Overview

The consultation is on the new draft National Transport Strategy (NTS) for Scotland, which aims to set out a compelling vision for the future of transport for the next twenty years.

Why we are consulting

We are consulting on the new draft National Transport Strategy to help determine whether the Strategy's Vision, Priorities and Outcomes are the right ones for our transport network for the next twenty years. We want to know if the policies contained in the Strategy are the right ones to help deliver it, and how the Strategy can continue to support what works well and address what does not work so well in our transport system. Your views will be key in helping to shape the kind of transport we want for the next two decades.

NTS Consultation questions

Section A: The Vision, Priorities and Outcomes Framework

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.

Four priorities shown in bold, each with three outcomes

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

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

Yes   ☒

Please explain your answer
The vision within this strategy is positive, aspirational and relevant to the challenges we face nationally and globally – and is achievable if the right policies and priorities are pursued with sufficient support and investment.

Q2a: 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   ☒

Please explain your answer
The four priorities are in keeping with our expectations of what a modern transport strategy should be seeking to address. Nevertheless, there is a question of balance between the priorities and how these priorities inter-relate and impact on each other. For example, the priority to enhance economic prosperity in Scotland through transport policies should not be at the expense of the other priorities. Further, while we welcome these priorities from a public health, inequalities and climate change perspective, it will require a radical shift in the way that transport resources are allocated and how decisions are made regarding infrastructure and transport modes. Therefore, while we agree with these priorities, we feel it is important to recognise the challenges and contradictions inherent within them, and to outline clearly how they can all be met in a complementary way.

Q2b: Are some of these Priorities and Outcomes more important than others or are they equally important?

Please explain your answer
It is difficult to assert that one priority is more important than another. Instead, we agree that they are all important and feel it is more useful to recognise the interconnected and potentially contradictory nature of each priority, as well as how they can be met through specific policies or actions. Further comments are provided in relation to each priority.

Promotes equality
Transport plays an important role in shaping poverty in Scotland, with expensive transport placing a strain on people's budgets. Poor quality or limited public transport can prevent access to resources for good health such as employment, social opportunities, greenspace and leisure or tourism destinations[i]. The recent Poverty and Inequality Commission Report[ii] suggests that transport should be considered as a human right, no matter what level of income a person has or where they live.

People on low incomes are less likely to own a car[iii] and more likely to be reliant on good quality and affordable public transport. It is therefore important to ensure that

public transport provision is prioritised in areas where it can have the most positive impact on the population. Active travel should also be considered through an equalities lens, both in terms of ensuring active travel infrastructure and in creating walkable neighbourhoods. To ensure that a more diverse population take up cycling, it is important that the barriers are accounted for and mitigated. For example, while cycle hire schemes can be an effective way of increasing the proportion of cyclists in a city, efforts are needed to ensure take-up across the whole population[iv]. This will require personal support and financial assistance for some people. Improving safety (or perceptions of safety) can also help make cycling more inclusive by reducing feelings that cycling is for 'others'[v].

Research has shown that people living in poverty and the most vulnerable populations are less likely to contribute to poor air quality but are most likely to be impacted by it[vi]. Within Glasgow, commuter routes often pass through deprived communities where car ownership is low, at the expense of the local community. This can be damaging to health and is an aspect of climate injustice that can be overlooked. In the interests of fairness, consideration should be given to the negative impacts of air pollution on neighbourhoods where it is primarily caused by vehicles from elsewhere. Where there is an environmental injustice, additional carbon offsetting should be introduced.

Takes climate action
There is growing recognition that we are in a climate emergency and that greenhouse gases need to be reduced rapidly and dramatically to achieve net-zero carbon emissions. The target of achieving this by 2045 is arguably not ambitious enough – given transport accounts for 37% of Scotland's greenhouse gas emissions and there continues to be an upward trend in vehicle kilometres driven. Glasgow has committed to achieving their target as a city for net-zero emissions by 2030[vii]. While we welcome this commitment, it is incredibly ambitious given current travel behaviour.

Investment in transport needs to shift away from supporting a car-based economy to one which supports sustainable public transport and active travel[viii]. Increased investment in public transport, especially bus services, needs to be a priority. Furthermore, public transport should be more affordable, convenient and reliable than traveling by car if we are to be successful in shifting people out of their cars.

Helps the economy prosper
Traditional measures of progress (e.g. GDP) and other personal measures of success need to be reconsidered in light of the pressing need to tackle the climate emergency. This will challenge established and comfortable ways of living and will demand that many employers change their existing practice in relation to car use, parking and working hours. Scotland should embrace the economic opportunities that this transition will bring and should aim to be world leader on sustainable transport innovation. In particular, the shift to micro-mobility and shared use schemes (e.g. car clubs and bike hire schemes) can make a significant difference to urban economies and how urban areas are experienced.

Improves our health and wellbeing
To improve health, our transport system needs to be safer for the most vulnerable road and pavement users (wheelchair users, walkers and cyclists), air pollution

needs to be reduced and active travel needs to be promoted (with sufficient investment) as a cheap, enjoyable, convenient, sustainable and healthy way of getting around[i].

Improving health and wellbeing should be considered from both a short-term and long-term perspective. Although travel can be beneficial for health and holidaying abroad has become commonplace in the entire working population, there is a pressing environmental need for people to travel less. This is important in preventing further air temperature rises that will ultimately be detrimental to population health[ix]. This represents an important paradox that needs to be considered explicitly in future transport policy.

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

It is helpful to see the transport challenges laid out in Chapter 3 and the summary of positive trends. The latter shows the limited areas where progress has been made and highlights the challenges of focus and ambition that need to be addressed if Scotland is to truly have a sustainable, inclusive and accessible transport system. It is important to highlight the specific challenges facing those on low incomes and the benefits of an affordable, reliable public transport service.

A number of specific points follow:

Road casualties
While total reported road traffic accident casualties have reduced, within this there are some troubling trends. Cyclist casualties with a serious injury increased by 34% in the period 2005-2018. As a related point, estimates of the volume of cycling which could be used as denominator to create an accurate cyclist casualty rate are limited and probably unreliable. Better information is needed on who cycles (by age, gender and other demographic characteristics) and how far they cycle.

Transport poverty and inclusion
Transport poverty is noted as exacerbating other poverty-related issues e.g. access to jobs, education and cultural opportunities, and social isolation. More convenient and affordable public transport options are needed which, ideally, can be combined easily and affordably with active travel modes to enable more complex journeys across the city. Active travel investment should seek to widen access to various active modes of transport. As an example, the Bikes for All project[x] in Glasgow takes a social inclusion approach to widening access to cycling in the city for vulnerable groups and people furthest from cycling (including refugees, asylum seekers, BME groups and women). Cheap membership of Glasgow's nextbike bikeshare scheme is provided along with one-to-one tailored support and mentoring to improve people's cycling confidence. Learning from this project shows that making the scheme affordable was crucial to participation for many and allowed savings to be made elsewhere. Through engagement with community organisations across Glasgow, the project has demonstrated that under-represented population groups can be encouraged to take up cycling. For many participants owning a bike is not financially viable but having access to one through cheap membership to a bikeshare scheme can save money on public transport and is more convenient.

Train services

While train services are improving, costs continue to rise, which, along with the variable reliability of the service, can discourage use. To encourage greater use, services need to be able to respond appropriately to increased demand (i.e. with longer trains or more frequent services). Furthermore, ticketing issues continue with some unmanned stations having limited ticket purchasing facilities.

Technological advances

As most journeys in urban areas are under 5 miles, it is important to recognise the potential for active travel, micro-mobility and public transport to eventually become the only modes of travel for short distances. Micro-mobility (i.e. travel solutions for short journeys, including electric bikes, scooters and other small vehicles) is changing the way people travel in many urban areas[xi]. This presents an opportunity to shift away from a carbon-reliant transport system and can support the aim of 'ensuring the economy prospers'. The shift towards electric vehicles is another positive environmental innovation but we do not feel it is the solution to transport provision in built-up urban areas. Cars take up considerable space on the roads and prevent enjoyable and safe pedestrian use. We would welcome more ambitious plans in this strategy to eradicate car dependence entirely within cities or town centres.

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 Priorities 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

Q4a: Are these the right policies to deliver the Priorities and Outcomes of the National Transport Strategy? Please explain your answer

These polices do not fully reflect the priorities and outcomes already described. Although climate action, improving health and ensuring equal access to transport are mentioned, the policies could go further to specifically state how these objectives will be achieved. For example, in relation to climate action, we would like to see a policy which outlines what actions will be taken to achieve carbon neutrality across different transport modes. For equality, rather than stating that transport should be "equally accessible" to all, it would helpful to state what measures will be supported/taken forward to ensure equal access. Several factors shape people's ability and willingness to access transport (e.g. financial, demographic, cultural, geographic) and these need to be considered. In addition, we feel that transport policy has an important role to play in shaping the quality of places and the strength of communities.

There are a wide range of policies and enablers, but it is difficult to discern which are the most important and which will drive change towards a carbon neutral transport system. Further, these policies are closely linked or overlap in their scope, and there is the potential for synergy (or conflict) depending on the extent to which they are developed and implemented in a connected way.

These policies do not include transport and travel related to the growing hospitality and tourism sector. The national tourism strategy, Tourism Scotland 2020 (TS2020), aims to make Scotland a "first-choice destination for a high quality, value for money and memorable customer experience delivered by skilled and passionate people". Consideration must be given to how the Transport Strategy can respond in order to achieve all four priorities.

We would welcome the addition of a policy/policies which recognise the need to transition away from a carbon-based transport system and the need to reduce the

dominance of private cars on roads. We would also welcome a commitment to encouraging more car sharing where possible.

Q4b: Are some of these policies more important than others or are they equally important?

Please provide details.

From our perspective a primary focus for the next 20 years of transport policy should be on rapidly transforming our transport system from one that is dominated by roads and the needs of the private car to one that, firstly, reduces the need to travel and, secondly, prioritises sustainable and active travel choices. This focus is driven by the current climate emergency and the need to rapidly reduce carbon emissions. Making this a primary priority will require a subsequent shift in transport investment toward greater support for clean, low-emission public transport which is integrated with active travel investment.

Another important issue is the conflict between the need to reduce carbon-based travel and the current status quo in terms of air travel growth and the convenience of driving. The ability to easily and conveniently reach other parts of the world has, until now, been regarded as an important example of human progress. Attracting tourists and business people to Scotland is currently an important aspect of our economy. If this priority is to remain, then clear and credible policies that mitigate and reduce the impact of air travel on climate change need to be elaborated.

Mobility outwith a local area is also considered to be important for personal growth and cultural capital, and people living in poverty can benefit by extending their movement beyond their immediate community. This highlights an important tension in ensuring that people can remain mobile without the need to use carbon.

Further issues of consideration relate to the cost, convenience and accessibility of public transport in comparison to private car use. The future transport system needs to be designed to be clean, affordable and convenient for all. It is important from a public perspective that changes to transport provision such as reduced parking, higher parking costs or workplace parking costs are compensated through alternative public transport options.

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

Q5a: 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.

We believe that decisions on universal road speed restrictions, such as the recent Bill to introduce a default 20mph limit on urban roads are best taken nationally. Despite this Bill being defeated we believe that introducing this speed restriction would have a large positive impact on road safety in Scotland; it would not only reduce casualties and their severity but would help create a low-speed environment which would support active travel and encourage parents to let their children play outside more[xii]. Early evidence from the city-wide 20mph limit introduced in Edinburgh is that the average speeds of collisions and casualties have reduced and most of the public support the scheme.

Nationally there needs to be improved co-ordination across transport, planning, health improvement, air quality and climate change policies and programmes. This consultation presents a broad context across these areas, but it is important that the priorities cited in the transport strategy are reflected in decisions across all government policy. For example, and as highlighted above, the aims of the Tourism Strategy need to be aligned with the priorities of the Transport Strategy. Consistency at national level makes it much easier to ensure alignment of policies at local level by sending a clear message regarding national government priorities.

More local issues, such as road re-design, place-making, cycle lanes and parking restrictions would more logically be handled by local authorities. Nevertheless, maintaining a national active travel budget is helpful in proving strategic direction and finance for local authorities to develop local active travel infrastructure.

Active travel should be better integrated into local urban planning and infrastructure development, supported by good quality community engagement to design spaces and places that are appropriate for the people who use them.

There is a need for better monitoring data on active travel at a local level in order to understand which interventions are impacting on active travel trends and how.

Q5b: 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

As with all issues that affect communities, people should able to contribute to the decision-making process if they wish to. For example, the introduction of a low-emission zone, parking restrictions, speed-limit changes, the introduction of bike hire or other shared mobility schemes and major street redesign are likely to generate significant public interest. To ensure representation, it is important to ensure that barriers to participation for different population groups are accounted for and measures are taken to ensure wide involvement[xiii]. However, despite the need to ensure that local people can contribute, their influence on decision-making has to be dependent on them being well informed about the impact of changes, and there needs to be a balance between listening to individual interests and ensuring that decisions are in the long-term interests of the public. Efforts to engage communities in transport decisions should be flexible in accommodating views. Public meetings or consultations may not be the most effective or representative way of canvasing opinion.

Section D: The Strategy as a whole

Q6: 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 ☐

Please explain your answer

As an organisation with a primary focus on Glasgow and the wider region, we do not feel able to comment on the needs of the whole country. Within Glasgow, we feel it is important to ensure that efforts to address the climate emergency are aligned with transport policies that benefit the whole population and which can reduce the negative impacts of poverty.

Section E: Looking ahead

Q7a: What aspects of the transport system work well at the moment?

Please provide details

The recent increased investment in active travel is a positive development, albeit this budget still needs further expansion to accelerate progress in active travel trends (see further comments below). The interconnected off-road cycle paths across Scotland are safe and attractive and encourage people to cycle for leisure.

Q7b: What practical actions would you like to see the National Transport Strategy take to encourage and promote these?

Please provide details

To make greater progress on active travel, investment needs to increase further. The current commitment of £80 million represents around 3% of the travel budget. This, we believe, is not enough to transition successfully to carbon neutrality. A larger investment fund would help to accelerate progress and to spread the investment beyond large urban conurbations.

Q8a: What aspects of the transport system do not work well at the moment?

Please provide details

Buses – air quality, accessibility, affordability, reliability and convenience. Bus services in some of our poorest communities are costly, inadequate and can make it difficult for residents to access employment – particularly employment that may require shift work or 'non-office' hours[xiv].

There is currently a lack of integration of different modes of transport for longer or more complex journeys – an integrated card that makes payment easier for a full journey (e.g. that one that includes a train, a bus and a hired bike) would be welcomed.

'Green tourism' – in popular tourist areas private cars and coaches can dominate and other options are often limited. For example, taking a bike on a train for a holiday in Scotland, rather than relying on a private car, can be quite difficult and requires significant forward planning.

The real and perceived safety of cycling on urban roads (e.g. due to pot holes/poorly maintained roads, parked cars on cycle lanes, inconsiderate/unsafe/intolerant drivers, inconsistent and unclear road markings for cyclists) can be a deterrent[xv].

The transport hierarchy is not reflected in urban spaces. For example, pedestrians often have to wait much longer than cars to cross at junctions, and pavements are poorly maintained or lit.

The limited public transport combined with free parking at out of town shopping centres makes it more convenient, cheaper and attractive to drive there than to use public or active transport. It also draws customers away from city and town centres[xv].

Investment in extra road capacity in Scotland has resulted in a rise in cars on the road and road miles driven, neither of which are compatible with a net-zero transport system.

The current transport system is responsible for an increasing proportion of Scotland's greenhouse gas emissions and transport is the main cause of high concentrations of air pollution in our cities and urban areas. There are currently 38

Air Quality Management Areas (AQMAs) in Scotland, with the majority designated as such due to road traffic pollution.

Q8b: What practical actions would you like to see the National Transport Strategy take to improve these?

Please provide details

Such changes would require increased investment in active travel and public transport as an alternative to road building. We would also welcome serious discussions around franchise or public ownership models in order that transport authorities can stipulate emission standards, implement integrated ticketing and ensure that a wide, inclusive and integrated public transport network is supported.

Air quality
The recent independent review of the Cleaner Air for Scotland strategy[xvi] made the point that there is "much more to do to achieve the desired outcomes across Scotland that ensure public health is comprehensively protected". The review also advocates "a suitably integrated approach to transport, environment, planning and health is taken" for the health and wellbeing of society and for economic and social needs. We would recommend that the national transport strategy explicitly prioritises an integrated approach across relevant policies for co-ordination and efficiency of effort, and in order that multiple sustainability, health and social co-benefits can accrue, particularly in relation to climate change mitigation and adaptation and poverty reduction.

On a practical level, the report also recommends that "where possible, active transport users, pedestrians and vulnerable groups should be separated from areas of exposure risk (i.e. to high levels of air pollution)." This type of approach will be required while we are still in the transition to a lower carbon, lower emissions transport system.

New infrastructure
The health and environment working group of the Clean Air for Scotland (CAFS) Review (2019)[xvii] made the following recommendation:

"To protect against future health and environmental impacts generally, consideration should be given to a presumption that any major new development (e.g. a new road or housing development) must not lead to a net increase in carbon emissions, must not worsen air quality, and must not exacerbate existing health inequalities."

Such a proposal, if adopted, would exemplify an integrated approach to development that takes as a starting point the principle of doing no further harm to health and the environment. Arguably, this recommendation does not go far enough, and the aim should be that any new development should reduce carbon and pollutant emissions and help to reduce health inequality.

Further, in the interests of carbon neutrality, large urban centres in Scotland should ultimately aim to become car-free. This should be accompanied by improvements to

public transport, public realm, active travel infrastructure and support for micro-mobility options (where appropriate).

We would like to see consideration given to the provision of universal free public transport or free public transport for certain population groups. Concessionary bus passes may be considered for population groups other than over 60s, including people claiming universal credit. As an extension to this or an alternative, providing concessionary rates to bike hire schemes may also be considered.

Q9: Chapter 6 of the Strategy sets out immediate actions the Scottish Government will take in three key areas: Increasing Accountability; Strengthening Evidence; and Managing Demand. Is there anything you would like to say about these actions?

Please provide details.

We welcome the use of the sustainable transport hierarchy to inform decision-making and investment. To ensure that this is put into practice, we would like all major transport decisions to be scrutinised on this basis. To ensure that this has influence, we would like to see it introduced as a policy rather than just a statement of intent.

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

Please provide details

Achieving carbon neutrality will require a radical shift in how transport develops over the next few years. More so than ever, this strategy needs to incorporate measures to reduce car dependency and encourage more active travel. While other sectors have contributed to reductions in carbon emissions, transport has lagged behind.

Section F: Strategic Environmental Assessment (SEA)

Q11: What are your views on the accuracy and scope of the information used to describe the SEA environmental baseline set out in Section 5 of the SEA Environmental Report? (Please give details of additional relevant sources)

The SEA concisely sets out the challenges and opportunities facing the Transport Strategy in a clear, balanced way in Section 5. However, in Section 6.2, the negative impacts of transport seem to be minimised and the focus is on the positive impacts of the Transport Strategy. For example, on page 40, a key to indicate whether effects are positive, mixed or negative is presented, but only used on page 41, where it presents the assessment of the overall impacts as positive (inset box in upper right hand corner), which seems overly optimistic. The strategy, in and of itself, is unlikely to address the significant negative impacts of transport, without a sea change in

mindset, practice and resources from one where the focus is on creating a world where private vehicles are dominant.

Q12: What are your views on the predicted environmental effects as set out in chapter 6.3 of the SEA Environmental Report?

The potential positive and negative environmental effects of transport are clearly laid out and referenced for each of the four priorities in chapter 6.3. We would have liked to have seen more on the interplay between the priorities and which should be emphasised to maximise positive impacts and to minimise the negative ones. In our view, Scotland needs to focus on addressing the challenges of the climate emergency, which would result in additional co-benefits aligned with the other priorities.

Q13: What are your views on the proposals for mitigation and monitoring of the environmental effects set out in chapter 6.5 and 7 of the SEA Environmental Report?

The proposals for mitigation are fine if adhered to. If anything, they could have been stronger to ensure that the strategy could maximise the potential benefits of following the recommendations.

Q14: Is there anything else you would like to say about the SEA Environmental Report?

n/a

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