

## National Transport Strategy NTS2 Draft for Consultation

The consultation commenced on 31 July and runs until 23 October. The consultation mechanism for responding to the content of the draft NTS2 is an online consultation which asks for comment on the strategy via a number of questions. There are 14 main questions in 6 sections and the supporting text from the questionnaire along with each question and the proposed draft response to each question is given below.

### 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

No

The vision identified in Chapter 2 of the draft NTS2 is set at an appropriate strategic and national level and is mostly supported. The vision must be set within the context that the strategy should take account of:

- A need to optimise what currently exists to improve resilience and efficiency; and

- The need for the transport system to be environmentally and commercially sustainable.

**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

No

The priorities and outcomes are aspirational and set at an appropriate level for a National Transport Strategy. They reflect other key national strategy/policies and initiatives such as the Climate Change Plan 2018-2032, Climate Change Bill, Fairer Scotland Action Plan 2016, A Fairer Scotland for Disabled People: delivery plan, Active Travel Task Force Delivery Plan, Accessible Travel Framework to name a few of the key documents.

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

SEStran is of a view that the Priorities and Outcomes should be considered equally important in helping deliver the Vision of the Strategy. The difficulty, however, is in finding the right balance between these Priorities when implementing the Strategy through various strategic projects.

The whole purpose of the Strategy should be to provide a holistic and fully integrated approach for delivering transport solutions, supporting the vision in its broadest sense.

In many aspects, these Priorities can be conflicting at the stage of implementation; to date, economic growth has been paired with an increase in GHG emissions, for example. Moreover, and as the NTS draft for consultation recognises, more frequent extreme weather events as a result of climate change can disproportionately impact vulnerable communities with fewer and less resilient transport options. On the other hand, however, significant behaviour-changing interventions to reduce transport-related emissions might have unintended consequence that negatively impact on access to employment and social inclusion for another geography or group of society. There is a strong need for better holistic thinking about place, and for consideration of the impacts different measures have on the Priorities set out in the new NTS, rather than in isolation.

To further illustrate this point, the example of LEZs is given. In principle, LEZs are well-targeted measures to improve the air quality and therefore quality of life in a local area. The risk, however, is that the LEZ is implemented in a way that solely focuses on improving air quality and meeting legal standards.

In this context, buses are often targeted by LEZs because they are considered “quick gains”. However, consideration should be given to the possible negative impacts of targeting buses with such an intervention, because it might either shift the air quality issue to other areas, or have wider consequences such as pushing up the fares as a result of the additional cost for bus operators to upgrade their fleet. In the first scenario, older buses that do not meet the standards of the LEZ will be used in higher concentrations in other areas outside the LEZ, potentially creating a new air quality issue. That might cause a new problem in terms of meeting the legal requirements, but even so, research indicates that there is no safe level of PM10 and NOx emissions and the decision to improve air quality in one area at the cost of another area needs to be reasonably justified. This requires coordination from a regional level and a plan to monitor and mitigate the impacts of an LEZ in the wider region.

Moreover, an LEZ targeting buses may have the unintended outcome of directly or indirectly pushing up fares for buses. Consequently, this might discourage bus use (and potentially encourage more car use when these are less affected by the LEZ). This not only causes an issue from an environmental perspective, but also from a social perspective. It is often those who cannot afford to have their own car, let alone to buy a new car that meets the standards of the LEZ, who rely the most on the bus network to access work, employment opportunities education or health facilities.

For an intervention to be fully successful and respectful of all strategic objectives, it very much depends on how a particular intervention is implemented. One critical success factor is that regional consideration is given to the impacts of an intervention such as an LEZ to properly consider the wider, potentially detrimental, impacts of the intervention out-with the area where it is being implemented.

Therefore, SEStran believes it is essential that these Priorities are considered equal, and that the Strategy provides some form of framework or guarantee to ensure that these Priorities are equally protected and balanced decisions are taken when the Strategy gets implemented through strategic projects. This is also an argument for enhanced integration and stronger, place-based alignment between transport, land use planning and economic development, such as at a regional level. A more elaborate explanation on this view is given in the response to question 5a further on in this consultation.

### **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 challenges identified in the strategy highlight the important role that transport can play in helping to tackle poverty and child poverty, social isolation, gender inequalities, health

inequalities, young people, a rapidly ageing population, disabled people, access to employment trade and connectivity is highlighted in detail in the consultation document.

All of these issues above will be improved by focussing on the following key challenges

- Decline in bus use
- Reliability and demand management
- Health benefits for all age groups of successful delivery of active travel
- Information and integration
- Resilience
- Air Quality
- Reliance on car (for shorter journeys)
- Behavioural change – Need for travel – commuting.

The main challenge in delivering a successful National Transport Strategy is how it enables financial sustainability of the solutions to be achieved both in terms of capital and ongoing revenue expenditure.

Deregulated bus services are still a major issue in the provision of financially sustainable bus transport and the disparate nature of rail operation adds additional complications and the cost of rail-based transport is prohibitive for many users of transport.

Whilst the challenges have been well documented they are outlined at a high level and critical to real success will be in how the policies and enablers in the Strategy can deliver practical positive improvements within the transport network.

Transport investment decisions should account for the true cost of car use to society.

Transport should be a key enabling factor for society: Any transport strategy should focus on delivering a truly integrated transport network which allows people to move through it seamlessly, boundaries both physical and virtual (provider/ticket/mode) whilst necessary should not be a hindrance to members of our society moving from one place to another.

## **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**

Yes. The policies are high level and broad in their formulation. They reflect the priorities and outcomes identified. Some policies and their enablers are aspirational in nature and the detail of how the policies will be implemented and funded is the main factor that will allow measurable improvement to be seen.

Some policies are more tangible such as *"improve the quality and availability of information to enable better transport choices"* and *"Improve access to healthcare, employment, education and training opportunities to generate inclusive sustainable economic growth"*. These potentially have a more direct outcome and subject to a satisfactory delivery mechanism and adequate funding can be delivered more readily.

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

Whilst the priorities and outcomes are all interconnected and equal in importance there is some risk that without setting priorities and taking an approach of 'parity of esteem' between the various policy drivers then tensions are created which are unresolved and which will act as a constraint. SEStran notes there are clear policy imperatives, which the Scottish Government has already set out, that help refine key policies:

- Inclusive Growth
- Net Zero Carbon
- Improved Health Outcomes

Policies which help tackle the pressing issues below should be the main priority areas for focus in the early years of delivering the NTS2.

- Decline in bus use
- Reliability and demand management
- Health and active travel
- Information and integration
- Lack of early transport planning in land use decisions
- Resilience
- Air Quality
- Geographic inequality of access to sustainable transport options
- Reliance on car (for shorter journeys)
- Behavioural change – Need for travel – commuting.

The policies which would seem best to tackle the above issues are:

- 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;
- Provide a transport system which enables businesses to be competitive domestically, within the UK and internationally;
- Improve the quality and availability of information to enable better transport choices;
- Improve and enable the efficient movement of people and goods on our transport system;
- Provide a transport system that is equally accessible for all.

## **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)?**

The case for a change in the Transport Governance has been made by the work undertaken by the "Roles and Responsibilities Working group". SEStran proposes the following levels for key decision making:

**National Level**

The requirement for all operators to provide integrated ticketing facilities should be taken at a national level.

Provision of concessionary fares should be set at a national level.

**Regional Level**

Regional partnership working and responsibility is suited to the following decisions and responsibilities: -

Regional strategy coordination.

Cross boundary transport interventions: development, budget management and delivery.

Region wide interventions to support and complement individual Local Authority measures that have a regional impact: development, budget management and delivery.

Coordinate and complement STPR interventions.

Regional Active Travel Development.

RTPs are well placed to take these decisions, and deliver appropriate interventions at a regional level. RTPs respond to a recognised and established need to decide on cross boundary priorities – in fact they were established on a voluntary basis following the creation of 32 unitary authorities, to make strategic decisions on transportation priorities that cross boundaries and correspond to travel-to-work geographies. RTPs, through established statutory boards, can take decisions about transport providing both accountability and responsibility that transcends individual authority areas; involving a wide range of end users and stakeholders. Whilst cross boundary is mainly referring to initiatives between RTP local authority areas, the ongoing collaborative working between adjacent RTPs is also critical to ensuring an integrated and consistent approach across and between RTP areas. Approved RTSs must align with national strategy aims and the statutory approval

of all RTSs by Scottish Ministers will be facilitated by evidence of coordination between RTP's.

The first statutory SEStran RTS was published in 2008 along with a detailed and costed list of projects identified to provide good transport accessibility throughout the SEStran region. The RTS was refreshed in 2015 and an updated delivery plan was produced at that time. The emphasis in the infrastructure delivery plan was changed reflecting the change to capital funding being directed to local authorities. The current RTS delivery plan includes a Projects Database which contains interventions across the whole SEStran area, including schemes to be delivered by Scottish Government.

Many of the outstanding interventions relate to cross boundary projects or schemes that support measures to reduce travel demand and make cross boundary journey travel more sustainable across the travel to work area of SEStran, but they have not been delivered within the current regional transport governance framework. Such cross boundary schemes support inclusive economic growth by connecting people, connecting businesses and moving goods.

An appropriately funded and empowered Regional body with strengthened governance reflecting the region needs could support and deliver the emerging NTS2 priorities and outcomes more quickly.

The delivery of cross boundary/regional schemes enables time limited non statutory partnerships such as the City Deals, Regional Economic partnerships and soon to emerge Regional Spatial Strategies to deliver within a regional framework that has appropriately identified, appraised, prioritised and then delivered regional transport infrastructure that supports national transport objectives. Delivery at a regional level, would allow constrained local authority resources and budget to focus on the delivery of vital and important local transport services.

The Climate Emergency and the need to reduce travel demand highlight the vital role of integrated transport and land use planning. Travel pattern and travel to work areas demand regional transport solutions, within which the land use strategy is set. Sustainable economic development needs low carbon transport solutions if it is to contribute to the national transport objectives.

The structure to deliver this approach would require a Regional Transport Partnership body with relevant statutory powers (that complement existing local authority powers) with funding from Scottish Government. This would enable a Regional Delivery Body which will identify, appraise, prioritise and deliver cross boundary transport projects objectively at a



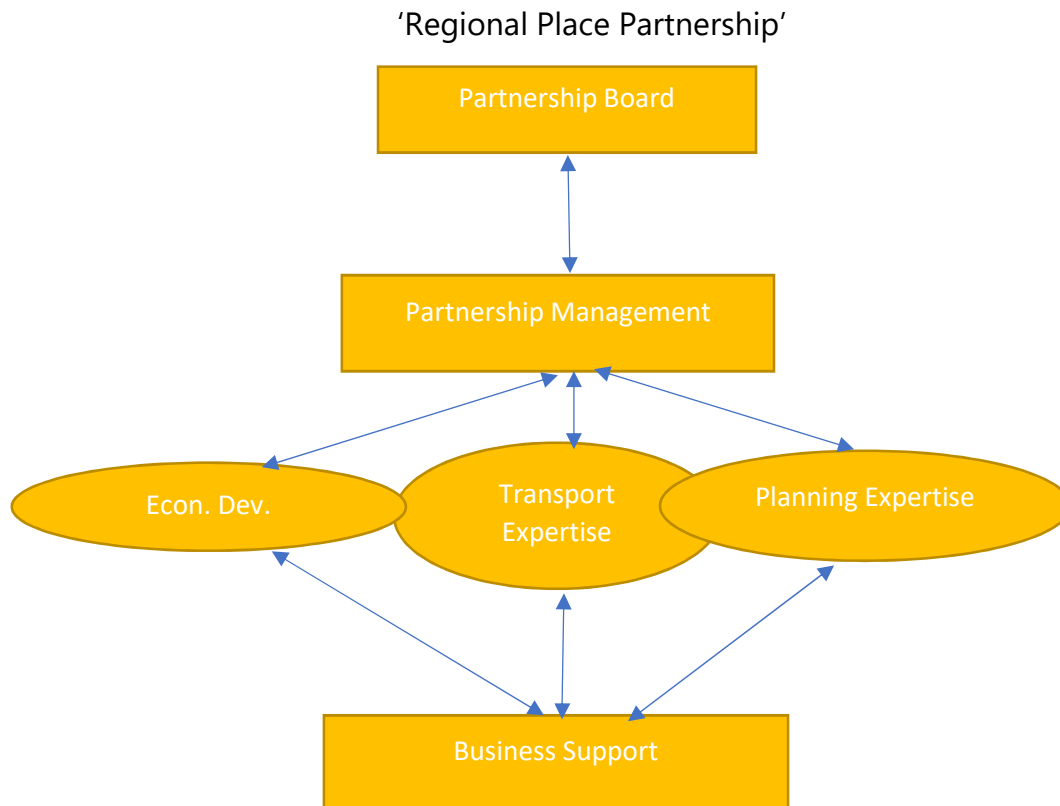
regional level. This then sets a clear transport framework within which time limited and voluntary partnerships can plan and deliver their projects and initiatives.

RTPs, with existing, dedicated staff resources, have experience and a track record of working with established relationships with local authorities, rail and bus operators, health boards Sustrans Scotland, Transport Scotland, and in aligning Regional Transport Strategy with regional economic and spatial strategies and time-bound projects. In providing a link between local and national bodies, RTPs are able to take objective decisions that address regional gaps in provision and therefore address regional outcomes. Rather than relying on voluntary local authority partnerships using already stretched resources, it is essential that regional governance is provided by dedicated staff, resourced independently of local authorities.

As transport decisions underpin the success of both spatial and economic strategies, RTPs are ideally placed to take decisions that directly benefit wider outcomes for inclusive growth. Subject to being vested with the appropriate responsibilities for decisions, and addition of requisite planning and economic expertise within their governance structure, RTP's could enhance their current role to deliver a common sense coordinated approach to cross boundary issues and tackle many of the current problems associated with the delivery of regional transport provision. This would provide the opportunity to streamline regional decision making within established, and statutory, regional bodies.

The existing RTP Boards in many cases already include appropriately enabled elected members with portfolios that encompass the wider remits envisaged within the proposed governance review. Therefore, the necessary political structure is already substantially in place and there is a logic to expanding the role of the existing statutory RTP establishments. The delivery of the priorities of the NTS need an integrated approach to transport delivery nationally, regionally and locally and given the transportation knowledge, coordination and experience that exists at a regional level, RTP's could provide a sound building block to develop a structure that will deliver the aims of the NTS at a regional level. Furthermore, greater alignment of transportation with planning and economic development by integrating these areas into the remit of the statutory RTP boards would allow a focus on sustainable regional transportation delivery. Dedicated resources available at a regional level to focus on regional transportation delivery would not be impacted upon by the staff resource implications associated with ever reducing local authorities and voluntary partnerships budgets.

The following is an illustration of a possible governance structure for RTPs, providing a holistic, place based approach:



## Local Level

Local authorities already deliver a broad range of transportation services within their local areas and those services and the powers available to deliver these services should remain. However, setting a clear regional framework and delivering cross boundary regional interventions will deliver a more integrated and connected transport network.

Local authorities would deliver transport interventions that:

- Support and target local community need e.g. road safety, active travel, local bus services;
- Improve living spaces and make better spaces in towns and villages
- Deliver measures locally to support, promoting equality, taking climate action, and improving health and wellbeing.

**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?**

There is a role for local communities to play in all aspects of transport. The level of engagement and input will depend on whether the engagement is about the strategy or specific projects. There is always a challenge because local community views tend to focus on very local issues. However, the statutory RTP bodies provide a sensible regional locus for engagement of local communities across a regional area and are therefore able to involve and respond to the needs of wide-ranging local concerns within their regional strategies and priorities.

Decisions should also be evidence based involving operators and experts and should be objective, looking at the bigger picture. However, we do not know what a net zero carbon future might look like, nor in the shorter-term how we achieve a modal shift to active travel (the outcome framework for active travel is currently being produced). So we have no evidence as yet around these commitments, hence the NTS needs to be a balance of policy-driven and evidence-led.

## **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?**

Yes

No

Only in part, although it is a high level strategy document with aspirations that if fulfilled would indeed meet the needs of transport users. However, the Strategy by itself cannot address the needs of transport users. It does set the framework for assessing and developing future projects and transport aspirations, priorities and outcomes. The focus of the strategy seeks to meet the needs identified in the current and emerging challenges section. However, it is the subsequent decisions and investment that will address the needs of transport users.

## **Section E: Looking Ahead**

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

Lothian Buses are a good model of how a local authority partnership can deliver high quality bus services.

Segregated cycle routes provide opportunities for greater active travel and high quality active travel schemes. Although they tend to be confined to high density centres at present. Real Time Passenger Information is a vital component that encourages public transport use.

Park and Ride has proven to be successful and is a key element in delivering mode share change.

Bus priority has been successful in improving bus reliability in increasing levels of overall congestion.

Bike share schemes have been successfully introduced in many towns and cities.

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

Expand the Lothian buses model to other areas of the country.

Support the implementation of increased bus priority in cities and towns.

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

A lack of integrated ticketing;

Commercially driven private sector bus provision;

A complicated rail management and operation structure;

Unreliable rail travel;

Rural transport provision/disparity with cities;

Too much on road freight;

The impact of congestion in cities and other key national routes e.g. Edinburgh City Bypass.

There is inadequate public transport priority to offset this congestion;

The current model of funding active travel schemes through a bidding process introduces a further level of complexity to project delivery especially for cross boundary projects; and

The Borders Railway has been a success, but the ongoing growth of the region is already being compromised because it was implemented as a single track non-electrified railway.

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

There is an urgency to resolve the issue of regional governance. Until that is changed the ability to deliver an improved transport system that can function at a regional level will not change.

Supporting investment in bus priority within cities and towns to tackle congestion to support local and regional public transport movements.

**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?**

The formation of a Transport Strategy Delivery Board and Transport Citizens' Panels will help to monitor the effectiveness and direction of the Strategy especially at a national level.

However, the delivery of the Sustainable Travel hierarchy will depend on the delivery of appropriate projects at a regional and a local level. The links to Economic Development and Planning and the development of spatial strategies are key to fully integrating the aims of the strategy into delivery on the ground.

Therefore, this reinforces the need to resolve issues of Regional Governance so there are clearly identified responsibilities for delivery and appropriately funded bodies who have all the powers necessary to deliver and implement measures in support of the aims of the National Transport Strategy.

The strengthening of the evidence base is important to measure and monitor progress. How that data is collected and managed is a significant and resource intensive task. The responsibility for this data collection must rest with Transport Scotland. Reliable and consistent data will be key to the successful monitoring of the effectiveness and outcomes of the Strategy.

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

The measure of success of the strategy will be in the delivery of a transport system which supports the aims of the 'Place Principle'.

## **Section F: Strategic Environmental Assessment (SEA)**

**Download the SEA Environmental report. ([user\\_uploads/environmental-report-290720191008f.pdf](#))**

## **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?**

The scope and information presented in the document is extensive and identifies the key environmental issues that are relevant to the development and implementation of the NTS. In particular, the evidence supports the emphasis of the strategy on the priorities of "Takes climate action" and "Improves our health and wellbeing".

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

The environmental impacts will depend on the detail of each local scheme and will vary scheme by scheme. However, it is considered on balance that the predicted environmental impacts set out in the report are a reasonable assessment of the likely impacts of implementing the strategy.

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

The use of EIA, HRA, and via site controls and Environmental Management Plans is an appropriate approach to manage the direct environmental impacts of the transport interventions.

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

No