

NATIONAL TRANSPORT STRATEGY CONSULTATION REPLIES

Section A: The Vision and Outcomes Framework

Four Priorities each with 3 Outcomes

Vision: We will have a sustainable, inclusive and accessible transport system, helping deliver a healthier, fairer and more prosperous Scotland for communities, businesses and visitors.

Promotes equality

Will provide fair access to services we need

Will be easy to use for all

Will be affordable for all

Takes climate action

Will adapt to the effects of climate change

Will help deliver our net-zero target

Will promote greener, cleaner choices

Helps our economy prosper

Will get us where we need to get to

Will be reliable, efficient and high quality

Will use beneficial innovation

Improves our health and wellbeing

Will be safe and secure for all

Will enable us to make healthy travel choices

Will help make our communities great places to live

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

Yes - This vision is suitable for the next 20 years, as it can be scoped to help deliver the transport system that Scotland requires in the future.

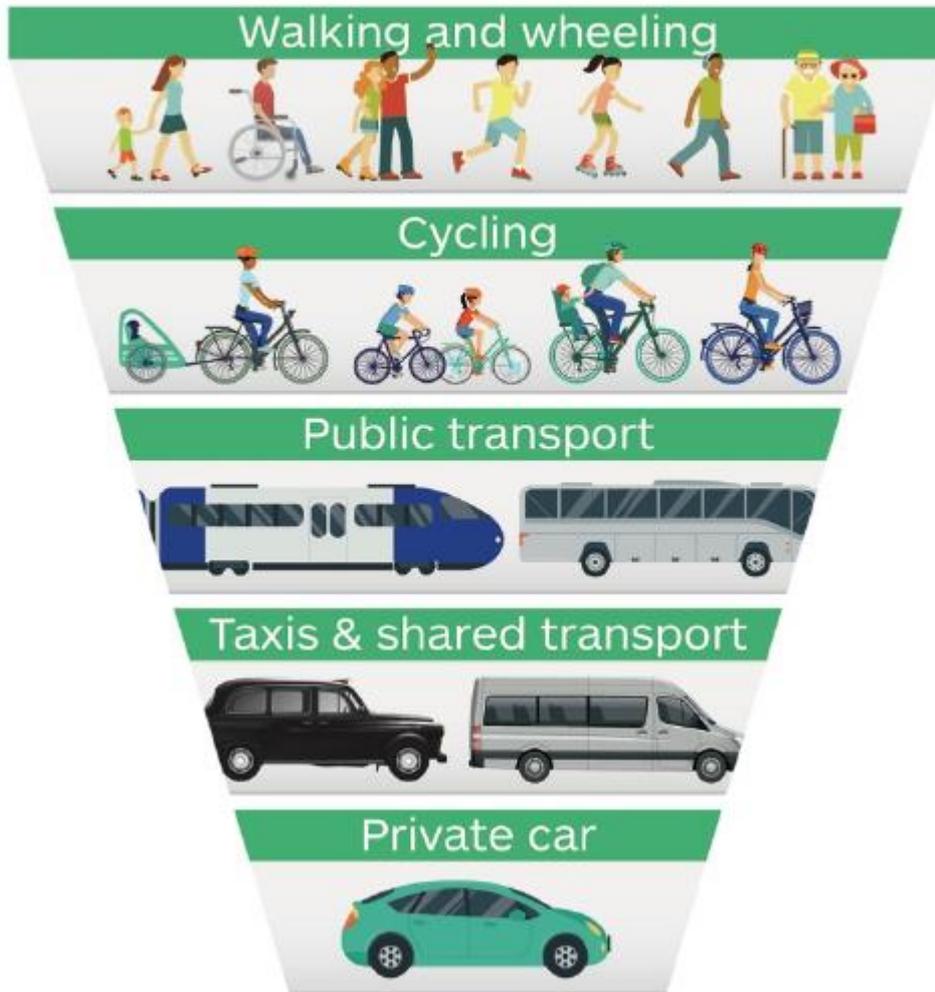
2a. Are the Priorities and Outcomes that the Strategy is trying to achieve the right Priorities and Outcomes for transport policy over the next 20 years?

Yes - The Priorities and Outcomes are clear and can help Scotland deliver a transport system for communities, businesses and visitors.

Transport overarches almost every Government portfolio so it is crucial that transport is integral in key Government objectives such as Climate Emergency, Fairness, Tackling Poverty, Healthy Living, planning for an aging population and loneliness/isolation.

The Strategy identifies a number of key priorities in Chapter 2; however, these could do to be strengthened throughout the rest of the Strategy. In particular, the on Page 5 of the Strategy reference is made to the "whole transport system (people and freight)", but in a number of places, including Figure 19 – Prioritising Sustainable Transport, this is very much a people focused hierarchy and does not take into account freight transport. The freight hierarchy should identify the methods with which are most preferred, whether this is rail, road, sea / harbour transport or air.

Prioritising Sustainable Transport



In the section about “Takes Climate Action” Page 7, the strategy needs to be clearer about Private Car use, in particular we make reference to shared transport, which may require the use of a Private Car to participate in LiftShare scheme. Should the term “Single Occupancy Private Car Use” as used on Page 59 be used instead of Private Car? Are we looking to discourage Private Car Use, if so, then the cost and time of travelling by Private Car needs to be more expensive than travelling by Public Transport.

There are a number of key transport methods which have not been considered in the people focused hierarchy, such as Powered Two Wheelers, Ferry, Internal Air Travel and Scooters.

Page 6 makes reference to the protected characteristics and details them: Will provide fair access to services we need: we have a duty to advance equality of opportunity and outcome, including the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. If this is a Strategy for 20 years, it is likely that these will change and will become outdated, recommend removing the list and finishing with “including the protected characteristics for all”.

A key element to Scotland’s economy is tourism and the National Transport Strategy vision also takes this into account.

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

“Take Climate Action” is the most important priority as this must be tackled and resolved in order for the other outcomes to be sustainable. The nature of transport is such that delivering the outcomes for Climate Action will have unintended consequences which form other outcomes in the Vision. For example, new cleaner greener buses may facilitate and encourage modal shift as well as tackling climate emergency. Improved walking and cycling facilities will improve the health of the person undertaking the activity as well as improving air quality.

Beneath “Take Climate Action” all priorities and outcomes are equally important as they are all intertwined and necessary to deliver the overall vision.

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 Strategy should focus on the following additional challenges:

- *Promotion of an integrated travel card across the whole of Scotland for a range of transport methods from for example; rail, bus, tram, ferry and eBike*
- *Continue to promote the creation and use of Shared Use Transport whether that is Demand Responsive Transport or Community Based Transport Groups.*
- *Developing Electric Vehicle Networks, working with the private and public sector to strengthen the number of charge points and normalise these. For example, a potential project would be to create an Electric Fuel Station, in a similar layout to a Petrol Filling Station forecourt, in that there are a series of pumps, covered with a canopy. Car users in Scotland currently enter a Petrol Filling Station, which is a normalised activity; we need to do the same for electric vehicles to remove the barriers for this type of vehicle usage. Working with one of the supermarket retail groups to develop a forecourt for the future may be an interesting project.*

Section B: The Policies to Deliver the NTS

Through the process to develop the National Transport Strategy, 14 policies have been identified that will deliver its Vision and Outcomes and address the Challenges. These are listed below:

- Plan our transport system to cope with the effects of climate change
- Continue to improve the reliability, safety and resilience of our transport system
- Embed the implications for transport in spatial planning and land-use decision making
- Integrate policies and infrastructure investment across the transport, energy and digital system
- Provide a transport system which enables businesses to be competitive domestically, within the UK and internationally
- Provide a high-quality transport system that integrates Scotland and recognises our different geographic needs
- Improve the quality and availability of information to enable better transport choices
- Embrace transport innovation that positively impacts on our society, environment and economy
- Improve and enable the efficient movement of people and goods on our transport system
- Provide a transport system that is equally accessible for all
- Improve access to healthcare, employment, education and training opportunities to generate inclusive sustainable economic growth
- Support the transport industry in meeting current and future employment and skills needs
- Provide a transport system which promotes and facilitates travel choices which help to improve people’s health and wellbeing
- Reduce the transport sector’s emissions to support our national objectives on air quality and climate change

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

Within the current strategy it is unclear how the 14 policies relate to the 4 priorities and the resulting 3 outcomes for each priority. At the moment in the Strategy the reader has to piece the Policy with the challenge and the priority and outcomes, this should be much clearer in the plan. What is the challenge and what is the policy to address this? How is it planned to address the issue? This would help guide the reader through the Strategy and provide a clear correlation.

There are a number of policies could be grouped together such as Plan our transport system to cope with the effects of climate change and Reduce the transport sector's emissions to support our national objectives on air quality and climate change under the Take Climate Action heading to address the challenge of Global climate emergency or Air Quality.

It is key that overall planning is undertaken considering all modes of transport and purpose, so that there is no silo working, whereby solving one challenge could increase another challenge resulting in a new barrier. For example, reducing road space to construct cycle lanes without constructing bus lanes, resulting in the bus being held up and delayed with all other traffic. So suggest the wording in some of the policies be revised to reflect this.

The transport needs to be integrated as well as the policies so there is ease of transfer between modes – i.e one ticket for every mode you need to use for a seamless journey. Wording in the appropriate policies should be revised to reflect this point.

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

The policies within the strategy must align with funding streams that are available to address the challenges, whether that is Active Travel or the decline in bus usage. The funding available from the Scottish Government will dictate the importance of the policies.

Section C: Transport governance – democracy, decision-making and delivery

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.

With an ever changing employment market the travel-to-work areas are changing, the roles of Regional Transport Partnerships should be considered. Many commuter trips go from one Regional Partnership to another on a regular basis, meaning that the start or end of a trip may be in another Regional Partnership or local authority area. Within the Tactran area there are many trips that start or end outwith our Regional Transport Partnership area for example many trips arrive/depart the Fife area. These trips are undertaken using a range of transport methods, including bus and rail; therefore it is important that this is considered as part of any future governance model.

Regardless of the governance method there will be a crossover for decision making and delivery. Having 32 local authorities' means that there will be more crossovers, reducing this to the 7 Regional Transport Partnerships reduces this, but still does not eliminate the problems. If governance is to be delivered through Regional Transport Partnerships, then all 7 partnerships must have the capability

of delivering the same services across Scotland regardless of their location to ensure seamless travel and consistency. As it currently stands, this is not the case as detailed on Page 52.

As it currently stands local authorities play a vital role in the delivery of transport solutions from roads maintenance, co-ordination of local bus services, delivery of pupil transport to school, safer routes to school, road safety, delivery of infrastructure for the transport network, providing functions to other departments such as Planning Consultations for planning applications, co-ordination and monitoring of works within the public road boundary and many other roads related responsibilities.

Whilst there is a duplication of these services across local authority areas, there are differing pressures and priorities for rural and city authorities which becomes a challenge when delivering services, and particularly more so when delivering a regional approach to transport. If a regional approach to the delivery of public transport is proposed, it is vital that funding is ring-fenced and them managed by the local authority area to ensure there is adequate provision for local communities. To ensure adequate provision, a robust consultation and feedback exercise should be undertaken across the whole spectrum of the population and transport professionals can respond effectively to the travelling public requirements.

The overall national strategy and funding for public transport is best assigned at national level, with the actual transport planning and provision for each area being made at an appropriate level.

There is a need to engage with people at a local level to deliver tailored solutions. Whilst being supportive of the desire for collaboration between authorities where this can deliver efficiencies, it is essential that local context for decision making is maintained.

The outcomes from the Roles and Responsibilities Working Group should feed into the setup of any future work.

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? Please explain your answer, by providing examples of which transport decisions local communities should be involved in, also suggesting how they should be involved.

Local communities should be involved in scoping local transport solutions, such as Active Travel Infrastructure, Community Transport Projects and Public Transport. One way to help scope a project would be to use the Place Standard Tool with a focus on transport, to help direct the local communities' attention to address their needs for the future.

Engagement should be undertaken with the local community to help them understand any changes that are proposed to their local transport network, this may be through a drop in session, community council meeting/workshop or a survey available online or in paper format through a local media channel such as a local newsletter or paper. Local Communities should be involved in decisions regarding transport in Scotland as they are the people who need it and use it. However, we must ensure that all sectors of the local community get involved so all ages, genders, races, cultures and mobility.

Other stakeholders should also be involved such as local employers, transport operators across modes and community groups and so we can all work together to provide an integrated transport system and it is not just local government and individual transport operators making the decisions.

If changes to local transport networks do not include the views of local people, they can feel disenfranchised or peripheral to decisions affecting them, and then they may not use the infrastructure or services that are being provided.

For example if an inter-city coach company revise their timetable to resolve an issue at one part of the route it can result in a connection then being lost with a ferry on the other part of the route. So consultation is key between operators to prevent this.

Section D: The Strategy as a whole

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 strategy needs to be clearer with links from the Priorities and Outcomes, through the challenges and then onto the policy. At the moment, it is a bit disjointed and could flow much better. It is not clear which policies and enablers are delivering the outcomes and challenges that Scotland faces.

There is a Sustainable Travel Hierarchy which focuses on passenger transport, but there is not a similar one for freight despite the strategy being for the whole of the transport network.

The strategy is supposed to deliver for the whole of Scotland, but the Sustainable Travel Hierarchy does not feature travel methods to and from islands such as ferry or air travel despite there being a Policy to "Provide a high-quality transport system that integrates Scotland and recognises our different geographic need", which is supposed to "Minimise the connectivity and cost disadvantages faced by island communities and those in remote and rural areas" and "Safeguard the provision of lifeline transport services and connections".

Section E: Looking Ahead

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

The aspects of the Transport System that currently work well:

- *The behaviour change programme that is currently delivered by Smarter Choices Smarter Places. Although ring fencing of any grant funding directly to the local authorities will remove some of the existing bureaucracy with third part involvement.*
- *The uptake of Electric Vehicles, currently in Perth & Kinross, there has been an annual increase of around 50% year on year for the number of individual charging sessions*
- *Ongoing implementation of off road cycle tracks beside canals, old railways etc is providing safer cycling routes*
- *Infrastructure and bus stations in the 4 major cities are up to date and modern*
- *Vehicles, ticketing and connections work well in the 4 major Scottish cities where there is high frequency, high quality vehicles so not long to wait if boarding a bus after alighting a train for example*

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

The strategy could promote a number of schemes such as:

- *The promotion of the transportation of freight by rail, where the National Transport Strategy makes a commitment to set up local freight loading locations on existing rail infrastructure, thus reducing impact of road freight on the transport network. To enable this, dedicated freight*

paths should be provided, to ensure frequent and regular services. Locations such as Inverkeithing, Halbeath, Perth or Dundee should be considered as rail freight hubs.

- *The implementation of Freight Consolidation Centres for the distribution of freight and parcels. With the growth of e-commerce there is a plethora of LGV's networking across the whole of Scotland, many of which are doing similar routes. Having Freight Consolidation Centres could reduce the number of trips in rural locations, resulting in a reduction of vehicle emissions. The size and location of Perth and Kinross would be a location where such a trial could be undertaken.*
- *Continue to promote the use of public transport, with initiatives to help communities develop their own local transport solutions to help with social isolation and lack of serviced public transport routes.*
- *The simplification of the STAG process to quicken the process to help progress transportation projects through to completion.*
- *The National Transport Strategy should promote the use of autonomous vehicles in rural communities for public transport and a trial should be undertaken in a number of rural locations to test the viability of such an innovation*
- *Include public transport in the national school curriculum for both Primary and Secondary education*
- *Provide cycling lessons at all Primary Schools and also adult cycling lessons locally and ensure affordable bike hire is available so all can access cycling*
- *Ensure it is widely known about contactless payment on buses, availability of real time information and ticket offers*

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

There are a number of aspects that do not work well at the moment and the following issues should be addressed:

- *The distribution of grant aid to help local authorities deliver active travel infrastructure, should have a clear vision that small local schemes for local communities can deliver large benefits to that community. The process for unlocking the grant aid to help deliver this should be a clear and straight forward*
- *Integration of public transport is poor for rural communities, out with the four major cities in Scotland, local public transport frequency is poor, along with vehicle quality and bus stations are inadequate and unappealing*
- *Public transport for families can be very expensive. The rail industry has a family railcard and although some bus and coach operators offer group tickets these can still be costly. This is a barrier to those on low incomes as they cannot afford the travel and also a barrier to modal shift as car owners will continue using the car as it is less costly*
- *Lack of integration between rail, bus and ferry to facilitate seamless travel and modal shift*
- *Local bus revenue budget being non statutory and controlled by local government and thus lack of parity of local bus provision throughout the country as the budget setting is made at local level and is dependent on the views and budget decisions of the administration in each local area*
- *Lack of a cashless and ticketless system for public transport to help ease the transition from one mode to another*
- *Lack of funding for bus operators/local authorities to try out new innovative transport solutions such as trolleybuses*
- *Lack of bus priority on the transport network to encourage modal shift*
- *Lack of early morning bus services to encourage rural communities to use this as a viable option to travel to work*

- *Lack of cohesive active travel infrastructure, small parts of the network are missing, but struggle to find funding solutions to deliver these, as they are not deemed to be ambitious enough*
- *Funding for small Park & Choose sites should be considered to encourage communities to Car Share, use public transport, walk, cycle or wheel to their destination. The Park & Ride sites should be easily accessed, visible and have CCTV for security*
- *Where there are heavily congested parts of the transport system, there are issues for Shift Workers that are unable to change their travel patterns to take account of congestion e.g. NHS Nurses and Doctors who are unable to work flexible shift patterns or work from home*
- *The use of rail for the movement of freight, more locations should be considered for the moving of freight by rail*
- *Better working between local authorities and Transport Scotland's road operating companies*
- *Lack of facilities to help members of the public with mobility issues*
- *Too many apps being created to promote travel options*
- *Lack of an integrated travel card, such as an Oyster Card for the whole of Scotland covering all public transport modes*
- *STAG process can be cumbersome, which is not proportionate to the scale of the project. A simplified (STAG Type) lower key appraisal may be more appropriate.*

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

A re-think of the current subsidy system to the bus industry to encourage higher quality cleaner vehicles and lower fares for family groups and children country wide.

Bus travel should also be marketed as an attractive alternative to single vehicle car occupancy and a responsible choice to change attitudes such as buses are "for poor people" and that buses are "loser cruisers".

Clarity should be provided for future funding of major committed transport scheme, such as STPR2, A9, A96 and Dundee Bypass.

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?

In Chapter 6, under the Increasing Accountability section, if a regional model of delivery is the way forward, a decision needs to be made on the best way to deliver this, is it through Regional Transport Partnerships or is it through more encompassing City Deal Partnerships with the advantage of linkages to Planning and Economic Development.

When the Transport Strategy Delivery Board meets it should consist of a cross section across both the local and national governments, transport operators, charities, user groups, professional bodies such as CILT, ATCO and CPT. There must be a combination of strategic, user and operational expertise.

Local authorities should be accountable if they implement initiatives that are in conflict with the National Transport Strategy, e.g availability of parking spaces in city centres.

Rather than setting up a Citizens Panel, it would be beneficial if transport bodies link into the existing and developing, engagement networks which have already been established through local authorities. The established local authority engagement networks should be promoted to encourage

a varied gender, age, culture, etc to attend to ensure that it isn't the same demographic that sits on such a panel.

In terms of strengthening evidence, all local authorities should be required to submit agreed key performance indicators annually to national government and this should be highlighted in the public domain so that the outcomes of the strategy are visible and measured.

Whilst it is fully appreciated why walking, wheeling and cycling are at the top of the sustainable hierarchy, we must be mindful that the sustainable investment hierarchy does not impact adversely on local bus provision. We have an ageing population and bus services are currently the most effective form of accessible mass transit. Bus operators are declining in numbers and if they are compromised in the hierarchy of investment that could lead to increasing many of the challenges rather than solving them. Also there may be an unintended consequence that the cost of statutory school transport rises if an operator is only undertaking school transport contracts if they withdraw from operating local bus services due to lack of investment.

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

The existence of the National Transport Strategy along with its delivery and outcomes should be consistently promoted and in the public domain so that it is kept in the public eye and very visible in order to assist the success of its objectives.

Partnership working between the local authorities and the trunk road authorities should not be a barrier to improving infrastructure and thus improving public transport facilities. For example if a local authority wished to install a bus shelter on a trunk road but the trunk road authority would not co-operate in the installation despite there being no road safety issues

There will need to be co-operation between all partners and the commercial bus operators to ensure the objectives of the strategy are met. Also, vehicle design should be conducive to the strategy as some operators buy and operate vehicles to hospitals with high steps rather than low floor and that is a barrier to many passengers to be able to access them.

In the Gender inequalities section, is the any evidence in Scotland to support the statement "14% of women travelling to work during the morning peak did not go directly from home to work, compared to 7% of men", Page 15, there is also no reference to this data source.

It is important that the National Transport Strategy takes account of current and emerging trends, legislation and other strategies, such as Planning Act, Clean Air for Scotland and Climate Change. It would be useful to identify and reference which existing policies fall within the priorities that have been identified, so that there is a clear correlation between them all.

Section F: Strategic Environmental Assessment (SEA)

11. What are your views on the accuracy and scope of the information used to describe the SEA environmental baseline set out in the Environmental Report?

There appear to be a number of key statements in the SEA which have not been referenced in a few locations such as "Transport, including international aviation and shipping, was the largest source of net greenhouse gas emissions in Scotland in 2016", on Page 38, this could be referenced back to previous references, as you may decide to only read a particular section of the report.

12. What are your views on the predicted environmental effects as set out in the Environmental Report?

It is hard to predict the environmental effects of a Strategy until it is being delivered. A change in political make up may change the overall delivery of the plan.

13. What are your views on the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?

Any monitoring that is being undertaken should draw data from local authorities and third sector organisations. There are a number of modal counters across Scotland owned and operated by a number of organisations, so a framework should be set up to collect all the data and report into the success of the strategy.

14. Is there anything else you would like to say about the Environmental Report?

Possibly put the references at the end of the report, so that if they are used a number of times, they can be referenced again.

It may have been helpful to drill down some of the statistics by area. For example the figure that “approximately 34% of all car journeys in Scotland are less than two miles and could be covered by bicycle or foot” is quite a general almost sweeping statement – is there not geographical variations? For example this may be the case in Edinburgh but is it the case in the Black Isle?