

## **National Transport Strategy: Draft for Consultation**

### **Tactran Response**

#### **Section A: The Vision and Outcomes Framework**

##### **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 - Suggest the vision is succinct and clear in that it states what we would like to achieve, for who and why.

##### **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?**

(1) Yes, the four priority themes are supported, covering as they do the environmental, social and economic objectives of a transport strategy. The strategy would demonstrate this if there was a clearer link between the problems discussed in chapter 3 and the proposed priorities and outcomes presented in chapter 2. Indeed, the document lacks the links between problems, outcomes, policies and enablers that an objective led process should have.

(2) The outcomes are accompanied by descriptions that help define the outcome and also how this is intended to be delivered. However:

- This isn't always done consistently. As presented the outcome descriptions are a mix of both the outcomes we'd like to achieve, and how we'd like to do this. . As a consequence of this inconsistency it is sometimes clearer how the strategy proposes we will achieve some priorities (e.g. health and wellbeing, promoting equality and taking climate action) than others (e.g. helping our economy prosper).
- Some of the descriptions suggest an overlap between outcomes. Where there is overlap, there is maybe a lost opportunity for the provision of further direction. For example:

- Will be easy to use for all: people have different needs and capabilities. Our transport system will recognise these and work to ensure that everyone can use the system with as little effort as possible.

Is covered by:

- Will provide fair access to services we need: we have a duty to advance equality of opportunity and outcome, including the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- We will ensure that our most disadvantaged communities and individuals have fair access to the transport services they need.

The transport system will enable everyone to access a wide range of facilities and services.

- The description of ‘Helps our economy prosper priority’ outcomes are weak:
  - *“Will get us where we need to go: network and services be integrated effectively with spatial and land use planning and economic development, and adapt to changing requirements of people, businesses and visitors”*: Other than integration of land use, transport and economic planning, what is this outcome actually proposing?
  - *“Will use beneficial innovation: new products, services and technologies are developing fast and altering our lives and our places dramatically. We will seize opportunities to improve our transport system and realise economic ambitions.”* This is just stating a tool that applies equally to the other priorities. Do strategies need reminding that we should consider the latest tools available? The set of enablers that are appropriate to deliver priorities and outcomes (and this is one of them) are set out in chapter 4.

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

Without setting priorities there is a risk that tensions are created which are unresolved and which will act as a constraint on decision-making and delivery.

There are clear policy imperatives, set by the Scottish Government, which should help identify priorities, the most important being (in that order) with equality running through:

- Inclusive Growth
- Net Zero Carbon
- Improved Health Outcomes

In short, whilst the purpose of the Strategy should be to deliver a holistic approach to delivering transport solutions it is difficult to encourage people and organisations leading healthier and more sustainable lives when they are more concerned with economic uncertainties. Nonetheless, we must also consider the limited timescales we have to undertake actions to address climate change issues

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

Chapter 3 presents the current and emerging challenges in an order which reflects the priorities, but does not explicitly state this. It may help in presenting/emphasising the links throughout the document, if this chapter was broken down into headings which reflected the priorities (i.e. People/Environment/Economy/Health). The inclusion of a handful of random achievements at the start of the chapter does not add value.

In terms of the detail of the challenges presented:

- Maybe useful to reference that less young people are learning to drive, and whether this will have some long term impact on the proportion of people driving(p15)
- Suggest that one of the key problems for people with mobility difficulties is having confidence that the whole journey can be made, rather than just parts of it (p17)
- The document states that population growth consequently means that there will be more people wanting to access our city centres? And this then informs our thinking of where and what type of solutions are required. However, are most of our jobs, services etc. in our city and town centres? Just because the routes in our city centres are our busiest routes, this only identifies a concentration of movements, not necessarily evidence that this is the majority of our movements.. Whilst good connections into all of Scotland's cities centres is important, we must not be drawn into thinking that this is where all, or even most of us travel to work/shopping / services (P19)
- Suggest lack of integrated ticketing is more an inconvenience than a barrier (P20)
- "Rural households drive more". Households with cars do. We must however be careful not to perpetuate the myth that all rural households have a car. There remains a significant proportion that don't (and these are undoubtedly the households which require support). An issue not covered in the discussion is the likelihood of people living in remote areas working in a number of part-time opportunities, increasing the complexity of their travel demands.
- **The section could also benefit from a fuller recognition of the impact of transport poverty in both rural as well as island communities.**
- Reference is made to autonomous vehicles helping make bus services viable where they are not currently commercially viable (p25). Autonomous buses may help reduce costs, but most of the areas where public transport is commercially unviable are unlikely to be suitable for autonomous vehicles for a long while yet
- In discussing the declining bus use (p28), only congestion is referenced as a factor. While the text acknowledges that there are various causes for the decline in bus use, it is perhaps unfortunate that congestion is used as the only example. Recognising that people make more complicated journeys than can be served by a bus service which only travels a linear route into a town or city centre is perhaps a greater factor on bus use than congestion (which means all vehicles are travelling at approximately the same speed, indeed, congestion may even reduce the differential in travel times between bus and car). Recognising the complexity of most journeys most people make (because most have unfortunately not considered bus or train routes as the most important factor in choosing a house or a job), is also critical when we consider the package of measures that a transport strategy should contain.
- The health impacts of air quality are highlighted, however it would also be useful to reference the health impacts of noise. Reference could be made to Scotland's Noise Mapping (p26)

- In terms of understanding the future issues that we need to consider in a National Transport Strategy, reference to some key findings from Transport Scotland’s scenario planning would be useful.

## **Section B: The Policies to Deliver the NTS**

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

- (1) Link between problems, outcomes and priorities and policies: Whilst not questioning the basis of most of the policies, the links between the challenges and the policies are poor. It would be helpful to include a diagram to show how challenges identified in chapter 3 may be solved by the policies and enablers in chapter 4 (NB presenting these clear links is a principle promoted by Transport Scotland in its STAG and DPMTAG guidance). Furthermore, showing the links between the problems and policies/enablers would enable everyone to understand the extent to which the proposed strategy is addressing the challenges presented.
- (2) There is a straight jump from challenges to policies/enablers: Presentation of the different transport futures (the scenario planning work that Transport Scotland have been undertaking) and understanding of the options we have (Transport Scotland’s LTS guidance recommends consideration of ‘alternative strategies’) would help everyone understand whether we have the right set of policies and enablers to achieve the priorities and outcomes.
- (3) Enablers that add little: Quite a number of enablers add very little additional guidance/direction to how a policy will be delivered. These are lost opportunities to present a clear direction and workstreams to address the challenges identified.

#### **Enablers that add very little additional guidance/direction to how a policy will be delivered that isn’t reasonably clear in the policy itself.**

<b>Policy</b>	<b>Enabler</b>
Integrate policies and infrastructure investment across the transport, energy and digital system	Ensure that local, national and regional policies offer an integrated approach across all aspects of infrastructure investment including the transport, digital, and energy system
Provide a transport system which enables businesses to be competitive domestically, within the UK and internationally	Optimise accessibility and connectivity within business- business and business-consumer markets by all modes of transport
Improve the quality and availability of information to enable better transport choices	Support improvements and innovations that enable all to make informed travel choices
Embrace transport innovation that positively impacts on our society, environment and economy	Support Scotland to become a market leader in the development and early adoption of beneficial transport innovations
Improve and enable the efficient movement of people and goods on our transport system	Ensure the Scottish transport system efficiently manages needs of people and freight
Provide a transport system that is equally accessible for all	Ensure transport in Scotland is accessible for all

Improve access to healthcare, employment, education and training opportunities to generate inclusive sustainable economic growth	Ensure sustainable labour market accessibility to employment locations Ensure sustainable access to education and training facilities Improve sustainable access to healthcare facilities for staff, patients and visitors
Support the transport industry in meeting current and future employment and skills needs	To meet the changing employment and skills demands of the transport industry and upskill workers
Provide a transport system which promotes and facilitates travel choices which help to improve people's health and wellbeing	Reduce emissions generated by the transport system to improve air quality Reduce emissions generated by the transport system to mitigate climate change

- (4) Overlap between some policy enabling areas: Most of the actions in a transport strategy are complementary. However, when defining work streams to take intentions forward, if there are the same issues being addressed by different workstreams this will reduce clarity of responsibility and consequently delivery. It is suggested that either greater differentiation between the enablers/policies identified below is required, or they are merged:

Overlapping policies?	
Ensure that infrastructure hubs and links form an accessible integrated system that improves the end-to-end journey for people and freight	Improve and enable the efficient movement of people and goods on our transport system
Continue to improve the reliability, safety and resilience of our transport system	Increase resilience of Scotland's transport system to climate change related disruption
Increase resilience of Scotland's transport system to climate change related disruption	Ensure the transport system adapts to the projected climate change impacts

- (5) Most of the policies are clear in what their end goal is (improved access/safety/health etc.). There are however 3 'policies', which while not questioned as worthwhile aims themselves are actually a means to an end, rather than an end in themselves, i.e.:

- Embrace transport innovation that positively impacts on our society, environment and economy
- 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

These 'policies' relate to most of the policies and enablers (to improve access/climate change), and are in a sense largely cross cutting. The overall set of policies and enablers may read better if these three actions were presented separately?

- (6) What does "Increase the use of asset management across the transport system" mean? Do you mean better integration between maintenance and improvement regimes?

(7) It is considered that specific interventions should be identified in a couple of areas:

- Freight: the challenges section discusses some of the freight issues, and while some of the policies and enablers implicitly cover freight, it is considered that unless freight is identified as a work stream in its own right, it might not receive the focus it requires as an essential part of our economy. For example development of or reference to a freight hierarchy will help understand where we should be focusing effort. The National Infrastructure Commission report 'Better Delivery: the Challenge for Freight' provides guidance on developing a freight hierarchy.
- Accessibility within rural areas: Similarly, whilst the policy of providing "a high quality transport system that integrates Scotland and recognises our different geographic demands" covers access to and from our more remote areas, and the policy relating to improving "access to healthcare, employment, education and training..." presumably covers the whole of the country, it is suggested that the importance of identifying and bringing forward access solutions for daily travel within our rural areas be highlighted. This may easily be done by adding "in both our urban and rural areas" into the "improving access" policy.

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

Our response to Question 2b highlights how:

- the priorities and outcomes proposed by the NTS are inter-related
- without setting priorities, there is a risk tensions are created which are unresolved and which will act as a constraint on decision-making and delivery

These issues apply equally to the policies and enablers presented in section 4 as many of the policies or enablers will support more than one priority or outcome, or even policy. This makes it even more important to understand which policies and enablers will have the greatest impact on the most important priorities and outcomes. Understanding this requires:

- clarity on which priorities and outcomes take 'priority'
- some (subjective?) quantification of the extent to which policies or enablers will support the respective priorities and outcomes
- some understanding of the relationships between complementary or conflicting policies or enablers.

As an example if, as is suggested in response to question 2b, the policy priorities are an equitable and inclusive approach to firstly economic, then climate change then health priorities, then it is suggested the policies and enablers which take priority are those which have the greatest impact on those priorities in that order. Hence, if the challenges that informed the priorities and outcomes included:

- declining bus services and other opportunities to access jobs, services and opportunities which contribute to both increasing car use (congestion/carbon emissions) and increasing inequality of opportunity, then:

*“Improving access to healthcare, employment, education and training opportunities”* would seem to present a reasonable opportunity to significantly address the economic, climate change and health (esp air quality) priorities

- maximising the competitiveness of Scottish business and markets – across the whole of Scotland - to compete within the UK and further afield, then:

*“Providing a transport system which enables businesses to be competitive domestically, within the UK and internationally”* would seem to be a priority both economically, but also in terms of equity across the country and enabling a strong economy to underpin other societal and environmental improvements

In both examples highlighted above, a number of other policies and enablers are clearly complementary to these policies, respectively:

- information / accessible transport system / travel choices and integration
- reliability, safety and resilience / efficient movement / integrating Scotland / climate change resilience

With all the remaining policies presenting approaches (policy integration/embracing technology/skills development/reducing emissions) which are central to how we take forward the above policies.

(NB The process followed above emphasises the need for the document to better link the problems – priorities – policies and enablers).

An additional comment is that there is a risk that asking people's subjective opinions on what is more important may only reflect the interests of those engaged in the process.



## **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.**

The Tactran Partnership considered the conclusions of NTS Roles and Responsibilities work stream at its meeting on 18 December 2018. At that time, there was a private discussion with the Board and the following points were noted:

- Given the emergence of the Tay Cities Region and Stirling / Clackmannanshire / Falkirk Region as part of the National Transport Strategy Review, we would suggest that Stirling might in the future be better served for regional transport planning if it was transferred to SESTRANS or another grouping built around the Stirling / Clackmannanshire City Region Deal.
- In terms of governance, strong support amongst board members for the retention of Regional Transport Partnerships to serve the development of regional transport infrastructure, and that regional transport partnerships should not be disbanded / oversight transferred to City Deal Committees.
- Any proposed changes should await the outcome of the Planning (Scotland) Bill through parliament and any other current national reviews, such as strategic development plan authorities and national review of local governance.
- Whilst fixed boundaries should not preclude the benefits of any joined up working, it would seem sensible that RTP boundaries should be reviewed. It may then be appropriate to consider whether these should be consistent with boundaries used for other purposes, such as strategic development plan boundaries.
- More equitable funding needs to be provided to all RTP's in future.

The response to Question 5a outlined below reflects the above private discussion and also raises some further points.

Tactran acknowledges that the case for change has been made and agrees that the future of transport governance should be based on some form of regional model allowing for variations in approach between different geographic regions.

The delivery of the NTS will rely on strong and clear governance being in place and this should be pursued as a priority. It would add strength and pace if a timeframe for completion of governance review is set e.g. by end of 2020 to coincide with STPR2 completion. It is considered that the existing Regional Transport Partnerships, created under the Transport (Scotland) Act 2005, provide a good starting point for this, with governance in place and Regional Transport Strategies recently refreshed.

There is clearly a strong case that supports a regional approach to transport planning and for this to be aligned with regional economic development and regional spatial planning. This approach is the cornerstone of the Place Principle jointly adopted by the Scottish Government and COSLA. The principle aims to promote a shared understanding of place, and the need to take a more joined-up, collaborative approach to services and assets within a place to achieve better outcomes for people and communities. It specifically advocates for consideration of the benefits of planning, investment and implementation activity at the regional level of place.

The NTS notes that the existing RTP boundaries are based on travel-to-work areas. However, this is only one consideration and there are exceptions to this rule. In Tactran for example there are a number of travel to work areas, but these can be generally divided into two distinct areas – Perth and Dundee travel to work and Stirling travel to work.

The effectiveness of a regional approach will be significantly strengthened by aligning the boundaries of economic development, land use planning and transport planning authorities. With Regional Economic Partnerships being developed and the Planning Bill requiring a regional spatial strategy to be prepared and adopted, Tactran would support a review of the regional boundaries on this basis. Coterminous boundaries would also provide a greater understanding from the public as to which organisation has responsibility for transport in their area, a clear failing of the current arrangements.

In terms of which decisions, duties and responsibilities should be undertaken at each level of government, the National Transport Strategy refresh in 2016 in annex 2 highlights 56 main responsibilities shared between National, Regional and Local Government. It is therefore little wonder that both accountability and the general public are confused. Any consideration of responsibilities should consider which governance arrangement will achieve the best outcomes for the user/customer. There are functions such as bus services which cross Local Authority boundaries, which would benefit from a regional approach. Similarly, where a strategic road passes through a community, should this be a national responsibility or would local responsibility be more appropriate? There needs to be consistency of governance/responsibility for strategic roads and a review of trunk and non-trunk roads considered alongside the appropriate body to carry out functions e.g. maintenance and road safety.

Tactran would support a detailed review of all duties/responsibilities, but as a starting position would consider the following transport issues/solutions;

#### National dimension

- Integrated ticketing requirement
- Concessionary fares

## Regional dimension

- Infrastructure pinch-points are not necessarily within a local authority area, with solutions such as road and rail capacity improvements; park and ride sites often across boundaries;
- Access to jobs/services/opportunities for those without access to a car, particularly those in rural areas e.g. Co-ordination of initiatives (bus/car share/community transport etc.) via MaaS frameworks;
- Bus service co-ordination including possible bus route franchising;
- Promotion of travel information and behaviour change initiatives;
- Regional Electric Vehicle Strategy;
- Strategic active travel networks;
- Region-wide parking and development contribution strategies;
- Planning, management and improvement of key routes, including Trunk Roads;
- Road maintenance & road safety – strategic routes

## Local dimension

- Local road safety;
- Traffic management;
- Active travel (inc. place-making).

Again, RTPs could provide a suitable vehicle for any transfer of roles and responsibilities from national or local to regional. As prescribed in the Transport (Scotland) Act 2005, RTPs would be able to continue in their current role, for Tactran this is as a 'model 1' RTP, with any transfer of duties/responsibilities as and when agreed with national and local authorities, providing a continuous consistent governance.

The governance review should include all functions undertaken by Non-governmental, third party, third sector, private and public sector transport organisations.

The Transport Bill currently being scrutinised by Parliament, does offer additional options regarding functions, roles and responsibilities, however, until the Bill is passed, it will be difficult to state exactly how it will inform debate.

Whatever regional governance structure emerges from the review, it is crucial that the regional transport organisation is given the resources, both in terms of staffing and finance, to deliver the necessary transport infrastructure and services for the region.

**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.**

Tactran agrees there is a role for local communities to play in all aspects of transport. This is already generally undertaken through strategy development;

engagement regarding proposed interventions and maintenance and safety programmes; Community Planning Partnerships; Local Outcome Improvement Plans (LOIPs); and participatory budgeting initiatives. There is also proportionate consultation undertaken, for example through STAG appraisal process, proposed bus scheduling/routing, etc. Large scale transport projects require a regional and national approach, but still can gain valuable insight through understanding of how local communities may be affected.

## **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?**

No - The NTS clearly establishes links to the Place Principle, spatial planning and has a section entitled 'Scotland's Regional Differences' that explains how the differing transport needs of people at a geographical level can be met. It does not, however, clearly define how the transport challenges of different 'communities of need' can be addressed. The first stated priority of the NTS is that it "Promotes Equality" and yet there are no stated policy drivers within the 14 that explicitly state how this priority and its associated outcomes will be met. There is reference to a "transport system that is equally accessible" but no reference within the policies or enablers that relate to "affordability" or "ease of use" in the context of the section on 'Poverty and Child Poverty' or the protected characteristics of those groups detailed under Policy 9.

The expectation was that a logic model or benefits realisation model would have been created that worked back from the positive outcomes that would be achieved for these groups and the enablers and policy drivers that would be needed to facilitate those outcomes. However, there seems to have been a break in the thread and so the fine words within the vision and priorities are not taken through the policies and enablers to achieve that vision.

It appears that the EqIA, Fairer Scotland Duty and Children's Rights assessments have been post production assessments and have not directly informed the policy drivers and enablers. For example, the EqIA states that, "The emerging NTS2 is a high level strategy and as such the identification of likely overall impacts on persons with individual protected characteristics is not appropriate." Tactran would disagree with this statement and, at the very least there should be examples, if not a thorough assessment, of how the policies and enablers will benefit those with protected characteristics. To do so at a later stage would miss the opportunity to better refine the policies, enablers and priority actions.

From the Children's Rights Assessment Tactran would support the recommendation that, "To demonstrate accordance with relevant statutory requirements, the development and implementation of relevant policies and policy enablers should include consultation with children and young people where their rights may be impacted or should be considered." And that hat this recommendation be carried forward into implementation of the Delivery Plan.

From the Fairer Scotland Duty assessment it states, "The high-level nature of all proposed NTS2 policies and policy enablers, precludes the identification at this stage of specific likely impacts on inequalities of outcome caused by socio-economic disadvantage." Tactran would disagree with this statement and, at the very least there should be examples, if not a thorough assessment, of how the policies and enablers will benefit those with challenging socio-economic characteristics. To do so at a later stage would miss the opportunity to better refine the policies, enablers and priority actions.

## **Section E: Looking Ahead**

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

It is difficult to outline those elements of the system that 'work well' as it depends upon the definition of success criteria and thresholds of acceptability. There are parts of the system that could be said to be improving due to investment in recent years but there is some way to go before the transport system could be said to be 'working well'. These elements are getting better:

- Inter-city connectivity: road and rail;
- Travel information, e.g. Traveline Scotland;
- Delivery of major schemes, e.g. Queensferry Crossing;
- Funding increases for Active Travel;
- Commitment to improved Air Quality: LEZs and phasing out diesel/petrol;
- Maintaining the concessionary fares scheme;
- Addressing the travel needs of young people.

There is much yet to do . . .

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

With regard to those improvements detailed above the following additional actions could be taken:

- Deliver Revolution in Rail and overhaul the franchise system;
- Rail fare review – improve affordability and remove regional disparities;
- Only deliver road improvements that address carbon reduction, i.e. reducing congestion;
- Extend funding into MaaS beyond the £2m MaaS Investment Fund to initiate further improvements in travel information, planning and journey management;
- Provide incentives, e.g. fiscal benefits and rewards schemes, to support behaviour change and more active travel;
- Extend LEZs to include all Air Quality Management Areas (AQMAs);
- Load transport accounts for young people up to age 26 on the NEC (National Entitlement Card);
- Conduct a pilot scheme for free public transport as per Estonia (residents only) & Luxembourg.

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

The transport system in Scotland at all levels is suffering from a chronic lack of under-investment:

- Lack of integration of rail infrastructure, services and rolling stock;
- Market failure in both rail franchising and bus deregulation;
- Slow (or no) implementation of STPR1 projects, e.g. Park & Ride;
- Lack of foresight in national implementation of MaaS;

- Continuing disadvantage of protected characteristic groups in terms of access, ease of use and affordability of transport system;
- Lack of commitment on behaviour change for active travel;
- Paucity of ambition for LEZ roll-out and addressing air quality;
- Lack of vision for a smart, integrated, affordable and clean public transport network;
- Lack of equal commitment to walking & cycling infrastructure investment;
- Lack of clarity on status of e-scooters;
- Lack of clarity and legislation regarding shared-use surfaces (not just pedestrians and mobility impaired vs cycling, but also electric scooters);
- All transport networks not yet accessible for all.

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

As per answer to 7b

**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?**

Increasing Accountability – the success of the collaborative approach will be determined by the response to this consultation. While it clearly has inclusivity benefits, the delineation of the process into separate work streams has left the document disjointed and hence lacking appropriate linkages from vision through to action. This has been exacerbated by the lack of hierarchy in the policy drivers, e.g. is climate change more important than inclusive economic growth? While a balance has to be struck the document is in danger of becoming ‘all things to all people’, thus lacking in core strategic intent and leadership on managing tensions between competing outcomes.

As previously indicated, we would support reference to the Place Principle and collaborative partnership for delivery.

The proposed Transport Strategy Delivery Board is to be welcomed but it needs to move beyond simple collaboration, i.e. having different agencies in the same room, but develop a real partnership approach to delivery, e.g. a greater level of regional/local input into rail franchising decisions.

The process would benefit from the major delivery agencies (TS, RTPs, LAs) producing regular (e.g. biannual) monitoring reports on output progress.

The Transport Citizens Panels are an interesting innovation but need to link into or be hosted by the Community Planning and Locality Action Partnerships.

We would support continued engagement with the business community which should have defined representation on the Transport Strategy Delivery Board.

It is disappointing after the work of the Roles & Responsibilities work stream and the consultants' background research that the scope of regional transport governance, i.e. to include transport planning, roads, public transport and examples of regional governance models were not included in the consultation document. There needs to be some pace injected into the next stages of this review.

Strengthening Evidence – we would support the design of a robust monitoring and evaluation framework and would suggest that this be closely aligned to the logic modelling and benefits realisation work flows that take vision – outcome – action – delivery – results – impact.

There is increasing need to access reliable data sources and we would suggest that Transport Scotland establish a 'Transport Data Warehouse' or else a meta-data index that indicates where open source data can be obtained for variety of transport uses.

There needs to be some effort to ensure that inclusivity, equality and environmental justice is built into the co-design, co-production and co-delivery processes from the outset and not treated as a bolt-on or post-hoc rationalisation after the policy or implementation plan has been determined. We would support the continued application of a scenario planning approach.

Managing Demand – we would support reference to the Sustainable Travel Hierarchy though we believe the Scottish Government and Transport Scotland will need to be more robust in addressing the continued reliance on private vehicles particularly for shorter trips.

We would also support reference to the Sustainable Investment Hierarchy and reference to climate change, inclusive growth and innovation.

However, we would perceive a conflict between these sustainable objectives and the use of STAG that uses an assessment method which is essentially an economic model that values the non-productive use of time as its primary measure. Hence there is a bias towards the private car and road building at the expense of other modes and infrastructure. There should be a shift in appraisal methodology towards productive time, addressing economic deficits, e.g. access to school/college/employment and low emission technology.

On the range of actions suggested, these are not bold enough and following the lead of places such as Estonia, **where residents travel free**, and Luxembourg, a free public transport trial should be initiated to ascertain whether this would meet the outcomes of the NTS in a more inclusive and sustainable way. We would suggest that such a trial should be conducted in both an urban and rural area and could potentially be run in parallel with the introduction of MaaS solutions so that a detailed evaluation could take place of trip preferences, costs and emissions.

On the Workplace Parking Levy, Tactran supports the principle of providing powers (e.g. via the Transport (Scotland) Bill) which give authorities the option to apply for and introduce a workplace parking levy to help reduce car traffic in a town/city/city



region if it is identified as an effective means of managing parking demand (and traffic) in that area.

STPR2 – it is to be welcomed that the scope has been extended to encompass Active Travel and other initiatives, however, in the context of the collaborative partnership approach, particularly at a regional level, the delivery of projects to support NTS outcomes is a wider responsibility than just Transport Scotland and will involve investment by a variety of partners and hence the objectives need to be determined at the regional level of governance.

The Transport Bill needs to allow a wider application of the Lothian Buses model and the potential for public/private/community joint ventures in the delivery of services. In that context, the funding for bus services within local authorities needs to be decoupled from decisions on children's services and adult social care so that investment decisions can be based on the NTS outcomes rather than competing but unrelated demand pressures.

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

There needs to be an overarching statement incorporating a published diagram as to how recent reviews and legislation integrate and support each other including:

- Enterprise & Skills Review;
- Planning Bill;
- Transport Bill;
- National Transport Strategy;
- Local Governance Review;
- National Infrastructure Commission; etc.

Perhaps referencing them in the context of the Place Principle might help?

## **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 SEA outlines the key environmental pressures and trends, however some more detail regarding the impacts associated with demographic change would be useful along with better quantification of the impacts that are highlighted.

There are also areas within the baseline section that conclude certain issues without the evidence being presented to support the assertion. For example, it is stated that a move to electricity the transport network would place pressure on the energy sector without quantifying what this pressure would be and if there are potential mitigation measures.

The roll of green infrastructure to reduce flood risk while also supporting active travel it noted within the SEA but it should also be noted that other active travel infrastructure is essential if there is to be an increase in walking and cycling trips and the consequential positive environmental impacts.

The potential shift towards autonomous vehicle is highlighted and the potential issues relating to this development noted. However, the impact that this shift could have on road traffic and the consequential impact on public transport patronage and active travel modes has not been discussed.

The impact of climate change on coastal areas, and in particular transport infrastructure and hubs that are located in these areas, is highlighted in terms of the future resilience that will be required. However, the impact of climate change on inland transport infrastructure does not appear to have been considered and with significant flooding events recently having significant impacts on both the road and rail network this should also be considered.

Inclusion of data related to environmental noise associated with transport would be useful and reference could be made to the recent TNAP for Scotland as well as for some conglomeration.

<https://consult.gov.scot/transport-scotland/transportation-noise-action-plan-2019-2023/>

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

The report largely focuses on the potential for the NTS to have a positive impact on GHG emissions while also recognising the impacts that policies supporting active and sustainable travel can make – including better integration of spatial and transport planning.

The report focuses on “green infrastructure” in a number of places in relation to active travel. While green infrastructure can have a positive impact on related

environmental issues such as flooding and biodiversity, the core function of an active travel network is to provide for safe and efficient journey by walking and cycling.

Little consideration is given to the impact of public transport policies and the SEA largely focuses on the impact of active travel and low carbon/technology solutions.

Flooding risks associated with climatic change focus on the impact on transport infrastructure/hubs in coastal areas; however as recent rail and road disruption demonstrates, inland flooding caused by extreme weather conditions can have a significant impact on the transport network.

The SEA notes that *“consideration may however need to be given to where modal shift or increased electrification could place additional pressures on other networks.”* however no details are provided as to what these pressures might be.

The health impacts of active travel in terms of air quality is noted, however it is suggested that action should be targeted in areas with high deprivation or poor air quality without quantifying or providing evidence to support this course of action.

Consideration should also be given to targeting the source of trips as well as where the impact is manifested as evidence suggests lower income groups generate fewer trips and are therefore not the key source.

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

The mitigation proposed suggests closer alignment of policy areas and closer integration across spatial and transport planning disciplines which will be key to delivering the outcomes presented.

The SEA also notes that a monitoring and evaluation framework will require to be developed and this will be developed alongside the final NTS. Tactran would support the proposed monitoring to a local and regional level as well as at the national level.

It should be noted that a significant amount of data is already gathered that can be used for monitoring purposes and consideration should be given to how this data can be more readily integrated and used for as wide a range of monitoring as possible, thereby reducing any potential duplication.

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

A number of sources appear to be missing from page footers (listed as “ibid”).