Note: This consultation document was compiled in October 2019 when the charity was called Royal Blind.

**Response to Transport Strategy Consultation:**

1. **Is the Vision that is set out for the National Transport Strategy the**

**right Vision for transport policy over the next 20 years?**

We welcome the vision of a sustainable, inclusive and accessible transport system, but this must be backed up with tangible action and bold ambition. For people with a visual impairment, good quality, accessible public transport is of vital importance, helping to promote inclusion and connection with people and services in their communities. In a survey we carried out last year, Scottish War Blinded members identified the main cause of loneliness and social isolation as being “unable to get out and about/access transport” with 151 respondents (53%) citing this issue.

In recent years there have been many debates about how bus services can be most effectively delivered as many routes have been withdrawn for both urban and rural communities. Discussion has focussed on the administration of the Bus Operators Grant, Quality Partnerships and potential changes in the way bus industry is structured. It is essential that adequate routes and services are run in an accessible way for people with disabilities. Too often the withdrawal of local bus services has contributed to the social isolation experienced by many people with sight loss.

It is notable that there is no reference in the strategy to visual impairment, blindness or sight loss. While there is recognition of the need to improve accessibility and promote equality, it would be helpful if there was explicit acknowledgement of the barriers faced by transport users with different disabilities and long-term health conditions, including those with visual impairment, and the ways these interact.

**2a. Are the Priorities and Outcomes that the Strategy is trying to achieve the right Priorities and Outcomes for transport policy over the next 20 years?**

We support the strategy’s Priorities and Outcomes but believe they should be more specific. For example, we recommend a commitment not only to improve accessibility but also encourage more people with disabilities to use public transport. While the priority of promoting equality is crucial, the principle of equity is just as important. Promoting equality should not mean equal treatment, as this can erase differences and compound disadvantage. Some groups with additional needs, such as people with a visual impairment, might not be able to engage with services or consultation exercises as easily as others, even though they have ostensibly ‘equal’ opportunity. Modifications must therefore be made to ensure fuller participation for all users.

The strategy highlights equality issues facing disabled people as well as those brought about by regional disparities. Scottish War Blinded members have raised particular concern with the inconsistency between local authority concessionary travel schemes for rail travel. There is also variable quality in bus services across Scotland, with our members based in small towns and rural areas generally reporting more negative experiences.

We also welcome the strategy’s focus on harnessing transport to help make communities great places to live. Many of the people we work with struggle because of sight impairment and age, so even if there are services in their areas they might not be able to access them. Transport is therefore an important means to link people with activity in their communities, make connections with other people and lead fuller lives.

**2b. Are some of these Priorities and Outcomes more important than others or are they equally important?**

Promoting equality and equity, as well as health and wellbeing, are of utmost importance. However, the priorities and outcomes can be viewed holistically: a fairer, more reliable and more accessible transport network will help to reduce the public’s reliance on cars, in turn helping to tackle climate change. That said, it is important to appreciate that for some people with disabilities, a good quality of life depends on access to a car.

Making communities great places to live is a very important outcome. Although the strategy is rightly focused on methods of transport, realising this ambition also involves consideration of how the built environment affects people with disabilities. For example, we have concerns over the “shared spaces” policies which have been developed by a number of local authorities. While shared spaces are intended to reduce the speed of traffic and the number of accidents through vehicles and pedestrians sharing the same surface, their design can involve the removal of kerbs, pedestrian crossings and tactile pavement markings. For people with visual impairment this makes it more difficult to negotiate and navigate such surroundings, reducing inclusion and increasing the risks of accidents and falls. The UK Government has advised local authorities in England to pause their development while guidance is reviewed, and we would welcome a similar approach by the Scottish Government.

1. **Are the Challenges the Strategy highlights in Chapter 3 the key Challenges for transport, or are there others the Strategy should focus on?**

The focus on addressing social isolation and loneliness is welcome. We believe transport services have a crucial role to play in reducing these issues among people with sight loss, as with many other groups in society. In our aforementioned survey of Scottish War Blinded members, the top cause of loneliness was being “unable to get out and about/access transport”. Scottish War Blinded invests significantly in minibus transport and the funding of taxi journeys for individuals so veterans with sight loss can access our services over a wider area, and this provision is a lifeline for many of our service users. However, many services and groups cannot provide this level of transport support, so public transport solutions are vital if many people with sight loss and other disabilities are not to be isolated at home.

The strategy is right to acknowledge the higher likelihood of transport poverty among people with disabilities and long-term health conditions. A lower proportion of disabled people are in employment compared to those who are not disabled and the disparity is even starker among people with visual impairment. Two thirds of working-age people who are registered as sight impaired or severely sight impaired in Scotland are not in paid employment.Those working-age people who are registered as sight impaired or severely sight impaired and are not in paid employment are nearly five times more likely to have not been in paid employment for five years or more than the general population.[[1]](#footnote-0)

We agree that the ageing population also poses significant challenges for Scotland’s transport system. It is estimated that there were 173,000 people with a visual impairment in Scotland in 2018, with this number set to increase to over 200,000 by 2030 and to double by 2050.[[2]](#footnote-1) As well as putting pressure on all health and social care services, the increase in prevalence of sight loss conditions will need to be matched by an expansion and improvement of accessible public transport.

Regional differences across Scotland must also be addressed. As noted in our answer to Question 2A, the experiences of people with sight loss of local bus services vary considerably and are largely dependent on area.

The strategy does not mention overcrowding on trains – this can pose particular difficulty for people with a visual impairment. Sight loss can often be an invisible condition and many of the people we support have told us of occasions in which they were left without a seat on the train.

**4a. Are these the right policies to deliver Priorities and Outcomes of the National Transport Strategy?**

The strategy sets out a positive range of policies from the perspective of people with visual impairment in relation to a transport system which is “equally accessible” and supporting the implementation of the Accessible Travel Framework. However, it is essential that policy intention is backed with decisions on prioritising and resourcing public transport, as many services have been reduced, routes withdrawn and people who are reliant on public transport having fewer opportunities to use it. Concessionary transport is vital for people with visual impairment, who often not only are no longer able to drive but do not have access to private transport. However, too many people with concessionary travel cards are no longer able to use them due to repeated cuts to bus routes over recent years.

We would also like to highlight more specific actions that would enhance the experience of people with visual impairment using transport. These will be addressed in our answer to Question 8B.

**4b. Are some of these policies more important than others or are they equally important?**

Equality and equity are paramount and should inform each of the policies and enablers. We agree that transport innovation policies should be embraced. The use of adaptations such as timetables in braille, large print and audio, stop announcements on buses, and visual impairment-friendly phone travel apps would help improve the public transport experience for people with sight loss.

**5a. Are there specific decisions about transport in Scotland that are best taken at the national level (e.g. by Transport Scotland or the Scottish Government), at a regional (e.g. by Regional Transport Partnerships), or at a local level (e.g. by Local Authorities)?**

**Please explain your answer, by providing examples of where you believe transport related decisions should be taken.**

While many decisions are best made at a local level, specific national approaches are important to ensure equity of delivery. For example, we believe there should also be a national “+1” concessionary scheme on trains for companions of people with a visual impairment. We made Freedom of Information requests to all 32 councils on their concessionary rail travel policy. Half price travel for companions is offered in 14 local authorities, with the majority of these in the Strathclyde Transport Partnership area. The inconsistency in the policy across Scotland creates confusion and stress for travellers and staff alike.

In addition, there is a lack of knowledge among some ScotRail staff of the entitlements of the National (Scotland) Concessionary Travel for Blind Persons card. Even in the local authorities that do offer half price travel for companions, people with visual impairment have experienced ignorance of the policy among staff, leading to distress, embarrassment and delays. While staff are generally very helpful on the trains, our members have experienced ticket collectors not accepting concessionary or +1 tickets, or not recognising a person with visual impairment’s travel pass. In some cases companions simply need to help the person with sight loss board the train, but are prevented from going past the barrier without a ticket when they’re not travelling.

This underlines the case for national standards for visual impairment awareness training for both train and bus staff.

**5b. Should local communities be involved in making decisions about transport in Scotland? If so, how should they be involved, and on which specific issues should they be involved in making decisions on?**

**Please explain your answer, by providing examples of which transport decisions local communities should be involved in, also suggesting how they should be involved.**

Yes, local communities are best placed to inform decisions about transport in their area. For example, communities should be consulted on any decision to withdraw or change the route of a local bus service. Similarly, impact assessments should be carried out into how a change to a service will affect people with disabilities and long term health conditions, including visual impairment. Part of this process should involve consultation with disability charities and local organisations.

We believe it is important that when notices on the establishment of or changes to partnership plans and schemes are issued they are accessible for disabled people and consultations on changes to plans and schemes should also include disabled people’s organisations. We believe this principle applies in other areas including consultations on proposed franchising frameworks.

We are interested to see how the Government will deliver on the Place Principle, which encourages collaboration and enables local flexibility, and ensure the transport system is embedded in regional decision making.

**6. Does the National Transport Strategy address the needs of transport users across Scotland, including citizens and businesses located in different parts of the country?**

We welcome the acknowledgement of the differing challenges between regions across the country. At Scottish War Blinded’s annual Gathering, our members’ assessments of local bus services varied considerably and were largely dependent on area. Out of 59 members, 32 rated transport in their area as “Good” rather than “OK” or “Poor.” Members in small towns or rural areas tended to report more negative experiences, facing infrequent and less reliable services, regular cancellations and expensive minimum charges in some councils. The strategy’s commitments to safeguarding lifeline transport services and connections, and minimising connectivity and cost disadvantages, are therefore welcome.

**7a. What aspects of the transport system work well at the moment?**

At the recent Scottish War Blinded Gathering, members reported mostly positive experiences using public transport in cities. Across the country, bus drivers were generally said to be friendly and helpful. While many of the people we support have had issues with ScotRail staff when buying tickets or getting through barriers, their experiences with staff on the train itself have been much more positive. The concessionary travel scheme on buses and trains is highly valued by people with visual impairment, but more needs to be done to raise awareness and ensure consistency across Scotland.

**7b. What practical actions would you like to see the National Transport Strategy take to encourage and promote these?**

We welcome the recognition of the importance of concessionary travel schemes. These should be encouraged and promoted as widely as possible, such as through radio advertising, local and social media, on buses and trains, and in services and organisations accessed by older people and those with disabilities. This information must be disseminated in accessible formats and should highlight increased participation in disability awareness training among public transport staff. As part of this training, bus and train staff should be made fully aware of the range of travel card entitlements, including concessionary companion travel.

Any further measures to promote accessibility should be shared widely to help reduce any concerns or anxieties people with disabilities or long-term help conditions may have about using public transport.

**8a. What aspects of the transport system do not work well at the moment?**

As we have outlined, there is a lack of adequate public transport provision. This has a disproportionate impact on people with a visual impairment, many of whom do not have access to a friend or relative’s car and rely on good public transport for their independence. Some members of Scottish War Blinded have expressed frustration that bus companies cared “only about turning a profit” and that it was “not a public service anymore”.

The inconsistency across Scotland in concessionary train travel for companions has been repeatedly raised by members of Scottish War Blinded. We made Freedom of Information requests to all 32 councils on their concessionary rail travel policy. Half price travel for companions is offered in 14 local authorities, with the majority of these in the Strathclyde Transport Partnership area. The inconsistency in the policy across Scotland creates confusion and stress for travellers and staff alike. Our members have highlighted occasions when they have been granted concessionary companion travel in one station but then faced an additional charge in another during the course of their journey.

Furthermore, there is a lack of knowledge among some ScotRail staff of the entitlements of the National (Scotland) Concessionary Travel for Blind Persons card. Even in the local authorities that do offer half price travel for companions, people with visual impairment have experienced ignorance of the policy among staff leading to distress, embarrassment and delays. Our members have experienced ticket collectors not accepting concessionary or +1 tickets, or not recognising a person with visual impairment’s travel pass. In some cases companions simply need to help the person with sight loss board the train, but are prevented from going past the barrier without a ticket even when they’re not travelling.

More widely, there is a lack of awareness among some public transport staff about the issues facing people with visual impairment. For example, Scottish War Blinded members have reported instances when bus drivers do not wait until they are seated down before driving, which can be particularly distressing and potentially dangerous for someone with sight loss. One member recalled an occasion when their companion was not allowed to travel for free, despite a disability +1 card holder and their companion being entitled to free travel on all bus companies.

Research by Guide Dogs has shown that guide dog owners are often refused access to minicabs and taxis. Under the Equality Act 2010, private hire operators and taxi drivers cannot refuse a booking from a person with a disability because they are travelling with an assistance dog, or charge more money for the journey. A driver must have a valid exemption certificate if they are unable to take an assistance dog for medical reasons.[[3]](#footnote-2) However, in a one-year period, 42% of assistance dog owners in the UK were refused entry to a taxi or minicab because of their dog.

**8b. What practical actions would you like to see the National Transport Strategy take to improve these?**

It is vital that the laudable policy intentions in the strategy are backed with decisions on prioritising and resourcing public transport, as many services have been reduced, routes withdrawn and people who are reliant on public transport having fewer opportunities to use it. We call on the Scottish Government and local authorities to explore the potential to support specialist community transport schemes for disabled people to address lack of provision in areas which are poorly served by public transport. We believe any new community transport provision for people with disabilities should be part of the concessionary travel scheme to ensure they are not unable to use them for financial reasons.

To guarantee equal rights for all blind and sighted people across Scotland, there should be a national “+1” concessionary scheme on trains for companions of people with a visual impairment. The postcode lottery of the current system makes train travel more expensive and less accessible for people with visual impairment in certain parts of the country, as well as causing confusion and delays for travellers and ScotRail staff.

We would like to reiterate the need for national standards of visual impairment awareness training for bus drivers and train staff. Royal Blind and Scottish War Blinded also support Guide Dogs’ call for Disability Equality Training for minicab and taxi drivers. People with mobility difficulties are more likely to use taxis or Private Hire Vehicles, yet many taxi drivers have not had disability awareness training.

We were disappointed that the Restricted Roads (20mph Speed Limit) (Scotland) Bill was not passed by the Scottish Parliament. A national restriction on traffic speed from 30 mph to 20 mph on restricted roads would improve safety and accessibility for people with a visual impairment on more streets and roads in Scotland. People with a visual impairment have to use a range of skills and strategies before deciding when it is safe to cross a road, including finding kerbs and listening to traffic to judge its speed and volume. Fast moving traffic can make this more difficult and it can also be intimidating. We hope Parliament will reconsider this proposal in future.

We would also like to reaffirm a recommendation by the Unforgotten Forces consortium, of which Scottish War Blinded is a member, for transport providers who have signed up to the Armed Forces Corporate Covenant to consider what more they can do to address the transport related needs of older veterans to give effect to the aims and principles of the Covenant.

**9. Chapter 6 of the Strategy sets out immediate actions the Scottish Government will take in three key areas: Increasing Accountability; Strengthening Evidence; and Managing Demand. Is there anything you would like to say about these actions?**

Increasing accountability and ongoing dialogue with disabled people’s organisations is crucial at a national and local level. Priority should be given to encouraging local passenger forums and ensuring the continued role of the Accessible Transport Steering Group. There should also be recognition and planning for the increased number of passengers with sensory impairment due to demographics.

**10. Is there anything else you would like to say about the National Transport Strategy?**

It is important to monitor progress and ensure evaluation is shared widely in accessible formats, such as easy-read, braille, audio and large print. If the strategy is to be genuinely inclusive for people with disabilities, including those with a visual impairment, it must be backed with resource at a national and local level which support its key ambitions.

1. https://www.rnib.org.uk/professionals/knowledge-and-research-hub/research-reports/employment-research [↑](#footnote-ref-0)
2. https://www.rnib.org.uk/professionals/knowledge-and-research-hub/key-information-and-statistics/sight-loss-data-tool [↑](#footnote-ref-1)
3. https://www.guidedogs.org.uk/how-you-can-help/campaigning/our-current-campaigns/access-all-areas [↑](#footnote-ref-2)