, concerns, and ideas are included.

4c. DU has already identified Clean Air Zones (CAZ) and the Ultra Low Emission Zone (ULEZ) policies as an area for action. Please tell us if there are other climate adaptations or mitigations that require greater disability inclusion?

The rise in electric vehicles and electric vehicle infrastructure has not, so far, adequately considered the needs of disabled people. We have heard from members of our community that the current charging infrastructure is inaccessible to them, and with many disabled people relying on cars as the most accessible form of travel due to its door-to-door nature, the rate of expansion will lock many people out of accessing electric vehicles and cutting their carbon emissions. We therefore urge the government to appropriately consult disabled people on the introduction of new electric vehicles and charging infrastructure, and meaningfully engage in codesign (as described above) for any new plans.

Similarly, newly designed electric buses and trains must exhibit the same level of engagement with and consideration of disabled people and our needs. For example, we know that new electric buses introduced under the ZEBRA scheme are required to adhere to enhanced accessibility feature standards, such as having a double wheelchair space instead of the standard single space. We urge the government to introduce enhanced accessibility standards for all new electric/low carbon public transport vehicles and rolling stock.

Clean Air Zones and the ULEZ do need to account for the fact that many disabled people rely on cars as the most reliable and accessible form of transport. Many disabled people travel in cars that have specialised adaptations that meet their accessibility needs appropriately, allowing for door-to-door travel for any length of time. Furthermore, disabled people incur far higher living costs than non-disabled people- on average, the living costs for a household with one disabled adult are £975 more a month, and for households with two disabled adults and at least two children, these costs rise to £1248 a month. Failing to mitigate extra charges for those who rely on cars as a mobility aid and accessibility measure unfairly penalises disabled people.

The expansion of the ULEZ has seen the GLA engage with disabled people's organisations and implement some new mitigations to support disabled people's travel. These have included: granting an exemption to all disabled people receiving any rate of the mobility component of PIP and some other disability benefits* until 2027; introducing the scrappage scheme and giving a higher amount of money for disabled people who need wheelchair Specific Adaptations or other adaptations to their cars; extending exemptions and the scrappage scheme to inner London boroughs, so every Disabled Londoner can benefit from new exemptions and enhanced funding from the scrappage scheme. Other CAZ/LEZ measures should follow this model and consult with disabled people and DPOs to ensure these schemes do not disproportionately affect disabled people.

5b. To what extent do you agree that this scheme [Disability Enabled Badge] would give increased confidence to disabled customers when accessing businesses or services?

We cautiously agree that a scheme of this type may help, but we would like to know more about what this training would entail. rather than disability awareness training, we advocate for Disability Equality Training that is developed with disabled access consultants who have expertise in this area. We have seen in the past that similar schemes such as Disability Confident employment have had less success than hoped (according to recent research, only 1/3 of Disability Confident employers actually employ a disabled person) (insert reference here). We would therefore like to see this scheme developed in conjunction with disabled people, access consultants, and disabled people's organisations.

7a. To what extent do you agree with the proposed plan to work more closely with the guide dog sector to establish what more government can do to address access refusals of guide dogs?

Guide dogs and guide dog handlers are routinely refused access from taxis and businesses. There is often little to no recourse for those who do this, and we often hear of circumstances where people have to resort to having a non-disabled friend or partner book a taxi so that their guide dogs are not refused upon arrival. We do agree that higher fines have the potential to somewhat mitigate this issue, as this may do more to discourage access refusals.

However, this alone will not stop the access refusals we hear about. As per the example above, often the problem begins at the booking stage. On an app-based booking system, when a guide dog handler's profile may show their dog or describe it, this makes it far easier for requests to be ignored or cancelled. In the case of cab companies that take bookings by phone, we are often told that booking staff engage in similar discrimination and access refusals. These must be looked at in conjunction with "on the spot" refusals and, in the case of app based bookings, looking at alternative penalties to ensure refusals are not happening on the basis of not wanting a guide dog in the car, rather than a driver being unavailable, for example.

Furthermore, fines will not stop the dismissal of evidence that we hear about in the case of access refusals. We have heard from blind research participants that they are often told, "it is your word against the driver's word", even when there is CCTV evidence available. In this case, fines will not resolve the issue as firms are not found guilty of discrimination in the first place. This will require longer-term strategies, such as investment in disability equality training for local authority licensing boards.