

# Consultation on the Case for Change Transport Options and draft STPR2 Update and Phase 1 Recommendation Report, particularly in relation to:

# Phase 1 Recommendations

# Options that will be taken forward for further appraisal in STPR2 Phase 2 the COVID-19 Addendum of the report.

## Response from the Royal National Institute of Blind People (RNIB) Scotland

The Royal National Institute of Blind People (RNIB) Scotland is the country’s leading charity working with blind and partially sighted people. We support children and adults with sight loss and help them to live full and independent lives, campaigning for their rights.

People with a visual impairment rely on public transport more than most groups to access employment, education and leisure activities and we welcome the opportunity to respond to this consultation.

The closing date for feedback is midnight on 31 March 2021.

**Section 1:**

[Case for Change Transport Options](https://ns55.askia.com/WebProd/cgi-bin/askiaext.dll?Action=StartSurvey&SurveyName=STPR2&QS=1)

This comments form is aimed at capturing your views on the STPR2 Transport Options outlined within the Case for Change document. It also seeks views on the challenges and opportunities related to COVID-19 as well as the STPR2 engagement process to date. We recommend that you review the material within the report prior to you providing comments. The form should take about 10 minutes to complete and all responses are anonymous.  
  
  
The closing date for comments is midnight 31 March 2021.

**Are you responding as an individual or an organisation?**

Individual

Organisation

**What is the name of your organisation?**

RNIB Scotland

**Please indicate which category best describes your organisation?**

Third Sector or Community group

Transport Operator

Business Organisation

Community Council

Local Authority

Regional Transport Partnership

Other Public Sector

Academia / Education

Other (please specify)

**Which of the Case for Change reports have you read prior to providing comments?   
Please select all that apply**

Argyll & Bute

Ayrshire & Arran

Edinburgh & the South East

Forth Valley

Glasgow City Region

Highlands & Islands

National Case for Change

Shetland Islands

Tay Cities

**To what extent do you agree or disagree with the following statement: The recommended transport options for STPR2 are strategic covering a range of modes and geographies.**

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

**How well do you feel the transport options recommended for further consideration address the problems, opportunities, and objectives for strategic transport connections in Scotland?**

Very well

Well

Poorly

Very Poorly

Don’t know / No opinion

**Do you have any other comments on the transport options identified?  
  
If you prefer not to leave a comment please click on the next button to move to the next screen**

RNIB Scotland supports the vision of a sustainable, inclusive, safe, and accessible transport system which helps deliver a healthier, fairer, and more prosperous Scotland for communities, businesses, and visitors.

The complexity of the transport options covered by STPR 2 mean that it was not possible to cover how each of the elements will be implemented and the potential future implications for blind and partially sighted people.

We do however welcome an approach that improves accessibility and reduces isolation and loneliness. Moreover, we agree with the need to address:

* accurate and relevant travel information both before and during the journey.
* being able to access public transport interchanges.
* being able to access public transport vehicles.
* being able to interchange between all modes.
* concerns regarding safety and comfort on the public transport network.

**To what extent do you agree or disagree with the following statement: It is clear what the next steps are when considering the transport options through STPR2?**

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

However, the next steps are outlined in the document do not specifically state how and in what format future engagement opportunities will be scheduled.

**Do you believe that the COVID-19 pandemic will bring about challenges and/or opportunities relevant to planning future transport investment through STPR2?**

Please select all that apply

Yes, challenges

Yes, opportunities

No, neither challenges nor opportunities

Don’t know

RNIB Scotland considers that the COVID-19 pandemic will result in both challenges and opportunities for planning future transport investment.

**What do you believe could be the key medium to longer-term challenges relevant to STPR2 arising from the COVID-19 pandemic on travel demand and patterns in your region / nationally?**  
**If you prefer not to leave a comment please click on the next button to move to the next screen**

RNIB Scotland has facilitated some discussion with visually impaired members on transport priorities. Blind and partially sighted people raised several concerns regarding the changes introduced throughout the COVID-19 pandemic, including:

* Transport providers and commissioners should recognise that any reductions in service will significantly affect blind and partially sighted people. RNIB Scotland members highlighted to us that individuals who are not blind or partially sighted often have alternatives open to them - for instance, instead of travelling by public transport, they can drive. This has been particularly relevant with the messaging around not using public transport to take part in recreational activities during the period of less strict Coronavirus restrictions. This has disproportionately affected blind and partially sighted people, who often do not have an alternative method of transport available to them, and who might avoid making a legitimate use of public transport for fear of being questioned about their journey. Participants highlighted this issue as especially pertinent given the expectation restrictions may be eased over the coming weeks and months.
* Blind and partially sighted people have also raised concerns about allocation of space should social distancing guidelines remain in place long term. There have been reports of the disabled passenger bay at the front of buses being taped off as part of social distancing measures. This has cut off an accessible and familiar seating area for blind and partially sighted people and made reaching a seat unexpectedly much more complicated.
* Further concerns have been raised about rural bus services, which are often a lifeline for communities and especially for those who cannot access other forms of transport. Maintaining these services is essential in the medium to long term.
* The importance of communication cannot be underestimated. A blind or partially sighted person relies on verbal communication for vital information and to help orientate themselves getting on the bus. It is important that all staff have adequate training to support blind and partially sighted travellers. For instance, bus drivers should not pull away from a bus stop until passengers are seated. Audio announcements can enable all passengers to get off at the right stop.
* In terms of rail travel, station accessibility remains an ongoing concern for many. Individuals report traveling to or from a nearby station in the knowledge it was more accessible and easier to navigate to other locations, even more so than a station closer to home.
* Given the financial impact of COVID-19 on transport services there are growing concerns around the long-term future of concessionary travel schemes in Scotland and calls for a national, statutory scheme.
* Regarding the Blue Badge scheme, complications have arisen through disabled parking bays being converted for other uses (i.e. commercial loading bays) without this information being shared with Blue Badge holders and taxi drivers. There have also been suggestions that signage of parking restrictions should be improved and made clearer, particularly where there is a change in restriction. Overall, participants who have a Blue Badge were overwhelmingly positive about it and would wish to see more action on tackling their misuse.
* The full impact of changes made under the Spaces for People Scheme is unlikely to be established until travel restrictions ease further. Feedback to date indicates that due to current government guidelines many people are not currently frequenting the areas where significant changes have been made.

**How well do you feel the Case for Change element of STPR2 has engaged with stakeholders and the public?**

Very well

Well

Poorly

Very Poorly

Don’t know / No opinion

RNIB Scotland acknowledges the broad range of events across geographical locations and efforts made to engage with a range of stakeholders. From the data included in the National Case for Change Report, however, it is not possible to identify how many of the individuals or organisations contributing to regional and national events had knowledge and/or lived experience of sight loss therefore we cannot comment on how well stakeholders and the public have been engaged.

**Have you or your organisation participated in events or previous online surveys in relation to STPR2?**

**Please select all that apply**

Workshops

Online Survey

Feedback forms

None

In relation to preparing this response, RNIB Scotland attended the MS Teams Live event which provided a comprehensive overview of the STPR2 process (23/03/21) and the associated equality impact assessment work, the recommendations emerging from Phase1 and next steps in the STPR2 and impact assessment process. We also attended the Equality Impact Assessment workshop: A focus on older people and people with disabilities (24/03/21).

**What worked well and what could have been improved in the Case for Change stakeholder and public engagement?  
  
If you prefer not to leave a comment please click on the next button to move to the next screen**

The presenters were well informed and paced the presentations appropriately. There was a genuine willingness to engage with participants and accept questions during the sessions as well as an offer for participants to seek more information afterwards.

The online presentations provided a strong overview into STPR2. However, the presentations relied heavily on detailed PowerPoint slides. This format is not always accessible for individuals who are blind or partially sighted. It would be helpful to always verbally describe slides during presentations. Furthermore, given that the Equality Impact Assessment workshop focused solely on the areas relating to older people and people with disabilities, it would have been useful to have copies of this content in advance to allow more time to respond to the specific asks and more focused questioning.

Reflecting the complex nature of the STPR2 report, there was also a reliance on the use of acronyms which can be confusing for those not immersed in this field. We appreciate that acronyms used are listed within the report; however, during stakeholder and public engagement it may aid understanding to use the full terms.

**Overall, has the Case for Change element of STPR2 met your or your organisation’s expectations?**

Yes, it has fully met my or my organisation’s expectations

It has met some of my or my organisation’s expectations

No, it has not met my or my organisation’s expectations

**Please explain why the Case for Change element of STPR2 HAS NOT met all your organisation’s expectations?**  
**If you prefer not to leave a comment please click on the next button to move to the next screen**

We broadly support the Case of Change element of STPR however believe it could go further by:

* Embedding accessibility as a central principle.
* Providing more detail on how people with disabilities will be involved to a greater degree in all aspects of the transport network from consultation to being employed in the transport sector.
* Disaggregating data gathered on the rates of usage of different modes of transport by disability.

**Please provide any other comments on the Case for Change element of STPR2?  
  
If you prefer not to leave a comment please click on the next button to move to the next screen**

We would like to see further guidance on the accessibility of street infrastructure relating to transport. Minimum disability training standards and accessible information standards are best set at national level to ensure people receive a consistent service across Scotland.

**Many thanks for completing these questions.**

**Section 2:**

**Would you like to comment on the Phase 1 Recommendations?**

**No**

**Yes**

**Do you feel the eight themes within the STPR2 Phase 1 capture what needs to be done in the short term, in relation to the transport investment priorities?**

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

The eight themes cover a broad range of needs and we appreciate that this work is also supported by regional projects to target the needs within specific local areas and communities.

**Do you feel the themes appropriately address challenges and opportunities described within the report?**

Yes

No

**Please use the space below to provide any further comments on the challenges and opportunities described within the report:  
  
If you prefer not to leave a comment please click on the next button to move to the next screen**

We recognise the complexities and multilevel detail included in the challenges and opportunities. In relation to blind and partially sighted people, we would like to emphasise that limited travel, accessibility, and employment opportunities disproportionately affect individuals with sight loss.

**Do you feel that the Phase 1 interventions associated with the eight themes support the priorities and outcomes of the National Transport Strategy?**

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please use the space below to provide any further comments that you wish to make on the eight themes.  
 **If you prefer not to leave a comment please click on the next button to move to the next screen**

**How well do the Phase 1 interventions respond to the uncertainty in travel demand and behaviour that we face in the short term due to COVID-19?**

Very well

Well

Poorly

Very poorly

Don’t know / No opinion

There are concerns that the long-term impacts of coronavirus, and resultant increase in the proportion of people working from home, will reduce the availability of vital transport links for people with sight loss who cannot readily access other modes of transport.

**How well do the Phase 1 interventions support Scotland’s recovery from the Covid-19 pandemic in the short-term?**

Very well

Well

Poorly

Very poorly

Don’t know / No opinion

**Please use the space below to highlight the Phase 1 themes and interventions, that you particularly support:  
  
If you prefer not to leave a comment please click on the next button to move to the next screen**

RNIB Scotland welcome the themes and interventions proposed. We would like to comment on the following interventions:

Intervention 2 - Expansion of 20mph zones:

We welcome the reduced speed limit on urban roads.

Intervention 4 – Transport’s contribution towards placemaking principles in neighbourhoods:

While RNIB Scotland value the plans for the reallocation of road space to better provide for those that walk, wheel or cycle, we would again emphasise the need for appropriate tactile markings and signage in these areas. We would like to highlight concerns regarding the positioning of planters and increased seating and ask that such proposals do not present new obstacles which could endanger individuals who are blind and partially sighted.

Intervention 6 - Investment in Demand Responsive Transport and Mobility as a Service:

Details of the changes made under pilot schemes, should be made available in an accessible format. People who are blind and partially sighted cannot always read the route number or station notices and therefore may have difficulty in accessing services. Should specific routes be under review, consideration should be given to the type of transport offered to ensure that it remains accessible, for example, for long cane users and guide dog users.

Intervention 8 - Enhancing facilities at major rail stations (Rail Station Redevelopment):

RNIB Scotland welcome improvements in accessibility and infrastructure in and around major rail stations.

Intervention 9 - Development of Glasgow ‘Metro’ and Edinburgh Mass Transit strategies:

Improvement in this area would be particularly important to blind and partially sighted people. Specific areas of note:

* Unserved and under-served areas with relatively poor connectivity.
* Improving access to key hubs such as the city centre, hospitals, major education facilities key employment centres, retail hubs, major leisure/sports facilities.
* Integrating with major transport hubs such as Glasgow Central and Queen Street railway stations, Glasgow Airport, and suburban interchanges.

Intervention 10 - Reallocation of road space for buses:

While we welcome increased public transport options, we would call for adequate signage and tactile markings to ensure the safety of blind and partially sighted people.

Intervention 11 - Supporting integrated journeys at ferry terminals:

Given the rural location of many ferry terminals, we believe improved access to public transport services will be beneficial for all.

Intervention 12 - Infrastructure to provide access for all at rail stations:

This is a crucial intervention for blind and partially sighted people. We welcome new technological solutions to improve the safety and accessibility for users with reduced mobility at stations, as well as the identification of opportunities to improve integrated journeys at stations i.e. by reviewing onward accessible travel particularly by bus and taxi.

Making infrastructure accessible for those who are blind and partially sighted, including tactile strips to denote platform edges, should be factored into these interventions from the planning stages.

**Please use the space below to highlight where you disagree with any the Phase 1 themes or interventions.**  
  
**If you prefer not to leave a comment please click on the next button to move to the next screen**

RNIB Scotland has concerns over the future implementation of the following interventions:

Intervention 1 Active freeways:

Blind and partially sighted people can often experience difficulty navigating community routes where there are no kerb edges to guide them or where there is insufficient colour contrast between surfaces. Appropriate tactile paving and kerb edging are required to assist orientation. So too is signage to warn of shared routes. Painted lines are not sufficient as a delineator on a shared route as those with sight loss cannot detect them. The camber of the route is also useful as this helps indicate the centre of the path. Potential inconsiderate behaviour of some cyclists travelling along the active freeways can impact on the personal safety of visually impaired people. Cyclists are very hard to hear and can approach very quickly without being detected. It is often impossible for a visually impaired person to sense their approach and to move out of their way.

Intervention 5 - Guidance and framework for delivering mobility hubs: RNIB Scotland welcomes the ease of accessing multiple modes of transport in one location although careful consideration should be given to the placing of street furniture such as docking for rental bikes in relation to other facilities including bus stops.

Intervention 7 - Reallocation of road space for active travel:

While Spaces for People Schemes have allowed for greater social distancing it is not yet possible to determine the success of temporary measures and to conclude which schemes should be made permanent. Current government guidelines to stay at home prevent people from accessing areas that they would routinely frequent. Therefore, comment on the appropriateness of changes made is premature.

The Spaces for People programme has so far utilised almost £39 million funding. The recent Programme for Government states that:

“Local authorities now have the opportunity to review the temporary infrastructure projects – turning many of them into permanent schemes – and we are engaging with them to determine where this is possible.”

RNIB Scotland and other sight loss organisations are concerned that schemes introduced at speed and with minimal consultation will become permanent.

We would welcome assurance that there shall be an independent third-party national review of Spaces for People. This should take place before any decisions on permanent alterations are made. Otherwise, the transition out of emergency measures could leave blind and partially sighted people psychologically and physically excluded from our streets.

For infrastructure to be accessible to blind and partially sighted people three features are essential:

1. Kerbs of at least a 60mm upstand between changes in street use, for example between the pedestrian zone and cycling zone, and between the cycling zone and the car zone, with dropped kerbs at regular intervals.
2. Controlled crossings across roads with either an audible or tactile signal.
3. Easy access to bus stops guaranteed with a safe pedestrian path to bus stops. In cases of floating bus stops a traffic light should be extended across the road and the cycle path with the central reservation raised at least 60mm.

**Please use the space below to provide any other comments you wish to make on the STPR2: Update and Phase 1 Recommendations report.  
  
If you prefer not to leave a comment please click on the next button to move to the next screen**

**For further information please contact:**

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