TRANSPORT
SCOTLAND
CÒMHDHAIL ALBA

National Transport Strategy 2
Analysis of consultation responses
December 2019

Contents

Executive Summary

The draft National Transport Strategy (NTS2) ('the Strategy') sets out a Vision for the transport system in Scotland for the next 20 years. The draft Vision is that:

"We will have a sustainable, inclusive and accessible transport system, helping deliver a healthier, fairer and more prosperous Scotland for communities, businesses and visitors."

The Vision is underpinned by four Priorities (namely, it Promotes equality, Takes climate action, Helps our economy prosper and Improves our health and wellbeing), each with three associated Outcomes.

The Strategy was developed following a comprehensive review of the original National Transport Strategy, based on three pillars: collaborative working with partners, engaging with stakeholders and building an evidence base. As part of the wider stakeholder engagement to inform the final strategy, a public consultation was launched seeking feedback on the draft Vision of the strategy, current and emerging challenges, policies directed at meeting the challenges and transport governance. The consultation also sought views on the separate Strategic Environmental Assessment (SEA) report which was developed to support the Strategy.

The consultation, in line with Section 2 of the Transport (Scotland) Act 2019, opened on 31 July 2019 and closed on 23 October 2019[1] and asked a total of 22 questions. A total of **1,221** responses were received, including **201** responses from organisations, **382** from individuals and **638** campaign responses, generated from an online campaign by a national cycling organisation.

This independent analysis report, which summarises the findings from the Strategy's consultation responses, will inform the statutory consultation report referenced in Section 3(2)a of the Transport (Scotland) Act 2019.

Main Findings

The Vision

The Vision was widely supported with three quarters (77%) of respondents offering positive feedback. While some suggested minor changes to the wording to make it even clearer, and urged more detail on funding and implementation, most people agreed that it set out the right direction for the future transport system in Scotland.

Priorities and Outcomes

The majority of respondents (76%) endorsed the existing Priorities and Outcomes, but some suggested there was room for more clarity. Many respondents wanted

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[1] A small number of requests for extensions were agreed which meant that some organisations and individuals submitted a response up to two weeks after this deadline.

specific targets which were measurable, and felt the relative importance of each of the Priorities and timing for delivery should also be set out.

Most respondents felt that all Priorities should be treated with equal importance, however, a large number also felt that climate action should be the main Priority overall (as it was the most 'urgent'). Priorities around equality and climate action received the most support overall.

Outcomes that were particularly well supported included those linked to ease of use of the transport system for all, affordability of transport and helping to deliver the net-zero target. While the economic prosperity Priority attracted least support, Outcomes within that Priority were valued, especially those linked to getting people (and goods) to where they need to be, reliability, efficiency and quality of services. Respondents argued Outcomes could be strengthened further with reference to resilience and must be seen as dynamic and flexible in different geographies.

Potential tensions between some of the Priorities should also be recognised in the strategy, especially those linked to climate action and economic prosperity.

Current and emerging challenges

Respondents agreed that there were numerous existing and emerging challenges with the transport system in Scotland, and a wide range of solutions were posited. Challenges which attracted the greatest comment included the need to improve connectivity, improve active travel infrastructures, remove poverty barriers to travel, improve links to remote, rural and island communities, improve reliability and resilience, reduce congestion and traffic speeds and improve road safety for all road users (especially vulnerable road users). Delivering the net-zero target was seen as the main challenge, along with encouraging modal shift to help realise this.

In redrafting the strategy, there were calls to prioritise the challenges and link them more with the strategic overview, to provide more detail on the scale of the challenges ahead in achieving the Strategy's Priorities and to identify where challenges overlap and can be tackled together to maximise efficiency.

Meeting the challenges

The existing policies and enablers set out in the strategy to achieve the Outcomes and address current and emerging challenges were welcomed, although there was a split in opinion as to whether more or fewer policies were required to affect change. A small number suggested that the policies were not sufficiently radical, ambitious or clear to deliver the Vision or address the important challenges outlined in the strategy (especially around climate action).

A number of specific suggestions for changes to the wording of the policies were made, to add clarity, strength and reduce interpretation bias. The large majority of respondents (both individuals and organisations) viewed the policies as being of equal importance.

Transport governance

There were very mixed views regarding transport governance arrangements, however, there was consensus that local communities and businesses should be consulted and engaged wherever appropriate.

Only a few organisations mentioned the potential need for revision and amendments to existing transport governance structures, roles and responsibilities in order to achieve the required changes to local, regional and national transport infrastructure and systems. Regional and local governance models received the most support overall.

Looking ahead

There were also mixed views around whether the strategy addressed the needs of all transport users across Scotland, including citizens and businesses around the country, with a rough split between those who felt that it did (53%) and did not (47%). Rural and remote communities and those living with physical and sensory impairments, as well as women, families, older adults, young people and those living in poverty should appropriately receive specific focus in the strategy, it was felt.

Many aspects of the transport system were seen to be working well, and should continue to receive policy support and investment. This included the road network (especially in the Central Belt), local rail services, public transport information provision (although more could be done to make information available in a wider variety of formats) and concessionary travel.

An equal number were seen as lacking or failing in some regard, especially public transport availability, reliability and fares, integrated transport options, maintenance of the road network (especially beyond the Central Belt) and a lack of segregated cycle lanes and networks, especially around towns and cities.

Strategic environmental assessment

The majority of respondents did not provide comment on the SEA or said that the document seemed credible, but felt that they lacked the technical expertise to comment reliably on its content. Those who did felt that it could be more closely aligned to the strategy and could be made stronger by recognising the urgency of the need to tackle climate change and by making the negative effects of transport more explicit.

Cross-cutting themes

Business sector

Businesses urged greater consideration of competing Priorities for climate action and increased prosperity (including the conflict between increased exports using aviation and freight while cutting emissions). The revised draft should fully consider any

unintended consequences of policies linked to climate action, equality and health and wellbeing on the business community and on sustained economic growth.

Investment in innovation and technologies was seen as necessary to help meet the challenges Scotland faces and to ensure that revenue is raised to deliver improved connectivity for both people and businesses. Better data sharing between businesses and government was also urged. There was also a call for a dedicated and comprehensive aviation strategy for Scotland as well as a separate document alongside the strategy to address freight.

Overall, business respondents stressed that a strong and growing Scottish economy is fundamental to achieving the Vision and Priorities outlined in the Strategy and this could be better set out.

Urban and rural concerns

Those living in urban areas mainly urged action aimed at decongestion of roads, improved road safety, more affordable and better integrated transport within and between urban areas, cities and suburbs with better and more segregated cycle lanes and networks to allow movement to and within urban areas.

The main issues for rural residents and businesses were better linking of local communities to cities and towns as well as to one another, ensuring that public transport fares reflect the economic characteristics of different geographies (including the most deprived areas) and maintaining ferry and flight frequency for the benefit of island residents and businesses.

Among rural and remote communities, there were also some perceptions that the strategy wrongly penalises private car use, which is essential for some in reducing social isolation. This was linked to perceptions that the draft strategy was heavily focussed on towns and cities and that the needs of rural and remote areas had not been adequately addressed and differentiated from the urban challenges.

Conflicting interests

There were some perceptions that climate change interests had been disproportionately reflected in the strategy (some wanted to see more attention, and some less) and this may have been at the expense of a more rounded focus on such things as rail, freight and aviation. While there were some views that business and economic interests should not be prioritised over other interests, other respondents felt that even more attention could have been given to business needs in the draft.

Implementation

Overall, for both individuals and organisations, the draft strategy needed to be revised to be more explicit and provide more detail on how the Vision, Priorities and Outcomes will be translated into reality. Presenting the Outcomes in more measurable terms was also widely encouraged. An overarching concern was that

sufficient funding would not be made available to aid implementation of the strategy and reassurances were sought in this regard.

Conclusions

There is strong support for the scope and direction of the Strategy, in particular the expansion to consider wider transport and environmental concerns beyond those set out in the original strategy. There is a willingness among partners to continue to engage in directing the strategy, developing clear actions linked to the Priorities and monitoring and evaluating performance over time, to ensure that it remains fit for purpose. If anything, the strategy could be even bolder in its final form with even more ambitious aspirations and targets, as well as offering more nuanced direction for specific groups of individuals, businesses and communities. If delivered, respondents were confident that the Vision, Priorities and Outcomes of the Strategy would be a positive and transformative step forward for transport in Scotland.

Introduction

Background

The original National Transport Strategy (NTS) set out the long-term Vision for transport policies in Scotland up to 2026. It was first published in 2006, and refreshed in 2016. The 2016 refresh concluded that the strategic outcomes set out in the original 2006 NTS were still valid, and also suggested keeping the overall NTS framework whilst updating the strategic context and clarifying roles and responsibilities across transport modes, locations and organisational hierarchy. It recommended a "fuller, collaborative review of the NTS to the next Scottish Government", which was subsequently announced in August 2016.

As a result, Transport Scotland undertook a collaborative review of the NTS, including a call for evidence, conducted by the Research and Evidence Group of the NTS review, an early engagement survey with the public and further engagement with stakeholders and communities across Scotland to give them a greater say in influencing the development of transport policy at the local, regional and national level. The National Transport Strategy review was based on three pillars: collaborative working with partners, engaging with stakeholders and building an evidence base. The strategy was developed in collaboration with a wide range of groups in the third sector, passenger representatives, academic experts, business, transport operators and local government. More than 6,500 people attended almost 100 engagement events in rural, island and urban communities or participated through surveys.

Feedback from these activities resulted in a new draft National Transport Strategy (NTS2) ('the strategy'). The strategy sets out a Vision for the transport system in Scotland for the next 20 years. The Vision is that: *"We will have a sustainable, inclusive and accessible transport system, helping deliver a healthier, fairer and more prosperous Scotland for communities, businesses and visitors."*

The Vision is underpinned by four Priorities, each with three associated 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

The strategy redefines investment priorities, putting sustainable and public transport at the heart of decision-making. The global climate emergency and the role of transport in helping to deliver net-zero emissions by 2045 is a key priority, along with how transport can play its part in building a fairer society - including reducing child poverty.

To inform finalisation of the new strategy, a public consultation was launched on the initial draft of the Strategy, the findings of which are presented here. This independent analysis report will inform the statutory consultation report referenced in Section 3(2)a of the Transport (Scotland) Act 2019.

The consultation

The consultation, in line with Section 2 of the Transport (Scotland) Act 2019, opened on 31 July 2019 and closed on 23 October 2019[2]. It asked 22 questions, broken down as follows:

- 3 closed questions (inviting yes/no/don't know responses)

- 19 open questions (inviting a free text response, e.g. 'explain your answer' or 'do you have any other comments?')

The questions followed the structure of the draft Strategy, with sections on the Vision of the strategy, current and emerging challenges, policies directed at meeting the challenges and transport governance. The consultation also sought views on the separate Strategic Environmental Assessment (SEA) report which was developed to support the draft strategy.

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[2] A small number of requests for extensions were agreed which meant that some organisations and individuals submitted a response up to two weeks after this deadline.

As a public consultation, views were sought from both individuals and organisations, and the Scottish Government undertook a number of engagement activities to raise awareness of the consultation and to encourage responses.

Respondent profiles

A total of **1,221** responses were received, including **201** responses from organisations, **382** from individuals and **638** campaign responses. Responses were classified by 'type' based on feedback from Respondent Information Forms (RIF) and the table below shows the profile of respondents by type.

The majority of responses were submitted directly via Citizen Space, the Scottish Government's online consultation platform. Around a fifth were submitted by post or email, in addition to all of the campaign responses.

Respondent Type	Number of Respondents	Percentage of Respondents	Percentage (excluding campaigns) (n=583)
Academia/Education	5	1%	1%
Local Authorities	26	2%	5%
Other Public Sector	37	3%	6%
Private Sector	28	2%	5%
Regional Transport Partnerships[3]	6	1%	1%
Third Sector or Community Group	78	6%	13%
Transport Operator	6	1%	1%
Other	15	1%	3%
Individuals	382	31%	65%
Campaign respondents	638	52%	
Total	**1,221**	**100%**	**100%**

Table 1: Number of responses received by respondent type

It is important to stress that some responses submitted by organisations were based on wider in-house consultation or engagement activities coordinated by them with their respective members, service users or staff. This was true, for example, for unions, some third sector support organisations and umbrella bodies for private sector/transport operators[4]. Indeed, in some cases, a single response was submitted by one organisation on behalf of multiple other affiliated/partner organisations. This means that the numbers presented above underestimate the true number of individuals and organisations who contributed to the consultation and, in the case of transport operators and business organisations, the percentages do not accurately

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[3] One 'Model 3' Regional Transport Partnership submitted a joint response with their respective local authority. This response was included only in the count for local authorities, to avoid double counting.
[4] For example, members of one organisation that responded directly employ around 500,000 people in Scotland, which represents a quarter of the private sector workforce. Another organisation that responded has one of the largest commercial fleets in Scotland.

reflect the proportionate input from the sector. They do, nonetheless, give an indication of the distribution of responses received overall.

Most responses followed the standard format although several responses were received which did not answer the specific consultation questions which had been set, but instead offered more general observations or feedback on the strategy as a whole. There was no word limit for free text responses and the length and level of detail provided in responses varied considerably (with responses from individuals typically being shorter than those from organisations). Many respondents did not answer every question, and responses also varied in how closely they answered the consultation questions. Several organisations also provided responses which had similar or identical substantive content.

All of the campaign responses were generated from an online e-action campaign by Cycling UK, a national cycling organisation. All contained the same substantive content but with some minor variations and all were counted as individual contributions in their own right.

There was one request for a Gaelic translation of the document and consultation questions and one for an Easy Read conversion, both of which were made available. This resulted in one Gaelic response and 22 Easy Read responses[5].

Several organisations submitted academic and other support papers to complement their main consultation submission and these were also reviewed as part of the analysis. Several other respondents referenced external sources of evidence which they suggested should be considered during the redrafting of the strategy, but these were not analysed here.

Analytical approach

Responses were logged into a database, and all were screened to ensure that they were appropriate and valid. Only exact duplicates were removed (i.e. those where a response was received from the same individual and contained the same content). Although some responses to individual questions were not appropriate/did not directly address the questions being asked, all feedback was analysed and is presented under the appropriate sections below.

Closed question responses were quantified and the number of respondents who agreed/disagreed with each closed question is reported below. Non-responses are also shown. Comments given at each open question were examined and, where questions elicited a positive or negative response, they were categorised as such. For most of the questions, respondents were also asked to state the reasons for their views, or to explain their answers. The main themes to emerge across the consultation were recorded and verbatim quotes extracted in some cases to highlight the dominant views that were expressed.

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[5] Seventeen of the Easy Read responses were from individuals and five were from organisations.

All respondents were asked if they were willing for their response to be published. Just over a third (37%) were content for their response to be published with their name and over half (52%) wanted only their response to be published, without their name. The remaining 11% did not wish their response to be published.

Only extracts where the respondent indicated that they were content for their response to be published have been include in this report. A decision was made to anonymise all responses as part of the reporting process.

Report presentation and caveats

Findings are presented as they relate to each question in the consultation. The tables below show the difference in views expressed by the respondent group as a whole, and split by individuals and organisations. Where individual respondents offered views that differed significantly from those submitted by organisations, this is picked up narratively in the report.

Given the relatively small number of responses received within some of the different sectors, disaggregated analysis by organisation type was considered unreliable. Where there were qualitative differences in views put forward by different 'types' of organisational respondents, however, this is highlighted.

The 638 campaign responses followed a similar format and answered only two questions in the consultation (Questions 8a and 8b). They all also contained reference to policies required to improve the uptake of cycling in Scotland. None of the campaign responses answered the closed questions which were presented in the consultation. This means that all tables presented in this report are based on the 583 responses received which did not result from the campaign.

Similarly, a large number of non-campaign respondents did not answer the closed questions within the consultation. The tables below show both the number and percentage of respondents who gave 'yes', 'no' and 'no response' answers, as well as the valid percent, which reflects the overall split in views once the 'non respondents' have been removed.

Finally, there was a notable bias in the overall sample, with the Third Sector and Community Groups making up a large proportion of responses. There were few responses from the Private Sector or Transport Operators in comparison, for example[6]. This means that there will be an inherent bias in the findings from the consultation, with views skewed towards the interests of those who responded. The findings presented here should not, therefore, be taken as representative of the wide range of stakeholders invited to respond to this consultation, nor should they be generalised too broadly. Rather, they reflect only the views of those individuals and organisations who chose to respond.

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[6] The main relevant business organisations did provide input and many responded on behalf of a wider pool of others within their sector.

Section A: The Vision and Outcomes Framework

The Vision

The Vision for transport in Scotland is that:

"We will have a sustainable, inclusive and accessible transport system, helping deliver a healthier, fairer and more prosperous Scotland for communities, businesses and visitors."

Respondents were invited to comment on whether the Vision, as drafted, was the 'right' Vision for transport policy over the next 20 years.

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

Three quarters of respondents who provided an answer (77%) offered support for the Vision, as written. The level of support was higher among individuals compared to organisations, although a large proportion of organisations did not answer this question directly.

Response	Individuals	Organisations	All Respondents	Valid %
Yes	259 (68%)	123 (60%)	382 (66%)	77%
No	99 (26%)	18 (9%)	117 (20%)	23%
No response	24 (6%)	60 (31%)	84 (14%)	
Total	**382**	**201**	**583**	**499**

Table 2: Number and percentage of respondents agreeing with NTS2 Vision, by respondent type

Qualitative comments offered in response to this question also suggested agreement amongst most, with comments that the Vision was welcomed as a driver for change. Particular strengths of the Vision were that it placed sustainability, inclusion and accessibility at the start. The Vision was also described as being succinct yet holistic, comprehensive, progressive and forward thinking. Having a robust National Transport Strategy with a clear Vision was also seen as setting Scotland apart from other countries as a leader in transport policy:

> *"[Organisation] is pleased to see the draft National Transport Strategy (NTS) adopt an ambitious and holistic Vision. The Vision acknowledges the transport sector's influence on the delivery of a wide range of other high priority public policy objectives in the social, environmental and economic spheres." [Organisation]*

Private sector respondents and those with business interests also welcomed the Vision, and felt that it was timely, when a range of other transport-related commitments had been put forward as part of the Programme for Government and the Transport (Scotland) Act 2019. The forthcoming Strategic Transport Projects Review (STPR2) would also make recommendations for potential transport

investments ahead of the publication of the 2020 Infrastructure Investment Plan for Scotland and there will be a separate delivery plan for the Strategy as well as transport elements in the update to the Climate Change Plan. Coordination between each of these activities was urged to ensure that they fit together. A strategic plan for the future of Scotland's infrastructure will be key to achieving the objectives outlined in the Strategy, it was felt.

Clarity

Despite support, a notable number suggested that the Vision (as well as the Priorities and Outcomes) may be too vague as currently worded. The concepts set out in the Vision should be clearly defined within the strategy, to ensure that those responsible for its delivery have a clear, shared understanding of what is meant by "sustainable[7]', 'fairer' and 'accessible' (as each are subjective). Similarly, it should set out whether 'communities' is intended to mean people in general, geographic locations, or groups of people, such as women or disabled people, etc. The role and notion of 'prosperity' also needed to be defined.

Ambition

The main perceived weakness with the Vision was that it was seen as being too cautious in its reference to climate change action. While the strategy encouraged active travel, it lacked rigour and ambition in relation to reducing emissions and reducing private car travel, it was felt:

> *"We are supportive of the elements laid out in the Vision, but it is missing a clear link to how transport can help address the biodiversity crisis as well as the climate emergency. Although biodiversity is mentioned in the accompanying Environmental Report, it is treated in isolation from other topics, with only a brief mention of the interdependencies between various environmental receptors." [Organisation]*

A more nuanced Vision that was applicable for a wider range of stakeholders was also encouraged by a small minority:

> *"As it is presently written, few would disagree with the principles outlined by the Vision. However, it should perhaps be more nuanced to reflect the multitude of stakeholders the National Transport Strategy is intended to serve. These include consumers, businesses and transport providers. The needs of these respective groups can differ considerably and so a uniform Vision is unlikely to target them all." [Organisation]*

Similarly, some questioned if it was appropriate to explicitly mention 'businesses' within the Vision and/or to give them the same weight as individuals, communities and visitors.

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[7] One respondent suggested that the Vision should read 'environmentally sustainable', if appropriate.

Other more general comments were that the Scottish Government should be more ambitious and aim to achieve the Vision before the 20-year life of the strategy (although others recognised that this timescale would allow for a longer-term view over the reform to transport infrastructure in Scotland).

Similar comments that the Priorities and Outcomes lacked ambition were made with some suggesting that they too read more as 'aspirations' and could be bolder or more radical.

Specific suggestions for strengthening the Vision included:

- reference to 'safety' within the Vision (i.e. of passengers, road users, pedestrians, etc.)

- direct reference to 'affordability' within the Vision

- embedding the principle of equality more explicitly within the overarching Vision and making reference to diversity as well as equality8

- reflecting the importance of an 'integrated' system in the Vision

- more explicitly referencing climate change aspirations in the Vision

- recognising in the Vision the need for strong transportation links within and between Scotland, other parts of the UK and neighbouring countries

Measuring success

There were also calls for ongoing engagement and consultation in coming years to ensure that the strategy and Vision remain relevant and focussed. Ongoing review should also be cognisant of the need for consistency between the National Transport Strategy and Local Transport Strategies, as well as wider policy changes which impact on and are impacted upon by the Strategy. The Vision should also not preclude investment in or adoption of 'quick win' solutions, even if these were not obviously aligned to the Vision, some felt.

Measuring success against the Vision also featured in many responses, in terms of how this would be achieved:

> *"It is important that national strategy of this nature is accountable. Evaluation is a key way of ensuring this. However, we have concerns about how the Scottish Government would measure against the Vision in its current form. The nature of the language is not entirely suitable for meaningful evaluation as it does not contain specific indicators. We would encourage the Scottish Government to consider how it will take forward evaluation of the strategy and consider the inclusion of specific measurement criteria for the success of the proposed new Strategy."* [Organisation]

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8 One respondent suggested including the words 'all' and 'people' as follows: 'for all people, communities, businesses, and visitors.'

A joined-up approach

Again, although not linked to the Vision directly, some comments were also made that the strategy needed to be more clearly and explicitly linked to other related documents:

> *"Whilst we welcome the development of the draft strategy, we believe that further clarity is required on what is meant by a 'strategy' and how this document fits together with other related documents such as the Strategic Transport Projects Review 2, the National Planning Framework and broader Scottish Government documents such as the Economic Strategy."* [Organisation]

Others welcomed that the Vision supported other existing frameworks, including the four key planning Outcomes for Scotland set out in the National Planning Framework (NPF) and other local authority strategic plans.

Overall, while some minor changes to the Vision were suggested to make it even clearer, and more detail on funding and tangible action for its implementation was urged, most respondents viewed that it set out the right direction for the future transport system in Scotland:

> *"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."*

Priorities and Outcomes

Views were also sought on whether the Priorities and Outcomes underpinning the Vision were the right ones for transport policy in the next 20 years.

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?

Three quarters of those who gave a valid response (76%) offered support for the Priorities and Outcomes in the strategy. Again, support was greater among individuals. A large number of organisations did not answer this question directly.

Response	Individuals	Organisations	All Respondents	Valid %
Yes	244 (64%)	118 (58%)	362 (62%)	76%
No	101 (27%)	16 (8%)	117 (20%)	24%
No response	37 (9%)	67 (34%)	104 (18%)	
Total	**382**	**201**	**583**	**479**

Table 3: Number and percentage of respondents agreeing with NTS2 Priorities and Outcomes by respondent type

Among individual respondents (in particular), the main views were that:

- while the Priorities and Outcomes had the correct focus and covered the right themes, the number could be reduced and be made more focussed

- tensions between Priorities and Outcomes could be more clearly set out and explained

- the Priorities could be weighted, rather than being treated equally (comments included that having three Outcomes for each Priority may appear contrived and not accurately reflect the actual balance of importance between them)

The relative importance of each of the Priorities and guidance (including timing) for delivery were currently missing, it was felt. It was unclear at present if all the four Priorities were 'ranked' equal:

> *"As with any list of Priorities and Outcomes, there is a question on which take priority and in delivery how one Priority and Outcome may conflict with others. This may lead to regional variations that are conflicting and contrary at worst or flexible and adaptive to local needs at best." [Organisation]*

While several respondents wished to see weighted prioritisation of the existing four themes in the revised draft, this must be dynamic, it was stressed. This might include some flexibility for the four themes to be prioritised differently in different areas, depending on community and business needs.

Organisations from across different sectors also encouraged the development of clearer and more specific commitments within the strategy instead of a broad series of intentions (including timescales for delivery). Outcomes needed to be more meaningful and measurable with more specific targets and target setting:

> *"The Priorities and Outcomes are appropriate but they need to be backed up with concrete action to achieve them, which is not currently in evidence elsewhere in the strategy." [Individual]*

> *"There is more work to be done to turn these into measurable, concrete Outcomes. Again, there is a risk that this becomes an aspirational statement without a clear pathway to delivery." [Individual]*

The most common specific gaps that were identified included:

- specific measures to reduce private car use/private car journeys

- more weight being given to sustainable modes of transport

- a greater focus on integrated ticketing for public transport modes

- specifically mentioning reductions in air pollution

- the need for a priority for electrified rail travel

- more mention of haulage, aviation and shipping (which at present are absent in the headline indicators)

- more focus on improving public rail services *per se*

- a commitment to improving road surfaces/the road network

- more mention of the impact on autonomous vehicles on uptake of different modes

- the need for Outcomes around road safety education and tackling irresponsible driver behaviour

Using SMART[9] language throughout the strategy was urged by many, replacing terms such as 'encouraging', and 'promoting' with 'enabling' and 'generating' since the former were seen as insufficient to drive change at ground level.

Specific mention should also be made of accountability and regulation for the strategy. Recognising the likelihood of significant technological and other changes in the coming 20 years, the strategy should also outline commitments to refresh, update and reconsider Priorities and Outcomes at appropriate timepoints. The 20-year Vision may be too distant to allow action planning with confidence and similarly, some Outcomes may be achieved in faster timescales than anticipated:

> *"We question whether the strategy is horizon scanning far enough and looking to the next innovations in movement of people and goods."* [Organisation]

> *"The Priorities and Outcomes are the right ones for transport policy over the next 20 years. However, this may require regular review in order for the policy to keep up with the pace of change in modern society. For example, changes to local strategies, nationwide legislation, developments in technology etc. should all be taken into consideration, on review, as these are never static and can be subject to change. This should be reflected in the transport policy and should be updated regularly so as not to become outdated or obsolete."* [Organisation]

Whilst appreciating the need for long term strategy and planning, this must not be at the expense of innovations that could make a real difference now, rather than in twenty years, it was felt.

A small number of individuals also suggested that 'alternative' Priorities and Outcomes should be presented to show what had *not* been included in the strategy (and to give consultees a chance to question if/why other issues had been wrongly deprioritised). This should include an outline of alternative methods of achieving the identified objectives, such as pricing, constraints to car use, investment in public transport, etc., and the likely costs, impacts and benefits of each approach.

Finally, a small number raised doubts that existing budgets and infrastructures would support the Vision, Priorities and Outcomes and felt that these two variables would

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[9] Specific, Measurable, Achievable, Realistic and Timebound.

present barriers to successful implementation and achievement. Indeed, a recurring theme throughout the consultation was that there was insufficient detail in the draft on what funding would be made available to support implementation:

> *"The Vision is very comprehensive, ambitious and captures the important issues but it is difficult to understand how it can all be achieved given the likely available funding and resources. The NTS2 should set the direction for what will be the Government's priorities and what is affordable. More clarity on prioritisation will benefit the strategy. Meeting such a broad range of policy objectives does present challenges for prioritisation. Does it imply increased funding, and if so, this should be made explicit."* [Organisation]

While broadly welcomed, the strategy represented a clear step change from existing practice within wider socio-economic policy arenas and, therefore, some of the Outcomes may be unachievable in practice.

> *"Although there exist many obvious interdependencies between transport and areas such as health and equalities, it does not seem logical to combine these from the outset and indeed, a National Transport Strategy that seeks to do so runs the risk of being too broad to lead to effective policy implementation. By attempting to tackle numerous policy challenges simultaneously, the draft Strategy undermines its own aspirations by misdirecting its attention and resources to problems that are ultimately not within its remit to address."* [Organisation]

Overall, it was seen as appropriate that the strategy should embrace wider concerns of equality, climate action, health and wellbeing but the linkages between Outcomes and actions could perhaps be made clearer.

Promotes equality

The promotion of equality featured more prominently in feedback from organisations, especially among third sector and community groups. Although this Priority was universally welcomed, there were concerns about how a transport system which promotes equality would be achieved in practice. Promoting equality was aspirational, it was stressed, and more concrete commitments to specific changes which remove barriers were needed to make this viable. Again, language could be strengthened, e.g. rather than 'promoting' equality, it would be stronger to commit to 'reducing inequality':

> *"We welcome the high-level Priority to focus on equality. However, 'promoting' equality falls short of the duty to "advance equality of opportunity and outcome, including the protected characteristics," as is subsequently set out in the text."* [Organisation]

Several respondents (both individuals and organisations) pointed out that certain groups (e.g. people with particular disabilities) must be able to continue to use cars where necessary. The existing Priorities and Outcomes may be naïve in this respect:

"We are concerned that the strategy prioritises private vehicle use the least, when this is clearly the mode of choice given the stark lack of alternatives. This in itself might impact negatively on achieving some of the four principles. It should therefore be incumbent on the Scottish Government to recognise that significant modal shift is unlikely." [Organisation]

More explicit references to Outcomes which will reduce inequality (of travel choices) for those living in poverty as well as reducing social isolation were sought. Affordability of transport would be key to achieving this Priority and focusing on affordability was deemed particularly relevant for getting more people using public transport:

"At the moment the Priorities and Outcomes do not explicitly acknowledge the role transport should have in contributing to reducing poverty and inequality in Scotland, which should be in addition to making transport affordable for individuals […] an additional Outcome should be included, under the Priority 'Promotes equality', that acknowledges not just the importance of ensuring fair access, ease of use and affordability, but also the role that transport potentially has in reducing inequality in Scotland more broadly. This could be framed as: "Will contribute to reducing poverty and inequality'." [Organisation]

The geographical element to promoting equality was also seen as missing in the existing draft strategy (by several respondents) as well as closer consideration of women travellers (raised by a small minority):

"In order for the transport system to advance (or even promote) equality, radical changes would therefore be needed to the design, implementation and governance of new systems. New services, routes and connections would have to be developed, with gender equality as a key design standard. Whilst the existing Outcomes do not preclude the possibility of such systemic change in decision-making and resource allocation, nor do they reflect the challenges the strategy subsequently sets out in terms of gender inequality. Instead, they infer tinkering with existing infrastructure to make it more accessible." [Organisation]

Urban and rural concerns

The Priorities and Outcomes were seen as being unrealistic for more rural areas and specific or different Outcomes for rural areas may be needed. There were perceptions that disproportionate funding may go to urban areas instead of rural communities, given the nature of the Priorities in relation to climate change:

"It is critical that the transport network in rural areas is the target of such action to ensure it can be environmentally and operationally sustainable or it will continue to remain disconnected, excluded from the benefits/opportunities available in urban areas and will not contribute to achieving national Outcomes." [Organisation]

> Better reflecting the needs of those living in the Highlands was seen as being particularly important, as well as specifically considering disabled transport users living in rural and remote areas, facing both physical and geographical challenges.
>
> Active travel and public transport are more efficient and effective in urban areas, it was felt and this should be reflected in the strategy.

Future actions linked to the strategy should focus on older adults and disabled people, it was stressed by some, and the strategy could make clear how the Scottish Government will take advantage of new mobility solutions to address existing challenges:

> *"By supporting and promoting more inclusive cycling, including by meeting the needs of disabled cyclists (as well as other users of non-standard cycles, such as family and freight cyclists), the Scottish Government will be taking a significant step towards realising these objectives."* [Organisation]

A small number urged a commitment to meaningful consultation with people with lived experience (including disabled people and people living with long term conditions) at every level of future design and implementation.

One union urged a commitment in the strategy to taking into account the working lives of transport staff and ensuring that policies are not made which would be unfair to workers. For example, any proposed workplace parking levy (WPL), from which public transport workers must be exempt.

Takes climate action

There were mixed views regarding the importance and urgency of taking climate action. Some felt that this was correctly identified as a Priority but felt that it should be posited as the number one Priority (i.e. there was currently inadequate recognition of the actual scale and speed of environmental change and its economic policy drivers). Others (mainly individuals) felt that it was too dominant in the strategy and that 'green' concerns had meant that the strategy was not realistic and practical to everyday road users, especially with respect to business travel. Others still felt that the strategy did not go far enough and stressed that there should be greater focus on environmental harm and not just climate change (with the climate action Priority including an Outcome of protecting the environment). This was a recurring theme throughout the consultation responses.

Some again urged more assertive Outcomes particularly in line with taking climate action, e.g. a fixed commitment to meet the net negative carbon position, or a commitment to provide the infrastructure for greener, cleaner transport, rather than simply 'promoting choice'. For several individuals, in particular, stronger and more directive Outcomes were needed and the Strategy should take greater account of the need to actively incentivise zero-carbon and low-carbon modes of transport (i.e. public transport, electric vehicles, walking and cycling). Given the declared climate

emergency, respondents suggested stronger action should be signalled, including reprioritising investment towards this Priority.

Encouraging sustainable travel had been subsumed under two Priorities ('Takes climate action' and 'Improves health and wellbeing') instead of being made a Priority in its own right. This, alongside more stringent measures to reduce private car use were mentioned by a large number of individual respondents:

> *"We must as a nation remove the dominance of cars on our communities and on the designs of our towns and cities; prioritising active travel and public transport."* [Individual]

Additionally, some respondents noted that investment decisions need to be aligned with climate goals; for example, setting carbon reduction targets for transport, while continuing investment in road building was seen as a mismatch of ambitions on climate change. It was also noted that greater focus should be put on prevention and mitigation of emissions, with adaptation being a secondary aim.

Highlighting the interaction between this Priority and, for example, promoting equality and improving health and wellbeing was also seen as something which could be strengthened in the strategy:

> *"Reduced costs and better availability of public transport, along with increased opportunities for active travel, are likely to reduce car usage and ultimately lower emissions. Therefore, both will have a clear role in supporting progress against the 'Takes Climate Action' Priority."* [Organisation]

Support was offered to:

- the focus on reducing emissions from transport, and therefore the need to increase the proportion of vehicles which are electric and ultra-low emission
- investment in environmentally friendly transport innovations
- giving more space to walking and segregated cycling
- ending new road building and prioritising active and sustainable travel
- delivering affordable and integrated public transport
- better land use planning
- supporting behaviour change
- improving access to bikes
- recognising the role of Powered Light Vehicles (PLV)

Support was also strong (from rail transport operators) for the aspiration to move more freight onto rail and off the roads to help reduce emissions and hit climate targets.

Fleet operators also endorsed a reliable, comprehensive infrastructure for low emission fuels and electric vehicles (EVs) as a priority for Scotland. This should include a comprehensive, reliable EV charging infrastructure as a matter of priority (including, for example, development of an online booking system for charging posts). They similarly urged a clear strategy for heavy goods vehicles (HGVs), to include provisions for increasing the number of refuelling points for alternatively-fuelled vehicles.

The need for an explicit statement on the relationship between transport and spatial planning in regards to climate action and promoting equality may also be constructive, it was suggested.

Helps our economy prosper

There was less support for this Priority overall, compared to the other three and some views that it should not be included as a main Priority, but rather was a secondary concern. This may be a reflection of the profile of the respondents, which included a large proportion of third sector and other public organisations, compared to private sector respondents. Those with business interests who did respond (including transport providers) welcomed its position in the strategy.

Again, clashes between this Priority and others in the strategy might present challenges, it was suggested. For example, businesses fully supported the Scottish Government's target of ensuring Scotland has a net-zero carbon economy by 2045, however, there was also support among businesses for fostering a greater exporting culture within Scotland to improve productivity (i.e. the Scottish Government has targeted increasing the value of exports from Scotland from 20% of GDP to 25% of GDP by 2029).

Concrete examples were sought on how "we will reduce the need to travel by unsustainable modes in line with the Sustainable Transport Hierarchy" to show how this might apply to the manufacturing sector and to also show how it would be implemented alongside the Scottish Government's ambition to increase exports and grow the economy:

> *"There is an inherent challenge in a prosperous economy in the short-term, and an environmentally sustainable long-term future for Scotland that should be acknowledged in this section. Where investment is needed to bridge this challenge, it should be made clear how this will be made available."* [Organisation]

Other specific comments included that:

- to address climate change and other environmental problems, there is a need to move beyond conventional economic principles such as continual economic growth, i.e. other measures of prosperity and wellbeing are needed
- short term economic gains may need to be sacrificed for long-term sustainability

- there is no recognition in this Priority of the need for cross-border planning and working on transportation matters between Scotland and northern England and between Scotland and Ireland

Several individuals commented on the need to elevate affordable fares and pricing for rail and bus travel within the strategy with specific Outcomes linked to making public transport more affordable. Addressing regional disparity in fares was also cited by several as something that had been overlooked i.e. more emphasis should be placed on having a transport system which is more consistent across the country and which also makes it a realistic alternative to driving for the majority of people, rather than the few who happen to live on a main transport route. It is those who live further out of towns and who are less connected to public transport who need it the most, it was suggested.

More reference and Outcomes linked to improving and fixing links between the Scottish Islands and the mainland was also needed (for businesses and residents).

Similarly, as raised in response to other areas of the consultation, the 'Helps our economy prosper' Priority should have a specific Outcome related to freight, it was felt:

> *"Businesses raised whether freight was clearly an equal priority for the transport system throughout the Vision, Priorities and Outcomes […] While it is understood that they are intended to be mode neutral, many of them are phrased to be about the movement of people (e.g. "Gets us where we need to go", etc) rather than the movement of freight. The lack of applicability to freight is also an issue with the current Sustainable Travel Hierarchy."* [Organisation]

One respondent suggested a separate document alongside the strategy to address freight.

Sustainable aviation growth was also cited as key to achieving export targets (i.e. the importance of enhancing international air connectivity to allow Scottish businesses to increase their earnings from markets outside of the UK, make Scotland more attractive to potential inward investors and allow Scotland to attract more inbound tourism). This requires coordinated and strategic policy across a variety of areas, including transport (specifically aviation), tourism, energy, climate change, planning and exporting. One business organisation suggested that the Strategy as drafted does not provide the answer as to how this will be achieved.

Bringing railways back into public ownership and offering subsidised rail and bus travel, as ways of making car travel less attractive and increasing public transport use was suggested. Addressing private shareholder transport was also seen as something missing in the existing indicators. A clear aim for Scotland's railway to be vertically integrated with the infrastructure, with operations and rolling stock all in public ownership, was also suggested.

Improves health and wellbeing

This Priority was broadly welcomed and was seen as positioning the transport sector to make a strong contribution to the Active Scotland Outcomes Framework. The strategy as written (including the kind of transport improvements envisaged) was also seen as strong in leading towards the desired health and wellbeing Outcomes:

> *"A modernised bus fleet and improved rail options would increase confidence in public transport allowing people to make healthier travel choices than the current over-reliance on door to door car travel. The shift from over-reliance on the car would also help release the public realm for other uses and improve community life."* [Organisation]

While widely supported, there were views that this Priority needed to be backed up with investment in walking and cycling infrastructure, action to tackle air pollution and creating more green space in urban areas. More consideration was also needed with regard to making walking and cycling routes 'safe' and encouraging feelings of safety among users. A commitment to 'safe' active travel routes that support people (especially children, young people and families) to make healthy travel choices is needed. Similarly, there may be scope to include an Outcome around road safety, highlighting the importance of reducing death and injury on Scotland's roads:

"This must be high priority particularly for vulnerable road users and in conjunction with a shift to sustainable modes. In not highlighting this specifically there is a danger that at regional and local levels, resource and funding is reduced." [Organisation]

The Outcomes could also be strengthened by reference to:

- improving air quality

- safety of young and novice drivers

- reducing the numbers of cars around school drop-offs

- increasing the range of other healthier alternatives including public transport, walking buses and a range of active travel opportunities

One organisation also noted that the strategy makes no mention of noise, either in the context of its effects or in detailing how the impacts of noise can be reduced, for example by considering restrictions on transport and the use of quiet road surfaces and/or noise barriers. This could be considered under the health and wellbeing Priority.

Again, promoting equalities, helping economies and improved health and wellbeing for island communities was seen as requiring a reliable, robust and affordable ferry system for island communities.

Wider systems and infrastructure

As with other areas of the consultation, several respondents pointed out that the means to achieving some of these Outcomes are not necessarily wholly transport related. Instead, they may involve consideration of digital, technological, strategic and local planning, as well as community-based options and interventions. This should be addressed in the strategy:

> *"Frequently, it is the interactions with other areas of interest (health, education, housing, planning, technology, commercial/leisure development, social trends) that will facilitate the delivery of the Outcomes that are being sought."* [Organisation]

One private sector respondent urged a range of additional strategic Outcomes linked to engineering which they would welcome in the strategy to help the Vision be realised, these being:

- maintenance - a structured and proactive programme of asset maintenance to ensure assets retain their maximum value and deliver transport solutions at their optimum capacity

- futureproofing - scope to allow for transformative technologies to come to market and be embedded within transport networks

- infrastructure finance - taking into consideration inevitable changes, the best ways to finance new infrastructure, infrastructure upgrades and maintenance ought to be considered

- holistic placemaking - transport considerations to be considered as part of a wider set of local challenges

- integrated networks - transport networks should be easy to use for all

Another private sector respondent suggested that "Will use beneficial innovation" may not sit well as an Outcome but rather as an indicator of an Outcome expressed as "Will harness new technologies and methods".

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

There were mixed views in response to this question. The two most dominant responses were from those who felt that all Priorities and Outcomes should be treated equally, and those who felt that the climate action Priority should be elevated above all others.

Among those who felt all should be treated equally, the main rationale was that they were interlinked and would support each other:

> *"Many of the Priorities and Outcomes are inter-related, particularly those related to climate action, health and equality. A transport system that genuinely prioritises walking, cycling and public transport, and invests in the infrastructure to support these, will meet all of these Priorities."* [Organisation]

The other main reason given was that it would be very difficult to rank one area above the others, given the diversity of different stakeholders' needs and perspectives.

Among those who felt that climate change should be prioritised, the main rationale was that the Scottish Government had declared a climate emergency and there was a need to meet Scotland's net-zero target which would help to realise all other ambitions, to some degree:

> *"Addressing the challenge of the climate emergency is the highest priority for the Government and for the NTS2, and in particular the Priority to 'Takes climate action'. This is more important and urgent than all the others because if we do not take climate action in the transport sector and do not achieve Scotland's net-zero target for greenhouse gases we put at risk all the other Priorities and benefits that come from achieving them (health, equality and economy). However, taking climate action itself needs to be achieved in a sustainable way that does not compromise the other Priorities."* [Organisation]

Promoting equality was cited as the next most important Priority overall, with reducing transport poverty and increasing accessibility both seen as key issues to address:

> *"The most important Priority is undoubtedly promoting equality. If we achieve truly equal public transport it will have a beneficial impact on the other Priorities - the more people on efficient public transport means less cars therefore less carbon emissions and air pollution […] Likewise better public transport that is integrated, reliable and affordable will enable people to participate in the economy and live healthier lifestyles."* [Individual]

Improving health and wellbeing received moderate support as a Priority but less so than climate change and promotion of equalities. Where health and wellbeing were posited as being the more important Priority, this was because it would contribute to tackling Scotland's wider health concerns as well as providing a robust foundation on which to take forward action in the other areas.

While there was support for the health and wellbeing Priority, this was one area where respondents stressed that there was a need to acknowledge that many of the changes required will not be easy or comfortable for many people to make and so the strategy should be 'up front' about this. Wide-ranging lifestyle change is required and must happen whether people like it or not, it was felt.

The most problematic Priority, which attracted the least favourable feedback was 'Helps our economy prosper' (true for both individual respondents and

organisations). Some explicitly indicated that helping the economy prosper should be an Outcome in the strategy and others offered more guarded reservations:

> *"Helping the economy to prosper leaves too much vague and capable of conflicting interpretations for it to have comparable weight; for instance, an economy that increased overall GDP with most of the increase going to a privileged minority would not be a measure of success."* [Individual]

> *"Equality, climate action, and health and wellbeing are the critical Priorities - economic considerations are important but should serve these Priorities, rather than sit alongside them."* [Individual]

Views were put forward that the Priority of 'helps the economy prosper' should focus on 'sustainable' economic growth rather than 'sustained' economic growth. Making the economy prosper in a sustainable way will improve indicators for the other Priorities, it was suggested e.g. by doing so it will reduce greenhouse gases emissions and will improve health and wellbeing.

Contradictions within the Outcomes for equality and prosperity were also raised, e.g. removing bus routes that are not profitable to the detriment of making services accessible. More general sentiments were raised that including economic growth as a Priority in a national transport strategy may lead to poor strategic transport investment decisions:

> *"I think the Priority around climate action is probably the most important right now, although it needs to be very closely tied to promoting equality and improving health and wellbeing. The Priority regarding economic prosperity needs to be addressed carefully and not prioritised over the other points, as it has been in the past - economic growth should only occur if it is truly sustainable and improves equality, health and wellbeing."* [Individual]

Only a very small number (mainly private sector respondents) felt that a prosperous economy should take highest priority, but this again may reflect the profile of respondents overall (i.e. there were more from individuals than those representing business or other interests).

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

Chapter 3 of the consultation report focussed on current and emerging challenges to Scotland's transport system and views were sought on whether the challenges highlighted were the correct ones for the strategy to be focussed on.

This question generated more data than all other questions in the consultation with many respondents providing detailed and lengthy responses. Many offered support for the challenges that are currently included:

> *"I would agree that the Challenges highlighted in Chapter 3 are the key challenges for transport and I do not consider that there are any challenges omitted. The current and emerging challenges include overarching challenges for society such as climate emergency, poverty, isolation, equality as well as geographical challenges, technological challenges, economic challenges and challenges for transport providers, therefore the whole spectrum of challenges are considered which is imperative for a National Transport Strategy."*
> *[Individual]*

A comprehensive array of other suggested challenges was, however, put forward as **missing**, including:

- challenges around the availability of information about accessibility of stops and stations

- connectivity/integration between different transport operators and different modes of transport (including integrated ticketing across railway, subway, tram and local buses to make multimodal travel easier)

- ensuring that active travel infrastructure is designed holistically, with the needs of everyone, particularly the most disadvantaged in mind

- prohibitive costs of train fares, poor timetabling and limited train services, especially in comparison to bus services

- quality of public transport services in general/ lack of access to viable alternatives to private car ownership

- problems with existing road networks/quality of roads/network reliability

- enforcement of regulations on exhaust emissions

- congestion (as a challenge but also a facilitator to modal shift)

- parking and lack of parking in all areas

- wider infrastructure changes e.g. stop designing towns and cities for the car and design them for people

- a need to tackle flight tax

- lack of on-street charging infrastructure and challenges of developing electric vehicle networks

- impact and role of electric bikes or scooters, electric wheelchairs/mobility scooters, which may help bring about a reduction in car usage

- behavioural challenges/car bias (tackling the mindset of people who have become too reliant on cars and tackling negative attitudes towards public transport)

- travel provider interests and transport and planning authority attitudes/resilience (including a perceived unwillingness on the part of local authorities to build cross-boundary active travel projects)

- historical impact of government policies and political uncertainty in the future

Suggestions for tackling emerging challenges were put forward by a large number of respondents (often reflecting the bias of different respondent groups), but these have not been summarised here. Several also offered more specific details on the challenges that had been highlighted, endorsing them as areas to be tackled. Again, these have not been highlighted here as responses often had no bearing on how the strategy could be redrafted or finalised.

Greater **clarity** was sought for a number of the challenges, including:

- the difference between poverty and affordability

- a more sophisticated discussion in relation to climate change rather than a perceived focus on analysis by mode which is currently based on road, air and maritime emissions only (i.e. no allocation for rail passenger or freight emissions resulting from rail)

- the role of bus information quality, passenger bus system literacy, loss of social capacity to use buses and increased complexity of the bus system and of people's lifestyles in the decline of bus use

- expanding the information and integration challenge to consider lack of coordination between different public transport modes

- more consideration of road speeds and road safety concerns (the existing road safety paragraph was described as 'complacent')

- more detail on spatial planning (including reference to freight as well as people)

- a more objective and detailed discussion of the role of aviation

- a more detailed consideration of tourism that sets out the range of challenges and opportunities for making changes

Funding was also highlighted by many as a key challenge which merited more discussion, especially with regards to how to get changes and investment in improved transport policy implemented at local level:

> *"Perhaps the key challenge to be addressed will be how a successful National Transport Strategy will be delivered. There is a need for robust long-term financial and sustainable contributions, both in terms of capital and ongoing revenue expenditure, to ensure the Strategy can be delivered."* [Organisation]

This challenge should acknowledge difficulties with the current arrangements for distributing national funding to local organisations, it was suggested. Another organisation noted that there is no mention in the draft strategy of the cost of operating, maintaining and renewing transport networks.

In more general comments, respondents questioned if some of the 'positive trends' highlighted in the strategy should instead be categorised as challenges, including, for

example, that 'total air passenger and freight traffic in Scotland has increased' (indeed, several suggested revisiting the discussion on freight, including decarbonisation of freight):

> *"I disagree that increasing air passenger and freight traffic is a positive trend. Aviation adds hugely to climate change and tends to be of benefit primarily to the richest in society. It is neither 'acting on climate change' nor ' promoting equality' so does not fit with the Priorities for the strategy (and for our planet)."* [Individual]

The section on positive trends ought to have been balanced by a section on negative trends, it was suggested.

The strategy should also explicitly acknowledge that the challenges are not always mutually exclusive and that many are interdependently linked. Similarly, the strategy could identify where challenges can be tackled together (for example, increased road traffic, congestion, air quality and physical inactivity).

Some suggested that each of the challenges should be given equal weight in the strategy and, at present, the length, detail and space allocated to some was disproportionate (e.g. freight receives little attention, as does rail travel, compared to other modes). This may be perceived as an inherent bias for some readers. A large number of individuals and organisations also stressed that the challenges should be prioritised.

Some of the challenge section subtitles may also need to be re-written, it was suggested. For example, an ageing population is not a challenge but 'meeting the needs of an ageing population' is a challenge to be addressed in the Strategy. The same applied to other groups:

> *"[Organisation] welcomes the acknowledgement in the strategy of the importance of taking account of poverty, gender inequality and the different needs of different transport users, including disabled people, older people, young people and people living in urban and rural communities. We would not frame these as challenges, however. Taking account of these different needs must be a core part of delivering the Vision. Framing them as challenges suggest that these users' needs are a problem to the transport system. The Strategy should acknowledge that it is the way the current transport system has developed and is organised that causes these challenges, rather [than] people's needs in themselves."* [Organisation]

More general comments were made that Chapter 3 of the strategy seemed 'unfocussed' and excessively long. It could be reduced, written more succinctly and be more clearly linked to evidence and the four Priority areas, it was felt:

> *"The key challenges are covered within Chapter 3 but seem to be randomly discussed and dealt with through out the chapter. Consideration should be given to restructuring the challenges in the final version of the Strategy. They could be discussed in terms of assessed priority."* [Organisation]

Several respondents noted here (and elsewhere in the consultation) a need to reference more clearly best practice examples from other countries, especially other EU countries. More clearly showing how the existing evidence base had informed the draft strategy was also suggested.

Urban and rural concerns

Greater discussion was sought in the strategy around the difference between rural areas and remote areas and the different challenges facing each (the two are not necessarily interchangeable and the language in the strategy should reflect that). The strategy could also address rural depopulation and the ageing demographic in more detail, it was felt.

One organisation suggested that a separate sub-section on "Remote, Rural and Island Communities" in the "Scotland's regional differences" section meant that the distinctive nature of Highlands and Islands transport networks was not properly represented in the other sections, e.g. those on rail and buses. As such, there is no proper coverage of the challenges facing these modes in the Highlands and Islands. South West Scotland was also seen as an area often overlooked in transport planning and recognition of the unique challenges faced in this region would be welcomed.

Rural areas, especially those with high levels of deprivation, present a very specific challenge to be addressed. Greater discussion of the challenges brought about by different trip purposes and destinations was also sought (including recognising the importance of transport between towns/cities and rural areas for recreational as well as work purposes).

Cutting out smaller stations to improve train speeds between cities was cited as another problem that needs to change, as well as focussing on connecting cities instead of linking smaller communities (and low-density suburban areas) to one another and the main transport network. Another challenge is the need for public transport costs to reflect the difference between urban and city living/incomes.

Urban challenges mainly included reducing car speeds, congestion, improved parking and more integrated public transport services.

Overall, while there was agreement with the challenges included in the draft strategy, a number of respondents posited a need to:

- prioritise the challenges and link them more with the strategic overview

- provide more detail on the scale of the challenge ahead in achieving the Strategy Priorities of equality, climate action, economy, and health and wellbeing

- identify where challenges join with each other and can therefore be tackled together, for example, increased road traffic, congestion, air quality and physical inactivity

Section B: The Policies to Deliver the NTS

Through the process to develop the National Transport Strategy, 14 policies were identified that will deliver its Vision and Outcomes and address the challenges, as follows:

- 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 Vision and Outcomes of the National Transport Strategy?

There was strong support for the policies listed in the draft strategy, although many felt that the number of policies was too long and did not reflect the massive challenge required to address existing problems:

> *"The number and extent of the challenges show that a radical overhaul of transport strategy and policies is needed in Scotland, rather than limited improvements or tinkering. Taken as a whole these policies do not give confidence that the Government is aiming for a radical overhaul. We recommend much clearer, stronger, ambitious, and well-developed policies."* [Individual]

Respondents also questioned the reality of funding being made available to aid policy implementation and questioned how compliance and delivery would be monitored and policies enforced (i.e. governance and regulation). There were a number of doubts around how and when the policies would actually be implemented.

The most commonly cited gap was specific policies aimed at enabling more cycling and active travel, with many disappointed to see no clear assertions in this regard. Similarly, several respondents felt that the policies did not adequately support the climate action Priority:

> *"What is missing and needs to be added: policies which will deliver the stated "Takes climate action" Priority and in particular the "Will promote greener, cleaner choices" Outcome. That is the most important Priority and Outcome for Scotland's future and they have been paid lip service by including them at the high level and then omitting them from the policies. I consider the two listed policies "Reduce the transport sector's emissions" and "cope with the effects of climate change" as woefully inadequate to meet the stated Priority and Outcome."* [Individual]

Campaign respondents stressed that they perceived there was a huge amount which needed to be done to improve the uptake of cycling in Scotland. The standard, verbatim response offered by campaign respondents was that the National Transport Strategy should:

- include more specific policies which address challenges and needs in Scotland, and clearly show how they fulfil Priorities and Outcomes of the strategy

- include specific policies to ensure there is an increase in active travel in Scotland - walking, cycling and wheeling

- be ambitious, show radical thinking, and include specific policies to make systemic change happen, enabling people to get out of their cars and cycle, walk or use public transport

It should be noted that some non-campaign respondents offered a counter view, i.e. that the policies were too focussed on climate change at the cost of other Priorities, and that the policies were anti-business and anti-motorist. This smaller group felt that policies were almost exclusively designed to appeal to the green lobby and cyclists rather than meet the needs of the wider Scottish population.

Other perceived gaps in the policies included those which:

- improve transport infrastructure for pedestrians and cyclists

- provide an integrated transport system (i.e. focus on connectivity)

- discourage private car use where possible

- increase train and ferry services and make them more affordable to compete better with air transport (to help the climate)

- reduce car usage and car ownership

- encourage movement of goods by rail

- improve the road network, increase road capacity and movement of vehicles

- encourage a switch to electric vehicles

- ensure new train lines are built and buses subsidised

- encourage modal shift

- address electrified rail travel

- explore investment in airports' surface access schemes to increase the availability, frequency and efficiency of public transport options to airports: this will help to reduce the indirect emissions caused by passengers and freight accessing aviation and improve air quality around airports

- have a stronger focus on transportation of goods

- help to reduce death and injury on Scotland's roads

A number of specific suggestions for changes to the wording of the policies were made, to add clarity, strengthen the policies and reduce interpretation bias.

A large number of comments were made (by individuals and organisations) that the policies needed to be linked more explicitly to the challenges, Priorities and Outcomes and accompanying quantifiable targets were sought. Some suggested that the listed policies covered generally the right points but needed to be expressed and presented in a much more accessible way (rather than as a "generic policy framework"):

> *"There is a striking and highly disappointing lack of the type of concrete proposals that would be needed to deliver the Priorities and Outcomes that head the NTS2." [Organisation]*

The same applied to the enablers:

> *"The language for some enablers lacks commitment, e.g. the use of "promote" or "support". This seems to be used where there is uncertainty about what will be required to deliver the Strategy and in relation to areas where the greatest change is required, i.e. with regard to sustainable transport. Greater*

commitment and positivity are required, particularly where the greatest changes compared to the current approach need to be delivered." [Individual]

Conflicts between policies were also highlighted again, and it was questioned how they would be prioritised and monitored to ensure that achieving one policy objective did not come at the expense of failing in other areas. Some businesses, in particular, commented on the potential tensions between and within policies and their associated Outcomes. These included the relative priority given to maintaining the operation of the current transport system or to transforming the system, and to taking climate action or to optimising competitive connectivity for the economy. They believed that the strategy should explicitly acknowledge where there are potential tensions between policies and set out how Transport Scotland proposes to address them.

Recognition of the role that transport system plays in enabling businesses to be competitive, both within the UK and internationally, was welcomed, however, a key enabler of that policy would be improving surface access to Scottish airports and sea ports. Strengthening the resilience of the transport network and minimising disruption during extreme weather was also cited as vital to all businesses and something for further policy consideration.

A small number again suggested that the policies were not sufficiently radical, ambitious or clear to deliver the Vision or address the important challenges outlined earlier in the document. An example of radical change would be to move public transport options to public ownership, it was suggested. The policies should also be prioritised.

The overall theme of responses to Question 3 of the consultation was that policies and their links to other parts of the strategy needed to be made more explicit with concrete plans for implementation:

> *"[…] the structure of the draft strategy, and the range of aspects contained within, makes it challenging to clearly judge if these are the most effective policies. The NTS in-essence is made up of seven layers (Vision, 4 Priorities, 12 Outcomes, 14 policies, 38 enablers, an as-yet undefined number of actions, and indicators) which is overly complex, making it hard to follow/evaluate and clearly respond to this question asking about the fit between policies, Priorities and Outcomes. The breadth of challenges set-out in the NTS make it especially challenging to appraise how well the policies 'address the challenges' as the 'Current and emerging challenges' section spans pages 11-46 of the 64-page document. It is suggested that challenges are crystalized to make clear the key issues to be tackled by the NTS, and its associated policies."* [Organisation]

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

The large majority of respondents (both individuals and organisations) viewed the policies as being of equal importance.

Among the others, there were two emerging sub-groups - the first who favoured policies linked to climate action being prioritised and a second who favoured policies linked to equality and accessibility.

For those who favoured Priorities linked to climate action, the most important policies were:

- 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

- Plan our transport system to cope with the effects of climate change

For those who favoured equalities and accessibility policies, the most important policies were:

- 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

- Provide a transport system that is equally accessible for all

- Improve access to healthcare, employment, education and training opportunities to generate inclusive and sustainable growth

Beyond these two main sub-groups, there was varying support for each of the different policies, with priority preferences not surprisingly reflecting respondent 'types' (e.g. private sector respondents urged prioritisation of policies which promote economic growth).

Urban and rural concerns

The poor effectiveness of the transport system outside urban areas, compared with the effectiveness of private cars, is a major factor in making transport choices for those living in remote and rural areas, it was suggested. Reliability of public transport was a key policy in this regard as well as policies linked to accessibility, efficient movement of people and goods and having a transport system which promotes and facilitates travel choices.

Policies to provide safe cycle routes in urban and rural areas were welcomed, as well as road safety related policies *per se*.

> Policies linked to transport resilience may be necessary for island communities, which currently suffer with high levels of access deprivation, social exclusion and poor resilience on key transport arteries. This would help both public and business transport users.
>
> Policies to tackle noise pollution in all areas (especially urban/city environments) would be welcomed.
>
> Prioritisation of policy actions that will enhance connectivity and accessibility were welcomed by people living in urban and rural areas alike, including those living in coastal communities.

Some respondents noted that it was not appropriate for the Scottish Government to view any of the policies as being 'more important than others' as some would have greater resonance for some members of the community than others, and so to prioritise would send messages around the perceived importance of need between different groups (e.g. it would not be appropriate to place policies that focus on improving access for disabled passengers above those which reduce social isolation for people living in rural communities).

One way to overcome tensions between policies may be to allow setting of Priorities at the regional rather than national level, it was suggested:

> *"The policies are all inter-linked but some prioritisation may be required to reflect varying demographics, priorities and expectations in different local authority areas. Consistency of approach and agreed Outcomes is both essential and important."*

Again, policies linked to economic prosperity were seen by several respondents as being least important overall for some i.e. "Provide a transport system which enables businesses to be competitive domestically, within the UK and internationally" although this may reflect the profile of respondents more than representing an accurate gauge of support for this policy.

More general comments included that policies which halt or reverse things that are wrong in society should be prioritised, e.g. those that reduce negative environmental impacts, turn around poor health indicators or reverse inequalities. It was also posited that policies which address multiple challenges or fulfil multiple Outcomes should be considered most important. These must be identified and prioritised in the Strategy, it was suggested.

Overall, responses to this question suggest that the policies were all viewed as equally important, however, some may have a greater importance in different geographic areas and for different stakeholder groups compared to others and some flexibility would therefore be needed to allow implementation to be tailored appropriately in different areas.

Section C: Transport Governance

Respondents were asked if there were specific decisions about transport in Scotland which they felt were 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). They were also asked if local communities should be involved in making decisions about transport in Scotland and, if so how/on what issues. All respondents were invited to explain their answers, by providing examples of where they believed transport related decisions should be taken and how communities could be engaged.

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)?

Roughly half of all individual respondents did not answer this question and most of those who did showed a bias towards decisions being made locally and regionally, wherever possible. Overall, only a few organisations mentioned the potential need for notable revision and amendments to existing transport governance structures, roles and responsibilities in order to achieve the required changes to local, regional and national transport infrastructure and systems. Where change was mentioned, this was mainly again linked to a need for more devolved local/regional responsibilities.

National Level

Only a few individuals felt that all transport decisions should be taken nationally. Reasons given included that this was necessary to ensure a coordinated and joined up network, as well as negative perceptions of local government, their decisions, and/or officials. Many individuals and organisations suggested that the Scottish Government/Transport Scotland should be responsible for developing national transport policy to direct strategic priorities and funding priorities in particular - a few individuals felt this was important to ensure there were no regional disparities or inequalities across the network:

> *"It would be better to handle everything at a national level so that the quality of products and services is equal throughout Scotland." [Individual]*

Similarly, some suggested that any major or policy decisions which have national impact should be taken nationally. Examples of specific issues where national decisions were felt to be necessary included:

- investment/spending priorities, and the allocation of funding

- entitlements

- national/integrated ticketing, the cost of tickets and concessionary fares

- developing infrastructure (including road, rail, air travel, cycling, etc) and setting national standards for infrastructure developments, service delivery/quality, accessibility

- better data sharing protocols between businesses and government which will result in better use of existing infrastructure

- developing policy and guidance for national cycling standards for infrastructure design and for strategic planning for ensuring infrastructure is provided for routes between communities

- city connections

- climate action

- a national strategy and planning for electric vehicles, the electrification of the rail network, and active travel, plus the development of a Scottish standard for PSV charging and overstay penalties for electric vehicle charge points

- implementing the 20mph urban speed limit

- setting health targets and pollution/emission standards

- driving legislation (e.g. speed limits, drink driving laws)

- the development of all motorways and main trunk roads/arterial routes

- all rail connectivity and franchise management

- all aviation and ferry decisions

National consideration should also be given to introducing legal minimum requirements for road standards, creating and delivering properly functioning national integrated transport and incentivising or taxing private companies to fund safer travel infrastructure.

While some respondents suggested that responsibility for decision making for various elements should sit at the national level, it was also stressed by many that regional and/or local level bodies and other stakeholders must be consulted and be able to input on any decisions that affect local areas.

Regional Level

A large number of respondents, including all of the RTPs as well as many individuals and other organisations suggested that most public transport decisions should be regional - both because they can provide a more integrated system across a wider area and it was felt they would not be as politically motivated as either local or national government decisions. Individual respondents focussed on public transport in particular, with comments that local bus and train routes, times and fares should be regionally influenced, as well as park and ride facilities. Regional partnerships understood the needs of local communities, it was stressed, and could respond appropriately (including ensuring access to jobs, services and opportunities).

Although there was little discussion of how 'regions' should be defined, RTPs (in particular) urged building on existing regional models, rather than redesigning them (although some existing RTP boundaries should perhaps be reviewed[10]). There may also be scope for planning and coordination of transport infrastructure at the city region level, it was suggested by some of the larger more urban authorities.

The main view among local authorities was that future transport governance arrangements should allow for local and regional variations to reflect the requirements of Scotland's different geographic regions (i.e. *"Governance is a complex issue and varies greatly depending on the particular geographies, scale and resources of organisations"*). The existing arrangements whereby local authorities work collaboratively with RTPs was welcomed as a way of enabling neighbouring authorities to plan together. Overall, local authorities would not support increased centralisation of transport decision making, it seems.

RTPs welcomed the regional focus of any governance model and felt that delivering national and regional transport strategies, particularly where these were aligned to planning and economic strategies, was a model that was most likely to succeed and have longevity. RTPs spoke of building on 'established track records', with strong existing partnerships in place between RTPs and local authorities. Regional Transport Strategies could help to deliver national priorities.

Regional partnerships should set out regional priorities and strategies, take a more interventionist approach, and take a bigger role in implementing transport across Scotland in a consistent way, it was suggested by various organisations and individuals (although variations in approach in different regions, both geographically and potentially thematically (e.g. rural and urban differences) should be accommodated).

While RTPs offered some of the strongest views in support of regional decision making, a large number of other individuals and other organisations also urged that regional decision making was relevant for:

- cross boundary transport interventions
- region wide interventions
- setting timetables and routes that suit the needs of communities
- implementing multi-modal ticketing system
- ensure integration of services across different modes of transport
- managing the development, budgeting and delivery of cross-boundary services/routes
- managing and coordinating regional level active travel

Regional decision makers should also work collaboratively with national government to be responsible for any existing or new services/routes which connect over local authority boundaries, including commuter networks, rail, roads, and cycle routes, and

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[10] Several comments were made about moving RTPs away from strict 'travel to work' boundaries.

consider infrastructure improvements to these. For example, key routes in and out of the Fife area, train links between Edinburgh and Perth, trips within the three Ayrshire authorities, key transport arteries linking Argyll and Bute with the Central Belt and service provision from the islands to the mainland and vital onward connecting links thereafter (such as rail/bus/air links to Inverness, Aberdeen, Glasgow, Edinburgh, Oban, Mallaig, Ullapool, Uig and the wider UK). The current structural arrangements were also cited as a significant impediment to tackling the critical issue Edinburgh faces from car-commuting into the city for work purposes, by people who live across the broader city region.

Other regional responsibilities should include:

- bus partnerships and reviewing/managing subsidised bus networks

- setting bus service requirements and delivery model (franchising, vehicle quality, etc)

- integrating rail, bus and ferry services

- powers of land-use planning, over roads, parking controls, Low Emission Zones and over all public transport within the region

- developing regional active travel and green network

- regional freight strategy

The main concern among RTPs for any increase in regional decision making or regional governance was that funding/resources should be consistently distributed around the country to allow RTPs to deliver local solutions (i.e. equitable funding to be provided to all RTPs in the future).

Local Level

It should be noted that there appeared to be some interchangeability in the language used for regional and local, with some respondents feeling these were equally important without clearly distinguishing between them - in both cases they were considered to provide local coverage. As such, many of the issues outlined below in relation to local authorities and local decisions were also relevant to regional authorities and regional decisions.

Further, the interpretation of local decisions and decision makers varied, to include local authorities, community councils, city regions, as well as local communities themselves.

Several individuals felt that all decisions should be taken locally, while others suggested that local authorities should be in charge of all matters relating to their local transport network and decide how best to implement national decisions and policies in their areas. In such cases, it was generally felt that local authorities/local communities had greatest familiarity with local geographies, demand, existing issues/problems and so were best placed to identify the most suitable solutions:

"Broad national strategies need to be taken at Scottish Government level but implementation will be best at local level where the differing needs and opportunities of areas are best understood." [Individual]

Specific areas of responsibility for local authorities, or areas where decisions should be made locally included:

- local active travel networks and hubs, and promote smarter travel

- more power regarding bus (and other collective transport) routes and operators delivered within their area

- deciding the specifics in relation to the frequency and route of a service/infrastructure

- ensuring transport is accessible

- providing facilities for electric vehicles

- special strategy within their bounds

- parking decisions, restrictions, and charges, including workplace parking

- local road network/infrastructure

- safety of the system in their area

- updated planning system to avoid the potential for cycle lanes being delayed by overly lengthy consultations and legal challenges

A few individuals and organisations again, however, also mentioned the risk of local decisions being influenced by political agendas.

More joined up working

Many individuals and organisations suggested that there needed to be more partnership working and joined up decision making between neighbouring areas, and between the different decision-making bodies. In particular, several suggested that, regardless of which level decisions are taken at, there should be national oversight to ensure a coordinated approach across the country/network.

Finally, many local authorities and Regional Transport Partnerships outlined their current responsibilities, decision remit and partnership working without indicating whether they considered this to be the best or most appropriate structure. Some did, however, also provide suggestions in relation to possible adaptations which could be made to the governance structure in order to improve decision making and its impact. Some also concurred with the consultation document that governance should be reviewed to ensure that the needs of local areas are given full consideration, that decision making can be adaptable, and to ensure that a 'one size fits all' structure is not imposed.

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?

Those not in favour of local communities being involved or who had negative views generally commented that:

- too much weight was currently given to certain (lobby) groups

- local communities/individuals would inevitably consider proposals based on their own self-interest, and not consider the wider, longer-term social/environmental benefits

- it is not possible 'to make all people happy all of the time

This group generally favoured community engagement and consultation rather than communities being directly involved in decision making.

Those in favour of involving communities more directly suggested that:

- wider consultation was required, not just the same groups each time, with a need to target 'actual users' and hard to reach groups

- there was a need to 'go to where the people are', not just ask them to come to you

- existing Community Councils, Community Planning Partnerships, Local Development Plans, Local Place Plans, and Neighbourhood Planning could be used as mechanisms to involve the public

- more use could be made of consultations, surveys (both online and postal), meetings/workshop events, letters, ballots, targeting local groups and local social media pages, widely publicising any consultation and proposed changes, and setting up dedicated boards/working groups/forums/citizen panels/user groups

Organisations often outlined the existing structures and opportunities for public consultation on issues, with several suggesting that these methods would be sufficient to incorporate transport related issues, and that additional layers of consultation activities should be avoided.

Examples of decisions local communities should be involved in included:

- all stages of transport planning, as well as the design and implementation/delivery of policies, projects, infrastructure and services

- identifying local priorities/problems/gaps in service

- input on ways to implement local policies, new schemes and infrastructure

- active travel

- identifying desire/need for and impact of potential developments/changes

- the closure of services

- input on specific locations, routes or services for development

- speed limits and parking

- ticketing (fares/prices), integrating services, public transport routes, frequency/timetable of services

- road infrastructure, maintenance and safety

Some respondents also detailed very specific examples from their local area (e.g. particular roads, bus and ferry services, etc.) which needed to be discussed with local communities.

The main caveats regarding including local communities in decision-making included:

- that it must not introduce delays in the process

- that it must not disrupt/block policy aims or wider benefits being achieved

- it was only appropriate if a vocal minority were not allowed to disrupt positive changes

- that communities must be genuinely listened to and not just engaged as a tick-box exercise (i.e. paying lip-service to the views of local communities)

- that some communities may need to be supported to engage in consultation and ensure their voice is heard (including those with sensory impairments)

- that the level and nature of consultation and community involvement should vary in relation to the proposals being discussed

- that local expectations would need to be managed

- that local communities should be consulted on how to achieve aims or how to implement changes/schemes and not on whether changes should happen

There was particular support for businesses and special interest groups/support organisations (such as disability groups) being consulted and involved in the decision-making process.

Urban and rural concerns

There was a strong desire to see smaller more rural communities involved in decision making wherever possible, as public transport provision was often critical for these communities and would affect large numbers of residents. They would also have greatest familiarity with local challenges/contexts:

"Particularly in rural/remote areas, which are usually badly served by transport, local communities feel that transport is imposed on them, and doesn't meet their needs. They don't know who is responsible for various parts of the transport system or accountable when things don't work. They should be involved from the

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start in local transport decisions including infrastructure (e.g. airports) and services, for example: local bus and ferry networks, routes and timetables, and train timetables, to ensure these meet local transport needs and connect up with other transport services in a convenient and efficient way." [Individual]

Similarly, deprived communities (both urban and rural) were seen to often suffer the most from poor transport planning and should, therefore, be listened to and consulted on 'what works' best for them.

Co-production with communities (especially those with physical/sensory impairments) should underpin design of the urban travel environment and take place and start before plans are drawn up rather than simply consulting on schemes that have already been designed, it was felt.

Section D: The Strategy as a Whole

The strategy sets out that everyone in Scotland will share in the benefits of a modern and accessible transport system, and views were sought on whether the strategy, as written, addressed the needs of transport users across the country.

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?

Responses to this question were mixed, with a rough split between those who felt that the strategy did address everyone's needs (53%) and those who felt that it did not (47%). This divide was noted among both individuals and organisations.

Response	Individuals	Organisations	All Respondents	Valid %
Yes	165 (44%)	68 (33%)	233 (40%)	53%
No	155 (41%)	50 (24%)	205 (35%)	47%
No response	62 (15%)	83 (43%)	145 (25%)	
Total	382	201	583	438

Table 4: Number and percentage of respondents agreeing with NTS2 addressing needs of all transport users

Those who disagreed with this closed question were more likely to provide additional qualitative feedback than those who agreed. Only a small number of respondents explicitly indicated at this question that the strategy addressed the needs of all transport users, that it was inclusive and promotes equality.

Promotes equality

Most acknowledged that the strategy made strong and relevant reference to the need for promoting equality overall, including appropriate discussion of the needs of often marginalised groups, including those with protected characteristics. The strategy was seen as largely inclusive of the needs of residents by age and gender as well as those of businesses and visitors. Regular and frequent communication and consultation between all transport users, providers and relevant government bodies was, however, seen as being imperative to deliver the Vision of the strategy.

The main view with regard to equality and meeting the needs of different communities was that some of the less wealthy communities may have been overlooked. A view was put forward by respondents throughout the consultation (both individual and organisations) that the Central Belt of Scotland and the North East of the country have traditionally been prioritised over other areas of the country (especially the South West), and that there was no evidence to suggest that this would change going forward:

> "[…] statements regarding the Central Belt seem to imply that the rest of Scotland is "rural", whereas much of the population of the country lives in towns and cities outwith the Central Belt." [Organisation]

Importantly, others stressed that it was important that the strategy focussed on connecting cities, in light of what they perceived as the inevitable growth of metropolitan areas.

Similarly, the focus on connecting towns and cities should not be prioritised over connecting smaller communities e.g. links across and between rural areas, in particular:

> *"There is a welcome emphasis on the needs for different regions, however we do believe that some of the policies outlined tend to focus on more urban needs than those in the regions where vehicle dependence will continue to be extremely strong for the foreseeable future."* [Organisation]

A similar perception was again expressed that remote and rural areas geographies were not well understood and that rural transport was a particularly difficult issue, which needed more thought and attention *per se*. This might include considering how the most remote areas of the country, which often rely on aviation to connect them to wider society, may benefit most from the innovation of electric flights.

More focus on improving rural bus routes and recognising the importance of car use in rural communities where alternative public transport provision was absent were both seen as key:

> *"I feel the needs of rural areas have not been adequately addressed and differentiated from the urban challenges. Admittedly the problems may not seem so acute in remote areas (such as where I live) - but for example access to regular, affordable public transport for an ageing population is a big challenge which will only get worse if not addressed."* [Individual]

Again, for some, especially people living in rural areas and older adults, car use may be a necessity rather than a luxury and this had not been fully considered or addressed in the strategy, it was felt. Many respondents believed that putting private vehicle use at the bottom of a hierarchy fails to recognise the importance that vehicle use currently has for the majority of travellers (especially those in rural communities):

> *"[…] the only 'sustainable' option for many people living and working in our rural communities is to own and use a car for all or most of their journeys. This fact of rural life for many should be key to all considerations in relation to sustainable transport options discussed throughout this strategy."* [Organisation]

While the strategy acknowledges the need to connect the Highlands and Islands with the rest of Scotland in a financially feasible manner, it could be strengthened by also considering sustainable ways of ensuring connectivity of remote locations as well as noting that additional connectivity must not be forced upon communities that do not want it.

A very small number of contributors presented a counter view, i.e. that the focus should be on improving the most profitable and used routes, rather than focussing on inclusion and accessibility.

Others comments on inclusion, accessibility and equality included:

- that there is no recognition that much of Scotland's population has no local access to the railway network

- stating more explicitly the interaction between reliability of public services and poverty

- a need to consider more carefully the needs of blind and partially sighted people

- that the strategy does not mention horse riders and carriage drivers

Some recognition may also be needed in the strategy that people have multiple, different user-group needs:

> "[t]here is a danger of seeing an individual's transport needs as belonging primarily to one type of user-group, whereas in reality many people have multiple, different user-group needs, which may vary rapidly throughout the day and which may conflict with each other. Viewing people as belonging to primarily one type of group over-simplifies our complex lives and has been the downfall of many previous social and economic policies." [Individual]

Takes climate action

There was wide support for the discussion of climate change, active travel and sustainability throughout the strategy, although there was a perceived bias in the focus on city dwelling cyclists over other cyclists.

An emerging theme among a small number (of mainly individuals) was that the strategy may also be too focused on delivering the environmental and cycling agenda to the detriment of methods of transport people actually use most for work, especially if living in rural areas, i.e. car, bus and train:

> "I feel these priorities are far too stacked in favour of greening the transport system, rather than focusing on what transport should be - the efficient movement of vehicles and people." [Individual]

The strategy could be reworded in places so as not to penalise car users, this group felt.

Helps our economy prosper

The main comments in relation to prosperity included a perceived oversight and lack of attention given to the needs of the freight and logistics industry within the strategy (across all modes: road; rail; air and sea). The focus was seen as being

predominantly on personal transport, with only superficial exploration of the options for freight. More could be included to address the specific concerns of this sector:

> *"[Organisation is] surprised and disappointed that the whole freight sector is so superficially addressed in the consultation document. Rail freight itself is also critically important to Scotland's exporting economy." [Organisation]*

This was considered to be a serious omission especially given the role of rail freight in contributing to a number of the policies cited in the strategy.

Transport is a key enabler for economic growth and affordability of travel to places of work and recreation could be elevated in the strategy, as this is key to businesses. The potential introduction of a workplace parking levy was of particular concern to business respondents who felt there was a lack of evidence that it would encourage modal shift (and reduce carbon) and could instead be damaging to the economy.

Investment in innovation and technologies was seen as necessary to help meet the challenges Scotland faces and to ensure that revenue is raised to deliver improved connectivity for both people and businesses. Better data sharing between businesses and government was urged. There was also a call for a dedicated and comprehensive aviation strategy for Scotland.

Other more diffuse comments included:

- that round the clock public transport services are not provided equally around the country (impacting on workers and industries differently based on geography)
- many communities are still not considered or appropriately represented in the strategy, especially those reliant on ferries (the reliability of ferries and ferry capacity being a main concern)
- reliability of public transport (which supports people to work) is not adequately addressed in the strategy

Improves our Health and Wellbeing

Many respondents (especially third sector organisations) welcomed the focus within the strategy on those with physical disabilities and other impairments which act as a barrier to travel. Further emphasis could perhaps be placed on active travel or multi-modal journeys which have significant benefits for health and tackling inequalities.

Other comments that had a more spurious link to health and wellbeing included:

- that some specific routes could be improved to improve access to healthcare
- that road closures following RTAs are too long/need to be addressed

- a perceived failure to tackle cyclists using pavements, which at present makes it unsafe for many in the community to use pavements with confidence (e.g. the parents with small children, the elderly and infirm)

Other Comments

There were also a number of overarching comments that the strategy tries to meet too many different preferences without a clear focus - one strategy could not possibly cover the multitude of different needs around the country, some felt. Finally, while the strategy appears to address the needs of all users, it will require robust monitoring and oversight to ensure that is implemented effectively for all groups, it was stressed.

Section E: Looking Ahead

In considering the challenges ahead, respondents were asked which parts of the transport system currently work well, as well as which areas work less well. Respondents were also invited to posit practical actions which they would like to see the Strategy take to encourage and promote change.

Responses to these questions were wide-ranging and varied and individual perspectives were biased by where people lived or worked. This is important to note as things which were seen as 'working well' by some communities and individuals, were seen as not working well for others. Some rural and remote communities, in particular, did not benefit from the same efficiencies in public transport as those living in more urban areas, for example.

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

Respondents provided a wide range of suggestions for parts of the system that they considered to be working well. Some of these related to specific routes and services, while others discussed transport elements in more general terms.

Roads, typically motorways and main trunk roads were considered to be fast, easy to use, well maintained and generally safe (especially the road network in the Central Belt). Indeed, the main links between cities (including rail, bus and road) were viewed positively overall while, more locally, traffic calming and speed reduction measures (e.g. 20mph zones) were seen as examples of good practice. The increasing provision of electric car charging points was also praised.

Local rail (particularly around Glasgow), subway (in Glasgow), tram (in Edinburgh) and bus (Lothian Buses in particular were mentioned often) were seen as working well, although most positive comments on bus and rail related to Scotland's cities and not rural services.

All investment in active travel was seen as positive, including improvements to the footway system and improvements that had been made to cycling infrastructure.

Regional/multi-operator ticketing (where this exists) as well as contactless/cashless payment methods for public transport options were praised, as were concessionary travel schemes. Community transport, Park and Ride provision and bike hire/share schemes and car clubs were all also cited as examples of what works well.

Information provision (in particular Real Time Information (RTI) at stops and on services and Traveline Scotland) were praised. Air based transport, the Road Equivalent Tariff (RET) and the Air Discount Scheme (ADS) were all cited as positive.

It should be noted, however, that for most areas highlighted as working well, there were other respondents who disagreed and gave examples where they felt these did not work well - typically it depended upon their own personal experiences of using specific services or routes. Indeed, some suggested that coverage and service

quality was fragmented and piecemeal, so while there are often good examples available, there are also areas where services are lacking or failing in some way.

Urban and rural concerns

Urban areas were seen as well linked by public transport, in general, especially Edinburgh and Glasgow, with the main infrastructure between Glasgow and Edinburgh (train) also working well. That being said, travel between and within cities was seen as very expensive and out of reach of many commuters or would-be commuters and lack of integrated (affordable) ticketing can also prove a barrier.

Edinburgh trams were seen as clean, reliable and frequent and community transport (where available) works well in rural communities. The airport coverage (for the mainland) and service was also seen as good and comparable/superior to those of many large European cities and countries. Coach services between cities were also mentioned as being good.

For the islands, the Air Discount Scheme was described as a significant contributor to addressing high transport costs for island residents. The Road Equivalent Tariff, in its modified form for Shetland, was also welcomed and seen as a positive move to address high transport costs. Most (but not all) island ferry services were seen as working well to sustain lifestyles of residents and businesses.

Partnership working in local areas to provide live departure times for passengers (especially in rural and remote areas) is effective. Concessionary travel was also praised (for transport users in both urban and rural areas).

Most transport services were seen to work better in cities, with efficient, convenient, varied modes of travel available, and possibility of real-time tracking due to availability of internet services.

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

A wide array of responses was provided with regard to practical actions which could be taken. Some focussed on high level approaches that could be included within the strategy, while others outlined more specific priority areas for improvement.

Dominant themes included a need to focus on active travel and public transport to the same/greater extent as roads, to reverse the trend of reliance on cars and focus more on active and public transport solutions. Similarly, greater marketing and promotion of public transport information services to assist the public in making informed choices about greener, more environmentally friendly travel options was encouraged.

More use and wider provision for green/electric vehicles was encouraged, as well as electrification and expansion of the rail network,

Reducing costs of public transport, and increasing accessibility was urged. Better (and more efficient) transport provision in rural areas as well as better integration of public transport services, integrated timetables, integrated and smart ticketing (which do not include an additional charge between operators and/or modes), and more standardised fares were again reiterated as important.

Moving freight from roads to rail, ferry or canal, and air where possible was also seen as key.

Although only mentioned by a few respondents, an important issue for some was the preservation of the Air Discount Scheme (ADS) and its desired expansion to include the business sector in order to support island economies and communities.

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

Again, there were wide and disparate responses to this question.

Public Transport Generally

Fares (on both trains and buses) were considered too high or prohibitive, with a few suggesting this was particularly problematic for young people, children and families. Some also suggested that it was often cheaper to travel by car. As such, this was considered to be acting as a barrier to the use of public transport and social inclusion of those on low incomes, and as a barrier to modal shift as there was little financial incentive to switch away from car use.

Poor accessibility for disabled people and parents with prams, both in terms of boarding and alighting from services, and space/facilities onboard for wheelchairs, guide dogs, blind and deaf people, etc. was also cited as an existing failing.

Other general public transport concerns included service reliability, capacity, coverage and lack of inter-connectivity between different services/modes. A few respondents also highlighted safety concerns (for both passengers and staff) onboard public transport - particularly on trains and buses. Better timetabling and ticketing were also reiterated as priority needs.

Active Travel

Many simply said that cycling and active travel does not currently work well, and can be dangerous or impractical, without providing specifics about what the particular problems were. More specific active travel issues included poor cycle networks (including unsafe networks), lack of segregated cycle lanes, limited capacity for carrying cycles onboard buses and trains meaning multi-modal journeys are prohibited/difficult and poorly maintained pavements.

A number of barriers were cited by campaign respondents as preventing greater uptake of cycling, and the table below shows the frequency with which each were cited. Perceptions of local roads as being 'unsafe' was the most frequently cited barrier to cycling followed by a lack of segregated cycle lanes in local communities.

Barriers/Things that do not work well	Number of respondents	Percentage of Respondents
The roads where I live feel dangerous, and this affects how much I cycle	327	51%
More segregated cycle lanes around my neighbourhood would really boost my uptake of cycling	117	18%
Speeding drivers/traffic speeds put me off cycling	70	11%
The roads are often too busy with other traffic to be able to cycle comfortably and safely	61	10%
A lack of cycle storage is a real barrier to using my bike	13	<1%
My workplace doesn't offer adequate showers and changing facilities which affects my ability to commute by bike	4	<1%

Table 5: Barriers to cycling cited by campaign respondents

Other comments on what does not work well for cyclists/prevents cycling (mentioned by just one or two campaign respondents each) included:

- roads provision for bicycles is often insufficient, poorly implemented and discouraging to anything/anyone other than motor vehicles

- drivers are variable in how much care they give to cyclists

- roads are not particularly agreeable to cycle on - i.e. busy with traffic with drivers who frequently do not understand the needs of cyclists

- the state of the roads is frequently poor and seems to be getting worse

- inconsiderate and dangerous driving push cyclists off the road

- roads are narrow and feel dangerous

- more off road cycle lanes away from traffic/fumes/buses (and designed for suitable personal safety) are needed

A small number of campaign respondents (who did not live in Scotland) also indicated more generally that *"everyone should be able to enjoy the benefits of cycling, and to achieve this over the next twenty years we need to ensure people have the necessary opportunities to cycle, while also taking action to ensure people feel safe if they choose to cycle."*

Road Network

The main view was that there was too much promotion of and reliance of private vehicle modes. This causes congestion, is not good for the environment or people's health. A few respondents, however, felt that the changes on the road network to accommodate active travel were unwelcome and detrimental to other users, including public transport.

Other road specific concerns included that the road network is poorly maintained, that inconsiderate parking was rife, and that there was too much road-based freight movement.

Ferries and Air Travel

Several respondents indicated that ferries do not work well currently (both in terms of cost, capacity and inter-island links). Frequency of services were also mentioned more generally, as well as capacity issues due to peak season demand, RET and increases in tourism.

A few also mentioned air travel. This was either as being too popular and polluting, (with attempts to encourage use due to costs of other modes of transport and limited rail links) or as being too expensive (particularly in relation to flights from the island communities to the mainland).

Urban and rural concerns

Rural bus and train services were perceived as being limited/poor and often more expensive than in urban areas. In particular, there was a lack of radial routes, (i.e. typically routes in towns/cities all lead into the centre), and limited coverage in some suburban areas of towns and cities.

Ferry services to island communities can be unreliable and lack resilience, it was felt and the road, rail, and air infrastructure servicing the West Highlands and Islands was also criticised (including interisland ferries which were described as unreliable, expensive and financially unsound):

"It is when you get to more rural areas that the transport system fails people. This is a particular problem for people living in the Highlands and Islands, where they are a long way from railways, bus routes and have to face expensive ferry and air travel. However, these people are of equal value to Scotland and therefore should be able to travel around their own locale and within Scotland with closer to equal ease." [Individual]

The main existing limitations with urban travel included speeding drivers, lack of affordable integrated ticketing, lack of safe cycle routes and poor road networks/infrastructure, congestion and costs of public transport, *per se.*

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

Responses to this question largely mirrored or reiterated those provided at Q7a, Q7b and Q8a above.

Some respondents provided suggestions regarding what should be included in the strategy document to tackle improvements, while others focused on more practical improvements that were required on the ground. These main included:

- car reduction plans

- more active travel promotion with funding to support active travel options

- provision and enforcement of minimum service requirements for public transport

- greater priority and investment to support rural communities

- providing cheaper ticket prices for public transport

- a clear plan (not just a statement/commitment) to provide integrated public transport, in relation to infrastructure, timetables, ticketing and information, both between operators/over boundaries and different transport modes (and with active travel options)

- accurate and up-to-date public transport information

- greater/full electrification of the public transport network and the provision of charging points for electric vehicles

- ensure the accessibility of public transport and active travel, in terms of service provision, coverage, capacity, and accessibility for disabled travels

- greater regulation or public ownership of public transport services

Campaign respondents noted that infrastructure to support cyclists could best be achieved through *"the development of an Action Plan in the National Transport Strategy, with actions which encourage people to ride a bike more often, wherever they live or work."*

A wide variety of suggestions were put forward for what that Action Plan should include and the table below shows the suggestions that were cited with most frequency among campaign respondents. The introduction of more segregated cycle lanes along arterial routes into towns and cities was encouraged by four fifths of all campaign respondents.

Actions/Facilitators	Number of respondents	Percentage of Respondents
Segregated cycle lanes along arterial routes into towns and cities	508	80%
More linked cycle lanes	240	38%
Better linking up of cycle lanes and networks	127	20%
A larger, better linked National Cycle Network with more sections off the road	125	20%
More space for bikes on trains, including electric bikes	76	12%
More bus services able to carry bikes	59	9%
More car free zones in cities	44	7%
More support to help those on low incomes access bicycles	11	1%
Better travel planning information for cyclists	8	1%
More space and easier access/reduced requirement for booking processes to carry bikes on train services/increased provision of cycle carriages on trains	3	<1%

Table 6: Actions to facilitate cycling cited by campaign respondents

Other suggestions for actions, mentioned by just one or two campaign respondents each, included:

<u>Education</u>

- car driver education (around how to drive near cyclists)

- large scale promotion of the benefits of cycling

- more schemes to help people learn to ride a bike or encourage people to get back on a bike, especially the most disadvantaged in society

- clarification as to the rules for cycling on single track roads

<u>Policing and Enforcement</u>

- more specific road traffic policing/enforcement and the ability to upload dashcam/helmet cam videos for enforcement action as necessary

- police enforcement of laws governing safe driver behaviour when overtaking cyclists/enforcement of close passes by motorists

- more prosecutions of dangerous car drivers

- presumed liability to encourage car drivers to be more courteous, as well as cyclists to pedestrians

- proper penalties for dangerous driving/liability for more dangerous vehicles

- enforcing speed limits or introducing voluntary speed monitoring of vehicles via GPS with a corresponding reduction in vehicle insurance

- more enforcement of the 20 and 30mph speed limits in towns

- enforcement of dog control laws within parks and shared cycleways to prevent off-lead dogs from chasing and colliding with cyclists

Design and Infrastructure

- allowing cycling on the pavement where there is no dedicated cycle lane

- slowing down speeding traffic/low traffic neighbourhoods, with low speeds 'designed in'/ measures which reduce traffic on our roads

- improving road surfaces for cyclists

- pedestrianisation of city and town centres

- an end to building new road capacity - new trunk roads and road widening schemes

- more cycle lanes going to key destinations like schools and shopping areas

- priority to be given to cycling and walking when considering any road building or alteration project

- more cycle routes away from traffic (with personal safety designed in)

- co-locating (affordable) housing within a few miles of employment/amenities

- more cycle parking

- cycleway access gates to allow for tandems and tricycles

Social/Economic

- zero interest loans for people to buy bikes

- reductions in urban traffic, particularly commuters

- provision of bike storage for households without access to safe bike storage

- more towns and cities having a public bike share scheme, and a national integrated ticketing system which includes these public bike share schemes

- punitive taxes on workplace parking and public parking to encourage a greater cycling uptake

- regular monitoring of existing cycle lanes to ensure they are free of accumulated debris and potholes

Views regarding the affordability of bikes were also reiterated by some organisational respondents, noting that access to bikes was lowest amongst those on low incomes.

Other emerging themes from non-campaign respondents included the need to reduce the impact of the 'school run', with suggestions including providing genuinely safe routes to school, off-road routes to school, making it safe for all children to walk or cycle to school, introduce a congestion charge around schools, and increased use of school road closures.

More general comments included promoting a more coordinated approach to transport, land use planning, and economic development, as well as ensuring transport is central in housing policy, health and social care policy, environmental policy, etc.

A few respondents were also concerned about the focus on active travel and suggested that the main focus needed to be on sustainable and efficient public transport, better roads, and electrification of the system. They generally felt that "punishing" the road user, and taking away roads to provide greater space for walking and cycling would simply make it harder for commuters to get to work as, in the majority of cases, it was felt that accessing employment by active modes was only possible for a few individuals rather than being a feasible option for most. A few also worried that any reduction in the road maintenance budget would have wider economic impacts for some areas.

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?

Although organisations seemed more positive and less critical of the consultation document overall (and its origins and rationale in particular), the individuals who took part in the consultation focused much more on where the gaps were, including its scope and representativeness. Analysis focussed primarily on the three priority areas of increasing accountability, strengthening evidence and managing demand, and where additional issues arose, these are reported separately.

<u>Increasing accountability</u>

Several individuals commented on the possibility that accountability would be weakened with a move from a local to a regional level, which is what the strategy implied. Both national and local political structures need to be accountable, it was stressed and must bear in mind that much of the Scottish transport infrastructure is publicly owned (e.g., ferries and ports, road and rail networks, and internal airfields), despite the private sector being the main provider of transport services *per se*. There was also some concern about how to make the private sector (notably privatised bus and rail companies) and individuals (who often prefer private car travel to public transport) accountable for their actions.

The Sustainable Travel Hierarchy (STH) was welcomed; indeed, it was deemed so important to the overall strategy that it was felt to warrant a much higher priority within the draft:

"The sustainable transport hierarchy is key to the whole strategy and I would suggest this needs to be introduced earlier in the document. It needs to be applied to all transport projects from now on, existing and future." [Individual]

The STH was considered a plan that should be imposed rather than chosen - several argued that people should be 'mandated' to adopt it to ensure a real change compared to past behaviour:

"[The STH] is simply an updated version of a transport planning hierarchy that is at least 20 years old and has had minimal impact to date. Therefore, the test of the strategy will be seen in the way it is delivered and whether truly transformational change in our transport behaviour is seen." [Individual]

The main gaps in the STH were shipping and aviation, both of which are priorities in the Highlands and Islands of Scotland and yet have high emissions. Again, business travel was also deemed under-explored, as was freight:

"[T]he freight and logistics industry is essential to growth of the Scottish economy. If the goods cannot be moved: in, around, and out of the country in an efficient and timely manner, regardless of mode, that will harm the economy of Scotland and put it at a disadvantage economically." [Organisation]

Likewise, the Sustainable Investment Hierarchy (SIH) should prioritise existing assets over reducing unsustainable travel it was suggested, and prioritise reducing travel *per se* (for example, siting new developments close to existing developments, working from home and using video conferencing). One organisation argued for a greater emphasis on equality in the SIH and other budgetary requirements.

Representativeness

Most respondents spoke of 'representativeness' rather than accountability *per se*. The new accountability bodies were welcomed, although many individuals and, to a lesser extent, organisations commented on their potential make-up. Several individuals argued for increased passenger representation and diversity of membership, notably on the Transport Strategy Delivery Board. This might include those with disabilities or sensory impairments, young people, local people, those living in poverty (where the stigma of public transport use is unwelcomed), active travel and powered light vehicle proponents (e.g. ebike and escooter users), and public health, environment and community groups. As well as one organisation suggesting that representatives of Transport Citizen Panels (an idea which was highly praised) should also sit on the Transport Strategy Delivery Board, there were also suggestions that links could be improved between existing consultation groups and other national citizen panels.

Strengthening evidence

As raised elsewhere in the consultation, there was a general consensus that any strategy needs SMART and clear targets and Outcomes as well as a solid set of key performance indicators of progress and success. Annex A of the consultation document was criticised for having *"no specific goals meaning there is too much wiggle room for deciding if they were met":*

Some organisations pointed out that local and regional evidence was as important as national evidence and one organisation suggested creating a 'Transport Data Warehouse' to inform and collate reliable data. It was also suggested to be perhaps appropriate for a body such as Transport Scotland to lead on such a databank resource. More research was, however, also felt to be needed on how older adults and disabled people travel; on walking levels and frequency; on the needs and behaviours of pedestrians and cyclists; and on the costs and prices of transport.

While respondents stressed the urgency of the exercise to improve transport through reliable data and research, several commented that 'hard evidence' should not get in the way of real progress and that the government should 'react faster', albeit in alignment with current and future climate change planning.

Managing demand

This was the area of greatest challenge to all respondents, since 'managing' demand was deemed an understatement, not least given that the public cannot be held responsible for their transport choices if/when such choices are limited. The question of demand management raised wider concerns about infrastructure and future town planning more generally. Indeed, many suggested that an alternative demand needs to be created rather than an existing demand managed, through attractive options for transport and adequate infrastructure:

> *"Managing demand will be successful only if transport users… are convinced that we need to travel less, or if we need to travel, we need to do it in a sustainable way (public transport, shared travel)." [Individual]*

Car use was the most criticised mode of transport (including taxis), although car sharing was seen more on a par with public transport than private use, and it was acknowledged that car use is crucial currently for disabled people and rural dwellers (the latter being a particular issue for many in terms of adequate transport). Electric cars were not deemed by some to be a measure of success, since they are also hazardous to the environment, and generally car use was deemed unsustainable in the longer term whereas bus and train travel should be prioritised. Other suggestions for managing demand included reducing the national speed limit on motorways to 60 mph; more average speed cameras; bus priority lanes; reducing air travel; and actively encouraging public transport/active travel.

The wider infrastructure

While a very small minority indicated that current political and collaborative arrangements may be obstacles to the full and successful implementation of the proposed strategy, it was generally felt that there needed to be a more radical overhaul of not just transport policy but wider social structures, locally, regionally and nationally. Suggestions included a sustained education of the public, greater resources for new infrastructure, redeployment of existing resources, policy priorities, the creation of a National Infrastructure Agency, improved workers' rights, nationalised railways and the redesigning of towns and cities.

Generally speaking, respondents favoured the initiative to improve sustainable transport but felt that more needed to be done on the ground, with reduced 'bureaucracy'.

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

Respondents were asked if they wished to comment further on the National Transport Strategy. Many took this opportunity to again praise the Scottish Government for a) its commitment to addressing the transport problems of the future with ecologically sound alternatives to fossil fuel-based travel, and b) allowing individuals and organisations to input their views and recommendations into this process. Indeed, many offered to help further by giving feedback on future technical papers and/or reviews and by supporting the Government in any way deemed feasible to promote its future transport strategy.

However, while the broad aims and objectives of the strategy were almost unanimously endorsed, people were sceptical about the means of achieving those aims and objectives. While the strategy document itself was criticised by some as offering promises it could not deliver, the vast majority of respondents' concerns about the strategy were related to its lack of ambition, innovation, clarity and specificity. As with answers to earlier questions within the consultation, both individuals and organisations commented on the need for targets and measurements of success, so that not only the public but also the Government could be held to account on how it was fulfilling the terms of the strategy.

Specific perceived gaps in the strategy that had not been raised elsewhere included, but were not restricted to, the lack of mention of motorcycling, tourism demands, coach travel, and trips to and from school. The strategy was seen by some as conflating active travel out of necessity (to transit to work, etc.) with active travel for sporting/leisure purposes. Indeed, greater encouragement of active travel was seen as vitally important in such a transport strategy. Some felt that the strategy relied on electrification and 'vague' future technology as resolving many issues and ignored the very real problems affecting rural dwellers.

Most other individuals and organisations simply reiterated points made elsewhere in response to the main consultation questions.

Section F: Strategic Environmental Assessment (SEA)

A separate Strategic Environmental Assessment (SEA) Report accompanied the draft National Transport Strategy, setting out an assessment of the likely significant environmental effects that the strategy may have on the environment, if implemented.

Respondents to the consultation were asked four questions that related to the SEA covering views on:

- the accuracy and scope of the information used to describe the SEA environmental baseline set out in the Environmental Report

- the predicted environmental effects as set out in the Environmental Report

- proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report

- anything else respondents wished to say about the SEA

Nearly a third of respondents either did not comment on these questions or stated that they did not know enough to provide an informed response. A further third said that they agreed with what was written in the Environmental Report, or assumed it was accurate, but this does not necessarily mean that they were adequately informed to give such approval. Several respondents suggested that they did not have the time, the motivation or the expertise to digest and comment on this additional documentation, which was very lengthy.

Many respondents used one or more of these four questions to reiterate what they had said in responses to previous questions, or to comment more generally on the state of the environment/transport system currently. There was also considerable overlap between what respondents said at each of the four questions (i.e. if they felt unable to comment on accuracy and scope, they also felt unable to comment on proposals for mitigation and monitoring).

Q11. 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?

An attempt was made to code responses to this question based on whether positive or negative views had been given, although this was challenging as many respondents provided only vague or limited comments. A large number of respondents again stressed at that the document had been too long to read or that they felt it was too technical, and so felt unable or 'unsure' about its accuracy (around 6%). Most gave no response (around 75%). In broad terms, among those who did provide substantive comments (only a fifth of standard, non-campaign respondents altogether), approximately two thirds offered supportive comments, and one third were non-supportive.

Among individuals, the main supporting comments included that the report appeared to use current projects and scientific evidence, the data was consistent with the wider published information on the environment, that the complexity of the issues and their inter-connectivity had been well considered i.e. the report appeared comprehensive.

There was little offered by individuals on the technical content of the report other than comments that there may be potential conflicts between economic and environmental issues, which could be fleshed out in the report (especially since these also represent two of the main Priorities in the strategy):

"It is not clear how much weight the environmental impact of transport infrastructure will be given compared to the economic impact. From what documentation I have read in the past, environmental impact has had little to no impact on transport infrastructure decision making as decision making is always weighted heavily in favour of economic gains." [Individual]

A small number suggested that the SEA had not been broad enough as it did not translate to sufficient attention in the strategy on policies to address climate change.

Specific perceived omissions included:

- more site-specific proposals to give the SEA real value

- greater emphasis on future land use tied to transport planning

- greater discussion of how investment in sustainable aviation fuels (SAF), which use waste industrial gasses and municipal waste as feedstock, could assist with the Scottish Government's commitment to reducing aviation's impact on the environment

- failure to mention of the effects of tourism on the environment

- an insufficient focus on wildlife, nature and habitat loss

- expanding landscape and visual amenity to include adverse impact of transport infrastructure projects, and the beneficial impact on social wellbeing of communities that results from the enjoyment of natural landscapes without the damage caused by unsightly infrastructure

- that mention should have been made of the National Marine Plan and of the Regional Marine Plans (Clyde, Shetland, Orkney) that are currently being developed

- reference was needed to the Islands (Scotland) Act 2018

- cross-reference was needed to the McNulty report

It is important to note that many of these comments came from only single individuals, and there were no obvious recurring themes except that the SEA and the strategy did not go far enough to tackle environmental damage.

Among organisations, comments focussed on alignment between the strategy and the SEA. Some felt that the scale and information presented in the document was considerable and identified the environmental issues that are relevant to the development and implementation of the National Transport Strategy:

> *"The scope and information presented in the document is extensive and identifies the key environmental issues that are relevant to the development and implementation of the NTS. The evidence supports the emphasis of the strategy on the Priorities of "Takes climate action" and "Improves our health and wellbeing"." [Organisation]*

Others felt that the SEA and strategy were not well aligned, for example, statements that 'The transport sector as a whole is likely to benefit from a more integrated, multimodal transport system that supports sustainable modes of travel' is a fair assumption, but was not aligned to a strong level of content within the draft NTS to lead on and enable integration of transport modes or services. Others commented more generally that the strategy did not show how any of the SEA aspirations could be realistically achieved.

Some views were offered that mirrored those of individual respondents around the challenges of human behaviour change:

> *"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." [Organisation]*

Organisations, like individuals, also questioned if the SEA adequately reflected the changing, more urgent concern on climate change. It could also be set out more clearly to allow a comparison of the widely varying emissions produced by different modes of transport in Scotland, it was felt.

While organisations again recognised that this was a detailed and comprehensive document (and several were satisfied by its content and scope and its alignment with the Scottish Government's latest climate change targets), suggestions for specific additions/expansion included:

- reference to the historic environment
- more accurate reflection of long-term traffic growth
- more detail regarding the impacts associated with demographic change along with better quantification of the impacts that are highlighted
- clarifying exactly what a net-zero economy means
- greater reference to active travel infrastructures and consequential positive environmental impacts

- greater discussion of the impact that the potential shift towards autonomous vehicles may have (i.e. on road traffic, public transport patronage and active travel modes)

- the impact of climate change on coastal areas (including transport infrastructure and hubs and future resilience)

- inclusion of data related to environmental noise associated with transport

- reference to UKCP2018

It was also perceived by one respondent that there were areas within the baseline that made conclusions without the evidence being presented to support the assertion. For example, it is stated that a move to electrify the transport network would place pressure on the energy sector without quantifying what this pressure would be and if there are potential mitigation measures.

For some organisations, the SEA could also be more holistic:

> *"A fully integrated environmental assessment would address the climate change and sustainability issues, equalities Outcomes and fulfilment of the Fairer Scotland Duty, as the physical and social environment should be considered together."* [Organisation]

Some third sector support organisations also urged a more accessible version of the SEA for non-professional readers, including a version that is suitable for those with sensory impairments.

Q12. What are your views on the predicted environmental effects as set out in the Environmental Report?

Again, a large number of respondents did not answer this question, and many of the individual respondents who did said that they felt unable to comment, due to lack of understanding of the content.

There were some comments that the predicted environmental effects were "too cautious" and had been perhaps been underestimated and a feeling again that urgent action was required to minimise harmful effects:

> *"I expect the environmental issues/challenges are far worse than are currently being estimated officially. And I sense that the measures being mooted, while indicating the right direction, are already too little too late. What is needed is drastic, radical action on changing the lifestyles of all of us."* [Individual]

> *"There is an air of complacency to the report in its prediction of the benefits. Whatever benefits can be accrued, they must be delivered with greater urgency, targets dates must be sooner, targets must be more ambitious, within interim stages to track performance and encourage continued action. There is no benefit to overestimating the potential benefits. Also, dis-benefits*

must be recognised. Maintaining the status quo is a significant dis-benefit. Benefits must be maximised and delivered sooner, and continue to be delivered." [Individual]

Specific perceived under-estimates included that the SEA was too hopeful about how easy it will be to reduce greenhouse gas (GHG) emissions and what the cumulative (rather than discrete) impacts of different pollutants may be. Another respondent suggested that there was not enough emphasis on moving to net-zero and then net negative carbon dioxide production (for which better defined and earlier targets were needed). One other respondent suggested that the environmental effects of chemtrails and HAARP technology should be referenced.

Only a very small number offered a counter view i.e. that estimates had been over-exaggerated and the associated costs of tackling change were unwarranted, and a similarly small number suggested that the data and estimates presented represented only a 'best guess'. There were suggestions that the estimates would be improved or made more accurate if separate research/attention was given to rural communities. Presenting a more 'balanced' view was also encouraged:

> *"Care should be taken to remind the reader that the environment is not a closed loop. Consequently, actions to reduce emissions will not have a direct impact on climate change risk as this is dependent on global climate conditions. For this reason, adaptation and sustainability proposals should not be portrayed as a direct trade-off with local net-zero carbon initiatives."* [Individual]

The disadvantages of active travel (which may counter reduced emissions) should also be highlighted as well as any negative implications for electric grid management brought about by changes to electric vehicles, growth in rail electrification as well as potential growth in marine and aviation sectors.

The assumption that further projects will have individual SEA/HRA to look at their effects was described by one as *"an inappropriate way of assessing the SEA for the strategy"*. It should consider the issues properly at the strategic level and highlight particular issues for future developments, it was suggested.

Among organisations, there was general support for the estimates and a view that the SEA provided a reasonable assessment of the potential impacts of implementing the strategy. Some omissions were again highlighted (often similar to those raised by individuals), including:

- environmental effects related to soil, water, biodiversity, cultural heritage and landscape

- negative impacts linked to the promoted use of digital technology within the transport system (i.e. energy use)

- impact on the historic environment from new infrastructure or upgrades to the existing transport network

- acknowledgement of the role of the transport sector in contributing to the development of alternative fuel markets such as hydrogen

- specific proposals that would guarantee a significant reduction in fossil fuel use within an urgent time frame

- the environmental, economic and social gains of community transport

Cumulative impacts (and associated estimates) was again seen as something to be discussed in more detail in the SEA.

A more balanced view was also encouraged again, with the need for greater discussion of things such as:

- inability of the transport network to cope with flooding risks associated with climatic change

- inability of airports to cope with extreme weather events and the need to have greater contingencies in place to maintain operational effectiveness

- exactly what additional pressures might arise from modal shift or increased electrification

- the health impacts of active travel in terms of air quality not only in areas with high deprivation or poor air quality but in other areas too

- consideration of targeting the source of trips as well as where the impact is manifested (i.e. evidence suggests lower income groups generate fewer trips and are therefore not the key source)

- disruption and environmental impacts (including noise and air quality) from the construction of green infrastructure or new rail/bus routes

- lack of transport integration which creates issues for users of transport systems in urban areas, in addition to islands and remote communities, where car reliance is more important

- negative pollution effects linked to increased reliance/use of vehicles driven by renewable energy (i.e. pollution would be different rather than simply reduced)

The SEA and estimates may, at present, also focus too much on the impact of active travel and low carbon/technology solutions rather than exploring wider impacts of public transport policies *per se*.

There were again some comments from organisations that the estimates, and the SEA as a whole did not translate to clear actions in the strategy:

> *"[…] it is noted that the gap between the overall aims of the Strategy to contribute to ambitions in the Climate Change Bill (net-zero emissions of all greenhouse gases by 2045 with interim targets of a 70% reduction by 2030 and a 90% reduction by 2014) as well as practical actions to achieve these targets are not addressed within the Environmental Report. As transport is the*

largest contributor to emissions in Scotland, it is felt that the Environmental Report should consider the wider impacts of the National Transport Strategy in relation to these ambitious targets." [Organisation]

There should be more on the interplay between the Priorities and which should be emphasised to maximise positive environmental impacts and to minimise the negative ones, it was suggested.

Q13. What are your views on the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?

Again, there was a poor response to this question, however there was agreement between individuals and organisations that environmental effects need to be reviewed and updated frequently, not least given the climate emergency:

> *"The environmental effects need to be developed in more detail as NTS Priorities and Outcomes are progressed in detail. This will ensure that these effects are accurate and actively managed to reduce adverse impacts and increase environmental benefits." [Organisation]*

Three specific themes emerged in relation to monitoring, as follows:

- monitoring needs to be done at all stages of development of the strategy, including of changes in emission levels, in public attitudes and in health and wellbeing

- monitoring requires sophisticated data collection and analysis expertise and techniques

- any monitoring and evaluation framework should be open to public consultation before being finalised

The need for ongoing professional engagement with the SEA was also stressed:

> *"The SEA is a comprehensive document, but outlines clearly the uncertainties, assumptions and lack of clarity around some of the measures to implement proposed policies. It certainly provides useful guidance but further engagement and review should be conducted with businesses and other stakeholders when measures have been fully identified." [Organisation]*

Responsibility for addressing the issues set out in the SEA should also be clearly set out along with more specific targets in the final strategy, in particular, at the policy and enabler level. The Post Adoption Statement should clarify and explicitly identify mitigation measures to ensure that assumed mitigation is taken forward and that all effects are addressed at the appropriate lower level plan, it was suggested.

A separate summary response submitted on behalf of Scottish Natural Heritage (SNH), the Scottish Environment Protection Agency (SEPA) and Historic

Environment Scotland (HES) offered support for the assessment approach taken and the findings of the assessment. Additional clarity may, however, be required in relation to:

- the baseline information used in the assessment

- potential for physical impacts on heritage assets, and the permanence of effects on both the site and setting of historic assets

- the issues under topics of soil and water to include the indirect effects of pollutants transported through air movements and deposited on soil and water

- the potential for cumulative effects that might arise as a result of infrastructure projects, particularly in relation to the identification of location

Again, more generally, it was suggested that it could be made clearer how the SEA process had influenced the draft Strategy.

Discussion

Main Findings

The consultation attracted a large number of responses from individuals and stakeholder organisations representing a wide range of interests from different sectors. Respondents were broadly supportive of the strategy but several suggestions were put forward to make it more robust and actionable and to reflect a more diverse range of transport users' needs and priorities.

Vision, Priorities and Outcomes

While some minor changes to the Vision were suggested to make it even clearer, and more detail on funding and tangible action for its implementation was urged, most respondents viewed that it set out the right direction for the future transport system in Scotland.

There was strong support for the existing Priorities and Outcomes but some suggestions for additions and more detail to add clarity. Many respondents wanted specific targets which were measurable and the relative importance of each of the Priorities and timing for delivery should also be set out.

There were mixed views on whether Priorities and Outcomes should be ranked, and recognition that it would be very difficult to rank one area above the others, given the diversity of different stakeholders' needs and perspectives.

Potential tensions between some of the Priorities should also be recognised in the strategy, it was felt, especially those between climate action and economic prosperity (for example, the net-zero target and increased productivity/exports). Investment decisions may be confounded by such conflicts, and this needs to be recognised as a key challenge e.g. setting carbon reduction targets for transport, while continuing investment in road building was seen as a mismatch of ambitions.

Current and emerging challenges

While there was acceptance of most of the challenges included in the draft strategy, a number of respondents posited a need to:

- link challenges more with the strategic overview
- provide more detail on the scale of the challenges ahead in achieving the Priorities
- identify where challenges overlap and can therefore be tackled together, for example, increased road traffic, congestion, air quality and physical inactivity

Some suggested that all challenges be given equal weight in the strategy since, at present, the length, detail and space allocated to some was disproportionate (e.g. freight receives little attention, as does rail travel, compared to other modes).

Meeting the challenges

The existing policies were welcomed, although there was a split in opinion as to whether more or fewer policies were required to affect real change. A small number of respondents suggested that the policies were not sufficiently radical, ambitious or clear to deliver the Vision or address the important challenges outlined. Some of the policy wording could be changed to add clarity, strengthen the policies and reduce interpretation bias.

The large majority of respondents (both individuals and organisations) viewed the policies as being of equal importance. Some policies would inevitably have a greater importance in different geographic areas and for different stakeholder groups compared to others and some flexibility would therefore be needed to allow implementation to be tailored appropriately in different areas.

Transport Governance

There were very mixed views regarding transport governance arrangements, however, there was consensus that local communities and businesses should be consulted and engaged wherever appropriate, with scope for more (and more innovative) engagement than has been evidenced historically. Engagement must not be tokenistic.

Only a few organisations mentioned the potential need for revision and amendments to existing transport governance structures, roles and responsibilities in order to achieve the required changes to local, regional and national transport infrastructure and systems.

Looking Ahead

There were also mixed views around whether the strategy, as drafted, addresses the needs of all transport users across Scotland, including citizens and businesses located in different parts of the country, with a rough split between those who felt that it did (53%) and did not (47%). Rural and remote communities and those living with physical and sensory impairments, as well as women, families, older adults, young people and those living in poverty should appropriately receive specific focus in the strategy, it was felt.

Many aspects of the transport system were seen to be working well, and should continue to receive policy support and investment. This included the road network (especially in the Central Belt), local rail services, public transport information provision (although more could be done to make information available in alternative formats) and concessionary travel.

An equal number were seen as lacking or failing in some regard, especially public transport availability, reliability and fares, integrated transport options, maintenance of the road network (especially beyond the Central Belt), and a lack of segregated cycle lanes and networks, especially around towns and cities.

The Strategy will require robust monitoring and oversight to ensure that is implemented effectively for all groups, it was felt.

A key points summary in respect of the four Priorities and associated Outcomes is noted below:

Priorities	Outcomes	Challenges
Promotes equality	- will provide fair access to services we need - will be easy to use for all - will be affordable for all	- widely supported but reservations about how this would be achieved in practice - those living in rural and remote communities, as well as disabled and sensory impaired transport users emerged as priority groups - transport poverty viewed as a key issue to address
Takes climate action	- will adapt to the effects of climate change - will help deliver our net-zero target - will promote greener, cleaner choices	- split opinion, with some viewing this priority as being over-represented within the strategy and others seeing it as receiving insufficient weight - strong views that the proposed action would not be sufficient to meet the net-zero target - strong calls for even greater promotion of greener, cleaner choices and some scepticism that Outcomes will be achieved due to challenges in tackling driver behaviour - need to invest in new technologies and support businesses to aid achievement
Helps our economy prosper	- Will get us where we need to get to - will be reliable, efficient and high quality - will use beneficial innovation	- mixed views with many perceiving this should not be a priority or should be demoted in order of importance - potential clash with other priority areas should be highlighted more - essential to acknowledge more clearly in the strategy that a strong and growing Scottish economy is fundamental to achieving the Vision, Priorities and Outcomes outlined in the Strategy

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	• widely supported for contributing towards wider policy aspirations/national outcomes • More to be included in the strategy on safe travel and perceptions of safety on the roads (including safety of cyclists) • Needs to be backed up by infrastructure investment commitments • Behaviour change is a key challenge • Could be better integrated and linked to other Priorities

Strategic Environmental Assessment (SEA) Report

The majority of respondents did not provide comment on the Strategic Environmental Assessment or said that the document seemed credible, but felt that they lacked the technical expertise to comment reliably on its content. Those who did felt that it could more closely aligned to the strategy and could be made stronger by recognising the urgency of the need to tackle climate change and by making the negative effects of transport more explicit. Responses to the SEA questions suggest that addressing this subject (of climate change and environmental impacts) requires greater urgency with a balanced approach that recognises the cumulative impacts of the transport strategy as a key environmental concern.

Overarching Themes

In addition to comments received in relation to specific parts of the strategy, there were some clear emerging themes which spread across questions.

There were some perceptions that climate change interests had been disproportionately reflected in the strategy (some wanted to see more attention, and some less) and this may have been at the expense of a more rounded focus on such things as rail, freight and aviation. While there were some views that business and economic interests should not be prioritised over other interests, other respondents felt that even more attention could be given to business needs in the final Strategy.

Among rural and remote communities, there were also some perceptions that the strategy wrongly penalises car use, which is essential for some communities and individuals in reducing social isolation and improving accessibility. Greater sensitivity could be built into the strategy to recognise the needs of the full range of residents and businesses in Scotland. This was linked to perceptions that the strategy at present is heavily focussed on towns and cities and that the needs of rural areas had not been adequately addressed and differentiated from the urban challenges.

Overall, for both individuals and organisations, the draft strategy needed to be revised to be more explicit and provide more detail on how the Vision, Priorities and Outcomes will be translated into reality. Presenting the Outcomes in more measurable terms was also widely encouraged.

Conclusions

There is strong support for the scope and direction of the Strategy, in particular the expansion to consider wider transport and environmental concerns beyond those set out in the original strategy. There is a willingness among partners to continue to engage in directing the strategy, developing clear actions linked to the Priorities and monitoring and evaluating performance over time, to ensure that it remains fit for purpose. If anything, the strategy could be even bolder in its final form with even more ambitious aspirations and targets, as well as offering more nuanced direction for specific groups of individuals, businesses and communities. If delivered, respondents were confident that the Vision, Priorities and Outcomes of the Strategy would be a positive and transformative step forward for transport in Scotland.

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