

## **Poverty and Inequality Commission response to National 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?**

The Poverty and Inequality Commission welcomes the Vision and its focus on a sustainable, inclusive and accessible transport system. It particularly welcomes the focus on delivering a fairer Scotland.

### **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?**

The Commission welcomes the four priorities. At the moment the priorities and outcomes do not explicitly acknowledge the role transport should have in contributing to reducing poverty and inequality in Scotland, which should be in addition to making transport affordable for individuals. The Commission recommends that an additional outcome should be included, under the priority *Promotes equality*, that acknowledges not just the importance of ensuring fair access, ease of use and affordability, but also the role that transport potentially has in reducing inequality in Scotland more broadly. This could be framed as: "Will contribute to reducing poverty and inequality"

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

All the priorities are important and interlinked. Promoting equality must underlie all the priorities, otherwise it would be possible to end up with a transport system that achieves its other objectives but in fact increases inequality in Scotland.

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

The Commission welcomes the acknowledgement in the strategy of the importance of taking account of poverty, gender inequality and the different needs of different transport users, including disabled people, older people, young people and people living in urban and rural communities. We would not frame these as challenges, however. Taking account of these different needs must be a core part of delivering the Vision. Framing them as challenges suggests that these users' needs are a problem to the transport system. The Strategy should acknowledge that it is the way the current transport system has developed and is organised that causes these challenges, rather than people's needs in themselves. Taking the example of disabled people, using the social model of disability we recognise that disability is caused by the way society is organised and the way services are provided, rather than by a person's disability or difference.

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

In its comments the Commission is focusing on those policies and outcomes that are most directly relevant to transport's role in reducing poverty and inequality.

Some of the policies and enablers fit well with the recommendations of the previous Commission's Transport and Poverty in Scotland report <https://povertyinequality.scot/wp-content/uploads/2019/06/Transport-and-Poverty-in-Scotland-Report-of-the-Poverty-and-Inequality-Commission.pdf>.

We particularly welcome the policies and enablers relating to embedding the implications for transport in spatial planning and land use decision making; minimising the connectivity and cost disadvantages faced by island communities and those in remote and rural areas; improving quality and availability of information, and ensuring sustainable access to employment locations, education and training and healthcare facilities.

While we welcome the positive intention around the policy 'Provide a transport system that is equally accessible for all', we consider that there needs to be more detail about what this means. Does this mean, for example, equally financially and physically accessible? Does it mean the same amount of access for people living in all parts of the country? The next version of the strategy should provide more clarity on this. We would like to see a specific reference to affordability as despite affordable for all being one of the outcomes there is no reference to affordability in the policies or enablers.

The previous Commission recommended that work should be undertaken to explore how a minimum transport standard might be defined for Scotland. This could be something that Transport Scotland could undertake to inform this policy.

Policies relating to safety and embracing innovation would benefit from explicit acknowledgement that should take account of the needs of all users of the transport system in doing this. Women, black and minority ethnic people, older people and disabled people in particular often have different experiences of safety while travelling. Innovation has the potential for many positive benefits if it takes into account the needs of different groups and those on low incomes, but if it does not it could lead to those groups becoming further excluded from the transport system.

We suggest the policy 'Support the transport industry in meeting current and future employment and skills needs' should be expanded to say 'and ensure the workforce is more representative of the people it serves'.

There is nothing in the policies suggested in the strategy that sets out the role that transport can play in reducing poverty and inequality in Scotland, rather than just focusing on accessibility for individuals. While some of the existing policies can contribute to reducing poverty and inequality, we would expect to see an additional policy to ensure that transport policies and funding decisions take account of their impact on reducing poverty and inequality and enabling people to achieve their human rights.

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

**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.**

The Commission considers that there needs to be greater clarity and accountability in relation to who takes decisions about transport and how public money is spent. Communities should be involved in decision-making and be able to hold decision-makers to account at each level. The Commission is not best placed to suggest where particular decisions should be taken.

**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?**

The Commission strongly believes that local communities should be involved in making decisions about transport in Scotland. A sustainable, inclusive and accessible transport system will only be achieved where those who need to use the services are engaged in planning and discussions about delivering services. This should not just be at national or regional policy level: transport operators should be required to involve local communities in planning and decision-making in a meaningful way.

In involving local communities it is really important that groups whose experiences and needs are often not taken account of in the planning of the transport system are specifically engaged with. This includes those with lived experience of poverty, women, older people and disabled people. It is also important that it is not just existing public transport users who are involved, as this will mean that planners and operators may fail to identify barriers that prevent others from accessing public transport and may fail to plan for their needs in the design of the public transport system. Getting this right could reduce the heavy reliance on private cars (and single occupancy journeys) and increase public transport patronage, which would, in turn, assist with congestion and climate action goals.

There should also be improved opportunities for individuals to raise issues about services to allow immediate feedback that can shape transport services. The previous Commission was told that people often did not know who to raise issues with or had not confidence that anyone would respond. The previous Commission recommended that Transport Scotland should look at establishing a simple 'front-end' (e.g. through a website) that allows people to raise and escalate issues about services, no matter who is providing them, and consider establishing a transport ombudsman.

**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?**

The previous Commission found that issues of affordability and availability of transport are particularly pronounced in rural areas of Scotland. Rural communities

can face huge challenges accessing essential services such as healthcare, and employment and education opportunities because of the limited public transport available and the often high cost.

The reliability of services can have a very significant impact, particularly when changing between services, as there is often no alternative. This can lead to people having to live with a constant level of uncertainty about whether they will be able to get to the places that they need to go to.

People on low and/or restricted incomes in rural areas may have no choice but to run a car even if they cannot afford this, and those who are not able to can become isolated and unable to access the services they need. Many disabled people who live in rural areas, for example, opt to use the Disability Living Allowance/Personal Independence Payment for a car provided by Motability direct from their benefits to ensure that they have transport to stay connected. A more fit for purpose public transport system would prevent forced car ownership and increase their disposable income, some of which could be spent on public transport. This has the potential to lift some people out of poverty. The Commission recommended that Transport Scotland should examine ways of addressing the transport challenges faced by people on low and/or restricted incomes in remote and rural areas. We welcome the commitment to minimise the connectivity and cost disadvantages faced by island communities and those in remote and rural areas. We look forward to hearing more about what this means in practice including how this is linked to the proposed Islands Plan.

Research has also found a relationship between living in areas with higher levels of deprivation and having poorer transport options. While this is not universally the case, research suggests that areas with higher levels of deprivation tend to have worse public transport links in terms of both the number of options and quality of services. Even where there are some transport services, if options are few or restricted this can limit people's ability to travel. Some areas, for example, may be serviced by a rail network, and as such seen as having transport connectivity, however, the higher costs of train travel may be unaffordable to people on low incomes. Poor transport options restrict people's access to services, to education and employment, and to social opportunities and can increase the poverty premium that they face when buying food and other goods. This can lock people into poverty. We would like to see a more specific focus on this in the strategy.

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

People with lived experience of poverty highlighted existing concessionary travel schemes as something that worked well. These schemes were considered to provide a vital form of support, particularly for disabled people, and could help to combat the social isolation, loneliness and lack of confidence that people with disabilities can often experience. The schemes were also said to be essential in ensuring that people are able to access the essential services such as health services, social security services and education.

Participants also discussed the importance of community transport schemes to remote and rural communities. These schemes were said to be a vital lifeline for many communities, providing affordable and accessible connections that enabled

access to services and employment. However, it has also been noted (Disability Equality Scotland, Transport to Health Poll, August 2019) that some people could not afford to use community transport schemes, particularly in more rural areas where journeys were longer distance, as the reimbursement mileage rate to the volunteer drivers made the journeys unaffordable.

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

The previous Commission has recommended that Transport Scotland should explore and pilot a range of ways of making travel more affordable. These include radically widening access to concessionary travel; introducing carnet/multi-trip discounts; implementing lower-cost multi operator tickets that eliminate interchange penalties; implementing capped or flat fares; introducing a peak period start time to reduce costs for low paid workers travelling to early shifts; and exploring free public transport initiatives (such as Estonia and Luxemburg).

A plus one scheme for some concessionary card holders (older people and disabled people) would assist as this would give confidence to travel by bus and rely less on healthcare transport (ambulance and hospital) and private hire (again unaffordable to most) to enable the completion of a successful door to door journey, with the confidence and assistance of a companion without additional costs incurred for companion travel.

The National Transport Strategy should look at making community transport schemes more sustainable and affordable to all by financially supporting community transport schemes that provide transport to essential services such as health, because there is no alternative (ambulance or public transport). It should explore whether these journeys could receive reimbursement from the Bus Service Operator Grant allocation, or a similar fund, administered by Transport Scotland on behalf of the Scottish Government .

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

The previous Commission identified a range of aspects of the transport system that do not work well for people with lived experience of poverty. These included lack of affordability; lack of accountability; services that are not designed to meet the needs of women, older people and disabled people; poor connections and unreliable services; a lack of integration in planning transport and other services; and difficulties accessing education, employment and healthcare, particularly from low income areas. More details can be found in the Commission's report <https://povertyinequality.scot/wp-content/uploads/2019/06/Transport-and-Poverty-in-Scotland-Report-of-the-Poverty-and-Inequality-Commission.pdf>

In particular we would highlight that increasing fares, including rail travel, are unaffordable to many. Bus fares in Scotland have increased by 11% in real (adjusted for inflation) terms over the past five years, which is higher than Great Britain as a whole. This leads to people being excluded from transport on the basis of cost.

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

The Commission made a number of recommendations that are set out in full in its report. In particular we would highlight the action relating to affordable travel which we set out in response to an earlier question; action to improve information about national and local concessionary fares schemes; and action to address the transport challenges faced by people on low incomes in remote and rural areas.

**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?**

The Commission welcomes the commitment to develop new transport governance arrangements, as accountability is an issue that came through very strongly in the previous Commission's work. We are very pleased to see that the recommendations made by the previous Commission will inform the development of these governance and accountability arrangements.

The Commission also welcomes proposals to establish Transport Citizens' Panels to better understand the lived experiences of people across Scotland. These panels should ensure they include people who are often not heard and those with different experiences of the transport system, particularly people with lived experience of poverty, older people, disabled people, black and minority ethnic people and women and particularly people in rural and Island communities.

It is good to see a commitment to robust monitoring and evaluation of the strategy. The Commission notes that the strategy says that analysis will be broken down to look at demographic, socioeconomic and geographic facts where possible. The Commission would like to see a stronger commitment to collect the necessary data to enable this. While we do not intend to comment here in detail on the proposed indicators we would note some caution around an indicator on transport spend relative to income. We know that transport spend does not necessarily reflect transport needs for those on low incomes who may be forced to limit activities due to transport costs or make trade offs. We recognise that trying to measure transport affordability is complex and would be happy to have further discussion with Transport Scotland about the indicators.

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

The Commission was pleased to see the amendment to the Transport (Scotland) Bill, put forward by Cabinet Secretary for Transport, Infrastructure and Connectivity, and passed by the Scottish Parliament, that requires Scottish Ministers in determining the content of the national transport strategy, to have regard, among other things, to the desirability of transport being provided, developed, improved and operated so as to contribute to improving outcomes in relation to a number of aspects including the ability of people to realise their human rights; a number of matters in relation to social and economic well-being; the environment; and health and wellbeing.

The Commission looks forward to seeing these aspects further strengthened in the final version of the strategy, in particular in relation to the transport's role in enabling

people to achieve their human rights. The previous Commission recommended that the Scottish Government and Transport Scotland should adopt a rights-based approach to transport that recognises that access to suitable transport, no matter your level of income or where in Scotland you live, is a necessary requirement in order to achieve other human rights.

October 2019