Appendix 1 – National Transport Strategy Consultation – SPT Draft Response

The key points of SPT's response are as follows:

- In principle, SPT supports the Vision, Priorities, Outcomes, Policies and Enablers set out in the draft NTS2;

- SPT would emphasise that, in taking the NTS2 forward, there must be a much clearer and stronger focus on addressing some of the main issues we as a country face including, for example, the climate emergency/net-zero carbon, inclusive growth, poverty, health, city/regional development, rural access, and others. Similarly, and specifically in relation to transport, the NTS2 must lay out a clear, committed and deliverable plan to arrest the effects of and decline in bus network size and patronage;

- We believe that the stronger focus required at national level and highlighted above should be demonstrated through the NTS Delivery Plan, STPR2 and NPF4, based on the content of relevant Regional / Local Transport Strategies. Building on this, Transport Scotland should utilise in a greater way the strengths of Regional Transport Partnerships and their Regional Transport Strategies – which are statutory documents approved by Scottish Ministers – to help deliver national priorities;

- Further to the above point, and our later point about governance, SPT believes that the format of the NTS Delivery Plan should very much follow a regional theme, and be developed in partnership with and input from regional and local stakeholders. Transport Scotland should utilise the opportunity of the Delivery Plan to provide clarity and certainty about future initiatives, workstreams and crucially, revenue and capital funding, and the organisations tasked with taking them forward;

- In addition, given the seriousness of the main issues needing addressed, opportunities to utilise existing or emerging legislation (e.g. new Transport Bill) in support of delivering national priorities should be fully and robustly explored, and should these not prove suitable, or indeed not deliver the level of change required, new legislation should be brought forward to address this; and

- In relation to changes to transport governance, SPT supports the conclusions of the NTS Roles and Responsibilities group, namely that there is a case for change, that future governance should be based on a regional model, and that further analysis and development is required to create a deliverable and workable solution. Notwithstanding this however, SPT, a highly successful example of a regional transport body, believes that any future changes should be made via development of existing models.

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 – Yes.

Please explain your answer.

The Vision is broadly supported. In particular the commitment within the vision to sustainability and fairness is welcome given the challenge of a global climate emergency, the need to tackle poverty, and create a more inclusive society. Sustainable, affordable transport and active travel will be key to progress across many sectors.

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 – Yes.

Please explain your answer.

The Priorities are broadly supported. However, given the urgency of the need to tackle issues such as climate change, poverty and health, the priorities could show greater ambition through stronger, more positive and decisive language. For example, the wording in relation to the 'Takes Climate Action' Priority and its associated outcomes could be questioned as to whether it is strong enough to tackle the climate emergency.

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

Yes, they are all inter-related and the success of the strategy will depend on the successful management of the tensions and interdependencies among them to deliver the most positive outcome.

Again, it could be argued that the global climate emergency demands urgent and radical steps towards wide adoption of sustainable public transport and active travel measures which discourage unnecessary private car use.

However, there are other issues which could equally be defined in terms of an emergency. For example, tackling the inequalities in Scottish society has been a long term aim of successive Scottish Governments yet significant issues remain, particularly in Glasgow and the west of Scotland. More focus needs to be given to the critical role of public transport in helping get people out of poverty, through better, more affordable access to employment and services.

In particular, the decline in bus services, most marked in the west of Scotland, has damaging impacts on the fabric, wellbeing and prosperity of many of our communities, particularly those facing economic challenges including many rural, island and deprived areas. Child poverty rates in Glasgow are stark, with 1 in 3 children living in poverty in 2017, rising to 41% in some parts of the city[1]. Affordable public transport is critical in helping address issues around child poverty. In terms of social isolation, a 10% improvement in bus connectivity would result in a 3.6% reduction in social deprivation[2].

Similarly, health remains a significant issue which could be described as being in an emergency situation, particularly in areas of Glasgow and the west of Scotland. Recent statistics on life expectancy indicate that after many years of progress, the situation has stalled. There are many and complex reasons for this but undoubtedly exercise, and access to active travel is a component.

While the existential threat of climate change is clearly uppermost in many people's minds at the present time, the overriding challenge will be to develop transport and wider public policies in an integrated and complementary way; for example, we can tackle child poverty and promote inclusive economic growth in a way that still supports our commitment to addressing climate change.

We must therefore be careful that one policy does not undermine another as has often been the case in the past, where decades of unsustainable land-use and pro-car policies have meant achieving meaningful modal shift from car to sustainable modes has been at best futile and at worst, almost impossible.

3. Are the Challenges the Strategy highlights in Chapter 3 the key Challenges for transport, or are there others the Strategy should focus on? Please explain your answer.

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[1] Glasgow Centre for Population Health - https://www.gcph.co.uk/children_and_families/family_and_child_poverty
[2] https://greenerjourneys.com/wp-content/uploads/2016/10/The-Value-of-the-Bus-to-Society-FINAL.pdf

The Challenges highlighted are broadly correct. In particular, we welcome the acknowledgement of the damaging impact that declining bus services and patronage has had and is having on communities across Scotland, particularly in our region where the decline has been most stark.

Given that bus is the dominant public transport mode and is more likely to be used by women, young people, older people, people with a disability and people on low incomes, SPT would welcome the kind of investment in bus that historically has been made in the rail or road network. While the recent announcement in the Programme for Government of a £500m investment to transform bus is very welcome, a commitment to significant revenue funding for bus services should be considered a national priority as should a commitment to address ongoing access deprivation. This intent would go a considerable way in reducing transport emissions and supporting our most vulnerable communities, ensuring they are linked to employment, health, education, training and retail opportunities as well as to family and friends.

Section B: The Policies to Deliver the NTS

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

As noted earlier, we would welcome greater ambition in this regard.

Over the twenty year horizon of NTS2 and given the urgency of the challenges around climate change, healthcare and poverty, it would be good to see much more stretching aspirations. In particular, references to "improve" could be strengthened and made more specific and measurable.

We would welcome a strengthening of the outcome to "Embed the implications for transport in spatial planning and land-use decision making." Transport and land use planning should be integrated rather than simply one taking on board the implications of the other.

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

Reflecting our comments above, we would support greater prioritisation of tackling climate change since this will have benefits in virtually all other areas and if carefully planned has the capacity to help tackle a range of priorities such as those around poverty, health, congestion, safety and the economy. Investment in an adapted and resilient network where private car journeys are significantly reduced and there is a marked move to sustainable modal shift will benefit our economy, our environment, our health outcomes, the viability of our communities and the attractiveness of our places.

With increased investment and use of sustainable transport will come higher expectations and rightly increasing demand for inclusivity, creating a virtuous circle as we have seen in other countries that have shown the commitment and leadership to deliver 'places for people'.

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.

From the outset, it is worth emphasising that SPT support the recommendations of the Roles and Responsibilities Working Group as referenced in the Transport Governance chapter of the NTS2, namely that there is a case for change, and that transport governance arrangements should primarily be on the basis of some form of regional model whilst allowing for variations in approach between different regions, geographically and potentially, thematically (e.g. rural). We also agree that further work needs to be done to further develop a workable model for future transport governance. Notwithstanding this however, SPT, a highly successful example of a regional transport body, believes that any future changes should be made via development of existing regional models.

In undertaking any further work in regard to future Roles and Responsibilities, SPT believes it is essential that we are represented on any future working group, similar to the role we had in the earlier Roles and Responsibilities Working Group. In additions, we believe that governance arrangements should not be imposed on any local or regional area, rather they should be co-designed with them, and look forward to working with national, regional and local partners in taking this work forward.

We agree that there are appropriate roles for national, regional and local in decision making. There has been growing recognition of the importance of city regions as engines of economic growth and there is an argument that such regions should have more powers devolved to them to make sensible, rational and integrated decisions on economic, land use and transport matters which matter to their region.

SPT's view remains, however, that those regions with a dominant major city should encompass their full travel-to-work area to ensure effective transport arrangements which support the unique requirements of their region's economy, healthcare, education and employment opportunities through an affordable, responsive, inclusive, sustainable and integrated transport network. This has been and remains SPT's focus and our track record proves we have successfully delivered on that.

Lastly, Transport Scotland should utilise in a greater way the strengths of Regional Transport Partnerships and their Regional Transport Strategies – which are statutory documents approved by Scottish Ministers – to help deliver national priorities.

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.

Yes, SPT supports the principles enshrined in the Christie Commission report and laid out in the Community Empowerment Act. Local communities – of interest or geographic - must be involved in some form in all decisions taken about transport, be that through representative or participative democratic methods. It must be borne in mind too that neither of these methods are mutually exclusive and indeed the ideal process mixes the two. In particular, the most access deprived communities need to be involved. Joined up, cross agency and cross sector approach using and building on existing mechanisms principally through Community Planning provide significant opportunities.

In relation to the type of transport decisions local communities should be involved in, a good example would be bus services. Too often we hear of changes to a bus service being made which a local community did not have sufficient knowledge about in advance and which they feel powerless to do anything about. While in some cases this apparent lack of involvement may be attributed to a lack of awareness of the processes for such a change, without question the perception of powerlessness is strong and must be better addressed in future, potentially through opportunities presented in the new Transport Bill.

At a strategic level, it is also worth highlighting that sometimes decisions made at national level appear not to have considered the often very different impacts such a decision may have in different local or regional areas. This can relate to decisions on planning, road, rail, bus and others, and again must be addressed in future. Further developing the regional approach to transport governance advocated by the Roles and Responsibilities Working Group may go some way in dealing with 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?

Yes/No – Yes and No.

Please explain your answer.

Without doubt, the Strategy acknowledges the needs of all communities, groups, sectors and individuals, emphasising the all-pervading influence of transport in its widest sense on all our lives. The emphasis on social isolation is welcome as is the recognition that this is not always a function of physical isolation, but can be a consequence of low income, health including mental health challenges, or inequality.

Notwithstanding this, however, some of the choices facing many in society in future will be challenging, particularly when it comes to reducing personal car use, and the NTS would benefit from being bolder in acknowledging the reality of this.

Where the Strategy could also be strengthened, is in relation to the future role of Scotland's main metropolitan areas, and their internal and external connectivity. The importance of Glasgow and Edinburgh regions, particularly the former, is in our view under-acknowledged in the Strategy, which perhaps serves to emphasise the need for a stronger regional model of governance in future. There is wide recognition that cities and their regions will continue to grow in importance in future, and it is vital that we as a country prepare for that, and promote our cities and their regions to attract people, visitors and business in future.

Section E: Looking Ahead

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

Strathclyde, in many respects, has an excellent transport network: the largest rail network outwith London, an extensive bus network, a Subway system undergoing modernisation, a comprehensive motorway network and a growing active travel network. There is therefore much to build on for the future, but significant challenges remain, which we cover in our response to question 8a.

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

The complex and often competing elements of the network create challenges and barriers for the public. There is a lack of integration and indeed integrated decision-making and this is damaging to the efficiency of the economy and people's opportunities.

This goes beyond transport decision-making into areas such as land-use planning and economic development which require greater coordination, and where decisions taken in one area undermine investment elsewhere and can promote unsustainable travel behaviour.

The complexities of transport and its governance mechanisms do, very easily, lead to frustration and confusion amongst users, operators, policy-makers and administrators – there requires to be changes made to this and a concerted effort to ensure that decisions made are communicated to all users (and potential users) and are not undertaken in isolation across transport and wider sectors.

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

The transport network we have reflects the complex nature of the regulatory and legislative framework within which we exist, and can therefore seem poorly coordinated and lacking strategic focus. Different modes are pursuing different and competing business models and there is little incentive to integrate modes, simplify ticketing structures and tackle affordability.

Until there is a more fundamental shift away from the competitive model of transport delivery then the often significant investment in public transport will not be optimised. In many instances investment decisions by one mode will undermine investment in another.

As we have seen, the huge and welcome continuing investment in rail has come at a time of significant contraction in the bus market. Improving, albeit modest, investment in active travel is dwarfed by levels of investment in the road network.

As a consequence of all the above, the transport network is often a confusing, expensive and time consuming experience for the travelling public. Those most reliant on bus services continue to endure congestion brought about by decades of pro-car policies including cheap city centre parking.

Land use decisions have undermined sustainable transport solutions. It is noted in Chapter 3 of the NTS that our cities are growing, which is true. However, much of the growth is in the suburban area rather than in the city centre and immediate surrounding area, resulting in urban sprawl. More effort promoting people living in cities and towns, near employment and services and where public transport is the first choice over car is essential. Such densification will help to tackle the challenge of climate change while revitalising our city and town centres which are under challenge.

That said, the investment in the west of Scotland transport network since the 1960s has left the region with an extensive transport network. The key is to un-tap this by bringing strategic oversight and coordination back.

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

Establish effective regional governance arrangements with appropriate powers to promote integration and a sensible, coherent and joined up investment strategy.

Provide appropriate funding across modes and redress the balance in funding for bus which is critical to the achievement of wider policies to tackle poverty and support inclusive economic growth.

At a deep and fundamental level, society's ongoing and unsustainable reliance on private car travel needs addressed. The climate emergency must provide the stimulus for this and a step-change in how to generate positive behaviour change is essential.

As noted above the lack of integration of decision making with transport and with other sectors such as planning, economic development and health remains a big issues.

Also, as acknowledged in the draft NTS, bus services are in decline and this has severe impacts on the lives of many people given bus is the biggest mode and the one that people from our most vulnerable communities rely on. Again, at a fundamental level, this needs addressed.

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?
Please provide details.

In principle, we support these actions, but again we would welcome a more ambitious approach given the huge environmental, social and economic challenges we face. There are some areas where more direct focus could be achieved. For example, we should be more specific about using demand management to reduce unnecessary road traffic. The evidence base is clear and the tools available exist and so we should be more decisive and act in the shorter term given the scale of the challenge.
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10. Is there anything else you would like to say about the National Transport Strategy?
Please provide details.

SPT welcomes the new strategy and along with the Transport Bill and STPR2 we consider there is a real opportunity to achieve modal shift and a decisive move towards a more integrated, affordable, sustainable, accessible and connected transport network to help meet Scotland's social, economic and environmental ambitions and to achieve the kind of places people want to live. But much more needs to be done as set out in our response:

- More investment in sustainable transport in particular active travel and support for bus services.
- A move toward more integrated regional governance arrangements for transport that reflect the wider needs of the area. SPT believes that the format of the proposed NTS Delivery Plan should very much follow a regional theme, and be developed in partnership with and input from regional and local stakeholders. Transport Scotland should utilise the opportunity of the Delivery Plan to provide clarity and certainty about future initiatives and workstreams, and the organisations tasked with taking them forward;
- Support for electrification of the transport network but a recognition that electrification of cars is part of the solution but not the whole solution. Cars will continue to cause congestion, damage to local communities, cause air pollution and contribute to damaging health outcomes. Only by creating a more efficient, sustainable transport system with reduced energy consumption, and encouraging people to live in more sustainable places, will we begin to seriously reduce transport's carbon footprint.

In addition, given the seriousness of the main issues needing addressed, opportunities to utilise existing or emerging legislation (e.g. new Transport Bill) in support of delivering national priorities should be fully and robustly explored, and should these not prove suitable, or indeed not deliver the level of change required, new legislation should be brought forward to address this.

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?
Please give details of additional relevant sources.

The information appears both accurate and comprehensive.

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

Chapter 5 refers to "The use of digital technology within the transport system" and it should be noted that this technology, while it has clear potential benefits in terms of reducing the need to travel, also has potential costs in terms of significant energy use.

Similarly more opportunities for home working and using teleconferencing have benefits in terms of reduced travel but this can sometimes be substituted by more local trips.

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

Electrification of the transport fleet is essential and welcome. However, electrification will not achieve the kinds of reduction in carbon emissions that are needed to meet the Scottish Government's target. Cars will continue to cause accidents, congestion, air pollution, and impact adversely on the quality of the places where we live and visit. We would therefore caution against thinking electrification will solve all the problems without having to get people out of their cars.

Given the scale of the issue identified at section 11.1 around ground transport mode share, in particular that cars account for over three quarters (75%) of the total volume of traffic on the roads, and that all modes are increasing, with the exception of bus, then much more needs to be done to reduce the need to travel and to travel more sustainably.

In SPT's view there need to be stronger measures available locally, regionally and nationally to limit demand for private car travel as part of a carefully considered strategic approach.

14. Is there anything else you would like to say about the Environmental Report? No.