

**DPTAC response to the Prime Minister’s Strategy  
Unit’s consultation on its report “Improving the Life  
Chances of Disabled People”**

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**Introduction**

1. The Disabled Persons Transport Advisory Committee (DPTAC) welcomes the opportunity to comment on the Prime Minister’s Strategy Unit’s report “Improving the Life Chances of Disabled People”. This significant report sets out a long term strategy for the relationship between disabled people and the state. Many of the recommendations are highly relevant to the transport and built environment needs of

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disabled people. We are the Government's advisors on the transport needs of disabled people and, for most of the consultation period, have been its advisors on the built environment.

2. DPTAC was established under the Transport Act 1985 to advise the Government on the transport needs of disabled people. Our role was extended, on a non-statutory basis, to advise the Government on the built environment needs of disabled people.
3. DPTAC uses four overarching principles as the basis for its advice to Government, other organisations and disabled people. These are that:
  - Accessibility for disabled people is a condition of any investment;
  - Accessibility for disabled people must be a mainstream activity;
  - Users should be involved in determining accessibility;
  - Achieving accessibility for disabled people is the responsibility of the provider.
4. These principles are the basis of DPTAC's response to consultations. In this response we set out some general issues before making comments specific to this consultation.

**General comments**

**The Population**

5. DPTAC's principal concern is to ensure accessibility for disabled people. We mean by this inclusive transport systems and built environments that are easy to reach, use and understand by all, in safety and comfort.

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6. Disabled people account for some ten per cent of the population, about 11 million adults and 770,000 children. One in five of these are of working age. While higher numbers of children are being born and living with disabilities than ever before, levels of disability do increase with age: 8% of those aged 16-17 years have a current long-term disability, compared with 33% of those aged 50 to 65. Disabled people have a spending power of around £80 billion each year.
7. Of disabled people overall, in broad terms:
  - 70% have difficulty walking and/or climbing steps;
  - 41% have a hearing loss;
  - 24% have a vision loss.
8. In addition over 1 million people have learning difficulties and over 7 million adults have literacy problems.
9. Disabled people are not an homogenous group with identical needs. The needs of people with mental health problems or learning disabilities are distinct from those of wheelchair users for example. Even within disabilities needs vary; for example a profoundly deaf person will not benefit from an induction loop.
10. Disabled people live throughout the community. One in four households have a disabled resident. The need for access for disabled people is not limited to specific areas or buildings, but present throughout the wider transport and the built environment systems.
11. In broad terms, over the next 30 years:
  - The proportion of the population over 65 will rise by 40%;
  - The number of people aged over 65 will double;
  - Both the proportion and the number over 80 will double.

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12. Over the same period that will bring about these changes in the population profile, the overall population will increase by about 9%.
13. The nation risks adverse economic as well as social impacts from this growth in numbers of disabled and older people, if we fail to recognise and address the need for more inclusive environments. Mobility and transport are vital to achieving and sustaining self-sufficiency and independence into old age.

**A strategic approach**

14. There is enormous scope and opportunity to improve accessibility for disabled people but it will require a strong commitment at all levels.
15. Accessibility for disabled people is often only considered in terms in terms of detailed design. DPTAC believes this is no longer sufficient and that strategic decisions, investment and policies must be underpinned by consideration of accessibility for disabled people, with evidence of how diversity has been considered in decision making.
16. DPTAC welcomes the commitment that the Government has made to accessibility being a condition of public money being spent in support of its Ten Year Plan Transport 2010, and its similar commitment in respect of the Wales Transport Framework.
17. Private and public investors of any transport or built environment project need to know whether investment plans meet the need of disabled people. They will also need evidence that people at all levels of responsibility understand how to provide accessibility for disabled people effectively to prevent a waste of resources.

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**Specific Response to the Consultation**

18. Our specific comments focus first on those of general application, followed by those relating to the built environment, and ending with those that relate to transport.

**Effective consultation and engagement**

19. We agree with the recommendation that new arrangements should be established for securing participation of disabled people in policy design and delivery at all levels (page 178). This will include involvement, support and consultation with national bodies such as DPTAC; local bodies such as access groups and regional organisations. It may also include developing the capacity and resourcing of such groups and their formal recognition through local and regional compacts.
20. While the consultation document does place emphasis on the need to secure agreement on what the barriers are to meeting the individual needs of disabled people (page 52), it does not state how this agreement is to be achieved. Effective consultation and engagement at national, regional and local levels are likely to be more effective than the development of lists of barriers.

**National standards and local autonomy**

21. We also agree that there must be an appropriate balance between national standards and local autonomy (page 55). However, it is important to avoid a postcode lottery whereby some disabled people experience higher or lower standards of housing or transport provision, given comparable levels of disability, merely because they live in local authority areas with varying priorities and resources. Where local autonomy

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is exercised, this should be done in full consultation with disabled people.

**Government good practice**

22. We welcome the recommendation that from 2005 onwards government departments should model good practice in involving disabled people in achieving the government's vision (page 75). We recommend that departments follow the example of the Department for Transport and the Scottish Executive, and put this good involvement onto a statutory footing.

**Housing and transport provision**

23. DPTAC strongly supports the statement that steps should be taken to improve the provision of advice, housing and transport options for disabled people (page 13), and the explicit extension of this statement to disabled children and their families. These steps are significant in themselves. They are also vital if disabled people are to become more effective contributors to the nation through education, employment, production and consumption. The report notes that lack of support for transport costs can severely affect disabled people's ability to undertake training or employment (page 129).

**Addressing barriers to transport and housing**

24. We agree that addressing barriers to transport and housing will best be achieved by a mix of removing barriers, meeting the needs of individuals and empowering people (page 45). Deliver through the design of inclusive systems (page 51) is particularly important, and we hope that the government will make use of our publication "Inclusive Mobility" and our resource guidance "The Access Directory" in achieving this.

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**Housing stock**

25. We welcome the recognition by the government that much of the national housing stock is unsuitable for those with mobility and other disabilities, and that the economic disadvantages of many disabled people make it difficult for them to meet their housing needs either by buying or privately renting property (page 39) The report also notes that unsuitable accommodation is a particular problem for younger age groups and for families with disabled children (page 99).

**Disabled Facilities Grants (DFG)**

26. We note the Government's acknowledgement that the means testing of Disabled Facilities Grants (DFG) does not take account of outgoings such as mortgage repayments and expenditure on children. The Government also accepts that the upper limit on grants can lead to adaptations that do not adequately meet the accommodation needs of the disabled person concerned (page 67). Cash limits on grants mean that they cannot benefit all who need them. We welcome the recommendation that DFG be reformed, following a review that addresses these issues, as well as addressing the need to reduce disincentives to paid employment (page 82). We also welcome the statement that this recommendation will be applied specifically to families of disabled children and to disabled parents (page 100).

**Including disabled people in housing initiatives**

27. We support the recommendation (page 83) that ODPM, from 2005 onwards, should work with the DRC, organisations of disabled people, and the Housing Corporation to ensure that investment in initiatives such as neighbourhood renewal, housing market renewal, low-cost home ownership and key

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worker housing schemes improve housing opportunities for disabled people. We believe that the involvement of the Built Environment Group, (formerly part of DPTAC, now sponsored by the Commission for Architecture and the Built Environment) will be essential to the achievement of this recommendation.

**Lifetime homes**

28. We agree that lifetime home standards have not been sufficiently adopted (page 174). We strongly support the recommendation that ODPM should commission work, by 2006, to review the effect of the 1999 guidance on access to dwellings, and to consider the feasibility of incorporating Lifetime Homes standards, updated as necessary, into the guidance on Part M of the Building Regulations, and that any amendment be subject to a Regulatory Impact Assessment and the outcome of public consultation (page 83). The Built Environment Group offers its services to assist in this review.

**Accessing transport**

29. We also welcome the recognition by the government, based on our own research, that the difficulties that disabled people experience in accessing transport are a key component of wider social exclusion. (page 40) and to the relative economic inactivity of disabled people.

**Transport and independent living**

30. We support the recommendation that the Department of Health encourages local authorities to include transport and mobility needs of disabled people in assessments within the new system of promoting independent living. (page 84)

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**Transport and employment**

31. The report states that the travel to work element will pay up to 100% of the approved cost of a vehicle, or adaptations to a vehicle, or help towards taxi fares or other transport costs if someone cannot use public transport to get to work because of their impairment (page 146). We hope that in the longer term this will become less of a problem, as more vehicles become more accessible to disabled people, and the exemption that public transport now has from Part III of the Disability Discrimination Act 1995 is lifted. However we expect there to continue to be a need for travel to work to fully cover transport to work costs for some disabled people.

**Transport and local authorities**

32. We agree with the recommendation that (page 84) the Department for Transport should, from 2005 onwards, encourage local authorities to play a strategic role to ensure that disabled people do not experience barriers at any stage of the journeys they need to make.
33. However we are concerned that Local Transport Plan guidance has not been sufficiently clear, detailed and focussed to date to ensure that this can be achieved. At present there are not enough Centres for Independent Living, and they are not adequately resourced, to ensure that accessibility strategies recognise the needs of disabled people in the way that the government proposes.
34. DPTAC is not resourced to comment on local authorities' accessibility strategies either. The onus must be on local authorities to engage with disabled people in their areas, including identifying, empowering and supporting local groups, so that they can contribute effectively to delivering a local transport system that meets the needs of disabled people. The Government must also recognise that there are modes of transport, such as aviation and shipping, and some

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rail services, where central government as well as local authorities is a stakeholder in determining accessibility.

**Audio visual announcements on buses**

35. The report places highly appropriate emphasis on the need for a seamless journey (page 68). We are pleased that the report uses the example of a visually impaired person benefiting from tactile pavements that allow them to use a bus. The report then notes that the same person's transport could be jeopardised by the absence of an audible announcement system that indicates where the bus is going and when a particular stop has been reached. DPTAC is making a priority of working towards the provision of audio visual announcement systems on all buses. We remain deeply concerned that there is no legal requirement for this to be achieved at any time in the future.

**Mainstreaming and special provision in transport**

36. We agree that there does need to be a balance such between mainstreaming and specialist provision. However in public transport the emphasis needs to be placed on mainstreaming, so that as wide a range of disabled people as possible have access to all public transport. Specialist provision will often take the form of community based transport, travel information and travel training.

**Concessionary fares**

37. We see that there could be benefits in working towards new ways of supporting independent living that maximise choice and empowerment by direct payments to disabled people (page 77). It does not appear that the Government intends to extend this principle to concessionary fares for public transport facilities. We agree with this, because the costs of

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assessment would be disproportionate when the changes  
that need to be made are common to all.

Neil Betteridge Chair, Disabled Persons Transport Advisory Committee
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