



SPT Responses to Consultations

Committee Strategy and Programmes

Date of meeting 19 February 2021

Date of report 26 January 2021

Report by Chief Executive

1. Object of report

The object of this report is to recommend approval of the key points of draft SPT responses recently submitted or proposed on various consultations by the Scottish Parliament, Scottish Government, Transport Scotland and the UK Government.

2. Background

2.1 The relevant consultations are noted below, along with their closing date, and the date when SPT submitted a draft response (or propose to) subject to approval by this Committee:

Consultation	Closing Date	Status
Scottish Parliament Rural, Economy & Connectivity Committee Call for Views on the Scottish Government’s “Securing a green recovery on a path to net zero: Climate Change Plan 2018–2032 – Update” (CCPu) ¹	12 January 2021	SPT response submitted within deadline.
Scottish Government consultation on “free” bus travel for people resident in Scotland aged under 19 ²	7 December 2020	SPT response submitted within deadline.
Scottish Government consultation on Cleaner Air for Scotland 2 (CAFS2) ³	22 January 2021	SPT response submitted within extension to deadline granted 25 January.
Scottish Government consultation on National Planning Framework 4 Position Statement ⁴	19 February 2021	SPT proposed response at section 3.5 of this report, due for submission on day of Committee meeting.
Transport Scotland consultation on Rail Franchising Policy Statement ⁵	12 February 2021	SPT position submitted within deadline.

¹ <https://yourviews.parliament.scot/ecclr/ccp-update/>

² https://consult.gov.scot/transport-scotland/consultation-free-bus-travel-for-people-under19/user_uploads/free-bus-for-under-19s--final-consultation-pdf-version--23-october-2020.pdf

³ <https://www.gov.scot/publications/cleaner-air-scotland-2-draft-air-quality-strategy-consultation/>

⁴ <https://consult.gov.scot/planning-architecture/national-planning-framework-position-statement/>

⁵ <https://www.transport.gov.scot/media/48833/franchising-policy-statement-ts-website-version-9-december-2020.pdf>

UK Government call for evidence for Union Connectivity Review ⁶	30 December 2020	Joint Regional Transport Partnerships of Scotland response submitted within deadline.
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3. Outline of Proposals

Noted below are a brief summary of the purpose of each consultation, along with the key points of SPT's draft responses.

3.1 Scottish Parliament Rural, Economy & Connectivity (REC) Committee Call for Views on the Scottish Government's "Securing a green recovery on a path to net zero: Climate Change Plan 2018–2032 – Update" (CCPu)

3.1.1 Purpose of consultation

An update on the CCPu is provided in a separate report to this Committee; the key transport point being the target to reduce car kilometres by 20% by 2030. The Scottish Parliament REC Committee focused their Call for Views on progress to date on meeting CCPu targets; whether the target reductions and timescales are appropriate and achievable; whether support for behaviour change is sufficient; and the extent to which the CCPu will promote delivery of a green recovery.

3.1.2 Key points of SPT's response

- SPT welcomes the CCPu update, including the commitment to a 20% target for reduction in car kilometres by 2030 which would make a significant contribution to reducing overall transport emissions.
- Many of the proposals contained in the CCPu will contribute towards a green recovery and are welcome. SPT welcome commitments through the Programme for Government to decarbonise transport, promote bus priority, invest in active travel and support more efficient travel. However, investment in infrastructure and services without introducing measures to change travel behaviours will be insufficient in achieving the car kilometres target and therefore increased focus is required on this measure.
- The lack of reference in the CCPu to transport demand management is a matter for concern. More direct intervention is required to restrain private car use, including reduced parking in town and city centres, consideration of introduction of workplace parking levies where appropriate, consideration of road pricing and a greater emphasis on place-based solutions while recognising the importance of ensuring effective bus access to town and city centres.
- While acknowledging that improvements to the road network are necessary, in particular the need to maintain the current road infrastructure and for a limited number of strategic interventions, SPT believes that there should be greater equity between the level of investment in roads and that for sustainable transport interventions. SPT agrees with the recent Scottish Infrastructure Commission which highlighted that roads investment should be used "to future proof existing road infrastructure and to make it safer, resilient and more reliable, rather than increase road capacity."

⁶ <https://www.gov.uk/government/consultations/union-connectivity-review-call-for-evidence>

- The well documented benefits of active travel on health and wellbeing need to be translated into significant increases in walking, cycling and wheeling and this will require a quantum of investment not committed to date albeit recent increases in funding are very welcome.
- SPT welcomes the commitment in the CCPu to promoting decarbonisation of the transport network including promotion of electric vehicles (EVs). We welcome the commitment to bring forward the phasing-out of new petrol and diesel cars and vans from 2032 to 2030. A rapid uptake in electric vehicles is required to help achieve this. However, key barriers to the take-up of EVs remain and it is important to recognise that public transport and active travel will be central to achieving emission targets. It is also important to note that while EVs are an important measure to help tackle climate change, they too can bring challenges therefore there will be a continued need to ensure restraint on car use. Specifically, EVs contribute to congestion, will continue to emit tailpipe emissions, will continue to result in road casualties and will not contribute to more attractive places.
- Finally but importantly, SPT's response notes that Regional Transport Partnerships have a track record in partnership working to achieve sustainable transport solutions and are well placed to play a fuller role in contributing to achieving national climate change targets.

3.2 Scottish Government consultation on "free" bus travel for people resident in Scotland aged under 19

3.2.1 Purpose of consultation

In line with its commitment in the Programme for Government, the Scottish Government intends to add "free" bus travel for young people resident in Scotland up to their 19th birthday to the National Concessionary Travel Scheme. It is anticipated the scheme would come into effect later in 2021. The consultation sought views on the proposal, specifically: impact on reducing inequalities; appropriate card type for the scheme; parental/guardian approval; operator reimbursement; Covid-19 impacts; and wider equality impacts.

3.2.2 Key points of SPT's response

- SPT welcomes the proposal to extend "free" bus travel to under 19s. Access to education, health and employment is essential, and the proposals have the potential to encourage more young people to use public transport and have the potential to "lock in" more sustainable travel behaviours for the longer term.
- The proposal will particularly benefit those from low income households where travel costs are a disproportionate element of overall household income.
- However, there remain challenges which the transport network needs to address in relation to physical accessibility for disabled people. "Free" bus travel will undoubtedly extend the range of opportunities for young people but for those who are disabled, using public transport can be challenging; the benefits of the proposal are only available to those who can access our transport network.
- The reimbursement rate to operators may have an impact on the ability of bus operators to sustain services, which in turn could lead to extra pressure on transport authorities like SPT to provide a

replacement service. This needs closely monitored to identify any emerging issues.

- Local authorities in Scotland are under a statutory requirement to provide home to school transport arrangements that they consider necessary. Further detail is needed to better understand the impact of the scheme on councils and bus operators, with a particular focus on school transport. In addition, the introduction of “free” travel for young people should not be seen as an alternative or replacement for school transport provision.
- A more sophisticated product than the current National Entitlement Card (NEC) smartcard would offer greater potential for innovation, potentially exploiting the benefits of such initiatives as Mobility as a Service (MaaS). Young people are generally more technology-aware, so there is scope for much more innovation around ticketing and travel options.
- Separately, SPT is currently reviewing the Strathclyde Concessionary Travel Scheme on behalf of and in engagement with constituent authorities and will consider the implications of the extension of the national scheme to under-19s on the Strathclyde scheme. This will be the subject of a future report to the Strathclyde Concessionary Travel Scheme Joint Committee.

3.3 Scottish Government consultation on Cleaner Air for Scotland 2 (CAFS2)

3.3.1 Purpose of consultation

The Scottish Government published its first air quality strategy ‘Cleaner Air for Scotland – The Road to a Healthier Future’ (CAFS) in 2015. In 2018, the Scottish Government announced a review of CAFS to assess its progress and recommend priorities for further action. The review published its findings in August 2019 and concluded that while Scotland is performing relatively well by European standards, more remains to be done, and so preparations began for an updated strategy, CAFS2. Some key transport actions from CAFS2 include:

- Introduce LEZs into Scotland’s four largest cities⁷;
- Provide funding for permanent cycling and walking infrastructure and behavioural change programmes, in line with the NTS Sustainable Travel Hierarchy and the Sustainable Investment Hierarchy;
- Manage the Bus Partnership Fund to support local authorities to establish bus priority infrastructure and adapt the trunk road network to prioritise high occupancy vehicles;
- Explore how we can reallocate road space to cycling and pedestrians following learning from COVID-19 pop-up schemes; and
- Take forward a policy consultation in advance of drafting WPL regulations, and thereafter, take forward the regulations required to

⁷ Scotland's first Low Emission Zone (LEZ) came into effect in Glasgow city centre on 31 December 2018. Glasgow's LEZ is being phased in and to start with only applies to local service buses. When the LEZ is fully implemented, all vehicles entering the zone will have to meet specified exhaust emission standards. On 7 May 2020 the national LEZ Leadership Group announced a temporary pause in plans to implement Low Emission Zones in Scotland in response to COVID-19. Plans were formally resumed on 6 August 2020 and a new indicative timescale presented for LEZs in Scotland that aims to see their introduction between February and May of 2022.

support the WPL provisions in the Transport (Scotland) Act 2019 which require commencement and supporting regulations.

3.3.2 Key points of SPT response

- SPT welcomes the proposals contained in CAFS2. The severity of health issues and related problems linked to the transport sector's contribution to poor air quality requires significant and rapid intervention. Action therefore needs to be taken in the short term including significant investment to decarbonise transport while promoting active travel and public transport use.
- There is ever closer alignment of policy at national, regional and local level. SPT would, however, wish to see this policy alignment translate into more effective delivery of sustainable and integrated transport solutions. This could be supported by an enhanced role for Regional Transport Partnerships in helping tackle transport emissions and air quality.
- The way we own and use private cars is currently particularly problematic for emissions reductions. The number of cars per person is increasing in the SPT region and we are carrying fewer people per car trip than just a few years ago. More cars being used less efficiently means more embedded carbon from vehicle production and disposal processes and more emissions per person from our travel.
- We welcome the acknowledgement in CAFS2 that bus, which is the most used public transport mode, particularly for people on low incomes, people who have a disability and who are carers, is the "single most important mode for reducing transport related air pollution."
- We have also requested that reference should be made to the role of Regional Transport Strategies and Local Transport Strategies as key documents to support national and local policies.

3.4 Scottish Government consultation on National Planning Framework 4 Position Statement

3.4.1 Purpose of consultation

The Scottish Government is preparing a new National Planning Framework for Scotland 4 (NPF4). It will look ahead to 2050 and set out what Scotland, as a place, could and should look like for people, the economy and environment. NPF4 will include national planning policies, providing a clear and coherent plan for future development, and will have the enhanced status of a development plan (replacing the previous regional Strategic Development Plans statutory role), informing day to day planning decisions. It is anticipated the draft NPF4 will be laid before the Scottish Parliament in autumn 2021, with public consultation setting out fuller proposals at that stage.

This Position Statement sets out current thinking to inform further discussions on the content of a draft revised framework for consultation. It aims to support those discussions and is not, in itself, a document setting out policy. Statements in the Position Statement as to what the content of a revised National Planning Framework will contain should be read in that context. The final content of NPF4 will only be established following

consultation and consideration, and approval, of the draft revised framework by the Scottish Parliament. The current National Planning Framework (NPF3) and Scottish Planning Policy remain in place until NPF4 is adopted by Ministers.

3.4.2 Key points of proposed SPT response

SPT, directly and through the Regional Transport Partnerships of Scotland network, has had good engagement in the development of NPF4 to date, including with the Scottish Government and Clydeplan. Further, we are in the process of developing a new RTS which will reflect national policy and have implications for strategic transport, land-use planning and place-making.

SPT welcomes the current thinking set out in the Position Statement including the promotion of sustainable travel and the integration of transport and land use planning in achieving the proposed outcomes. However, SPT believes that the issue of sustainable connectivity could be given greater prominence, particularly in light of the targets committed to within the recent CCPu. This could be strengthened further by giving greater emphasis to the nationally, regionally and locally important role of the public transport network, specifically bus, towards meeting sustainable travel needs.

3.5 Transport Scotland consultation on Rail Franchising Policy Statement

3.5.1 Purpose of consultation

Current legislation requires Scottish Ministers to publish a Franchising Policy Statement which sets out how they propose to exercise their powers to select a person who will provide passenger rail services. The current Policy Statement was published in 2012 and requires to be updated. The Scottish Government had planned for this to take place once the outcomes from the UK Rail Review ('Williams Review'), due in autumn 2020, were known. However, due to delays publishing the Williams Review, it is not certain when these outcomes will be known.

The Scottish Government has stated for some time that the current franchising model is no longer fit for purpose. However, it is required to act in accordance with current UK rail legislation, which requires a Franchising Policy Statement to be in place. As noted above, it is not certain when the Williams Review will report and the Covid-19 outbreak continues to have a significant impact on rail passenger transport. Against this background, the Scottish Ministers will shortly require to take decisions as to the provision of ScotRail services after the expiry of the current franchise agreement. Ministers' therefore consider it necessary to put in place a revised Franchising Policy Statement at this time, until such a time as the outcomes of the Williams Review are known.

3.5.2 Key points of SPT's proposed response

Given the current status of the Williams Review, and following discussions with the Regional Transport Partnerships of Scotland, it is proposed that SPT respond noting the new Position Statement and advising that, like the Scottish Government, we await the outcome of the Williams' Rail Review which will provide further direction on future arrangements for the operation of railways in the UK, and look forward to discussions with Transport Scotland and others on the future of rail in Scotland at that time.

3.6 UK Government consultation on the Union Connectivity Review

3.6.1 Purpose of consultation

The UK Government announced the establishment of the Union Connectivity Review on 30 June 2020, with the remit to look at how transport infrastructure and connections between the four nations of the UK can be improved and “levelled up”. The Review is being led by Sir Peter Hendy, formerly the Commissioner of Transport for London, and issued a call for evidence late in 2020 seeking views on what stakeholders believed was required to deliver the improvements needed.

3.6.2 Key points of joint Regional Transport Partnerships response

- The importance of connections between Scotland’s cities and cities elsewhere in the UK.
- Many parts of Scotland are very remote geographically to other parts of the UK, and this is a significant challenge to deal with in improving transport connectivity.
- Focus on connectivity to Scotland generally centres on connections to the cities of the central belt (Glasgow and Edinburgh), and greater emphasis needs to be given to the five other cities in Scotland, and towns, rural and island communities.
- Various points on specific modes, including the importance of air connectivity for Scotland, consistency in trunk roads/motorways between Scotland and England (including preparing for electric vehicles), the key role of Scotland’s ports, and the importance of ensuring Scotland is not forgotten in the future High Speed Rail map of the UK.
- The ongoing issue of agreeing priorities between the various Governments and common benefits for each nation in delivering a truly connected transport system.
- The ability of regions within each nation to set their own transportation priorities, for example through regional transport strategies.

4. Conclusions

The consultations provide an opportunity for SPT to influence national policy. Officers will continue to engage with the Scottish Parliament, Scottish Government, Transport Scotland and the UK Government on these and other issues and update the Committee as appropriate in future as progress is made.

5. Committee action

The Committee is recommended to:

- Note the contents of this report; and
- Approve the key points of the responses in section 3 of this report.

6. Consequences

Policy consequences	<i>Responses in line with the current and developing RTS.</i>
Legal consequences	<i>None at present.</i>
Financial consequences	<i>None at present.</i>
Personnel consequences	<i>None at present.</i>
Equalities consequences	<i>None at present.</i>
Risk consequences	<i>None at present.</i>

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