

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

TRANSPORT (SCOTLAND) BILL

SUBMISSION FROM RNIB SCOTLAND

Introduction

The Royal National Institute of Blind People (RNIB) Scotland is Scotland's leading organisation of blind and partially sighted people. We support children and adults with sight loss to live full and independent lives.

In 2010, the date of the most recent figures published by the Scottish Government, the number of people registered as blind or partially sighted in Scotland was estimated to be 34,492. ¹ Research suggests that around 10 per cent of eligible people do not register making the true figure closer to 40,000. A further 130,000 people in Scotland are estimated to have significant sight loss and this figure could almost double between now and 2030 due to increases in the elderly population and a variety of health factors. ²

We have responded to previous Scottish Government consultations relating to bus services and responsible parking and now very much welcome the introduction of the Transport (Scotland) Bill. This brief note makes general observations in relation to Part 2 of the Bill - bus services - and Part 4 of the Bill - responsible parking. We are happy to provide further detailed information.

Part 2 of the Bill - bus services

The Policy Memorandum for the Bill acknowledges that "bus services play a vital role for people and communities across Scotland". Under "Information for the public", it also states that "poor information is cited as a reason why many bus users are reluctant to try buses" and that the Bill:

"provides powers to require the operators of local services to provide information on routes, timetables, actual running times (real time and in the past) and fares publicly and in a specified format. Ensuring consistency of approach across Scotland will allow the public to access information in a standardised format, free of charge." ³

In responding to the 2017 Scottish Government consultation "Local Bus Services in Scotland - Improving the Framework for Delivery", RNIB Scotland urged the inclusion of a minimum standard for service information ensuring that this information is accessible to all. This would involve making information available in braille, large print and audio. We also said that blind and partially sighted people face several challenges when accessing buses such as:

¹ A National Statistics Publication for Scotland: Registered Blind and Partially Sighted Persons, Scotland 2010, Scottish Government, 2010.

² The Cost of Blindness Scotland: 2010-2020, RNIB Scotland, 2011. Community care and mental health services for adults with sensory impairment in Scotland; Scottish Executive 2006. The economic impact of partial sight and blindness in the UK adult population; Access Economics for RNIB, 2009.

³ Transport (Scotland) Bill 2018, Policy Memorandum - see all relevant papers at <http://www.parliament.scot/parliamentarybusiness/Bills/108683.aspx>.

- Determining when their bus will arrive and what number they require as this can be very difficult when timetabling information is in tiny print and often in colours that do not contrast well such as orange on white.
- Research carried out by RNIB found that nine out of ten cannot see a bus in time to flag it down and that if they flag it down they cannot trust the bus driver to tell them when they have reached their stop. ⁴

Key recommendations on bus services

- Having a minimum standard for service information ensuring that this information is accessible to all, including availability on request for braille, large print and audio.
- Having both audio announcements and mandatory disability training for bus drivers. Driver training would include teaching drivers to stop at stops where there are passengers and communicating with passengers as they board the bus to give them the opportunity to ask for assistance.

Nota bene, over 85 per cent of Scotland's bus operators have currently signed up to RNIB Scotland's Bus Charter which includes commitments on driver training. RNIB Scotland has held "Swap with Me" events with bus drivers and visually impaired passengers changing place and recently launched an online Mystery Bus Passenger survey to rate bus journeys.

Part 4 of the Bill - responsible parking

Blind and partially sighted people face daily challenges getting around their local area. Parking, including on pavement, at dropped kerbs and double parking is a problem. We have many reports of blind and partially sighted people experiencing ongoing nuisance from parked vehicles and other unnecessary obstacles on and across footways. It can be difficult to find a space to cross because of parked cars. Where pavements are narrow any cars parked on the pavements leave very little room to get around and people may have to go on to the road to get around a parked car. This poses clear dangers "not solely for people who are sight impaired, but for older people, people with pushchairs and walking toddlers, wheelchair users, mobility scooter users and other people with mobility and cognitive impairments" as Guide Dogs Scotland noted in their response to this current call for evidence.

RNIB Scotland supports the Transport (Scotland) Bill and we wish to underline the following areas already identified by Guide Dogs Scotland - Exempt areas; Section 47 - Loading and unloading; Guidance and standards; Dropped kerbs; Education; and Consistency of enforcement.

Exempt areas

We agree with the Bill provision in allowing local authorities to define exempt areas on streets, which allow some pavement parking where it is either unavoidable or desirable. These exempt areas should be kept to a minimum and only identified with the agreement of local community groups, including access panels and disability organisations. Exempt areas should only be made in streets where it is feasible to leave room (minimum of 1.5m) for people to pass, such as people with guide dogs or other assistance dogs, wheelchair users and people with buggies.

⁴ Stop for me, speak to me: catching a bus should not be a sight test. RNIB, 2012.

Section 47 - Loading and unloading

Section 47 states that:

"(6) The parking prohibitions do not apply where—

(c) the vehicle is so parked for no longer than is necessary for the delivery, collection, loading or unloading and in any event for no more than a continuous period of 20 minutes."

The text appears to allow pavement parking for any vehicle up to 20 minutes at any one time. Yet this would be difficult to enforce and may undermine the main purpose of the Bill's parking provisions. This should be reviewed and a definition of what constitutes obstructing the pavement would help drivers, pedestrians and enforcement personnel.

Guidance and standards

The future parking law should be accompanied by guidance and standards and these will enable a consistent approach to making exempt areas in design, process and acceptable locations and circumstances.

Dropped kerbs

Dropped kerbs and other crossing areas which have the carriageway and pavement at the same height can be essential for crossing roads, particularly for people with buggies, wheelchair and mobility scooter users, and people with mobility impairments. When dropped kerbs are blocked, people must try to find a suitable space to squeeze off or onto a pavement, which is difficult for sight impaired people to do as they cannot see gaps or hazards. Previous parking bills have included banning parking over dropped kerbs. We would support a move to ban parking at dropped kerbs.

Education

When this Bill becomes law, implementation should include a public education and encouragement campaign.

Consistency of enforcement

Across Scotland there are differing means of enforcing parking. We are aware that some areas do not have decriminalised parking enforcement regimes in place and that Police Scotland do not run parking schemes. Therefore, there are areas of Scotland that currently have no regular everyday means of enforcement. We welcome the provisions within the Bill in respect of use of cameras, and the ability for local authorities to share decriminalised parking enforcement. We are still acutely aware, however, that gaps exist.

Key recommendations on responsible parking

- Exempt areas should be kept to a minimum.
- Section 47 on Loading and unloading should be reviewed.
- Guidance and standards should enable a consistent approach to making exempt areas.
- We would support a move to ban parking at dropped kerbs.
- Implementation should include a public education and encouragement campaign.
- Consistency of enforcement should be considered.