

Response to Whole Industry Strategic Plan Call for Evidence February 2022

Whole Industry Strategic Plan

Call for Evidence Response Form

09/12/2021

Responding to this Call for Evidence

This call for evidence launches on 9 December 2021 and will be open for eight weeks until 4 February 2022.

You may respond as an individual or on behalf of an organisation or organisations (please let us know all the organisations you are responding on behalf of) and can submit a response in the following ways:

- Online via the call for evidence [webpage](#).
- Via email to cfe@gbrtt.co.uk using this response template.

We recommend you read the call for evidence launch document in full before submitting your response.

Please send the completed response form, along with any supporting information or attachments, to cfe@gbrtt.co.uk.

In the email subject please include your name and/or organisation and 'WISP call for evidence submission'.

Confidentiality

The information you send to us may be shared with colleagues within Great British Railways Transition Team, the Department for Transport and published or referred to in the Response Summary Report response document. All information contained in your response may be subject to publication or disclosure if requested under the Freedom of Information Act 2000. If you want any information in your response to the call for evidence to be kept confidential, or if it contains sensitive information, you should explain why and identify the information clearly within your response. Extracts from responses used within the Response Summary Report will be agreed with the responder before publication, where information is not already in the public domain.

I am responding on behalf of: *The Disabled Persons Transport Advisory Committee ('DPTAC')

One or multiple organisations

If you are responding as an individual, please move to Section 2. If you are responding on behalf of an organisation, please fill in Section 1 and Section 2.

Section 1 – Organisation Details

Organisation name(s)*

<p>The Disabled Persons Transport Advisory Committee ('DPTAC')</p>
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Please identify the category, or categories that best describes your organisation(s)*

If multiple categories apply, please list within the “other” field below.

<p>Accessibility body or interest group</p>
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If other, please state

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Please provide a brief description of the organisation(s) you are responding on behalf of.

This may include information about who the organisation represents, the size of its membership and how the views of members were obtained.

<p>DPTAC is the government’s statutory advisor on matters relating to transport and disability. The Committee has a Chair and 15 members, 50% of whom are required to be disabled. Whilst the Committee is formally the advisor to the Secretary of State for Transport, in its established wider role it advises: the government more generally; the Department for Transport; as well as quasi-governmental organisations such as the Office of Rail and Road, and Network Rail.</p>
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Section 2 – Your details

Name

DPTAC

Email address

DPTAC.Enquiries@dft.gov.uk

Please choose the region you or your organisation(s) are based within*

If multiple regions apply, please list within the “other” field below.

UK-wide

If other, please state

Please provide information about the reason for your interest in the Whole Industry Strategic Plan

Rail sector reform including the creation of Great British Railways and the development of a longer-term Whole Industry Strategic Plan (‘WISP’) provides a once-in-a-generation opportunity to transform the accessibility of the rail network, which remains inaccessible to many disabled people. DPTAC wishes to ensure that WISP embraces accessibility and puts in place the necessary strategic framework to achieve a step-change improvement in rail network accessibility.

Strategic Objectives for the Whole Rail Industry

The UK Government has developed five strategic objectives for the Strategic Plan over the next 30 years: **meeting customers' needs, delivering financial sustainability, contributing to long-term economic growth, levelling up & connectivity, and delivering environmental sustainability.** We intend to put these objectives at the heart of the Strategic Plan, and we are using them to guide all of the questions in this call for evidence.

[Click here to see more information](#)

We recognise that many of you are working to similar long-term objectives. We are very interested in how you define and quantify your objectives, and how they match or differ from our own. When considering your response to question 1, please use your experiences to inform your answers and share any examples, taking into account that in all future scenarios we expect affordability to be a significant constraint.

Question 1

- a) How would you apply these objectives to rail in your region or to your area of expertise within the transport sector? Do you have evidence you can share with us of how you have applied similar objectives in relation to rail, and do you consider the objectives to have missed any key areas?
- b) How is it possible to make progress against a number of the objectives simultaneously? Do any of the objectives have larger barriers associated with them than others, or do any objectives pose possible barriers to others? Where would you make the trade-offs?
- c) What long-term trends in wider society, the economy, and the environment will affect these five objectives over the next 5, 10, and 30 years? Please give evidence to support your response.

[Click here to see more information](#)

- d) What are the key uncertainties you consider that the Strategic Plan must be resilient to in order to be effective over the next 5, 10 and 30 years?
- e) Over the next 5, 10 and 30 years, which steps should the sector take to improve integration of rail with the wider transport system (including walking and cycling) in pursuit of these objectives?

Question 1

a) From an accessibility perspective 'meeting customers' needs' is an absolutely fundamental objective for the railway, and one that it demonstrably fails to achieve at the moment.

In this context we were encouraged to note, that in the 'Ambitions for rail' breakdown of each of the five stated objectives, specific reference was made to accessibility in ambition c. However, we were extremely disappointed to note that the stated ambition was limited to 'widening accessibility', implying that even at the end of the 30 year period encompassed by WISP the railway would still fall some considerable way short of being fully accessible.

Whilst we accept that making the rail network's still largely Victorian station infrastructure physically accessible remains, in particular, a huge challenge both physically and financially, we had hoped that by 2052 the aspiration would have been for a railway that was fully or, at the least, very largely accessible. The poverty of ambition exposed by the very limited aspiration to 'widen accessibility' continues to reflect a railway culture where accessibility remains a 'nice to have', and where many of Britain's 14 million disabled people remain excluded from a vital public service and all the social, economic and other opportunities that it provides access to.

The lack of ambition is particularly disappointing given the legislative background of the Equality Act (and associated Public Sector Equality Duty), the railways' own regulatory framework, and the promised new 'Accessibility Duty' to be placed upon GBR.

Finally, we should add that the continued inaccessibility of the railway undermines the ability of disabled people to contribute to the future financial stability of the railway or long-term economic growth more generally. It also means that around a fifth of the UK's population will potentially fail to benefit from the government's plans to 'level-up' and improve connectivity. In this context we should highlight that, in our view, 'levelling-up' is not just about geography, but also applies to disabled people, who continue to experience more limited life outcomes than non-disabled people (the Office for National Statistics ('ONS') provided a comprehensive overview of this issue in its publication 'Outcomes for disabled people in the UK: 2020'. See:

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/outcomesfordisabledpeopleintheuk/2020>).

(b) Objectives I to IV are inextricably linked from an accessibility perspective. Not until accessibility is improved can disabled people use the rail network more frequently and more extensively, and in doing so more fully contribute to making the railway financially sustainable. Similarly the inaccessibility of the railway limits the ability of disabled people to find employment or participate in training or education, constraining their ability to contribute to longer-term economic growth. Conversely the impact of inaccessibility is likely to be overwhelmingly negative in terms of foregone tax revenue, higher welfare payments, and so on.

In this context, the key trade-off is for government to understand both the benefits of improving accessibility and the disbenefits of not improving it. We are not aware of any properly holistic cross-governmental work that has properly analysed this trade-off, despite it being at the core of the economic case for improving accessibility.

For the railways the trade-off (and implied choice) is clear: either improve accessibility and with it create a virtuous circle of increased revenue, improved financial sustainability, and positive contributions to economic growth and levelling-up, or continue with the status quo or worse and forego all the concomitant benefits of improving accessibility.

c) Notwithstanding the continued benefits likely to accrue to disabled people from advances in medical science and technology, it seems very likely that the number of disabled people will increase over the course of the next thirty years as a result of a demographically-driven continued increase in the average age of the population and the strong correlation between age and disability.

The ONS forecasts that by 2050 one in four of the UK population will be over 65 compared to one in five in 2019 (see: [. Overview of the UK population - Office for National Statistics \(ons.gov.uk\)](#)). The Government Office for Science has also undertaken analysis of future demographic trends that highlights the growth in the average age of the population (see: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/816458/future-of-an-ageing-population.pdf).

The ONS's 'Family Resources Survey; financial year 2019/20' highlighted that in 2019/20 46% of people at state pension age reported a disability compared to just 19% of working age adults (see: [Family Resources Survey: financial year 2019 to 2020 - GOV.UK \(www.gov.uk\)](#))

As such the imperative to improve accessibility is likely to grow stronger over the duration of WISP. We should note as well that many of the features that make a railway accessible also benefit non-disabled older people, accentuating the benefits to be gleaned from an accessible railway.

(d) There are many uncertainties that could affect the delivery of the Strategic Plan: lower or negative economic growth, political or social instability, environmental change and so on. However, none of these uncertainties are specific to disabled people, although history suggests that the impact is often likely to fall disproportionately on disabled people.

One specific uncertainty relating to accessibility is that successful legal challenge under the Equality Act or the industry's current regulatory framework may hard-wire accessibility requirements into industry operational practices or require a major re-shaping of current practice. One specific area of potential challenge in this context is around staffing and the provision of assistance, particularly where Driver Only Operated trains serve unstaffed or partially staffed stations.

Another area of uncertainty is around the expectations of disabled people, which are becoming better defined as the current inadequacies of the network are more fully understood. For instance, disabled people increasingly expect to be able to travel

spontaneously rather than having to pre-book assistance in advance of travel; a very different expectation to that which existed only a few years ago. We will discuss the expectations of disabled people more generally in our response to question 2.

It is important, therefore, that the Strategic Plan explicitly considers uncertainties and risks, and builds-in contingencies wherever possible. It may well be worth considering accessibility specifically within such contingency planning, particularly given the possibility of legal challenge and the implications of the rising expectations of disabled people highlighted above.

e) The integration of rail with the wider transport system is a key issue for disabled people. It helps little if the railway becomes more accessible but disabled people still can't use it as a result of the inaccessibility of other parts of the transport system.

We appreciate that this 'Call for Evidence' is restricted to the rail network but WISP should seek to ensure as a minimum that the connection points between the rail network and other transport modes are accessible. In practice this means for instance making provision for Blue Badge parking spaces in station car parks, or ensuring that there are accessible bus stops close to stations and accessible pedestrian routes between the bus stop and the station.

In this context, we welcome WISP's focus on connectivity and an integrated transport network.

Meeting customers' needs

Rail industry customers broadly fall into two types: passengers and freight. The rail network provides important benefits to the customers who rely on it. The Plan for Rail says that passengers must receive high-quality, consistent services day in, day out. This means accessible, reliable journeys that are well connected with other transport services and include new customer offers at stations and on trains.

Since the COVID-19 pandemic began, the rail freight industry has shown its resilience and agility, working to transport food and medical supplies around the country. This example, and others given in the Plan for Rail, highlight how important rail freight is to our economy now and in the future, and how we will develop growth targets for freight that will be included in the Strategic Plan. The Plan for Rail says of freight: 'national co-ordination, greater opportunities for growth and strong safeguards will put rail freight on the front foot.'

When considering your responses, please take account of the likelihood of changes in levels or patterns of passenger and freight demand over the next 5, 10 and 30 years, what that would mean for the rail system, and what will the interventions be over that period that will provide the maximum value for money.

Question 2

- a) Passenger: how will rail passenger expectations, including accessibility requirements, evolve over the coming 5, 10 and 30 years, what will be the driving causes of these changing expectations, and how can they be most effectively met by the rail sector?
- b) Passenger: in your experience, how can we most effectively monitor and assess customer satisfaction? What is a stretching yet realistic ambition for this objective and what measures can we most effectively use to consider success over the coming 5, 10 and 30 years? What evidence can you share to support your view?
- c) Freight: what evidence can you provide regarding the advantage(s) of transporting goods by rail and what evidence can you share for how that could develop in the next 5, 10 and 30 years? What do you consider to be the most effective role for rail freight in the existing supply chains served and those that it doesn't? How could this change over that period? In answering, please explain and take account of likely developments in technology and in the wider economy.
- d) What is a stretching yet realistic ambition for this objective and what measures can we most effectively use to consider success over the coming 5, 10 and 30 years? What are the interventions over that period which will be the maximum value for money, and what evidence can you share to support your claim?

Question 2

a) Before considering the expectations of disabled passengers over the next 5, 10 and 30 years it is worth noting that the rail network remains inaccessible to many disabled people.

As a backdrop this is true of transport more generally. The 2020 National Travel Survey showed disabled adults (16+) make around 28% fewer trips per year than non-disabled adults. In terms of miles travelled per year the disparity was even greater with disabled adults travelling 40% less miles than non-disabled adults (see: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1019477/transport-disability-and-accessibility-statistics-england-2020.pdf)

Use of the rail network by disabled people seems to follow a similar pattern with the best available evidence showing that disabled people make less trips and travel fewer miles than non-disabled people. The Department for Transport's 'Disability and Accessibility Statistics, England 2019/20' published in March 2021 provides the most recent pre-pandemic data on rail travel by disabled and non-disabled people, and stated that disabled adults in England made an average of 10 surface rail trips in 2019 compared to 28 surface rail trips for non-disabled adults (see: [Transport: Disability and Accessibility Statistics, England 2019/20 \(publishing.service.gov.uk \(1\)\)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1019477/transport-disability-and-accessibility-statistics-england-2020.pdf)). Whilst we are not aware of similar data for Wales and Scotland, it seems reasonable to assume that similar levels of disparity exist in both countries.

Even those disabled people that do use the rail network experience barriers when making journeys. Research into disabled rail passengers undertaken jointly by the Department for Transport and Transport Focus in 2019 ('Research on experiences of disabled rail passengers', July 2019, see: [Research on experiences of disabled rail passengers: summary \(accessible version\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/824242/research-on-experiences-of-disabled-rail-passengers-summary-accessible-version.pdf)) found that two third of disabled rail users experienced at least one problem or barrier during a typical journey, while just under half of disabled rail travellers reported that they expected problems with future rail travel. It is worth re-iterating that these are the views of disabled people who use the rail network, and do not reflect the views of the many disabled people who don't have the confidence to use the rail network in the first place.

We are not aware of any specific evidence on disabled people's expectations of rail travel in the future but the 2019 DfT/Transport Focus research found, unsurprisingly, that disabled rail users across the board would like to travel more frequently by rail than currently.

It is not unreasonable to extrapolate from this that disabled people in general (both rail users and non-rail users) would like to use the rail network more (indeed there is no prima facie reason to believe that they would not like to use it to the same extent as non-disabled people) and that in order to do this would like to see the barriers that currently exclude them from rail travel removed.

Whilst there have been worthwhile and significant improvements to the accessibility of the rail network over recent years (rolling stock and staff training have been notable areas of improvement), the very significant disparity in terms of use of the rail network

by disabled people and non-disabled people highlights just how much more needs to be done.

This, in turn, explains our disappointment at the very limited ambition reflected in this 'Call for Evidence'. Given where we are now an ambition to 'widen accessibility' is likely to fall a very long way short of the expectation of disabled people with regard to the accessibility of rail travel over the next thirty years.

b) DPTAC believes that there are two key measures that can be used to measure the satisfaction of disabled rail users: usage of the rail network; and the satisfaction of disabled rail users with journeys made.

Usage of the rail network can itself be used as an indicator of satisfaction. If the current barriers that exclude disabled people from the rail network are progressively removed we would expect the number of trips made and miles travelled by disabled people to also increase progressively, and proportionately more than for non-disabled people. Over time this would mean that the current very significant gap between use of the rail system by disabled and non-disabled people would also progressively narrow. This would be a clear indicator that the rail network was becoming more accessible.

We also believe that this is measurable using passenger data from Transport Focus's National Rail Passenger Survey (which already collects data on self-identified disabled passengers) and passenger journeys/mileage data collected the rail industry's existing Lennon systems/database (and currently published in aggregate form by the Office of Rail and Road).

However, usage alone is a necessary but not sufficient condition to ensure that there is an equality of opportunity and experience for disabled and non-disabled people when using the rail network. Disabled people making rail journeys should have the reasonable expectation that that they will be as satisfied with their experience as other rail users. This should be measurable through customer research; indeed Transport Focus's National Rail Passenger Survey ('NRPS') already provides comparative data on the satisfaction levels of disabled and non-disabled passengers (the Spring 2020 survey found slightly lower levels of overall satisfaction amongst disabled passengers than non-disabled passengers for instance, with wider disparities on some measures such as the gap between the train and platform).

Finally, in terms of stretching but realistic ambitions, we would suggest that the gap between usage of the rail network by disabled and non-disabled people should progressively narrow over the next thirty years, and to the extent possible should be eliminated by 2052. We qualify our ambition with 'to the extent possible' on the basis that there may ultimately prove to be some difference between the travel expectations of disabled and non-disabled people – some disabled people may prefer to work from home rather than commute to an office for instance, where there is a choice. We are not aware of any evidence base available at the moment to assess this, and we should also emphasise that any such gap should be on the basis of choice NOT exclusion.

To ensure that this does not become a 'jam tomorrow' ambition, interim targets should be set throughout the thirty year period of WISP, based on the best evidence

available and on the assumption that barriers to use of the rail network by disabled people are progressively removed.

It is worth noting in the context of the above that the Department for Transport is due to publish shortly its long-awaited research into disabled non-rail users. This research should provide much needed and valuable insight into why disabled people do not use the rail network.

In terms of satisfaction there is no reason that disabled people should expect to be as satisfied with using the rail network as non-disabled users, although we would note that there is a complementary need to understand satisfaction with features of the rail network (such as step-free access) that may be more or solely important to disabled rail users.

Given that the 'satisfaction gap' between disabled and non-disabled rail users is relatively narrow at the moment it seems an entirely achievable ambition to target the elimination of this gap within a 5-10 year time frame.

c) DPTAC has no remit in this area, and no evidence to contribute.

d) We have already, to a large extent, addressed these questions in our responses to the earlier parts of this question but have summarised below what we believe to be stretching but realistic and achievable ambitions over the next 5, 210 and 30 years:

5 years: the elimination of most non-physical barriers to use of the rail network by disabled people and properly prioritised and targeted interventions to improve the physical accessibility of the rail network. Success to be measured in terms of material increases to use of the rail network by disabled people in excess of increases in usage by non-disabled people, and a material narrowing in the gap in satisfaction with rail travel between disabled and non-disabled passengers.

10 years: the complete elimination of all non-physical barriers to use of the rail network by disabled people and further properly prioritised and targeted interventions to improve the physical accessibility of the rail network. Success to be measured in terms of material increases to use of the rail network by disabled people in excess of increases in usage by non-disabled people, and the complete elimination of the gap in satisfaction with rail travel between disabled and non-disabled passengers.

30 years: the removal of the most important physical barriers to use of the rail network by disabled people and the effective mitigation of remaining barriers by well trained staff and innovative technology.

Finally in terms of which interventions would provide the best value for money, we need to highlight that the removal of physical barriers is necessarily a long-term project. Whilst the heavy rail rolling stock fleet is now largely accessible (or, at least, compliant with current regulatory requirements), the station estate requires extensive capital investment to make it physically accessible. This includes not just step-free access, but level platform-train interfaces, heated waiting accommodation and UAT toilets at all medium and larger stations, visual information displays and so on. As such a long-term capital investment programme, properly prioritised and targeted is required, and the key short-term requirements are the establishment of long-term

funding mechanisms, the development of an effective approach to prioritisation and targeting, and the improvement of current accessible design standards.

However, physical accessibility aside, the key interventions required are all around the elimination of non-physical barriers to access. This is an achievable target within a 5-10 year time frame and rests upon the establishment of an industry culture that embeds accessibility into its core in the same way that safety (and, to an increasing extent, sustainability) are already embedded. Such a culture will crucially depend on an industry leadership committed at every level to improving accessibility, the hard-wiring of accessibility into industry incentives and penalties, and the strengthening of the regulatory framework, most importantly through the introduction of the proposed new Accessibility Duty. It also means commitments to an adequately staffed railway (in number, deployment, and training), reliably-provided assistance, accessible information and ticketing, and so on.

Staffing is a particularly important issue as it has the potential to alleviate or mitigate many of the physical barriers that will, realistically, take many years of sustained capital investment to remove. For instance reaching a position where all stations provide level access between train and platform (needed by mobility-impaired passengers) requires huge capital investment (and the development of innovative approaches to the civil engineering and other challenges associated with this task) but in the short to medium-term the barriers to travel that result from non-level access can be reduced or in most cases eliminated by the deployment of boarding ramps by staff. Given the necessarily long timescales associated with the eradication of physical barriers to access across the rail network, the availability of properly trained staff stands out as the key mitigation for what will remain, in many areas, a physically inaccessible network for the foreseeable future.

Many of the non-physical requirements come at little or no cost, whilst others are relatively inexpensive in the overall context of industry costs. Some, such as staffing, may be considered more material, but the benefits are likely to be felt by all passengers, and can be seen as core to the customer-centric railway envisioned by the Williams-Shapps Plan for Rail.

(1) Data for travel in 2020, published by the DfT in September 2021 found a much more marginal difference in trip rates between disabled and non-disabled people, but data was clearly very significantly impacted by changes to travel patterns as a result of Covid. As such, we believe the pre-pandemic data from 2019 quoted in our response to 2 a) above to be more representative of true travel patterns and more consistent with previous data.

Delivering financial sustainability

Rail is both a public service, supported by the taxpayer, and a business, run by private operators, with paying passenger and freight customers. The railways have received unprecedented levels of public support throughout the pandemic, protecting the essential services that people, including commuting key workers, rely on. As the recovery and rail reform gains pace, as with all areas of public expenditure, there is an onus on the rail sector to ensure value for money for users and taxpayers in how funds are used, and it must harness the incentives of the private sector to deliver the service in the most cost-effective way.

The railway, accordingly, must seek to deliver infrastructure and services more efficiently, in order to maximise beneficial outcomes while balancing costs against revenue and taxpayer funding. This is more than just a short-term issue: we are clear that reducing the cost of the railway, increasing efficiency including through innovating with private partners, and achieving a better deal for users and taxpayers is a critical priority over the next 30 years.

When considering your answer to the question below, please consider how we can support greater efficiency (such as joined up operations), innovation, alternative sources of funding and/or cost base reduction. Similarly, what steps you would propose to improve the efficiency and reduce the cost of infrastructure projects, operation and maintenance, and what evidence you have to support your response.

Question 3

Where are the most significant opportunities and barriers to delivering financial sustainability in the rail sector over 5, 10, and 30 years and how do we achieve/overcome them? How can we most effectively monitor and assess this? What is a stretching yet realistic ambition for this objective and what measures can we most effectively use to consider success over the coming 5, 10 and 30 years? What are the interventions over that period which will be the maximum value for money?

Question 3

After almost twenty-five years of virtually uninterrupted growth in passenger numbers and revenue, the Covid-pandemic has resulted in a very significant fall in usage of the rail network. Over the last two years this has reflected the (effective) restrictions imposed on travel by the government to contain the pandemic, but as we emerge from this period it is clear that there are likely to be longer-term implications for rail travel and the economics of the rail industry.

Working from home has become an embedded practice for a significant proportion of the workforce and whilst a gradual return to office-working is likely, it seems probable that an element of working from home is likely to continue with the traditional working week for office-based workers replaced by hybrid arrangements where work is shared between home and office. This has important implications for rail's most important market, the commuting market. Similarly, business travel seems unlikely to return to pre-pandemic levels with face-to-face meetings replaced by more cost effective remote, virtual meetings.

For a capital intensive industry like rail with relatively high fixed costs this provides a very significant challenge in terms of achieving financial stability. Reducing variable costs may provide some short-term relief, but the only truly-sustainable long-term solution is to re-grow demand and revenue.

In this context, it should be highlighted that one key area of current suppressed demand is travel by disabled people. There are around 14 million disabled people in the UK, over a fifth of the population, representing a sizeable potential market, which if fully utilised could result in material increases to rail usage and revenue.

It is clear from the evidence presented earlier that disabled people make significantly fewer rail trips than non-disabled people and travel less far on the rail network. Removing the barriers to access that prevent disabled people from travelling by rail potentially unlocks a very large new market, which could make a material contribution to the long-term financial sustainability of the rail industry.

It is worth emphasising, however, that this required a more robust approach to the provision of accessibility (for a disabled person to undertake regular commuting journeys, they need to be confident that they will enjoy a consistently accessible railway with staff availability being a particularly key issue). The probable higher price elasticity of disabled people (given lower employment rates and lower average incomes) may also be something that GBR wishes to consider from a commercial perspective.

We accept that this also means increased costs, particularly capital costs to address the inaccessibility of the station estate, but in the short- to medium-term the elimination of non-physical barriers would come at significantly lower cost and would potentially drive sizeable increases in volume and revenue. It is also worth highlighting that in many areas making the network more accessible would benefit a much wider swathe of passengers, particularly the elderly. In this context, it is important, that a properly holistic approach is taken to station staffing, with an appropriately rounded analysis of costs and benefits, including accessibility, being

undertaken before decisions on staffing levels are taken. This contrasts with current approaches, which seem to be almost solely focussed on station retailing activities.

There is a strong moral rationale for making the rail network accessible; a moral rationale that is reflected in legislation and regulation, most importantly the Equality Act. As far as rail is concerned that moral imperative is conjoined with an economic imperative that means that a more inclusive railway can also be a more financially sustainable one. But to be both the railway has to be accessible; certainly a challenge but, more importantly, a huge opportunity for GBR.

Contributing to long-term economic growth

Rail helps to boost productivity and growth through improved connectivity and job creation, enables supply chains, delivers goods to businesses and consumers and directly employs over 240,000 people (source: the rail sector in numbers). Among other factors, such as population growth, long term economic growth is influenced by emerging technology, and innovative, more effective ways of thinking and doing things. Over the next 30 years, wider economic, social, environmental and technological trends will change the role rail plays in our economy. It will be for the whole sector to demonstrate that it cannot only continue to deliver wide economic benefits in the face of a changed economy but that it can find new ways to catalyse growth and prosperity.

When considering your answer to the questions below, please share examples of any relevant local, regional and national growth and productivity, and examples of innovations and technology from the UK and abroad, research into trends that may influence rail's contribution to economic growth, and/or new ways of thinking that should be used in or for the rail sector over the coming 5, 10 and 30 years.

Question 4

- a) As Britain recovers from the effects of the COVID-19 pandemic, what evidence do you have for how rail can contribute to wider economic growth over the next 5, 10, and 30 years? What is a stretching yet realistic ambition for this objective and what measures can we most effectively use to consider success over the coming 5, 10 and 30 years? What type of interventions over that period will provide maximum value for money from rail's economic contribution, and what evidence can you share to support your views?
- b) In the context of enabling development and regeneration opportunities both in the immediate vicinity of stations and within the surrounding area, how can rail best facilitate improvements to places and local growth, through improved connectivity and unlocking commercial activity, housing, and employment over the next 5, 10 and 30 years?
- c) What innovative and modernising ideas do you have which would benefit the railway while supporting the strategic objectives? Please give evidence and make reference to how they would maintain or enhance the railway's safety record.

Question 4

We will provide a single response to question 4, rather than specific responses to parts a), b) and c).

In the same way that many disabled people are excluded from using the rail network, many are excluded from employment. In its publication 'Outcomes for disabled people in the UK', published in 2020, the Office for National statistics ('ONS') stated that in July to September 2020 around half of disabled people aged 16 to 64 years (52.1%) in the UK were in employment compared with around 8 in 10 (81.3%) of non-disabled people.

This, in part, reflects that disabled people also had lower levels of educational attainment: according to the ONS 23.0% of disabled people aged 21 to 64 years in the UK had a degree as their highest qualification compared with 39.7% of non-disabled people; 15.1% of disabled people had no qualifications compared with 5.4% of non-disabled people (year ending June 2020).

(See <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/outcomesfordisabledpeopleintheuk/2020>)

This excludes disabled people from being able collectively to contribute to longer-term economic growth to the same extent as non-disabled people. There are wider costs associated with this inequality in terms of foregone tax revenue, higher welfare costs, increased NHS costs, and so on.

As stated earlier we are not aware of any cross-governmental analysis of the financial impact of this but it seems self-obvious that an economically active disabled person is much more likely to be a net contributor to the economy than a disabled person that is not economically active.

Moving more disabled people into employment has an important role, therefore, in generating a more prosperous and productive economy, and helping drive long-term economic growth. However, this is made more difficult if the transport system has barriers that prevent or make it more difficult for disabled people to find and retain employment, or access education to gain the qualifications they need to find employment.

Excluding many disabled people from the rail network because it is inaccessible has, therefore, much wider implications in terms of also excluding them from work and education, and preventing them from becoming net economic contributors. Conversely, making the rail network more accessible can have a 'multiplier' effect, allowing more disabled people to access employment and education, increasing tax revenue, reducing welfare and other costs, and making a positive contribution to long-term economic growth.

In terms of the interventions required to help achieve this, our responses to previous questions already set out the kind of interventions that we believe to be necessary.

Levelling up and connectivity

The Secretary of State for Levelling Up has outlined four key outcomes on which the government will focus:

- Empowering local leaders and communities;
- Boosting living standards by growing the private sector and improving productivity and connectivity;
- Spreading opportunity and improving public services; and
- Restoring local pride.

Rail has an important part to play in working toward these outcomes, and particularly so in connecting the nations, regions and communities of the UK. Improved rail links can connect people to jobs, education and skills, high-quality housing, social opportunities, services, and green spaces, as well as encouraging the growth of businesses, and attracting leisure visitors into an area. Improving stations and surrounding areas can also act as a catalyst for regeneration and development and a cause for local pride.

At present, usage of rail differs widely across the UK; before the pandemic, almost two thirds of all rail journeys made were in London and the south east ([Rail Sector in Numbers report from 2019](#)).

When answering your questions, consider the ways in which rail can be used to improve connectivity and local economic growth over the next 5, 10, and 30 years.

Question 5

- a) What evidence can you provide for how the rail sector contributes to the four levelling up outcomes and to improving connectivity across Great Britain, including through cross-border services? How does this change depending on the type of place where the sector operates (including in cities, towns and rural areas), and what are the most cost-effective ways at the sector's disposal to improve that further during the next 5, 10, and 30 years?
- b) How could the rail industry, over the next 5, 10, and 30 years, become more responsive to, and more accountable to, local communities and passengers? Please give evidence and examples in your response.
- c) What is a stretching yet realistic ambition for this objective and what measures can we most effectively use to consider success over the coming 5, 10 and 30 years? What are the interventions over that period which will be the maximum value for money, and what evidence can you share to support your views?

Question 5

We will provide a single response to question 5, rather than specific responses to parts a), b) and c).

In our response to question 1, we highlighted that 'levelling-up' should not just be seen in geographic terms, but that there is also a strong case for the same principle to be applied to disabled people. Our subsequent answers have provided evidence of the extent to which disabled people do not enjoy the same life outcomes as non-disabled people. The UK Disability Survey research report published by the Disability Unit in the Cabinet Office in 2021 provides a wealth of other data highlighting the disparities between the lives of disabled and non-disabled people (see: [UK Disability Survey research report, June 2021 - GOV.UK \(www.gov.uk\)](#), as well as <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/outcomesfordisabledpeopleintheuk/2020> cited earlier in our response).

Making the rail network more accessible will not on its own remove these inequalities, but it will contribute to greater equality of opportunity, improve living standards and create more vibrant and inclusive communities that allow disabled people to more fully participate in society. It is also consistent with GBR's obligations under the Public Sector Equality Duty to advance equality of opportunity.

Connectivity is an important element in achieving this, and we have already emphasised the importance of seeing transport accessibility in holistic, system-wide terms. Door to door journeys will only ever be accessible as their weakest transport link, and while GBR cannot be held accountable for the accessibility of the whole transport network, it can ensure that the interfaces between rail and other modes are accessible.

Finally, GBR, and any train companies to which it sub-contracts the provision of rail services as a result of the planned, new Passenger Service Contracts, needs to engage with disabled people through local groups. GBR will, we hope, bring a much greater degree of consistency to the railway in terms of accessibility, but it will be important that a more strategic, network-wide approach is appropriately nuanced by taking specific local needs into account,

Delivering environmental sustainability

The Plan for Rail commits to the creation of a comprehensive environment plan that will establish rail as the backbone of a cleaner future transport system, one that aims to protect and enhance biodiversity and the natural environment. That plan, the Sustainable Rail Strategy (SRS), will be one of the inputs to the Strategic Plan, and will build on and develop a strategy for achieving the policy commitments set out in both the UK's [Transport Decarbonisation Plan](#) and the [Rail Environment Policy Statement](#) that were published in July 2021, as well as the Net Zero Strategy from October 2021.

In addition to tackling the causes of climate change, the rail network must also be able to adapt to the changes already being seen. This means preparing for the impact of extreme weather events and increasing the resilience of the rail network to the impacts of these events – for example, flooding.

When answering your questions, consider the ways in which rail and the rail estate can contribute to wider national and regional environmental policy agendas, support decarbonisation, conserve and enhance biodiversity, improve air quality and increase renewable power generation.

Question 6

- a) What is a stretching yet realistic ambition for this objective and what measures can we most effectively use to consider success over the coming 5, 10 and 30 years? What are the interventions over that period which will be the maximum value for money, and what evidence can you share to support your views?
- b) What use can the rail sector make of emerging or existing technologies to reduce its impact on the environment and enhance biodiversity over the next 5, 10, and 30 years, and, in a proportionate and cost-effective way, help national and regional authorities to meet their environmental objectives?
- c) How can rail best invest in climate resilience, supported by smarter forecasting, planning and technology, over the next 5, 10, and 30 years and what evidence do you have to support your view?

These questions relate to areas outside DPTAC's remit, so we have no evidence to contribute.