

## **Mobility and Access Committee for Scotland (MACS)**

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Mr Andrew Hutt  
South East Scotland Regional Transport Partnership  
via email

Your ref:

Our ref:  
EXCOMM/3092

Date:  
1 Jan 2015

Dear Mr Hutt,

### **REGIONAL TRANSPORT STRATEGY REFRESH CONSULTATION**

The Mobility and Access Committee for Scotland is grateful to have the opportunity to respond to your consultation on the refreshed Regional Transport Strategy. You will be aware MACS is the statutory adviser to Scottish Ministers on transport accessibility for disabled people and it therefore takes a strong interest in Regional Transport Strategies as a vital strategic coordination mechanism with the potential to deliver significant improvements to the lives of disabled people.

Regional Transport Partnerships have significant obligations under both the Equality Act 2010 (including its Public Sector Equality Duties) and the UN Convention on the Rights of Persons with Disabilities. We are alert to the fact that these obligations must be properly and positively reflected in Regional Transport Strategies.

We warmly welcome the key objectives and in particular objective 2 on accessibility and the references to personal security in the context of disability harassment. We agree it is important to improve accessibility to those with limited transport choice and that specific actions are required for disabled people.

We suggest that the definition in objective 2 be refined to refer to disabled people as opposed to people with mobility difficulties, as this would better reflect the wording of Policy 26 and give greater prominence to hidden disabilities which can have a substantial effect on transport accessibility. These points apply to paragraph 7.6 where we note no prioritisation of action. Additionally, references in the refreshed strategy to the defunct Disability Discrimination Act 1995 should be replaced with reference to the Equality Act 2010. We agree with your intention to audit relevant interventions with these legislative provisions in mind but consider it may be valuable to further define the meaning of a "relevant" intervention in Policy 25.

We welcome the focus on outcomes for people of the draft refreshed strategy, such as on health and social care, and on employment. We support the targets mentioned in Chapter 4 of the document but consider it would be especially impressive to see SESTRans moving forward in its development of targets and their monitoring by monitoring, analysing and acting upon disabled people's experiences within all relevant targets, such as increased access to labour market catchments. Drilling down to this level would provide especially rich management information

and be a clear demonstrator of success for SESTrans outputs towards increasing employability and employment opportunities for some of the most marginalised groups in society.

This is a comment of general application to the draft refresh RTS. Whilst there are specific sections across the draft refresh RTS relating to disabled people, it is noted that their needs are not always explicitly discussed when dealing with other topics. A mainstreaming approach to completing the refresh is therefore recommended. For example, 'Smarter Choices' initiative designed to influence travel choices at individual level, or the promotion and increased uptake of club car usage.

In respect of paragraphs 7.4-7.8, we are pleased to the acknowledgement that community transport is extremely important and demand responsive transport is of particular relevance to disabled travellers. It will be especially important to involve disabled people with the empirical evidence of how transport impacts on other aspects of their lives in any such work.

Our suggestions for improvement to the document should be taken in the context of our being strongly supportive of the direction of travel indicated in your revised strategy. We are very positive about your well developed mechanisms for assessing areas for improvement in respect of transport accessibility in consultation with others, in particular through your Equality Forum which is an exemplar of better practice.

We hope our comments are useful in building on this record, and would be grateful if we might be kept informed about your work and how we might contribute to the development of accessible transport policy. Please contact us through the secretariat whose contact details are as above. Thank you again for the opportunity to comment.

Yours sincerely,

**HEATHER FISKEN**

Joint Lead, Planning and Infrastructure Workstream