![the POVERTY ALLIANCE — WORKING TOGETHER TO COMBAT POVERTY]

Poverty Alliance: Response to National Transport Strategy consultation

October 2019

About the Poverty Alliance

The Poverty Alliance was established in 1992 and is the national anti-poverty network in Scotland. We are an independent organisation with over 230 members drawn from the voluntary and public sectors, trade unions, researchers, faith groups and individuals with direct experience of poverty. Our aim is to work with others to enable communities and individuals to tackle poverty.

We have a number of key policy areas that provide the focus for our activities; these are addressing low incomes, supporting services to address poverty, enhancing the participation of people with direct experience of poverty in policy development processes, and addressing attitudes to poverty.

Background to submission

Over the last year, the Poverty Alliance has undertaken a significant amount of community engagement on the interaction between transport and poverty. This has involved two events – each bringing together 40-50 people with experience of poverty and organisations working with people experiencing poverty – in partnership with the Poverty and Inequality Commission, held in Glasgow in February 2019 and in Lairg in April 2019.

It also involved a larger-scale event in April in partnership with the Scottish Poverty and Inequality Research Unit, as well as dozens of community discussions that have taken place across Scotland as part of our *Get Heard Scotland* initiative. These *Get Heard Scotland* discussions have, while not exclusively focusing on individuals' experiences of transport, involved a significant amount of discussion about the role that transport plays in the lives of people experiencing poverty.

This submission has therefore been directly informed by the experiences, perspectives and policy proposals of people experiencing poverty across Scotland, as well as by organisations working with people experiencing poverty.

Responses to consultation questions

Q1. Is the vision that is set out for the National Transport Strategy the right vision for transport policy over the next 20 years?

As part of our community engagement work around transport and poverty over the last year, we have been asking people with experience of poverty for their vision for our transport system. The common vision that they had – a transport system that is affordable, available, accessible, and sustainable and that works for everyone in Scotland – is broadly reflected in the vision set out by the National Transport Strategy and we therefore welcome it.

It should be noted, though, that we are currently a sizeable distance away from realising the vision. From the perspectives of people living on low incomes in communities across Scotland, the transport system is currently not affordable or accessible and can often be entirely unavailable. This means that the vision, while welcome, will remain unrealised unless significant action is taken.

Q2(a). 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?

We broadly agree that the priorities and outcomes identified are the right ones for transport policy over the next 20 years. Many of the outcomes reflect the discussions that we have had with people living on low incomes over the last year around transport and poverty, particularly the outcomes associated with the 'Promotes equality' priority.

We also believe though, that the outcomes would be further strengthened by the addition of an outcome directly related to poverty. As identified in *Every Child Every Chance* – the Scottish Government's child poverty delivery plan – transport plays a critical role in the lives of people living in the grip of poverty in Scotland and can also play an important role in loosening that grip, for example by facilitating access to employment and to the services that people and communities rely upon.[i]

The Transport (Scotland) Bill as passed makes clear that Scottish Ministers must have regard – in determining the content of the Strategy – to how transport should be delivered in a way that supports the reduction of poverty and inequality. This was an extremely positive step, but to build upon it and ensure that transport-related policies and actions are developed that help to make that reduction of poverty and inequality a reality, the Strategy requires the addition of an outcome specifically related to that aim. It is only through making clear – in the priorities and outcomes – the role that transport has to play in tackling poverty that we will begin to see that role being fully realised.

Additionally, we also believe there is a strong case to include an additional priority related to rights. A key theme to have emerged from our community engagement with people living on low incomes has been that, while transport in and of itself is not deemed a human right, transport is critical in enabling individuals to access other rights, such as their rights to education, to work, and to participate in cultural and public life. The adoption of a rights-based approach to transport would therefore be of huge value, and should be reflected within the Strategy through the inclusion of a relevant additional priority.

Q2(b): Are some of the priorities and outcomes more important than others or are they equally important?

All of the priorities and outcomes will need to be met if we are to realise the vision set out by the Strategy, and they are therefore all of equal importance.

Q3: Are the challenges the Strategy highlights in Chapter 3 the key challenges for transport, or are there others the Strategy should focus on?

We are pleased that the Strategy recognises poverty as one of the key challenges facing the transport system in Scotland. The Strategy is right to make clear, in chapter 3, the vital role that transport has to play in the lives of people experiencing poverty, and it is also right to make clear that an affordable and accessible transport system can play an important role in loosening the grip of poverty on people's lives.

Through our engagement with people experiencing poverty on the links between poverty and transport, what has been made clear is that the transport system is currently simply not working for people living in poverty. Whether in urban or rural areas, too often people living in poverty in Scotland are either prevented from accessing transport due to its unaffordability, or transport represents a significant cost burden and acts to tighten the grip of poverty on their lives.

People living in poverty also often live in communities that are either under-served or not served at all by public transport, which means that there is often simply no transport at all to areas of employment or to local services. This results in individuals either being entirely isolated or being forced into car ownership, with all of its associated high costs.

The recognition of the particular and additional transport-related challenges faced by women – especially women living on low incomes - is welcome. Many women that we spoke to as part of our community engagement on transport and poverty spoke of the problems they faced in balancing childcare responsibilities (which disproportionately fall to women) and employment (which can often be low-paid and insecure employment) with a high-cost and often unavailable or unreliable transport system.

The identification of the particular challenges faced by remote and rural communities is welcome. In April, we held an event in partnership with HUG Action for Mental Health and the Poverty and Inequality Commission in Lairg, Sutherland. The event brought together 40 people (either people living on low incomes or representatives of organisations who work with people on low incomes) to explore their experiences of transport and poverty.[ii]

While the primary issues raised – affordability, accessibility and availability – were the same as in community discussions held in urban areas, it was clear that in more rural areas these issues were significantly more pronounced. While bus fares, for example, are often unaffordable for people living on low incomes in urban areas, in rural areas the cost can be even more prohibitive. And while some communities in urban areas are under-served by transport, some communities in remote and rural areas are simply not served at all. These disparities serve to exacerbate inequalities and tighten the grip of poverty on people living in rural areas.

Finally, the identification of the particular challenges faced by young people in accessing transport also reflects discussions that we have held with people living on low incomes about their experiences of transport. At our event in Lairg, for example, it was felt that young people in rural communities are particularly impacted by the high cost of travel, particularly given that they generally have lower incomes due to lower levels of pay and lower levels of social security entitlements.[iii] The same issue was also discussed in relation to young people living in urban areas, at a community discussion that we held in partnership with the Poverty and Inequality Commission and Oxfam Scotland in Glasgow in February.[iv]

While the key challenges – poverty, the gendered nature of access to transport, the challenges faced by young people in accessing transport and the impact of rurality - are correctly identified, it must also be said that the Strategy does not currently appear to contain the policies and actions that will allow us to overcome these challenges. It is not clear how many of the policies and actions contained within the Strategy will particularly impact upon levels of poverty or make the transport system more affordable or accessible to people on low incomes, for example. It is also not apparent which policies and actions will have a particular impact on the gendered nature of access to transport or on the affordable and accessible transport options available to remote and rural communities.

Q4(a): Are these the right policies to deliver priorities and outcomes of the National Transport Strategy?

We support the policies identified but, on their own and as currently drafted, we do not believe that they would be sufficient in delivering the priorities and outcomes of the National Transport Strategy, and particularly the outcomes related to the transport system being affordable for all and being easy to use for all.

We would strongly support the inclusion of a policy more directly related to using the transport system to reduce poverty and inequality, for example: "Provide a transport system that reduces poverty and inequality".

Q4(b): Are some of these policies more important than others or are they equally important?

All of the policies identified are important, but as stated in response to question 4A, we believe that the policies would be significantly strengthened by the inclusion of a policy more directly related to ensuring that the transport system supports efforts to reduce poverty and inequality.

Q5(a): 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)?

One of the strongest themes to have emerged from our community discussions in the last year on the issues of transport and poverty has been the lack of accountability that many people feel exists with regards to the delivery of transport services in Scotland. Very simply, the people that we spoke with felt extremely strongly that – despite transport services often entirely failing to meet their needs – there were no levers for accountability and no way that people (particularly people on low incomes) and communities could hold providers to account or adequately seek redress. This speaks to an opaqueness within the governance of the transport system that requires to be addressed.

While the precise nature of alternative forms of transport governance lie outside our scope of expertise, there are some key decisions that we believe – having been informed by the views of people living on low incomes across Scotland – should be taken at a national level. These include:

- Regulation of pricing: One of the clear themes from our engagement with people living on low incomes has been the sizeable pricing disparities that exist, particularly around bus services. Whether between different bus providers or between rural and urban areas, it is clear that some communities are being forced into paying significantly more

for bus travel than others. A remedy for this would be for fares to be set and/or regulated at a national level, ensuring that no community or region is experiencing disproportionately high fares.

- Service standards: Another clear theme to emerge was the disparity between different providers and different areas in terms of the standards of service, including integration with other forms of transport and regularity of services. Setting these standards at a national level would, again, help to reduce inequalities and disparities between communities and regions.

We also believe that decisions taken at a regional level should include setting timetables and routes that meet the needs of the local community and reflect the way that people – particularly people living on low incomes, who may be in precarious and low-paid work that requires public transport to access – live their lives.

Q5(b): 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?

Transport plays a vital role in the lives of people living in the grip of poverty. It is therefore essential that local communities are involved in making decisions about transport in Scotland. It is only through ensuring that the voices of communities – and particularly communities with high levels of poverty – are heard that we will be able to create a transport system that truly works for everyone in Scotland.

Throughout all of our community engagement around the issues of transport and poverty, a clear theme has been the desire for people living in poverty to have a greater say about transport-related decisions, and to play an active role in transport planning and policy-making. The participation of local communities in transport decision-making processes should be considered intrinsic to how transport is planned and delivered.

We would place no limits on the extent of this community involvement and believe that local communities – and particularly people living on low incomes and organisations working with people on low incomes – should be involved at every step of the transport planning and decision-making process. Their involvement is particularly important on issues related to routes (i.e. where they need to be connected to and from) and fares.

Of critical importance is not only that community involvement is ongoing, but also that the individuals and groups that are involved in decision-making processes are representative of groups that disproportionately rely upon public transport (e.g. people on low incomes), and also of groups that face additional challenges in accessing transport (e.g. women, disabled people, black and minority ethnic groups).

It is also essential not only that local communities are involved in decision-making, but that they are able to hold providers to account for the services that they deliver. Currently, a common complaint – particularly from people on low incomes and communities with high levels of poverty – is that they are entirely unable to seek redress when transport services are not meeting their needs. It is therefore important that participation processes are accompanied by clear accountability mechanisms for local communities to access.

We welcome the commitment within the Strategy to establishing Citizens' Panels to better understand the lived experiences of people across Scotland. We believe that representatives from these Panels – including representatives with experience of poverty - should also sit on the proposed national Transport Strategy Delivery Board.

Q6: Does the National Transport Strategy address the needs of transport users in Scotland, including citizens and businesses located in different parts of the country?

The National Transport Strategy does accurately identify the needs of transport users in Scotland, and we particularly welcome its recognition of the particular transport-related needs of people living in poverty in Scotland.

We do not believe, however, that the Strategy currently contains the particular actions and policies that will fully meet these needs. In particular, the Strategy appears to be lacking the actions that will help to create a transport system that acts to prevent and reduce poverty and inequality.

Q7(a): What aspects of the transport system work well at the moment?

From the perspectives of the people living on low incomes with whom we have engaged on the issue of transport and poverty, there are a number of aspects of the transport system which are currently working well. These include:

- Concessionary travel: For individuals with access to concessionary travel passes – and who live in areas that were well-served by public transport – they were said to help people access services and help to prevent social isolation and loneliness.

- Community transport schemes: Community transport schemes, which provide affordable and accessible connections that enable access to services and employment, were said to be a vital lifeline for many remote and rural communities. One example cited at a community discussion held in Lairg was Transport for Tongue, a community transport organisation that serves the community of Tongue in the northwest Highlands. Transport for Tongue provides a range of services including door-to-door car services for older people and buses to college for younger people, and was said to provide a service that many people in the community living on a low income rely upon.

- Summer holiday ticketing discount schemes: Provided by a number of bus companies, these discount schemes were said by participants at a number of discussions to have helped to hugely reduce the cost of travel for their families during school holidays, which is a time of increased financial pressures for many families.

Q7(b): What practical actions would you like to see the National Transport Strategy take to encourage and promote these?

There was a clear consensus across all of our community discussions that there was a need to substantially and radically widen access to concessionary travel. Young people were said to be in particular need of widened concessionary travel, as well as people on low incomes (e.g. anyone with a Universal Credit entitlement, anyone accessing any of the Scottish devolved benefits, and people with insecure immigration status).

Q8(a): What aspects of the transport system do not work well at the moment?

The overwhelming message from our community discussions around transport and poverty has been that the transport system is currently not working for people living on low incomes in Scotland. Particular aspects that have been highlighted to us include:

- Affordability: The topic that received the most focus at all of our community discussions, and which acts as the most significant transport-related barrier for people on low incomes, is the cost of public transport. Very simply, transport services – especially bus services – are often unaffordable for many people on low incomes.

  For people who are out of work, the cost of transport represents a major consideration when assessing possible employment options, and it often limits the scope of realistic and feasible employment options.[v] For people who are in low-paid work, transport costs can represent a significant proportion of their expenditure and can entrench and compound the in-work poverty that they are experiencing. Other people spoke to us about of how the cost of transport acted as a barrier to their children being able to participate in after-school or extra-curricular activities; something which could have a detrimental impact upon their educational attainment.

  The unaffordability of transport is something that impacts on communities in both rural and urban areas, but it can have a particularly acute impact on people living in rural communities. Some participants at our community discussion in Lairg reported that the cost of transport was so high that they knew of people in their community who had missed hospital appointments due to being unable to afford the up-front cost of transport.[vi]

  There was also a very strong sense from people we engaged with in rural areas that the cost of transport is inconsistent across the country, and that people on low incomes who live in rural areas are particularly impacted by inconsistency of pricing between urban and rural areas. This 'rural transport premium' was said to compound the poverty experienced that people experience, and also exacerbate inequalities between and within communities.

- Availability: Many participants spoke of the absence, or lack, of public transport in their community, with discussion primarily focusing around the fragmented nature of bus service provision and of how this fragmentation results in the needs of people on low incomes often not being met.

  We heard, for example, of how in some areas in Glasgow with high levels of poverty, there are no buses to major supermarkets. As a result, people have no option but to shop at more expensive shops that are easier to access; something that represents the 'poverty premium' in action. A lack of bus service provision in these areas also impacts people's ability to access essential services like health, education, training and social security. This can have a huge effect on people's lives, reinforcing social isolation as well as preventing people from being able to access their rights.

  We also heard examples that highlighted the lack of joined-up thinking that exists in relation to planning. One discussion participant told us of how a new affordable housing development was built in their community. However, there was no suitable transport provision to enable people to travel from the housing development to areas of employment or to access health services. As a result, while residents (many of whom

are living on low incomes) may have reduced their housing costs, their transport costs had simultaneously significantly increased.

It was clear that transport services – particularly bus services – were not being planned or delivered in a way that adequately considered when people living on low incomes needed to travel, and where they needed to travel to. Given that bus providers are not required to service particular routes, the end result is too often communities being entirely under-served.

- Accessibility: Participants in several community discussions raised the issue of the poor provision of information relating to transport services. This was a particular problem for people without digital access – a significant proportion of whom can reasonably be presumed to be on low incomes – and led to challenges when people were seeking to plan journeys.

- Accountability: A common theme across our community discussions was the lack of accountability that people felt existed within the transport system. Despite the transport system clearly not working for people living on low incomes, people felt that neither they as individuals or as members of their local community could affect change or seek redress to enable change.

Q8(b): What practical actions would you like to see the National Transport Strategy take to improve these?

In relation to affordability, as stated in our response to question 7b, we believe there is a strong case for, in the short to medium-term, a substantial and radical widening of access to concessionary travel, particularly for young people and for people living on low incomes (e.g. people with a Universal Credit entitlement and people with insecure immigration status). In the longer-term, we would strongly support an exploration of the feasibility of universal free bus travel. Given the role that transport services – particularly bus services – have to play in enabling people to access their rights, universal free bus travel could be one way of supporting a move towards a rights-based approach to transport.

In relation to availability and accessibility, as stated in our responses to questions 5a and 5b, we support stronger regional governance of routes and timetables to ensure that services are operating in ways that meet the needs of everyone, but particularly people living on low incomes. Related to this, we strongly support the idea – proposed by a participant at one of our community discussions on transport and poverty – that any substantial service changes (e.g. the closure of a bus route) must be subject to health and equality impact assessments. Currently, the health and equality impacts caused by the withdrawal or major altering of services can be significant yet this is not captured or meaningfully considered.

We also strongly support the meaningful involvement of local communities, including people living on low incomes and organisations working with people on low incomes, at all stages of the transport planning and policy-making process. For example, the Transport (Scotland) Bill makes provision for the development of Bus Service Improvement Partnership Plans. While they require local authorities to show how communities have been consulted as part of the development of the plans, they could go significantly further and ensure that particular groups of people who disproportionately rely upon buses – such as people on low incomes, women, BME groups – are more actively involved in the development of the plans.

Q9: 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?

There are a number of immediate actions that we welcome. Firstly, the establishment of a Transport Strategy Delivery Board is positive and should provide a stronger degree of accountability for the success of the Strategy. It is essential, though, that the Board includes a broad section of stakeholders and is not solely comprised of senior representatives drawn from the transport sector. We would view it essential that local communities are represented on the Board, and that wider organisations or bodies – such as the Poverty and Inequality Commission, for example – are either represented or are provided with means to engage with the Board's work.

We also welcome the establishment of Transport Citizens Panels, but again believe that representatives from these Panels should also sit on the Transport Strategy Delivery Board. There is also a need for the Panels to be genuinely representative; this includes ensuring the participation of people living on low incomes, as well as other groups that disproportionately rely upon public transport.

Also welcome is the review of concessionary travel for young people. As stated previously in our response we are strongly in favour of the substantial widening of access to concessionary travel, including for young people. We would encourage this review to be wider in its scope, and to also look at other groups that may benefit from concessionary travel, such as people living on low incomes.

Q10: Is there anything else you would like to say about the National Transport Strategy?

That the National Transport Strategy recognises the important role that transport has to play in the lives of people experiencing poverty is hugely welcome, as is its recognition that the transport system itself has an important role to play in loosening the grip of poverty on people's lives. This represents a significant step forward.

However, while there are a number of commitments that we welcome, we do not believe that the Strategy currently contains the kind of action required to ensure that the transport system is more affordable and accessible to people on low incomes, or that helps to reduce levels of poverty and inequality in Scotland. As stated previously in our response, while it recognises the transport-related challenges faced by people living in poverty, it does not currently contain the actions and policies that will allow us to overcome those challenges.

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[i] Scottish Government, *Every Child Every Chance: The Tackling Child Poverty Delivery Plan 2018 – 2022*, March 2018, https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-

plan/2018/03/child-chance-tackling-child-poverty-delivery-plan-2018-22/documents/00533606-pdf/00533606-pdf/govscot%3Adocument/00533606.pdf

[ii] Poverty Alliance & HUG Action for Mental Health, *Poverty & transport event: Summary report,* April 2019, https://povertyinequality.scot/wp-content/uploads/2019/06/Lairg-transport-event-summary.pdf

[iii] Poverty Alliance & HUG Action for Mental Health, *Poverty & transport event: Summary report,* April 2019, https://povertyinequality.scot/wp-content/uploads/2019/06/Lairg-transport-event-summary.pdf

[iv] Poverty Alliance & Oxfam Scotland, *Poverty & transport event: Summary report*, February 2019, https://povertyinequality.scot/wp-content/uploads/2019/06/Poverty-Alliance-Oxfam-transport-event-.pdf

[v] Joseph Rowntree Foundation, *Tackling transport-related barriers to work in Scotland*, August 2018, https://www.jrf.org.uk/report/tackling-transport-related-barriers-employment-low-income-neighbourhoods

[vi] Poverty Alliance & HUG Action for Mental Health, *Poverty & transport event: Summary report,* April 2019, https://povertyinequality.scot/wp-content/uploads/2019/06/Lairg-transport-event-summary.pdf