

Inclusive Mobility Action Plan

Highways, Transportation and Waste

August 2019



1 Introduction

- 1.1 The Equality Act 2010¹ places a requirement on local authorities and other publicly funded organisations to make “reasonable adjustments” to ensure that all people with protected characteristics can access our services. Disability is a protected characteristic in the Equality Act 2010.
- 1.2 The Public Sector Equality Duty (2011)² requires local authorities to “eliminate discrimination, harassment and victimisation (and) make sure people with a protected characteristic have the same opportunities as other people”.
- 1.3 The Department for Transport have issued a new Inclusive Transport Strategy which “sets out the Government’s plans to make our transport system more inclusive, and to make travel easier for disabled people”.³
- 1.4 This Mobility Action Plan outlines the measures that Kent County Council (KCC) is taking within Highways, Transportation and Waste (HTW) to remove barriers for disabled people. Given the continuing pressures on Local Authority budgets, it also provides a framework within which actions are prioritised.

¹ www.legislation.gov.uk/ukpga/2010/15/contents

² <https://www.gov.uk/government/publications/public-sector-equality-duty>

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728547/inclusive-transport-strategy.pdf

2 Background and policy framework

- 2.1 Disability as defined by the Equality Act 2010 is “a physical or mental impairment that has a ‘substantial’ and ‘long-term’ negative affect on a person’s ability to do normal daily activities”.
- 2.2 There is no single quantifiable measure of the number of disabled people in Kent (or the UK), because identifying as disabled relies on individuals’ self-perception; but a widely used estimate is that 20% of UK residents are disabled. Applying this to the population of Kent of 1,554,600⁴ this suggests that some 310920 Kent residents can be considered to be disabled.
- 2.3 Significantly in terms of future challenges, the UK has an ageing population, with the number of over 65 year olds forecast to increase by 43.4% between now and 2026⁵.
- 2.4 The UN Convention on Human Rights makes reference to disability and what action is required. On accessibility (Article 9), the Convention requires countries to identify and eliminate obstacles and barriers and ensure that disabled people can access their environment, transportation, public facilities and services, and information and communications technologies. It is important to note that the Convention does not give a timetable for implementation, and is not incorporated into domestic law in the UK; the government has produced *Fulfilling Potential: Making it Happen* and an associated Action Plan⁶.
- 2.5 In Kent policy terms, this document sits beneath the Kent County Council Equality and Human Rights Policy 2016-2020⁷ which is the overarching KCC document covering all protected characteristics.

⁴ www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/summary-of-kent-facts-and-figures

⁵ www.kent.gov.uk/_data/assets/pdf_file/0006/5577/Equality-annual-report.pdf

⁶ www.gov.uk/government/publications/fulfilling-potential-making-it-happen-for-disabled-people

⁷ www.kent.gov.uk/about-the-council/strategies-and-policies/corporate-policies/equality-and-diversity

3 Priorities

- 3.1 As a Highway Authority, KCC is responsible for the public highway in the county, including local roads and footways. This responsibility covers maintenance and making improvements as budgets allow.
- 3.2 Whilst KCC is not responsible for the provision of bus services in the deregulated market, it does have a role in facilitating and encouraging companies to improve these services as well as providing financial support to fill gaps in the network where services are considered socially necessary, but are uneconomic to provide.
- 3.3 This Plan recognises that improvements can be made to the pedestrian and road network as well as to the availability and accessibility of public transport services in Kent to improve access for disabled people. These are priority areas for this plan.
- 3.4 The 2018 National Highways and Transport Network Survey Public Satisfaction Survey recorded a 67% satisfaction for accessibility in Kent compared to an NHT average of 70%.

4 Public transport

NB – The below section from 4.1 to 4.3 inclusive has not been reviewed at this time.

- 4.1 Buses must comply with Public Service Vehicle Accessibility Regulations (PSVAR) 2000⁸, and the actions that we are committed to including those from PSVAR:
 - 4.1.1 All full size single deck buses over 7.5 tons will be fully accessible from 1 January 2016.
 - 4.1.2 All double deck buses will be fully accessible from 1 January 2017.
 - 4.1.3 New buses could be capable of using real time information to provide audible information but this is something the operators would need to invest in.

⁸ www.legislation.gov.uk/ukSI/2000/1970/contents/made

4.1.4 KCC are continuing to fund supported services (those services that are deemed socially necessary but that bus operators do not consider to be financially viable) with Member support. As a discretionary activity, this budget is coming under significant pressure and some reductions to services were implemented during 2016.

4.1.5 The budget that provides socially necessary bus services also subsidises KCC's Kent Karrier services. The services operate to and from user's home address and are designed in part for residents who cannot access conventional public transport owing to a mobility or other impairment.

4.1.6 KCC has formed Quality Bus Partnerships in a number of districts in Kent and these help to focus investment in new technology that supports the bus network.

4.1.7 As part of their licensing, any bus driver has to undertake training towards a Certificate of Professional Competence and an element of this relates to disability training.

4.2 Bus stops and bus stop infrastructure is generally maintained either by the County Council (in rural areas) or by the local borough or district council where shelters are provided in more urban areas under advertising contracts. In recent years, investment in real time information has diminished as greater prominence is given to mobile friendly websites and smart phone applications which are also cheaper and easier to introduce and maintain. Supplying real time information at bus stops on dedicated screens is expensive, so it will only be supplied at key stops or interchanges when it is funded by developer schemes, third parties or for services such as Fastrack. KCC has made the decision that funding socially necessary bus services is more important than bus stop technology. The bus stop actions that KCC is committed to are:

4.2.1 Timetables being produced on bus stops in an easier, more accessible format. In addition, other information on bus stops is being updated.

4.2.2 Newly constructed bus stops will have hard standing, raised kerbs and bus stop clearways to ensure that users can board easily and that the infrastructure reciprocates the accessible nature of vehicles.

4.3 The English National Concessionary Transport Scheme (ENCTS), a concessionary travel scheme for older and disabled people to travel for free by bus outside of peak time, has a number of commitments to improve the service for disabled people:

4.3.1 In recent years, the majority of passes are automatically renewed. It is not necessary to travel to a destination to renew the bus pass as the card is sent out to the user or where a new application is required, this can be made online.

4.3.2 For people who prefer not to use the internet, or who are unable to do so, the application and information services are also provided through libraries across Kent.

4.4 Kent Connected is an information and journey planning website and mobile application that shows sustainable transport options available to help plan door to door journeys in Kent. The aim is to provide accurate, accessible and reliable information about the different transport options for journeys in Kent. Access for all is a key part of this project which identified the following as key considerations:

4.4.1 The Kent Connected website complies with the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG 2.0 ISO/IEC 40500:2012), level AA as a minimum.

4.4.2 Improved access to sustainable modes of travel for older and disabled people by including information on Community Transport schemes on the website.

4.4.3 If users would like to use the website but do not have the access to do so at home, or are unable to do so, they can call the Contact Centre who are able to provide them with support.

5 Access to the pedestrian network

5.1 With approximately 4000 miles of footway in Kent, it is recognised that footway maintenance is under invested as budgets are reduced and the road network takes priority. However KCC is committed to reviewing its current practices in prioritising footway maintenance issues.

5.2 HTW is commissioning work to identify a maintenance prioritisation programme that considers demographics and census data as well as level of usage information.

5.3 HTW is also committed to seeking additional funding specifically for footway maintenance.

5.4 HTW will ensure the pedestrian network is moving towards accessibility for all by:

5.4.1 Encouraging consultation with disabled stakeholders for all public realm projects within KCC. Design will be with access for everyone in mind. Consultation is important when different stakeholder groups may have different views on a potential project.

5.4.2 Adhering to any future Government guidance on access to the pedestrian and transport network.

5.4.3 Reviewing and updating on a regular basis the inclusive access work that was conducted in 2012 to form the basis of future guidance.

5.5 Items placed on the pedestrian network can be problematic when located without due care and consideration. They can impede access to different parts of the pedestrian network if placed inconsiderately. To make certain that items on the highway are placed with consideration so that people can pass through safely, HTW is committed to:

5.5.1 Working with local businesses to encourage items such as advertising boards and tables and chairs to be placed in accordance with Kent's requirements with consideration for all pedestrians so that people can pass through safely.

5.5.2 Ensuring that when Highway Stewards periodically inspect the highway they ask business owners to move items such as tables and chairs and advertising boards if they are placed inconsiderately.

5.5.3 Supporting District Councils as required, when issues arise regarding items on the highway.

5.6 Dropped Kerbs are an important part of the pedestrian network and for a number of years HTW has committed a sum of money to install dropped kerbs where required, according to an agreed set of priorities. The commitments are:

5.6.1 Improvements to linear access routes across Kent through the installation of dropped kerbs, alongside annual bidding for funding to help with continuing improvements.

5.6.2 Getting maximum benefit from the money that is available by prioritising missing links and routes to shops, doctor's surgeries, care homes and schools.

5.6.3 Using Local Sustainable Transport Funding to improve rail station facilities and the walking routes from rail stations to town centres.

5.6.4 Securing various other funding streams when they are available to deliver larger schemes of work that incorporate dropped kerbs and will have a benefit to all members of the community.

5.7 The Department for Transport has asked Councils to pause the introduction of new shared space schemes which incorporate a level surface as a result of concerns raised about navigability for disabilities and reduced mobility⁹. Any schemes which are at design stage have been paused by KCC until the DfT has completed its research and produced an updated guidance document.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/749116/ministerial-letter-about-shared_space.pdf

6 Access to the highway network for people with learning disabilities

- 6.1 Independent Travel Training for people with a learning disability is located within Independent Travel Training for young people with an Education Health Care Plan (EHCP) can be supported to learn the skills and confidence to travel from home to school or college. A travel trainer works with the young person on a 1:1 basis.
- 6.2 For more information please see www.kent.gov.uk/independenttraveltraining

7 Access to Waste Management services

- 7.1 Kent County Council is the statutory “Waste Disposal Authority” (WDA) for Kent, and as such is required to provide “places” for Kent householders to deposit their waste, these facilities are known as Household Waste Recycling Centres (HWRCs).
- 7.2 In common with many similar WDAs the County Council has outsourced the management of these facilities to specialist Private sector contractors, and there is provision for the receipt of a number of different waste and recyclables material streams.
- 7.3 The KCC HWRC network includes 18 sites. In addition, 6 of these sites also operate Waste Transfer Stations (WTSs) for the deposit and bulk loading of waste materials collected and delivered by the District and Borough Councils of Kent.
- 7.4 The majority of KCC’s HWRCs and WTSs were designed and built some years ago and were initially intended to manage small quantities of household waste produced by Kent residents in addition to ‘black sack waste’ collected by the WCAs. The modern waste management industry has come far, and with increased recycling and technological advances.
- 7.5 The impact of the increased emphasis on material segregation / extraction is that the HWRC has come from requiring one simple tipping area allowing users to discharge swiftly, to now having to accommodate a plethora of different receptacles and containers for all of the different material fractions. Furthermore, in order to reduce costs and reduce the number of traders illegally exploiting the HWRCs, KCC bought in a number of policies including limits and/or charges for certain material streams, and vehicle restrictions. It has become very important, therefore, to ensure that

current operations and policies do not impact on those with protected characteristics, including those with disabilities. Within KCC Waste Management, we therefore undertake the following measures:

7.5.1 In 2012, as part of the policy changes mentioned above, this included restrictions of certain vehicles from entering the HWRCs. As a result some vehicles e.g. vans, mini-buses etc require vouchers to enter the HWRCs and is based on a height restriction. Those that have over-height vehicles that are required for a disability are able to access the HWRCs without restriction. It was important to ensure that the policy introduced did not have an adverse impact on those with disabilities. Prior to any new policy or procedure being introduced an EqIA will be undertaken to assess potential impact on each of the protected characteristics.

7.5.2 Site staff at the HWRCs are required to provide support to anyone that asks for it (as long as health and safety is adhered to), this includes those with disabilities. Individual contractors also provide training to staff regarding equality and inclusion. In order to evaluate performance of the site staff, one method that KCC Waste Management employ is 'mystery shopping'. This involves 4 visits per month to each HWRC to monitor a number of aspects including cleanliness, site staff knowledge, and customer service. As part of the questionnaire, at half the visits per month, mystery shoppers are asked to pose an enquiry question to site staff. These enquiries include 'equality' questions to test response to questions posed e.g. 'My grandad is having a clear out- he's pretty fit and healthy for his age but he might need a bit of assistance when he gets here- if he asks someone would they be able to help? I'm not sure he'll know where everything should go' or 'My mum's got a mobility vehicle and she can't visit as it doesn't go under the height barrier- she would prefer to come and do things herself. Is there any way around this?'

7.5.3 Whenever HWRCs have specific refurbishment works undertaken, or indeed on the very rare occasion that new sites are opened, making the sites easier to use for all customers, including those with disabilities is paramount. For example, when the new Ashford HWRC and WTS was opened in 2013, a buzzer was installed at the site entrance to alert site staff of over-height

vehicles requiring access to the site. KCC continue to work with current contractors and engage with the market to understand all aspects of the HWRC service including innovative approaches to making things easier for customers, for example, KCC wish to explore the opportunity of, where feasible, introducing a disabled bay at the HWRCs.

8 Designing new developments

8.1 Movement and access are key considerations throughout the planning and design of new developments. To achieve development layouts that effectively cater for all users, HTW is committed to:

8.1.1 Using current guidance such as the Kent Design Guide and Manual For Streets 1 and 2 (MfS and MfS2) to achieve high standards of design and place-making in new developments.

8.1.2 The Kent Design Guide is currently being reviewed and updated to ensure it complies to current standards.

8.1.3 Currently the Kent Design Guide states that “Developments should be designed so that walkers, cyclists, children and people with disabilities have priority over vehicles except on main roads”¹⁰. Street design should be inclusive. Inclusive design means providing for all people regardless of age or ability. There is a specific obligation for those who design, manage and maintain buildings and public spaces to ensure that disabled people pay a full part in benefiting, and shaping, an inclusive built environment¹¹.

8.1.4 Ensuring that parking provision at new developments is located and arranged in a manner that adequately caters for all people including those with disabilities.

8.1.5 Ensuring that new developments comply with the minimum standards for the provision of parking for people with impaired mobility, as set out in KCC’s

¹⁰ http://www.kent.gov.uk/_data/assets/pdf_file/0017/12095/design-guide-generating.pdf

¹¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf

Vehicle Parking Standards (SPG4)¹². SPG4 states that, “The County Council encourages the integration into the community of people with impaired mobility and will require designated parking spaces to be allocated as part of the overall level of parking provision for new developments”.

8.1.6 Ensuring that footways linking key areas are designed to allow for the needs of blind or partially-sighted people, and that people with disabilities benefit from direct links to and from services that have a smooth and well-maintained surface.

8.2 The Transport and Development team are piloting a New Build Post-Occupation Household Transport Survey in 2019.

8.2.1 The survey seeks the opinion of residents in new housing developments on how they think infrastructure and services could be improved for residential developments.

8.2.2 The results from this will help to shape the future new developments within Kent.

8.2.3 The survey includes questions around mobility scooter access, bus access, and walking around the development, including with a visual impairment. Each participant is asked whether they consider themselves to be disabled as set out in the Equality Act 2010.

9 Future technologies

9.1 Testing for driverless vehicles in Kent is not planned for the foreseeable future. The Department for Transport have issued *The Pathway to Driverless Cars: A code of practice for testing*, 2015 which covers the expectations of testing organisations when carrying out testing for driverless vehicles. This includes testing organisations giving “particular consideration (...) to the concerns of more vulnerable road users including disabled people, those with visual or hearing impairments, pedestrians, cyclists,

¹² http://www.maidstone.gov.uk/_data/assets/pdf_file/0010/88984/Kent-and-Medway-Structure-Plan-2006-SPG4-Vehicle-Parking-Standards.pdf

motorcyclists, children and horse riders”.¹³ Should testing for driverless vehicles be considered in Kent, HTW would comply with government guidelines.

9.2 The Cities Unlocked project is a collaboration between Future Cities Catapult, Guide Dogs and Microsoft and they believe that “technology can open up our cities and reduce the stress associated with getting around urban spaces”¹⁴. They are developing soundscape technology that would make streets more accessible to everyone using, for example, street signs with audio, tactile and visual information, and demonstrators. HTW will look for opportunities to deliver these types of technologies through new planning applications and new funding opportunities.

10 Inclusion and representation

10.1 Kent’s Active Travel Strategy 2018.19 Action Plan¹⁵ included the following action

“Raise awareness within KCC as well as with developers etc of equalities standards for disabled access cycle facilities, using the Wheels to Wellbeing guide¹⁶”

With the aim of

“More individuals with disabilities able to access Active Travel opportunities, better representation and facilities for residents with lower mobility, increased prevalence of Active Travel modes”

11 Conclusion

11.1 HTW has reviewed this action plan and is continuing to show firm commitment to meeting the requirements of the Equalities Act 2010, the DfT Inclusive Transport Strategy and the UN Convention of Human Rights with regards to the needs of disabled people. The actions that are set out in this Plan show the work that has been done to meet legislative requirements placed upon this part of KCC.

¹³www.gov.uk/government/uploads/system/uploads/attachment_data/file/446316/pathway-driverless-cars.pdf

¹⁴ www.citiesunlocked.org.uk

¹⁵ <https://www.kent.gov.uk/about-the-council/strategies-and-policies/transport-and-highways-policies/active-travel-strategy>

¹⁶ <https://wheelsforwellbeing.org.uk/campaigning/guide/>