

Scotland's National Transport Strategy - a consultation

JUNE 2006

Response from the Scottish Accessible Transport Alliance (SATA)

Introduction

A national conference on accessible transport in Edinburgh in July 1993 called 'Transport for Independent Living' had concluded that the users of transport services, the providers and the planners of those services, needed to act together to make progress in accessible transport. It recommended a 'standing forum' and as well as a 'national campaign for accessible transport'.

SATA was launched in Glasgow on 13th June 1995 to fulfil these recommendations.

The aim of SATA is to work for the provision of accessible transport in Scotland as a basic right for all people. This includes working not only for the provision of vehicles, vessels and rolling stock which are accessible but also for the provision of an integrated system of public transport, affordable services, accessible information and appropriate support services.

SATA supports policies from the Government which are in accord with its own aim and is equally supportive of measures designed to deliver these policies. So a statement that the Government was 'committed to comprehensive civil rights for disabled people' and that 'an integrated transport policy which encompasses accessible public transport, public transport infrastructure and a barrier-free pedestrian environment, is fundamentally important to the delivery of that commitment' was encouraging.

The Government's Ten-Year Transport Plan (DETR 2000) said 'Building in accessibility for disabled people in all new investment is a condition of public money being spent. Local authorities and transport operators should ensure that the transport needs of disabled people are factored into their plans and that the full benefits of improved public transport are accessible to all.'

Under reserved and devolved powers the parliaments in Westminster and Holyrood have enacted legislation to give effect to this policy, notably the Disability Discrimination Acts of 1995 and 2005 and the Transport (Scotland) Acts of 2001 and 2005. The disability rights legislation is designed to ensure that disabled people are able to enjoy the same rights, choices and opportunities as non-disabled people. From the end of this year there will be a general duty on all public authorities to promote disability equality.

SATA welcomes this consultation on Scotland's National Transport Strategy. It needs to be embraced and give further expression to the above commitments and as 'a guide to future policy formulation over the next 20 years' ensure that they are delivered.

Chapter 1. Where are we now?

As the introduction to this chapter says, our transport system exists, not as an end in itself, but because people need to get about and because transport infrastructure is essential to businesses and a competitive economy. Figures are given for the growth in travel and transport use. There are also statistics on Scotland's ageing population. But transport policy should be based on a broader and very detailed analysis of people's travel purposes, who is travelling, who is not travelling and why. Research has shown that as a group, although a very varied group, disabled people travel less frequently than other transport users, have less access to cars and use buses and taxis more often than other modes.

In developing the transport strategy as a 'coherent set of policies' for 'a transport system that is compatible with economic growth, sustainable development, equality, social inclusion and health improvement principles', reference should be made to the large body of information and research on both policy and practice in the area of access and mobility for disabled people. Some of these are given as an annex in this response.

We now have in place a complex network of local, regional and national transport bodies responsible for transport planning and management. The consultation document makes reference to them in Annex D. How these will relate to each other is crucial in delivering improvements to the transport system and deserves more attention.

We note that Regional Transport Partnerships (RTPs) are bound to produce regional transport strategies (RTSs) whereas local transport strategies are a non-statutory requirement for local authorities. The Scottish Executive has given guidance on both and both lay stress on consultation. Continual attention must however be given as to how stakeholders and the wider public can, firstly, understand who is responsible for what and, secondly, engage in the decision-making process.

Question 1 – the right goals for transport in Scotland?

We think that objectives and goals should be identified as arrival points not as the means of arriving. They should be measurable as outcomes not as processes. So 'promoting' etc should become 'achieving', or something similar.

We find the mix of 'high level objectives' as set out in the 2004 White Paper and the 'key goals' set out here very confusing. We think continuing to use the former would be more helpful in setting out what the NTS wants to achieve. Thus 'promoting (achieving) social inclusion by connecting remote and disadvantaged communities and increasing the accessibility of the transport network' is better than just 'promoting (achieving) accessibility' however broadly that is defined. The requirements on Regional Transport Partnerships (given in Annex D) also have the objective of 'promoting social inclusion' rather than 'promoting accessibility'. We note that the Scottish Executive's 'Guidance on Regional Transport Strategies' refers to 'guiding principles' underpinning the strategy which are 'based on the national aims and objectives for transport and on the Executive's overall policy goals'. Among these are to 'improve access to public services....' and 'addressing transport inequalities...'

However the NTS has its own set of ‘underpinning principles’ set out on pages 15/16 which does not mention access but does include the targeting of investment, addressing the transport requirements of different equality groups and support for partnership working between public sector agencies, the private and voluntary sectors. Promoting equality/equal opportunities should be stated as a key goal.

There should be cross referencing and commonality in the terminology being used.

On social inclusion issues, reference is made to an ageing population. In view of the strong correlation between age and disability/long term illness, it is important to highlight the mobility and access needs of this sector of the population in local, regional and national strategies. At the same time the civil rights of all disabled people to non-discrimination in respect of transport services is recognised in legislation and will be increasingly enforced through regulation over the next 15 years. The National Transport Strategy should include measures which will both promote and enhance the implementation of this legislation.

Another set of targets should be directed towards transport policies which support transport modes and services which are disproportionately used by low-income sections of the population and people living in areas of multiple deprivation. Some 48% of disabled adults and 45% of adults with long-term illness (LTI) live in households without a car compared to 21% of non-disabled/LTI adults. Some 30% of disabled adults and 29% of adults with LTI are nearly twice as likely to live in the most multiply deprived areas of Scotland compared to 18% of non-disabled/LTI adults.

Chapter 2. What are we trying to achieve?

Question 2 – is there need for amendment to see health at the heart of policy?

What we have said above is relevant here: we need clear objectives/goals against which to measure outcomes. Our particular test for the NTS is how far it will achieve social inclusion and the mobility of disabled people by targeting improving access to a range of transport services, including health services, for those who need it. And by getting people out and about, their physical and mental health, social well-being and quality of life will be improved. At the same time it must be recognised that some health-giving activities such as walking and cycling are either difficult or impossible for many disabled people. So alternatives are needed.

Chapter 3. The action we will take

This section forms the heart of the strategy. But as already stated, objectives should be expressed as measures to ‘achieve’ social inclusion, accessibility, etc. There should also be a section on measures to achieve equality, including disability equality.

Question 3 - areas of work for the dissemination of best practice examples?

The recent research for the Scottish Executive 'Improved Public Transport for Disabled People' identifies twelve examples of 'best practice', six of which are in Scotland. But we think there are many more in the public transport sector and in the private and community/voluntary sectors.

There would certainly be merit in compiling and circulating details although what is deemed 'best' as opposed to 'good' or 'original' needs to be considered. In disability and community transport areas, the Mobility and Access Committee for Scotland (MACS) and the Community Transport Association (CTA) would be well placed to lead on this. Recent national transport awards can also be noted as providing evidence of achievement.

We think that a comprehensive and freely-available central 'information bank' on research and projects would be a useful facility to have in Scotland so that past experience can be built upon. It would be good if Transport Scotland could provide this and it should as a matter of course include examples of relevance to disabled people.

Methods to facilitate economic growth

Question 4 - issues to ensure the effectiveness of the Strategic Projects Review?

Disabled people are significant contributors to economic growth and the economy through the workforce. They should not be characterised and stigmatised as being solely consumers of products and services. However their priorities may differ from the population at large and additional investment is needed to be effective. An example would be an increase in Direct Payments which permit disabled people to live more independently and employ their own assistants. Also extra travel assistance for disabled young people getting to education, training and early work opportunities.

Disabled people are transport users on all modes of transport and every mode should be responsive to demands and needs which have been properly researched. Subsidies for bus services should be balanced by subsidies for alternative services for those, for instance, who cannot regularly use bus services for various reasons. Such services are taxi and private hire services, community transport, car sharing schemes, etc. Subsidies for rail, ferry and domestic air services should be similarly assessed.

All projects included in the SPR must be compliant with regulations and specifications under the DDA and must contribute to the goals of social inclusion and accessibility for disabled people.

Question 5 – is the balance of investment right between spending on new and existing infrastructure and between different modes of transport? If not how should it change over time?

There should be a balancing out of spending towards revenue support and non-infrastructure activities. Expenditure on road and rail infrastructure is disproportionate

and spending on improvements to existing infrastructure is as important as spending on new infrastructure. Over 70% of all public transport trips in Scotland are undertaken by bus or coach, covering almost half the total distance travelled. But public transport subsidies and grants are estimated to contribute less than 30% to bus companies' revenues – the lowest proportion across Europe.

Similarly, public financial support for the taxi and private hire sectors, outside of contractual work, is minimal. They provide a door-to-door, 24 hour service across Scotland and a link with many other transport modes. In isolated areas they are the only substitute for the car. For disabled people, especially those who are less mobile and without access to a private car, they potentially offer a lifeline to a range of essential services and social activities. The main barriers are high fares, the cost of accessible vehicles or adaptations, and inadequate driver training.

Question 6 - targeting of spending?

As we said above, to achieve social inclusion and equity, spending should be directed to support transport modes and services which are disproportionately used by low-income sections of the population and people living in areas of multiple deprivation. Amongst these is a high proportion of disabled people. Some 48% of disabled adults and 45% of adults with long-term illness (LTI) live in households without a car compared to 21% of non-disabled/LTI adults. Some 30% of disabled adults and 29% of adults with LTI are nearly twice as likely to live in the most multiply deprived areas of Scotland compared to 18% of non-disabled/LTI adults. To address this, strong emphasis must be placed on local provision providing access to local amenities and this may primarily be the local authorities' task to deliver or support in partnership with other agencies in a co-ordinated and integrated manner.

Question 7 - steps to develop international connections by both air and sea?

Whatever developments take place in regard to air and sea travel, the disabled passenger must be given equal access and service opportunities. International journeys start with journeys in Scotland, so that ways of getting to and from airports and shipping ports, and from there accessing planes and vessels, must be secured. Authorities in Scotland need to recognise and implement international standards and agreements.

Question 8 - issues connected with cross-border connection?

Question 9 - a faster Scotland to London rail service?

We support the development of cross-border rail services as an alternative to short haul flights and coaches. It is highly desirable to reduce travelling times between Scotland and London including on the West Coast Mainline. But for the railways to compete on quality, cost and speed, continued investment of public money will be required. For many disabled people, the accessibility of the stations and trains and their reliability, service quality and affordability are more important than speed.

Question 10 - spending on local roads and trunk roads?

We do not have a view on whether spending on the local road network should be ring fenced but would expect that if it is not, under-spending or over-spending should be fully explained and justified. If it is, then there may well be other areas where local discretion results in very variable standards. Certainly, disabled people using the roads look for high quality management and maintenance especially where there are hazards for pedestrians who may be mobility or sight impaired such as when repairs are undertaken.

Question 11- issues relating to the management and maintenance of the road and rail network over the long term?

We aspire to having a barrier-free environment and infrastructure for all transport services. Proper auditing to identify the barriers must be undertaken followed by a prioritised programme of work to overcome them. This has been happening on the railways but funding for minor works and major enhancements needs to be maintained. Similar progress on the roads is harder to see. This should be a primary task for the new Transport Scotland agency. We also welcome the appointment of a Roads Commissioner.

We would like to see more professional environmental auditors and managers trained and employed. Their training and remit should include an understanding of the needs of disabled people. The current course at Heriot Watt University is an encouraging start.

Question 12 - what about freight?

We have no comment on this.

Question 13 - what about skills and good practice?

The NTS should be saying a lot about the importance of the workforce in delivering good quality transport services although a separate Scottish Strategy for Skills may not be required. We need to know more about the numbers employed and how they are recruited and trained. If Transport Scotland is to be 'a hub of best practice' how will it discharge its role and relate to other interested agencies?

Staff at all levels need to have good understanding and skills in dealing with disabled travellers. When endorsing MACS' publication 'Recommended minimum training standard for staff assisting disabled people' the Minister of Transport identified the training of transport employees as 'key' to achieving a transport system that is 'helpful, well-informed and friendly'.

Question 14 - measures to support tourism?

Tourists, both from outwith Scotland and within Scotland, require to get around whether by public transport or other means. But they need access to appropriate information and a range of associated facilities. For disabled people, careful planning is needed to meet their specific travel needs and ensure that the whole journey is feasible and enjoyable.

Much more could be done by VisitScotland, local tourist authorities, transport operators and a host of other agencies.

Measures to promote accessibility

The accessibility of public transport services has been defined as the ease with which all categories of passengers can use it. Its use also depends on other factors –

- availability (route options, timing and frequency of services; location and design of stopping points; a barrier-free environment).
- affordability (the extent to which an individual or household has to make sacrifices in other areas to cover the expense of travel)
- acceptability (other factors that determine the quality of services eg cleanliness of vehicles; staff attitudes and driving style; facilities in waiting areas).

It is interesting to note that in setting out the functions of the Public Transport Users' Committee for Scotland, the Transport (Scotland) Act 2005 says the term 'public transport services' means 'all those services (including ferry services used also for carrying freight) on which members of the public rely for getting from place to place when not relying on facilities of their own'. But it excludes (a) excursions and tours and (b) services provided under Section 19 of the Transport Act 1985 and 'other services provided wholly or mainly to meet the needs of members of the public who are elderly or disabled'.

Question 15 - key barriers to developing effective DRT?

Demand Responsive Transport (DRT) is the now popular umbrella term for a very wide range of flexible, semi-scheduled and non-scheduled services. It is defined in the Annex B Glossary as 'any form of transport where day-to-day service provision is influenced by the demands of users.'

The Scottish Executive sponsored 'Review of Demand Responsive Transport in Scotland' and associated guidance 'How to Plan and Run Flexible and Demand Responsive Transport' have now been published. The researchers conclude that 'DRT should form an essential part of an overall transport and accessibility plan' showing how each of the various markets for it is being developed including commercial taxis. Their other conclusions and recommendations must be addressed, especially the matter of on-going funding for existing projects.

Development would be helped by the removal of the legislative and administrative anomalies mentioned in paragraphs 59-61 and we support the idea of establishing a single local point of contact for all forms of non-scheduled transport. We need to make sure that services are well advertised and information about them is readily available on the internet and in a variety of formats.

Older and disabled people are principal users of DRT and an expansion of services is critical to improving their mobility. The Scottish Executive's earlier research 'Improved Public Transport for Disabled People' includes the recommendation for 'adding on a flexible, user-friendly, fully accessible, affordable door-to-door element to existing

transport provision (with appropriate concessions)'. It says that 'the inevitable cost of implementing some of the necessary changes and initiatives needs to be recognised by government' and that 'setting duties and responsibilities for other agencies and transport operators without the provision of additional funding will not achieve the required outcomes'.

Regarding licensed taxis and private hire cars, there are some 20,000 in Scotland in about equal numbers although not in distribution. The former are dominant in the cities and larger towns, the latter in rural areas. Independent research highlights their importance for severely disabled people as potentially offering a door-to-door service around the clock and through the week. However SATA's policy states that to provide an effective service:

- more vehicles need to be purpose built or adapted to an acceptable specification under the DDA (on which the Government has yet to pronounce)
- fares must be discounted by at least 50% to make them affordable
- there should be an allowance of one return trip a day on discounted fares
- drivers must receive appropriate training.

The main barrier for achieving these things is again financial, both for the taxi trade which has to meet the higher cost of accessible vehicles and driver training, and for local authorities which need to meet the cost of concessionary taxi fares. So a national initiative is needed and it has been made more urgent by the Scotland-wide concession scheme which provides free all-day travel across the country to the more mobile who can use buses. SATA estimates that there are some 110,000 disabled people across Scotland who qualify for taxi concessions based on their inability to use buses on a regular basis.

Question 16 - examples of good practice in DRT?

The recent research for the Scottish Executive mentioned above contains many examples of DRT schemes in Scotland and elsewhere and there is a wealth of experience and information on which we could and should build.

The MASCARA project, funded under the INTERREG IIIC West programme has examined the potential of DRT services in Europe.

Question 17 - should accessibility planning be compulsory?

We think that accessibility planning should be undertaken on a regional basis and should be compulsory as in England. This is because to get an integrated transport system requires planning on a larger regional scale rather than on a local basis. If not compulsory it may not be adhered to. Accessibility planning should enable accessibility problems to be identified at an early stage in the transport planning process. However, it must be followed by monitoring to ensure the plans are implemented and the outcomes known.

Question 18 - how to improve the accessibility of public transport to disabled people, including the extension of concessions?

The timescale allowed for public transport vehicle accessibility under the DDA and related regulations extends to 2020 and to-date improvements in accessibility have been much slower that disabled people were entitled to expect when the Act was passed in 1995. Many disabled people are unable to use even low floor buses and elderly people find the design makes it longer to find a seat before the bus moves off. Best practice should be encouraged, for example making all drivers undergo disability awareness training, and this should be a condition of public funding.

A greater proportion of public funding should be directed at DRT to ensure that the most severely disadvantaged people can at least share in the monies being expended on the majority, thus enabling them to feel that they too matter and that their welfare and inclusion in society is of importance.

The Scotland-wide free bus concession scheme is welcome as it undoubtedly enhances the travel opportunities for those who are eligible and can use the services. But for disabled people it is not as comprehensive as the publicity behind it suggests. Research indicates that two-thirds are not able to benefit. Some local authorities operating taxi concession schemes will not let holders have a national bus pass at the same time. Two free ferry trips a year are not enough to make much difference, for instance for those living in Dunoon. So many feel even more left out now that the wider travel opportunities have been introduced. We should identify those who are excluded and provide alternatives other than the car.

On taxi concessions we would like to see

- the introduction of a national taxi and private hire car concession scheme
- those who otherwise qualify for local taxi concessions also being able to qualify for the Scotland-wide free bus scheme
- where these concessions exist, a programme for introducing accessible vehicles
- compulsory and comprehensive training for drivers

It should be possible to use concessionary passes on non-scheduled, not-for-profit community transport services and the operators should be able to recoup the costs. When considering the cost of DRT services, the Executive should weigh this against the enormous budget which has been approved for free concessionary bus travel throughout Scotland. Many elderly and disabled people would love to be included in the scheme but cannot reach a bus route. So more flexible routing and Scandinavian-type 'service routes' should be promoted.

Question 19 - how can operators and drivers follow best practice when dealing with people with mobility difficulties?

The way to provide good quality passenger services for staff at all levels is to have appropriate general and mode-specific training and this must include disability awareness and equalities training. This should be a licensing and contract condition for public transport providers.

The Mobility and Access Committee for Scotland (MACS) has published a 'Recommended minimum training standard for staff assisting disabled people'. Its

recommendations should be endorsed in the NTS and in local and regional transport strategies and implemented by transport operators.

National standards should be set and the training provided by people with recognised qualifications. Systems of monitoring, evaluation and up-dating these standards should be adopted in liaison with disability groups and local access panels. Where the standards are not met there should be compensation for users.

The 2002 PSV regulations for the conduct of drivers, inspectors, conductors and passengers should be reviewed in the light of recent experience, especially by disabled and elderly people. Effective enforcement measures need to be introduced. Failure to help disabled people should be seen as misconduct leading to disciplinary action.

All staff who operate equipment such as ramps, lifts and restraints should be trained to do so correctly and safely.

We support the re-launch of the Thistle Travel Card Scheme and consider that all transport operators should be required to train their staff in its use.

Question 20 - what more to do for social exclusion in rural areas?

For those without a car, transport provision in rural areas is often poor or non-existent. We support the funding of pilot DRT schemes from the Rural Transport Fund but ways need to be found to sustain these from mainstream sources.

Question 21 -what to consider for the lifeline air and ferry network?

We welcome the financial support given for these services and their infrastructure and, as quoted in our introduction, recall that the Government's Ten-Year Transport Plan (DETR 2000) said 'Building in accessibility for disabled people in all new investment is a condition of public money being spent. Local authorities and transport operators should ensure that the transport needs of disabled people are factored into their plans and that the full benefits of improved public transport are accessible to all.'

We think it important in the public interest that Hebridean ferry services are retained as a single unit and we welcome the development of a long-term strategy to deliver real improvements.

More could be done to develop ferry services across and along the Forth and Clyde estuaries.

Question 22 - how to ensure connections for outlying estates in towns and cities?

Transport links to towns and cities are very important. A statutory obligation and draft guidance are all very well but it is not clear what additional funding is being made

available to Regional Transport Partnerships and local authorities to support this objective.

Question 23 - issues to do with access to cultural activities and opportunities?

This is a problem for dispersed and isolated communities and especially for young people and those with mobility difficulties. It can also be a problem in cities at certain times. For instance, during the Edinburgh Festival there can be difficulties travelling late at night between Edinburgh and Glasgow. This suggests the need to review in particular bus and rail timetables and provide more inter-connecting services.

We look forward to the proposed research on this matter.

Measures to promote choice and raise awareness of the need for change

Question 24 - travel plans by larger employers?

We have no comment on this.

Question 25 - how to increase and enforce travel plans by developers?

We have no comment on this.

Question 26 - how to encourage 'smart measures' to promote modal shift?

Modal shift is especially difficult for disabled people when their choices are limited or non-existent due to their personal situations or to barriers put in their way. However if they are to be treated like everyone else, choice of mode needs to be an option for instance from taxi to bus, from car to bus or train. Not allowing people to hold both bus and taxi concessions for use when they are able to is a case in point.

'Travel training' and trial periods are measures which can open up these options.

Question 27 - is there a need for a national travel awareness 'brand'?

We think the Scottish Executive has a major role to play in making people aware of the importance of good public transport services. But any marketing campaign needs to be sensitive to the travel options for disabled people and the need to respect measures, such as reserved parking, designed to provide easier access.

Measures to promote modal shift

Please see our response to Question 26

Question 28 - how to promote walking and cycling?

We note that many disabled people enjoy both walking and cycling and therefore we support measures to encourage them – but to avoid making them mutually hazardous.

Question 29 - how to improve health?

We have no comment on this.

Question 30 - how can we make buses more attractive?

All the options listed in Paragraph 101 require to be pursued. Bus services tend to be better in cities than in outlying areas. Fares need to be kept low to encourage use. More low floor buses should help but many disabled people still find it hard or impossible to use them. Routing and frequencies need to provide regular access to local amenities as well as to central locations. Local authorities need to subsidise socially-responsive routes. Buses in certain outlying areas need to be subsidised to attract tourists in the summer.

The quality of travelling experience on a bus is likely to be affected by overcrowding on busy routes at certain times of the day. It should be possible to ensure that each locality has at least one operator, with competition being encouraged as much as possible.

Trams should be more accessible than buses but access to stops has to be equally accessible.

Question 31 - how should the bus industry change?

There is a case for considering re-regulation using Edinburgh and London as examples of control in the public interest. This could facilitate the greater integration of bus and rail services.

Question 32 - how do we make rail more attractive?

We need high speed travel between major cities but equally trains need to be more reliable and affordable. Rail travel ought to be faster than travel by car and better value for money than air travel (taking account of time wasted at airports). Our rail system has a lot to learn from continental Europe where many countries have faster, more integrated rail systems than ours.

Good interchange between rail and other transport services makes them all more attractive.

Question 33 - how to improve travel information?

On the whole this has improved in recent years being more accessible for people with sensory and other disabilities. However it needs to be more reliable and consistent on all

transport modes and in all areas. People providing the information require basic skills and knowledge.

Reference should be made to the Mobility and Access Committee for Scotland's publication 'Valuable for anyone, value for everyone – proving accessible information about travel.' Also to 'The SAIF Standards for Disability Information and Advice Provision in Scotland' from the Scottish Accessible Information Forum.

Question 34 - what changes in public transport fares are needed

Question 35 - how to fund lower fares?

Question 36 - how to promote integrated ticketing?

Rail fares need to be competitive with bus and air travel to discourage travel by car. We also need a simpler and more understandable fares structure. Whilst it may be possible to subsidise fares through tax revenue to a certain extent, it is doubtful if using the tax varying powers to subsidise public transport would be politically feasible.

We think that the use of discount cards to encourage more frequent travel would be a worthwhile innovation. If more people travelled by rail, fares could be somewhat lower. It should be possible to promote integrated ticketing especially since First Group is a significant bus operator and holds the ScotRail franchise. Bus companies should be encouraged to accept tickets issued by other operators.

Question 37 - how to promote modal shift from road freight to rail and waterborne freight?

In addition to the Freight Facilities Grant Scheme, local authorities need to encourage port facilities to develop along our long coastline. We also need to develop the canal system.

Question 38 - how to ensure people's safety?

We agree with what is said on page 53. It is thought that CCTV cameras are useful in providing evidence but these need to be backed up by regular policing. Disabled people, like others, are unlikely to travel if they feel unsafe.

Measures to promote new technologies and cleaner fuels

Question 39 – what can be done to promote the take up of biofuels?

We have no comment on this.

Question 40 - what are the opportunities for biofuels?

We have no comment on this.

Question 41 - what can be done to make motor vehicles cleaner to run?

We have no comment on this.

Question 42 - what about new technologies?

We have no comment on this.

Measures to manage demand

Question 43 - how to ensure a more effective parking policy.

We have no comment on this.

Question 44 - how to develop park and ride schemes.

We have no comment on this.

Question 45 - how to pilot demand management on trunk roads

We have no comment on this.

Question 46 - is road pricing an effective way to manage demand?

After the failure of the Edinburgh road user charging scheme to obtain public support, other local authorities are unlikely to pursue this option. A national road pricing scheme appears to be the way forward. Major difficulties here include establishing the real cost of motoring and a fair way to share these costs.

Question 47 - can more be done to promote road pricing schemes?

It is difficult to know if sufficient public and political support will exist to make such a scheme feasible in the foreseeable future

Question 48 - what are the objectives of road pricing schemes?

We have no comment on this.

Question 49 - should there be a Scotland only road pricing scheme?

A Scotland only scheme would face difficulties because of the large amount of cross-border traffic between Scotland and England.

Question 50 - should surface transport be included in CO2 emission trading schemes?

We have no comment on this.

Measures to reduce the need for travel

Question 51 - what more can be done to ensure the consideration of transport in location decisions?

We would welcome clearer directions to public authorities that transport issues must be considered at the very earliest stage in the decision-making process about the location of new developments. The convenient location of public services is particularly vital for disabled people who find public transport difficult or impossible to use. Many cannot travel by foot or bike.

Many public buildings still remain inaccessible to disabled people.

Question 52 - what more can be done to reduce the need to travel?

Broadband and teleworking can have a slight impact on reducing the need to travel but the effect is limited because planning controls and restrictions imposed by title deeds limit the ability to work from home – it is not usually possible to carry on a business from home. Home working can be of benefit to disabled people but realistically broadband and teleworking are most likely to be used by employees of large organisations who occasionally work from home.

Question 53 - what more should be done nationally to improve road safety?

Disabled people experience difficulties in crossing roads for instance because of insufficient time given by green man traffic lights. They often depend on motorists to allow them more time. 20 mph speed limits should be enforced as a major factor in reducing fatalities.

Question 54 - how can we make streets safer and more pleasant?

We support measure to make streets safer and more pleasant. But they need to be environmentally friendly for disabled people especially those with sensory impairments. Road humps should be avoided.

Chapter 4. How we will implement and monitor the strategy

Question 55 – what issues should be considered for implementing the NTS?

We welcome the statement that all involved in transport policy must take full account of the strands of equalities including disability. ‘Quality proofing’ of the NTS should take place before its publication and the document should be made available in a variety of formats.

Monitoring: proposals for indicators

Question 56 - is traffic intensity a useful indicator of the NTS’ success?

We have no comment on this particular question.

Question 57 - are the transport goal indicators useful?

The suggested indicators on accessibility are related to services and job opportunities. These need to reflect the problems they present for access by disabled people

Other performance indicators for achieving social inclusion and transport equality need to be set. Indicators would include the number of disabled people travelling, gender, age, ethnic origin, place of residence, destinations, purpose, frequency etc

Monitoring: existing and future targets

Question 58 - should the cycle use target be reviewed?

We have no comment on this.

Question 59 - other target measures to stabilise road traffic volumes?

We have no comment on this.

Question 60 - agree with proposals to

- stabilise road traffic
- measure modal shift
- direct efforts onto environment and congestion issues?

Yes, but to devise ways of measuring modal shift by disabled people eg by monitoring the number of Blue Badge holders, the use of concession cards, take up of DRT services, etc

Question 61 - move from a national target for traffic reduction to regional ones?

We have no comment on this.

Question 62 - no realistic, deliverable milestones for traffic stabilisation?

We have no comment on this.

Question 63 - link level of contribution for reductions in CO2 emissions to devolved areas?

We have no comment on this.

Question 64 - specific CO2 reduction levels?

We have no comment on this.

Question 65 - timing and scope of NTS reviews?

We have no comment on this.

Annex

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