



## SPT Responses to Consultations by the Scottish Government and Transport Scotland

**Date of meeting** 18 March 2022

**Date of report** 22 February 2022

### Report by Chief Executive

#### 1. Object of report

The object of this report is to recommend approval of proposed SPT responses to the following consultations:

- Transport Scotland consultation<sup>1</sup> on the Strategic Transport Projects Review 2 (STPR2) Phase 2 Recommendations (attached at Appendix A, closing date for responses is 15 April 2022);
- Scottish Government consultation<sup>2</sup> on draft National Planning Framework 4 (NPF4) (Appendix B, closing date is 31 March 2022); and
- Transport Scotland's consultation<sup>3</sup> (in partnership with the Convention of Scottish Local Authorities (COSLA)) on "A route map to achieve a 20 per cent reduction in car kilometres by 2030" (Appendix C, closing date is 6 April 2022).

#### 2. Background

2.1 Members will recall from previous reports that there is currently a wide range of workstreams underway at national, regional and local levels which have the potential to impact on the people and communities, and transport network of the west of Scotland:

- The STPR2 will set the national investment priorities for transport for the next 20 years;
- The National Planning Framework 4 will set out the Scottish Governments priorities and policies for the Scottish planning system up to 2045, including how planning and development will help to achieve a net zero, sustainable Scotland by 2045; and
- "A route map to achieve a 20 per cent reduction in car kilometres by 2030" sets out what Transport Scotland believe are the necessary steps to achieving the 20% reduction in car kilometres target adopted by the Scottish Government in its Climate Change Plan Update (CCPu).

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<sup>1</sup> <https://www.transport.gov.scot/consultation/consultation-on-the-draft-second-strategic-transport-projects-review-stpr2-for-scotland/>

<sup>2</sup> <https://consult.gov.scot/local-government-and-communities/draft-national-planning-framework-4/>

<sup>3</sup> <https://www.transport.gov.scot/publication/a-route-map-to-achieve-a-20-per-cent-reduction-in-car-kilometres-by-2030/>

- 2.2 SPT has been involved in the development of all three of the above at varying levels over recent years.

### 3. Outline of proposals

#### 3.1 STPR2 response

SPT's proposed response to the STPR2 Phase 2 draft recommendations is attached at Appendix A. On the whole, SPT is supportive of the draft recommendations from the STPR2, including such potentially transformative projects such as the Clyde Metro. However, a key point of our response includes that a large number of the STPR2 recommendations lack detail on specific interventions and delivery pathways, but clearly will fall under the powers and functions of RTPs like SPT and councils. It is essential that clear delivery and funding mechanisms are mapped out. SPT has highlighted this throughout the response and has also noted the need to ensure STPR2 recommendations are brought forward in ways that enable delivery and do not add to existing challenges. Further, SPT highlights that appropriate demand management measures will need to be implemented alongside STPR2 recommendations to achieve the national targets for car kilometre reductions.

#### 3.2 NPF4 Response

3.2.1 SPT's proposed response to the draft NPF4 is attached at Appendix B. Key points of SPT's response include highlighting the intrinsic relationship between spatial planning and transport and travel demand by both people and goods, and welcoming and supporting the focus on compact growth and local living which support active travel and public transport use in support of carbon reduction commitments. The response also highlights the need to ensure the resilience of strategic transport connections to support local living within a network of linked neighbourhoods and centres while also meeting the needs of business and industry and the demands of leisure travel.

3.2.2 SPT's response also seeks to strengthen the relationship between STPR2 recommendations and the transport related National Developments, specifically the National Walking, Cycling and Wheeling Network (2); Urban Mass/Rapid Transit Networks (3); High Speed Rail (13); and Stranraer Gateway (18) and highlights the need for connections between transport decarbonisation infrastructure and supply requirements and the Strategic Renewable Electricity Generation and Transmission Infrastructure national development (12).

3.2.3 Furthermore, SPT's response highlights opportunities of the proposed National Planning Policies to be amended and strengthened to support and promote sustainable travel behaviour and reducing the need to travel or reduce the distance travelled, in line with climate change targets.

3.2.4 The need for clear delivery pathways to support the achievement of 20-minute neighbourhoods and the sustainable travel and transport policies that support car restraint and demand management are required to meet the climate change targets and reduction in car km and further work is required to ensure mechanisms are in place to achieve an infrastructure first approach in relation to transport.

#### 3.3 20% Route Map response

3.3.1 SPT's response to "A route map to achieve a 20 per cent reduction in car kilometres by 2030" is attached at Appendix C. Key points of SPT's response include that while we welcome the route map, we have concerns about its

capacity to deliver on a 2030 timeframe. There is a danger that the difficult decisions needed to address the reduced mileage are either not taken or are put off until a later date. As we note, time is short to achieving this ambitious but necessary target and there is a need for rapid interventions given the scale of the challenge ahead.

- 3.3.2 Further, it is clear that behaviour change on its own will not achieve the necessary outcome and that a combination of measures will be required including demand management measures; effective leadership; reformed transport governance; sustained and increased funding; and measures to address the attractiveness, accessibility and affordability of the transport network. In addition, there are opportunities which can be taken through the route map to positively influence behaviour change through improvements to the affordability, accessibility, responsiveness and attractiveness of the public transport network. This should include greater public investment in active travel, enhanced revenue support for bus and light rail services and further roll out of integrated ticketing.
- 3.3.3 In particular, the utilisation of demand management measures will be a critical success factor given the significance of the transport sector's contribution to climate change and poor air quality. The severity of the problems linked to this requires significant and rapid intervention and SPT is concerned that the timeframe for the public conversation on demand management and any subsequent action lacks the necessary urgency to enable the 20% target to be achieved by 2030.
- 3.3.4 There has been an unprecedented level of public funding to sustain the public transport network during Covid but we are currently seeing a reduction in rail frequencies and bus services reflecting reduced demand. At the same time, car use has almost returned to pre pandemic levels. There is a danger that we enter into a vicious cycle of reduced public transport services undermining the attractiveness and responsiveness of the public transport system and reinforcing moves to more car mileage.

#### **4. Conclusions**

SPT officers will continue to work with colleagues at Transport Scotland and the Scottish Government and other key stakeholders in taking these three workstreams forward and will keep members updated as progress is made.

#### **5. Partnership action**

The Partnership is recommended to:

- note this report; and
- approve the draft responses attached at the Appendices.

#### **6. Consequences**

Policy consequences

*Each of the workstreams being consulted on have the potential to have significant impacts across a range of sectors for many years. Officers will take account of these workstreams in developing the new RTS.*

Legal consequences	<i>None at present.</i>
Financial consequences	<i>None at present.</i>
Personnel consequences	<i>None at present.</i>
Equalities consequences	<i>Equality Impact Assessments have been undertaken by Transport Scotland/Scottish Government for each of the workstreams.</i>
Risk consequences	<i>None at present.</i>

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## **APPENDIX A**

### **Strategic Transport Projects Review (STPR2) Consultation – SPT Response**

#### **Overview**

This consultation is on the draft second Strategic Transport Projects Review, which sets out draft transport recommendations for the next 20 years. STPR2 is one of the mechanisms for delivering the Vision, Priorities and Outcomes of the second National Transport Strategy (NTS2). It is an important tool for achieving the Government's commitment to 20% reduction in vehicle kilometres by 2030 and contributing to Scotland's net zero greenhouse gas emissions target by 2045. Also, addressing inequalities, improving health and wellbeing and contributing to inclusive economic growth.

#### **Questionnaire:**

##### **STPR2 Process**

**Q1.** Were you aware of STPR2 prior to this consultation?

Yes  No  Don't Know / No Opinion

**Q2.** To what extent do you agree or disagree that the STPR2 process reflects the NTS2 Priorities and Outcomes?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly Disagree
- Don't Know / No Opinion

SPT considers that our comments made on the Phase 1 report remain relevant.

**Q3.** Please provide any further comments you have in relation to the STPR2 process:

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**Q4.** To what extent do you agree or disagree that it was correct to take both a Regional and National approach to STPR2?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly Disagree
- Don't Know / No Opinion

**Q5.** Please provide any further comments:

The adoption of a national and regional approach in STPR2 provided the opportunity for a more detailed review at regional level through the Regional Transport Working Groups of which we were a part. However, at this stage, nearing the end of the process, greater detail is required on the interventions themselves and their geographic locus in order to understand what will be required of regional partners as the STPR2 moves to delivery. SPT expect this to be a key focus in the STPR2 Delivery Plan.

**Q6.** To what extent do you agree or disagree that the engagement process has allowed you to provide a contribution to STPR2?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly Disagree
- Don't Know / No Opinion

**Q7.** Please provide any further comments you have on the engagement carried out throughout STPR2.

### **Key themes**

STPR2 recommendations are grouped under six key themes:

1. Improving active travel infrastructure
2. Influencing travel choices and behaviours
3. Enhancing access to affordable public transport
4. Decarbonising transport
5. Increasing safety and resilience on the strategic transport network
6. Strengthening strategic connections

**Q8.** Which of the overall key themes is your / your organisation's **top priority**?

- 1. Improving active travel infrastructure
- 2. Influencing travel choices and behaviours
- 3. Enhancing access to affordable public transport
- 4. Decarbonising transport
- 5. Increasing safety and resilience on the strategic transport network
- 6. Strengthening strategic connections
- Don't Know / No Opinion

**Q9.** Which of the overall key themes is your / your organisation's **lowest priority**?

- 1. Improving active travel infrastructure
- 2. Influencing travel choices and behaviours
- 3. Enhancing access to affordable public transport
- 4. Decarbonising transport
- 5. Increasing safety and resilience on the strategic transport network
- 6. Strengthening strategic connections
- Don't Know / No Opinion

## **STPR2 Key Themes and Recommendations**

### **A. Improving Active Travel Infrastructure**

**Q10.** To what extent do you agree or disagree that the recommendations under this theme will contribute to Improving Active Travel Infrastructure?

	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Don't Know / No Opinion
Recommendations (1-5):						
1. Connected neighbourhoods	x					
2. Active freeways	x					
3. Village-town active travel connections	x					
4. Connecting towns by active travel	x					
5. Long distance active travel network		x				

**Q11.** Which of these recommendations would you prioritise to contribute to Improving Active Travel Infrastructure?

	High Priority	Medium Priority	Low Priority	Do not support this recommendation	Don't Know / No Opinion
Recommendations (1-5):					
1. Connected neighbourhoods	x				
2. Active freeways	x				
3. Village-town active travel connections	x				
4. Connecting towns by active travel	x				
5. Long distance active travel network		x			

**Q12.** Do the recommendations under this theme address the transport needs of your local or regional area or the people your organisation represents?

Yes  No  Don't Know / No Opinion

**Q13.** Please provide any additional comments you have on the theme Improving Active Travel Infrastructure and the recommendations within it.

It is crucial to accelerate delivery of high-quality active travel infrastructure to meet climate change targets and improve health. However, STPR2 should make stronger statements about the need for road space reallocation to deliver many of these recommendations, in particular, to deliver active freeways. There needs to be a clear national message and leadership on this point, to help enable local delivery. SPT made a similar comment in our response to Phase 1.

The majority of the STPR2 recommendations in this theme are local in nature and are broadly captured already within local and regional active travel and green network strategies/plans. There should be an assumption that the existing policy frameworks for local & regional active travel strategies already require strategy makers to plan for active travel connectivity of neighbourhoods, villages, towns, town-to-town and cross-boundary networks, and NCN/connections to NCN. This should be considered when the recommendations are progressed to avoid unnecessary strategy redevelopment work, 'pilot' programmes or challenge funds.

Local authorities are the chief delivery partners in active travel infrastructure. All authorities with a up to date active travel strategies should be provided with a large degree of autonomy in planning and delivering STPR2 recommendations that are local in nature, working as they already do in partnership with neighbouring authorities, RTPs, Sustrans, Green Network partnerships and others on quality, network and cross-boundary matters.

Local authorities and RTPs should be trusted to deliver high quality infrastructure in line with local and regional strategies, existing national policy & guidance, and any additional criteria established for the STPR2 recommendations. The STPR2 recommendations should be brought forward via a framework or collectively in some way that enables and facilitates delivery by local and regional partners. Ideally, there will be simplified allocation of multi-year funding, ring fenced for active travel, to local authorities and RTPs, to accelerate delivery.



## 2. Influencing Travel Choices and Behaviours

**Q14.** To what extent do you agree or disagree that the recommendations under this theme contribute to Influencing Travel Choices and Behaviours?

	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Don't Know / No Opinion
Recommendations (6-10):						
6. Behaviour change initiatives		x				
7. Changing road user behaviour		x				
8. Increasing active travel to school	x					
9. Improving access to bikes	x					
10. Expansion of 20mph limits and zones	x					

**Q15.** Which of these recommendations would you prioritise to contribute to Influencing Travel Choices and Behaviours?

	High Priority	Medium Priority	Low Priority	Do not support this recommendation	Don't Know / No Opinion
Recommendations (6-10):					
6. Behavioural change initiatives		x			
7. Changing road user behaviour		x			
8. Increasing active travel to school	x				
9. Improving access to bikes	x				
10. Expansion of 20mph limits and zones	x				

**Q16.** Do the recommendations under this theme address the transport needs of your local or regional area or the people your organisation represents?

Yes  No  Don't Know / No Opinion

**Q17.** Please provide any additional comments you have on the theme Influencing Travel Choices and Behaviours and the recommendations within it.

SPT supports these recommendations particularly to improve road safety for vulnerable road users and reduce inequalities in access to cycling; however, changing behaviours at a strategic, scaled up level requires appropriate demand management measures.

The recommendations are predominantly local in nature and correspond to powers and functions of local authorities and SPT. STPR2 should consider existing delivery challenges and ensure the recommendations come forward in ways that are streamlined/dovetailed with complementary STPR2 recommendations (e.g. active travel recommendations).

Recommendation 6: Behaviour Change should be more specific as to the types of initiatives that can be supported via STPR2 as the majority of suggested initiatives are predominantly revenue activities. Additionally, STPR2 should be more specific on the types of behaviour change activities that have been found to be most successful through this appraisal, and should aim to enable these rather than anything falling within 'behaviour change initiatives' whilst still providing scope for innovation. Generally, it needs to be clear what are the most beneficial activities so authorities can direct scarce resources to developing these. The recommendations should also consider how to scale up and join up bike hire/sharing schemes.

### 3. Enhancing Access to Affordable Public Transport

**Q18.** To what extent do you agree or disagree that the recommendations under this theme contribute to Enhancing Access to Affordable Public Transport

	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Don't Know / No Opinion
Recommendations (11-23):						
11. Clyde Metro	x					
12. Edinburgh & South East Scotland Mass Transit						x
13. Aberdeen Rapid Transit						x
14. Provision of strategic bus priority measures	x					
15. Highland Mainline rail corridor enhancements			x			
16. Perth-Dundee-Aberdeen rail corridor enhancement			x			
17. Edinburgh/Glasgow – Perth/Dundee rail corridor enhancement		x				
18. Supporting integrated journeys at ferry terminals		x				
19. Infrastructure to provide access for all at railway stations	x					
20. Investment in DRT and MaaS		x				
21. Improved public transport passenger interchange facilities		x				
22. Framework for delivery of mobility hubs		x				
23. Smart, integrated public transport ticketing		x				

**Q19.** Which of these recommendations would you prioritise to contribute to Enhancing Access to Affordable Public Transport?

	High Priority	Medium Priority	Low Priority	Do not support this recommendation	Don't Know / No Opinion
Recommendations (11-23):					
11. Clyde Metro	x				
12. Edinburgh & South East Scotland Mass Transit					x
13. Aberdeen Rapid Transit					x
14. Provision of strategic bus priority measures	x				
15. Highland Mainline rail corridor enhancements					x
16. Perth-Dundee-Aberdeen rail corridor enhancement					x
17. Edinburgh/Glasgow – Perth/Dundee rail corridor enhancement		x			
18. Supporting integrated journeys at ferry terminals					
19. Infrastructure to provide access for all at railway stations	x				
20. Investment in DRT and MaaS	x				
21. Improved public transport passenger interchange facilities		x			

22. Framework for delivery of mobility hubs		x			
23. Smart, integrated public transport ticketing	x				

**Q20.** Do the recommendations under this theme address the transport needs of your local or regional area or the people your organisation represents?

Yes  No  Don't Know / No Opinion

**Q21.** Please provide any additional comments you have on the theme Enhancing Access to Affordable Public Transport and the recommendations within it

The theme references 'affordable' public transport but it is not clear how affordability of public transport in relation to, for example, cost of travel by car, or against income, has been considered in these recommendations. The recommendations also provide very limited scope for improving provision of rural transport services and do not include opportunities for improving rural bus services.

### **Recommendation 11: Clyde Metro**

SPT welcomes the announcement of Clyde Metro as a nationally important project as part of STPR2 and particularly recommendation 11 which commits Transport Scotland to work in partnership with SPT, Glasgow City Council and other regional partners in the development of the scheme including the design, business case and governance. While couched under the theme of 'Enhancing Access to Affordable Public Transport', SPT believes the project to be truly transformational and notes that in the STPR2 Phase1 recommendations that it was highlighted under the 'Transforming Cities' section.

SPT welcomes being named as a key partner in taking the Clyde Metro proposal forward, assisting Transport Scotland alongside Glasgow City Council and other regional partners. The Metro proposal at stands builds on much previous work by SPT over the last 30 years, and SPT officers have been involved at varying levels in both the development of the STPR2 and the Metro proposal and are continuing to pursue opportunities in that regard. Transport Scotland should be commended for their continuing open engagement through the process and the Metro Feasibility Team at Glasgow City Council for their commitment to partnership working.

As the statutory regional transport authority, our expectation is that SPT will continue to be a full and equal partner in taking the project forward and we are taking steps to be able to provide a skilled and professional resource in order to play our part in that regard. Indeed, we would expect to take the lead on certain aspect of the project. For example, the guidance for Regional Transport Partnerships (RTPs) gives them the clear lead on transport integration and interchange, and this is one area where our facilities ownership, operational experience and strategic skill sets will be of benefit to the project team.

SPT notes that in the initial STAG assessment, the Clyde Metro scored at the highest level (+++) in both the Low and High value scenarios. This should reflect the highest priority given to the scheme in the final STPR2 report and recommendations.

For many years SPT has advocated for greater investment in the public transport network of the west of Scotland, and Clyde Metro has the potential to facilitate the transformative change required in that regard. That transformation is even more important now, as public transport faces the twin challenges of recovering from the pandemic and helping to achieve national climate change targets. Furthermore, our region has some of the most deprived areas in Scotland, and many areas or places with poor public transport connectivity, and the Clyde Metro is focused on creating or improving links to these communities, providing people with the chance to pursue life or work opportunities that would otherwise be unavailable to them.

While Clyde Metro has been promoted as providing the 'missing link' in transport provision within a 15km radius of Glasgow City Centre, SPT does not believe that it would be beneficial to promote competition between different modes and that the Metro should be seen as an enhancement rather than a displacement of current transport provision. Following the consultation currently underway, should the Clyde Metro be formally approved in the final STPR2 report later this year, it will be important that the role of local bus services and Bus Rapid Transit as well as the Subway, are given a prominent

role in future considerations as part of Clyde Metro development. They will play a key role in integrating with other modes, and in continuing to provide regular services within the urban core and to and between outlying areas of the region.

SPT also welcomes the reference to the Clyde Metro in the draft NPF4 documentation, Draft NPF4 National Development 3. Urban Mass/Rapid Transit Networks. We believe it will enhance the key principle of Clydeplan in promoting 'compact growth' and will support a place-based approach at regional, city-wide and local level. This sits within the Draft NPF4 Central action area and proposes that priorities for the area include reinventing our largest cities and the wider central belt to pioneer a new era of low carbon urban living across Scotland. SPT notes that this recommendation contributes to these priorities and supporting actions.

As the STPR2 Case for Change assessment outlined, particular benefits may arise through Connected Neighbourhoods where active travel allows easier walking and cycling conditions in more pleasant and secure conditions. Development around Clyde Metro should be considered to ensure the transport provision enhances the sense of place in each locality and supports the development of 20min neighbourhoods. This will be enabled through the quality of the design of stations, stops and interchanges and the careful consideration of setting to provide a focal point and recognition of the 'place' in each locality.

The Minister for Transport recently confirmed to the Scottish Parliament that "the early estimated cost of the Metro project is somewhere between £11 billion and £16 billion, based on the outturn cost of other comparable projects, with a timescale of 25 to 35 years to completion"<sup>1</sup>. It is therefore essential that, in these early stages, development of business cases, design and development, and work to address any governance issues is expedited in a robust, evidence-based and objective-led way, in line with due process and statutory obligations. SPT recognises the informal partnership arrangements that have led to this point of approval in STPR2 but believes that the portfolio, programme and distinct project management arrangements need to be firmed-up in the near future to provide reassurance and to avoid any missteps in the early stages of development, which ultimately could prove costly in both time and money at a later stage.

While the current definition of the Clyde Metro proposal appears to limit the scope of the network to a 15km radius around Glasgow City Centre, we would advocate for the transformative nature of the project across the whole of the SPT region and indeed, the west of Scotland. Improving access across the city region supports Scottish Government policies aimed at promoting inclusive growth, at the same time tackling deprivation and health issues.

Connecting Clyde Metro with active travel and existing transport networks would remove shorter distance trips from the heavy rail network and free up additional rail capacity for longer journeys. The system would help to deliver environmental benefits, improving public transport journey times and journey time reliability, making sustainable travel options more attractive.

SPT is developing an updated Regional Transport Strategy (RTS) due for publication in 2022. The RTS Case for Change presents objectives to reduce transport emissions, improve equality of access, improve connections between regional centres and domestic/international markets, and to make public transport a desirable travel choice. There is, therefore, excellent alignment between national and regional priorities and considerations with regard to the Clyde Metro.

In conclusion, the inclusion of the Clyde Metro as a draft recommendation in the STPR2 is a very positive first step towards what could potentially be the most significant transport project in our region for many years. SPT will continue to work with Transport Scotland, Glasgow City Council, our constituent councils and other partners in seeking to ensure it emerges as a key project in the approved STPR2 later this year and, should that be the case, that preparations are in place to ensure that work can begin in earnest to transform the region's public transport network.

#### **Recommendation 14. Provision of strategic bus priority measures**

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<sup>1</sup> [https://www.parliament.scot/chamber-and-committees/official-report/what-was-said-in-parliament/meeting-of-parliament-02-02-2022?meeting=13561&iob=123048#orscontributions\\_M5613E438P774C2376526](https://www.parliament.scot/chamber-and-committees/official-report/what-was-said-in-parliament/meeting-of-parliament-02-02-2022?meeting=13561&iob=123048#orscontributions_M5613E438P774C2376526)

SPT believes this recommendation should not be solely focused on the most congested bus routes. There is a need to deliver high quality bus corridors to make bus *more* attractive than car travel to achieve modal shift, which does not necessarily require an existing corridor to be congested significantly. It is the outcome of modal shift that is important, supported by faster journey times and improved reliability. Widening the scope in this way would allow for some areas in our region that will not directly benefit from Clyde Metro mass transit interventions to more readily make the case for funding for bus priority measures. This includes areas like Inverclyde and Ayrshire inter-town routes, which are affected by traffic congestion but not necessarily at the 'highest' levels as set out in the recommendation text.

SPT believes that the final STPR recommendations should more clearly set out a description of strategic bus priority measures, and how these can vary in scale and scope i.e. from Quality Bus Corridors to Guided Busways. SMART objectives must be developed for these forms of bus interventions, inclusive of objectives based on national best practice standards for bus journey times and reliability in motorway, urban, town and rural settings. Indeed, with reference to the latter, consideration must be given to a strategy for rural bus services, given the myriad challenges it faces.

There is a need to better link this recommendation with the Clyde Metro recommendation. It is essential that route and network development of Clyde Metro, bus priority routes and active freeways are highly integrated from the outset as there is insufficient space to deliver all interventions on all main routes. Transport Scotland should be clear what criteria they expect to be applied in determining modal priority for specific routes and overall network development.

### **Recommendation 15 – 17 - strategic rail enhancements**

The SPT region has strong cross-regional labour markets, much of this facilitated by the dense suburban rail network which serves many of the rural, remote and coastal areas in our region affected by depopulation of younger and working age residents and increasing isolation from economic opportunities. SPT believes the role of rail in our region is not sufficiently represented in STPR2 and, indeed, is potentially undermined by the statement that future rail investment is targeted at the strongest city-to-city markets. SPT feels this broad statement does not recognise regional differences in rail infrastructure and usage. It is true that COVID has disrupted historic patterns of rail usage, but it is not at all clear that this will continue in years to come and there should be a stronger position with regard to maximising the role of the rail in promoting modal shift, reducing transport emissions and reducing car km for every day journeys. It is worth highlighting that, at the request of Transport Scotland, the Regional Transport Partnerships of Scotland are exploring with ScotRail and Network Rail how RTPs can have a stronger role in rail in their regions in future, and a concordat in that regard is in development.

SPT also believes that HMNB Clyde rail connectivity should be further considered for inclusion in STPR2. The Maritime Change Project is a £1.3 billion development at the largest single-site employment location in Scotland. It is difficult to understand how this scale of development has failed to be included in STPR2 and we would ask for further details of the Phase 2 process in relation to this option. This also links to our wider point that the scope of 'strategic rail enhancements' (and the exclusion of any complementary local rail enhancements in STPR2) does not reflect the role of rail in the SPT region, specifically in this case the opportunity to link local rail enhancements in the wider regional rail network with the Metro recommendation.

### **Recommendation 18. Supporting integrated journeys at ferry terminals**

This recommendation is welcomed. However, a key challenge in the SPT region is increasing numbers of cars carried on ferries, leading to congestion around ferry terminals, capacity issues for island residents, and loss of passengers on island bus services. Previous analysis by SPT found that the number of cars carried on Clyde ferry services in the SPT region increased by 24% between 2014 and 2019 whilst passenger numbers increased by 14%. Investment in ferry infrastructure needs to be aligned with the review of ferry ticketing as well as ensuring that existing public transport connections are maintained. All of the mainland, non-peninsular ferry terminals in the SPT region are well-located for rail connections (i.e. Gourock, Ardrossan, Largs, Wemyss Bay) and maintaining a good level of rail service is essential to achieving a modal shift for the whole journey i.e. leaving car at home altogether whilst still supporting island visitor economies.

### **Recommendation 19. Infrastructure to provide access for all at railway stations**

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SPT supports this recommendation, but highlights that new technologies to improve mobility and access, whilst important, cannot be substitutes for an accessible physical environment. Planning should extend beyond station footprints, working with partners to consider the main routes to stations and dovetailing with STPR2 active travel recommendations, to help achieve accessible door to door journeys. It should be clarified how this recommendation links to existing Network Rail Access for All programme.

### **Recommendation 20: Investment in MaaS and DRT**

SPT supports integration of DRT and Community Transport (CT) with Mobility as a Service (MaaS) solutions to deliver a more integrated network; however, MaaS has a much wider role in integration and modal shift than what is suggested by the way MaaS is represented in STPR2. MaaS is a solution predominantly suited to urban areas where there is a dense provision of transport services. SPT believes MaaS investment should be dovetailed with Recommendation 23: Smart and Integrated Ticketing as the systemic and structural challenges to achieving fully integrated ticketing & payments needs to be tackled before MaaS can be truly beneficial and scaled up. The role of MaaS in delivering wider objectives may be substantially larger than suggested in the 2018 Smart and Integrated Ticketing & Payments Delivery Strategy, which Recommendation 23 proposes building on.

As SPT previously raised in our response to Phase 1 recommendations, DRT and CT are accessible transport solutions in all contexts, not just 'rural, island and peripheral areas.' This is because DRT and CT meet accessibility needs not met by mainstream public transport, which is not only a function of low demand, but includes personal mobility accessibility needs and communities of interest e.g. hospital outpatients. Additionally, DRT and CT can provide transport solutions for low demand movements in urban settings, and this may be increasingly important in future and could be integrated with Clyde Metro to maximise benefits.

Whilst SPT supports this recommendation generally, we would highlight existing evidence of collaborative partnerships with, for example, the health sector, community operators and non-transport council departments, which are proving useful in making a significant change to existing provision. It is essential that any guidance or frameworks stemming from this recommendation are not overly 'top down' or 'one size fits all' as Community Transport and Demand Responsive Transport work best as bottom up with a deep understanding of specific community needs.

We would also highlight that these approaches require additional revenue funding in order to be mainstreamed into service provision beyond any pilot stage. Any potential revenue efficiencies to be achieved across public sector budgets means achieving agreement on integration of budgets and assets across multiple departments and bodies. We urged, in the phase 1 response, that these challenges be seriously considered in a meaningful way as the recommendation was further developed. Rural and disadvantaged communities will be ill-served by any 'start-stop' approaches that have no realistic means of being sustained, particularly if there is danger of undermining any existing transport services.

It is important that this recommendation does not undermine the case for continued funding and investment in fixed route rural transport services where these are efficiently and effectively meeting community needs. Passengers and communities do not necessarily prefer on-demand services in rural areas. Fixed route rural bus networks are valued by local communities and important to community identity and cultural and economic connections to market towns.

### **Recommendation 21. Improved public transport passenger interchange facilities**

SPT supports this recommendation and welcomes additional funding for passenger facilities. However, bus facilities generally have a local or cross-authority function only. Additionally, SPT operates bus stations and, with our local authority partners, has been successfully delivering significant improvement to bus passenger facilities for many years. SPT feels that any future funding stream linked to this recommendation should not be disproportionately 'top down' as excellent experience already exists within local and regional partners to deliver on this recommendation. Further consideration to how this recommendation fits with Clyde Metro is required given that high quality multi-modal interchange will form a vital component of this intervention.

## **Recommendation 22: Framework for mobility hubs**

The framework should consider how hubs will be 'future proofed' for the way transport services may be accessed and operated in future as well as the changing requirements of ultra-low emission vehicles. The framework should have a strong practical focus on how existing sites/hubs can be redeveloped and any demonstrator/pilot projects should include existing sites for redevelopment/alteration, as it is unlikely that most mobility hubs will be altogether 'new'. There should also be a specific focus on the way hubs could help improve integration of rural transport services with mainline networks and services. The framework should include consideration of routes to hubs and be streamlined with other STPR2 recommendations for active travel, public transport, ticketing and EV infrastructure, as appropriate, as part of an integrated transport system approach.

## **Recommendation 23. Smart, integrated public transport ticketing**

SPT supports the principle of providing convenient, flexible and attractive public transport through smart and integrated ticketing and payments; however, this recommendation appears to be very broad/general and does not provide any level of focus to the task of "recommending the transport investment priorities for Scottish Ministers for the next 20 years".

In order to build on the interventions and services delivered from the 2018 Smart and Integrated Ticketing & Payments Delivery Strategy, it would appear necessary to refresh that Strategy to set a new and more current baseline.

There is a strong local and regional aspect to smart and integrated ticketing and payments as most journeys are made at a local and regional spatial scale, and relatively few are at a national scale. As a result, investment at regional scale may have the most strategic benefit and RTPs must be a key partner in the further development of this recommendation into specific interventions. There is a potential path of evolution from smart/integrated ticketing and payments to Account Based Ticketing (ABT) and Mobility as a Service and it would be appropriate to reference specific actions relating to ABT and MaaS within Recommendation 23.

#### 4. Decarbonising Transport

**Q22.** To what extent do you agree or disagree that the recommendations under this theme contribute to Decarbonising Transport?

	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Don't Know / No Opinion
Recommendations (24-28):						
24. Ferry vessel renewal and replacement and decarbonisation	x					
25. Rail decarbonisation	x					
26. Decarbonisation of bus network	x					
27. Behaviour change and modal shift for freight	x					
28. Zero emissions vehicles and infrastructure transition	x					

**Q23.** Which of these recommendations would you prioritise to contribute to Decarbonising Transport?

	High Priority	Medium Priority	Low Priority	Do not support this recommendation	Don't Know / No Opinion
Recommendations (24-28):					
24. Ferry vessel renewal and replacement and decarbonisation	x				
25. Rail decarbonisation	x				
26. Decarbonisation of bus network	x				
27. Behaviour change and modal shift for freight	x				
28. Zero emissions vehicles and infrastructure transition	x				

**Q24.** Do the recommendations under this theme address the transport needs of your local or regional area or the people your organisation represents?

Yes  No  Don't Know / No Opinion

**Q25.** Please provide any additional comments you have on the theme Decarbonising Transport and the recommendations within it

#### **Recommendation 24: Ferry vessel renewal and replacement and decarbonisation**

In February 2021, CMAL on behalf of Scottish Government commenced a major programme to replace up to seven small "loch class" vessels serving the Clyde & Hebrides Ferry Services (CHFS) network due to operational life expiry. The programme aims to achieve a very substantial renewal of the small vessel fleet during the next 10 years. CMAL is leading the programme, supported by Transport Scotland and CalMac in a working group.

It should be noted that provision of additional vessels very often requires altered or new shoreside infrastructure, this has been the case at Brodick and will be the case at Ardrossan and there are also implications at Largs and Cumbrae. In some locations, shore-side redevelopments can be challenging whilst wholesale re-location of facilities can be very expensive, unfeasible and potentially inconvenient for passengers.

Ferry and terminal replacement will also have to take cognisance of the change in vehicle sizes since they were last constructed, mainly 1970s and 80s, essentially meaning that a vessel built now will have



to be notably bigger in order to carry the same number of vehicles that the vessel it is replacing, obviously growth in demand will mean that, in some instances, considerably larger (or additional) vessels and shoreside infrastructure might need to be procured to meet this demand. Similarly, footprints for shore infrastructure are now substantially larger than before both in terms of ramps and link-spans as well with regard to marshalling areas.

Over the next c. 3-8 years, CMAL expect the c.£550m spend will comprise six major ferries, plus ten smaller vessels (7 “Loch” class vessels to be replaced as part of smaller vessel project plus 3 vessels in on-going process) as well as three replacements for chartered ferries on Clyde routes from Gourrock.

SPT obviously welcomes this level of investment for island and more remote communities. The needs of island communities both in terms of access as well as with regard to sustainable economic development (very often tourist based) should remain paramount in this process. The Capital and on-going operational costs are, by their very nature, very high and it is noticeable that investment in vessels and infrastructure has, in the past and up to this time, tended to be undertaken as vessels and infrastructure becomes time expired rather than via a programme of required incremental improvements being devised in a more planned manner. It is to be hoped that the major investments planned and outlined as part of STPR2 will signal the start on an on-going replacement strategy that will reassure island communities that their essential ferry services can be delivered in the future via a robust and timely procedure, while importantly also reducing carbon impacts.

#### **Recommendation 25: Rail decarbonisation**

SPT supports this recommendation in principle; however, investment in West Highland Line services, Glasgow South West and Maryhill line is also required to cut carbon emissions from rail transport. In particular, rural railways provide opportunity to reduce car km from residents of rural areas and leisure trips into rural areas.

#### **Recommendation 26: Decarbonisation of bus network**

SPT supports this recommendation and welcomes recognition that funding criteria needs to be widened to include all types of operators. Smaller bus operators also require support with upgrading of fleets, depots and local energy infrastructure. This can be particularly challenging for depots located in rural areas and where access to suitable electricity grid capacity is more challenging. The full benefits of bus network decarbonisation will only be released through wider modal shift from private car to bus, which can accelerate the decarbonisation of transport more generally.

#### **Recommendation 27: Behaviour change and modal shift for freight**

SPT supports this recommendation in principle but feels that the recommendation could be stronger and more specific given that there are existing rail freight and modal shift strategies nationally and within the industry. STPR2 recommendations for rail infrastructure need to reflect the likely make up of a ‘net zero freight and logistics network’ centred on a road to rail freight modal shift policy.

#### **Recommendation 28: Zero emissions vehicles and infrastructure transition**

SPT supports this recommendation in principle but feel that it lacks ambition, detail and sense of urgency in relation to the need to accelerate transition to zero emission road transport vehicles. There is substantial detailed work already carried out by local, regional, and national partners that could be utilised to make this a stronger and more detailed recommendation on specific interventions by mode.

## 5. Increasing Safety and Resilience on the Strategic Transport Network

**Q26.** To what extent do you agree or disagree that the recommendations under this theme contribute to Increasing Safety and Resilience on the Strategic Transport Network?

	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Don't Know / No Opinion
Recommendations (29-38):						
29. Access to Argyll A83	x					
30. Trunk road and motorway safety Improvements	x					
31. Trunk road and motorway network climate change adaption and resilience	x					
32. Trunk road and motorway network renewal for reliability, resilience and safety	x					
33, 34, 35 Enhancing Intelligent Transport Systems		x				
36. Strategy for improving rest and welfare facilities for hauliers		x				
37. Improving active travel on trunk roads through communities		x				
38. Speed management plan	x					

**Q27.** Which of these recommendations would you prioritise to contribute to Increasing Safety and Resilience on the Strategic Transport Network?

	High Priority	Medium Priority	Low Priority	Do not support this recommendation	Don't Know / No Opinion
Recommendations (29-38):					
29. Access to Argyll A83	x				
30. Trunk road and motorway safety Improvements	x				
31. Trunk road and motorway network climate change adaption and resilience	x				
32. Trunk road and motorway network renewal for reliability, resilience and safety	x				
33, 34, 35 Enhancing Intelligent Transport Systems		x			
36. Strategy for improving rest and welfare facilities for hauliers			x		
37. Improving active travel on trunk roads through communities		x			
38. Speed management plan	x				

**Q28.** Do the recommendations under this theme address the transport needs of your local or regional area or the people your organisation represents?

Yes  No  Don't Know / No Opinion

**Q29.** Please provide any additional comments you have on the theme Increasing Safety and Resilience on the Strategic Transport Network and the recommendations within it  
As SPT has already raised, STPR2 should be more inclusive of issues for locally and regionally strategic roads that do not comprise the trunk road network in order to tackle spatial socio-economic inequalities within Scotland and help enable delivery of regional economic strategies.

**Recommendation 29: Access to Argyll A83**

SPT's previous comments in Phase 1 remain relevant.

**Recommendation 31: Trunk road and motorway network climate change adaption and resilience**

SPT welcomes inclusion of A82, A83, A77, and A78 in this recommendation. Additionally, SPT urges that the A8 in Inverclyde is included in this recommendation. The A8 is included in the SEPA; Clyde and Loch Lomond Local Plan District Flood Risk Management Strategy (2015) as a route susceptible to flooding and subsequent disruption to transport networks including operation of bus services and access to Ocean Terminal, ferry services to Argyll and rail connectivity.

**Recommendation 36: Strategy for improving rest and welfare facilities for hauliers**

The recommendation should go beyond developing a strategy and be representative of the 20-year time period of the STPR2.

**Recommendation 38. Speed management plan**

SPT believes the language in STPR2 should be stronger, with a presumption in favour of comprehensive coverage of 20mph speed limits in built up areas

## 6. Strengthening Strategic Connections

**Q30.** To what extent do you agree or disagree that the recommendations under this theme contribute to Strengthening Strategic Connections?

	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Don't Know / No Opinion
Recommendations (39-45):						
39. Sustainable access to Grangemouth Investment Zone			x			
40. Access to Stranraer and ports at Cairnryan		x				
41. Potential fixed links in Outer Hebrides and Mull			x			
42. Investment in port infrastructure			x			
43. Major station masterplans	x					
44. Rail freight terminals	x					
45. High speed and cross Border rail enhancements	x					

**Q31.** Which of these recommendations would you prioritise to contribute to Strengthening Strategic Connections?

	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Don't Know / No Opinion
Recommendations (39-45):						
39. Sustainable access to Grangemouth Investment Zone						
40. Access to Stranraer and ports at Cairnryan	x					
41. Potential fixed links in Outer Hebrides and Mull						
42. Investment in port infrastructure						
43. Major station masterplans	x					
44. Rail freight terminals	x					
45. High speed and cross Border rail enhancements	x					

**Q32.** Do the recommendations under this theme address the transport needs of your local or regional area or the people your organisation represents?

Yes  No  Don't Know / No Opinion

**Q33.** Please provide any additional comments you have on the theme Strengthening Strategic Connections and the recommendations within it

### Recommendation 40: Access to Stranraer and ports at Cairnryan

SPT supports this recommendation and highlights that a number of the named improvements support the objectives of the Ayrshire Growth Deal. It is crucial that the recommendation is developed into specific interventions at pace as many of the locations named in the recommendation, including Bellfield

Interchange, have long standing challenges that need to be addressed to enable strategic development and investment in Ayrshire.

SPT supports improving the rail station accessibility at Stranraer and improving connections between Stranraer rail station and Cairnryan port and ferry terminals as a large proportion of passenger travel to Cairnryan originates in the greater Glasgow area so this provides improved opportunity for modal shift. At the same time, SPT believes there should be further consideration of rail improvements south of Ayr to Girvan and Stranraer to improve strategic connectivity between the region by more sustainable modes.

#### **Recommendation 43: Major station masterplans**

SPT supports this recommendation. The masterplan for Glasgow Central must be planned to accommodate High Speed Rail (HSR) as the development of HSR in Scotland must include a direct connection to Glasgow. The recommendation should include better integration between Glasgow Central Low Level and High Level. The recommendation should aim to maximise benefit of adjacent bus infrastructure and public realm improvements delivered by SPT and Glasgow City Council and opportunities to improve connections with Glasgow Queen Street.

#### **Recommendation 44: Rail freight terminals**

SPT believes there should be clarity on how this proposal relates to recommendation 27. SPT supports an updated market study and RTPs should be involved in that process. It is not clear if this recommendation is only for the market study and if there will be additional funding for rail freight terminal infrastructure (either via Freight Facilities Grant or other means). It will be important to be able to deliver on the market study outcomes and the recommendation should include examples of likely interventions.

#### **Recommendation 45 High speed and cross Border rail enhancements**

SPT supports this recommendation including inclusion of Glasgow South West (GSW) for further assessment. GSW enhancement presents opportunities to tackle spatial socio-economic inequalities, enhance Ayrshire strategic connectivity and unlock additional rail freight opportunities. SPT supports West Coast Mail Line as *the* key High Speed Rail line for Scotland with direct connection to Glasgow. SPT urges Transport Scotland to publish a revised timescale for key decisions regarding future of High Speed Rail in Scotland. We would highlight too that greater attention could be given to connections to Europe.

## **STPR2 RECOMMENDATIONS AND OTHER SCOTTISH GOVERNMENT POLICY**

STPR2 recommendations aim to contribute to five key objectives that are consistent across Scottish Government Policy. These are:

- takes climate action
- addressing inequalities & accessibility
- improving health & wellbeing
- supporting sustainable and inclusive economic growth
- improving safety & resilience

This ensures that STPR2 recommendations:

- align with relevant Scottish Government policy, delivery and investment plans in order to help deliver their priorities
- help to deliver the priorities set out in the National Transport Strategy (NTS2) and its Delivery Plan
- meets the transport planning objectives and stated purpose of STPR2 (as identified by the STPR2 development process)

**Q34.** Prior to this consultation were you aware of the list of Scottish Government policies below, which STPR2 aligns with and supports?

	Yes	No	Don't Know / No opinion
Take action against climate change	X		
Decarbonising transport	X		
Reducing car use	X		
Encouraging greater walking, wheeling and cycling	X		
Addressing inequalities, such as:	X		
• Child poverty	X		
• Affordability of transport	X		
• Access to transport	X		
Transport as an enabler of inclusive economic growth	X		
Providing a safe transport system	X		
Providing a reliable and resilient transport system	X		

**Q35.** Prior to this consultation were you aware of the Scottish Government policy documents to which STPR2 aligns with and supports?

	Yes	No	Don't Know / No opinion
National Transport Strategy 2 (NTS2)	X		
National Planning Framework (NPF4)	X		
Climate Change Plan Update & Route Map	X		
Infrastructure Investment Plan	X		
Just Transition	X		
Cleaner Air for Scotland 2 & Delivery Plan	X		
National Performance Framework	x		

**Q36.** To what extent do you agree or disagree that the STPR2 recommendations reflect and will contribute to the aims of government policy?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly Disagree
- Don't Know / No Opinion

**Q37.** Please provide any additional comments you have on the STPR2 recommendations' contribution to Government policy?

It is important that how the STPR2 contributes to wider Government policy is clearly demonstrated. We would highlight that the contribution of STPR2 to reducing car use is unlikely to be very strong unless its recommendations are implemented alongside complementary demand management measures. This includes road and parking pricing and reduction in road capacity for private cars.

## **Strategic Environmental Assessment (SEA) & Other Impact Assessments**

A statutory Strategic Environmental Assessment (SEA) ensures the potential impact of transport projects on the environment are considered by STPR2. Other impact assessments, which have been undertaken to review how STPR2 can have a positive impact on groups in society as part of STPR2, are listed below:

- The Strategic Environmental Assessment (SEA)
- Equality Impact Assessment
- Island Communities Impact Assessment
- Fairer Scotland Duty Assessment
- Child Rights and Wellbeing Impact Assessment

### **The Strategic Environmental Assessment (SEA)**

**Q38.** To what extent do you agree or disagree with the overall findings of the SEA?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly Disagree
- Don't Know / No Opinion

**Q39.** The SEA has reviewed plans, policies and programmes relevant to STPR2. Are there any others that should be considered?

Yes     No     Don't Know / No Opinion

If Yes is selected, please provide details here:

**Q40.** The SEA sets out the current national and regional baseline environment conditions and future trends. Do you have any comments on this baseline data?

Yes     No     Don't Know / No Opinion

If Yes is selected, please provide details here:



**Q41.** Are there any particular issues, problems or opportunities you would like to mention that have not been captured within the SEA? Yes  No  Don't Know / No Opinion

**Other Impact Assessments**

**Q42.** Please provide any comments on the findings of the **Equality Impact Assessment**

**Q43.** Please provide any comments on the findings of the **Island Communities Impact Assessment**

**Q44.** Please provide any comments on the findings of the **Fairer Scotland Duty Assessment**

**Q45.** Please provide any comments on the **Child Rights and Wellbeing Impact Assessment**

## **APPENDIX B**

### **Scotland 2045 - The Fourth National Planning Framework - SPT Response**

#### **Part 1 - A National Spatial Strategy for Scotland 2045**

##### **Q5: Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?**

Transport is a derived demand created as a result of development decisions. The location of the development, its connectivity with other places, and the types of transport modes and infrastructure that facilitate travel, are significant determinants on the ways in which people will choose to travel and the ways goods and materials are moved around.

While reducing the need to travel unsustainably and supporting local living are key components in meeting the national targets for climate change emissions reductions, car km reductions and driving up the quality of our places, the importance of the strategic and local connections between places must be reflected more clearly across the four pillars of the spatial strategy. This must include the strategic transport connections required to ensure business and industry thrive and to support the decarbonisation of the transport sector. The importance of connections in support of leisure travel, domestically and internationally, should also be recognised.

#### **Spatial principles for Scotland 2045**

##### **Q6: Do you agree that these spatial principles will enable the right choices to be made about where development should be located?**

**Compact Growth:** Increased density of settlement will support reducing the need to travel unsustainably, making the best use of existing infrastructure and public transport services and the development of Clyde Metro.

**Local Living:** The importance of promoting and facilitating public transport and digital connections should be recognised within this principle as well as active travel and digital connectivity. Reference should also be made to the potential for local living to reducing journey distances (in line with 20% reduction in car km) as well as reducing the need to travel unsustainably.

#### **Action Areas for Scotland 2045**

##### **Q7: Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?**

There are existing regional geographies including those of the indicative Regional Spatial Strategies. City Region and Growth Deals, and the Regional Transport Working Groups that informed STPR2, focus. The broader Spatial Strategy Action Areas included in the draft NPF4 risk masking priorities in the respective regions, especially in the Central Region.

The Spatial Strategy Action Areas fail to fully recognise the strategic connections and the existing regional identities and there is a disconnect between the spatial representations of the areas on the diagram and the boundaries identified in the text. Specifically:

- Parts of Argyll and Bute are within the Central Urban Transformational Area diagrammatically but there is no reference to this in the text; and

- Inland Ayrshire is entirely in the Southern Sustainability Area diagrammatically but entirely in the Central Urban Transformational Area in the text (and only considered to link to the Southern Sustainability Area).

This lack of clarity could undermine the ability to take forward the regional priority actions through the Local Development Plan process and other Statutory Policy documents.

In addition, while it is recognised that additional supporting information and evidence is provided through the website, this information does not form part of the Statutory Development Plan and therefore does not provide the relevant supporting role for the development of Regional Spatial Strategies and Local Development Plans. Nor do the Action Areas provide a framework for Regional Spatial Strategies which would enable further detailed exploration of the actions at a geographically specific regional level, in line with existing working partnerships, that would help to facilitate cross boundary cohesion and deliverability. The relationship between the Action Areas and the Regional Spatial Strategies needs to be further explored.

Finally, there is an over generalisation of the characteristics of the Action Areas and, therefore, the framework of priority actions. For example, Central Scotland is referred to as the **Central Urban** Transformational area. The geographies referenced within this area range from areas which are Class 6 Remote Rural to Class 1 Urban and include the Loch Lomond and Trossachs National Park, therefore considering this area as only urban is misleading. Consequently, Ayrshire is underrepresented and therefore its connectivity needs are not adequately reflected.

Strategic connections which must be further reflected within the relevant Action Areas are:

- Links between Argyll and Bute and Glasgow Conurbation reflecting the strategic importance of the A82 and A83 and cross-boundary rail corridor, as recognised through the Strategic Transport Projects Review (STPR2);
- Links between Ayrshire to the east and the south towards England, as identified in the Ayrshire Regional Spatial Strategy; and
- Island connectivity.

### **Central Urban Transformation**

#### **Q14: Do you agree with this summary of challenges and opportunities for this action area?**

The Arran and the Ayrshire coast, the Clyde estuary and parts of Argyll and Bute face many of the same climate change challenges outlined in relation to the North and West coastal innovation area. The resilience of the transport network is a key issue for these areas and while this is partly captured in the STPR2 Phase 2 recommendations in relation to trunk roads, railways and ferry infrastructure it should also be recognised here.

The development of HMNB Clyde provides both significant challenges and opportunities for the Helensburgh and Lomond area of Argyll and Bute, particularly in relation to off-site infrastructure and connectivity requirements necessary to support the largest single-site employment location in Scotland. These challenges and opportunities should be recognised.

As noted above, there is a significant rurality within this area. The needs, opportunities and challenges associated with such rurality are not recognised, including the connectivity, population decline and community resilience issues experienced by these areas.

The areas of focus for this action area must be expanded to include the rural hinterland included within it.

There should be further recognition of the importance of Glasgow and Prestwick airports and their surface access requirements.

The Bellfield Interchange on the A77 is a key infrastructure priority for Ayrshire. This should be recognised

#### **Q15: What are your views on these strategic actions for this action area?**

The actions fail to recognise the diverse nature of the area. Additional actions should be considered in relation to:

- Addressing depopulation;
- Rural and island accessibility;
- Reinventing and future proofing town centres towards a low carbon future, many of our town centres are of significant economic importance at a regional level and face similar challenges to our city centres; and
- Strengthening resilience and decarbonising connectivity, including the provision of infrastructure to enable the uptake of zero emission vehicles and viable alternatives to private car use, is essential in meeting climate change targets. This should also recognise the hub and gateway functions of Glasgow and Prestwick airports in terms of national and international connectivity for business and tourism.

**13. Pioneer low-carbon, resilient urban living:** Sustainable connectivity, active travel, public transport and shared transport is key to low carbon living within a network of local neighbourhoods, towns and city centres. Sustainable, low carbon public transport provision is as important to resilient urban living as an active travel network. Dual consideration is required.

A people-centred approach is, on its own, unlikely to be sufficient to reverse the impact of previous car-based design and development decisions. Policies and approaches that support car restraint and demand management, which include reallocation of road space from cars to active and sustainable travel modes, strong parking policies and road pricing, are required to meet climate change targets and reduction in car km.

**15. Accelerate urban greening:** Green infrastructure that supports the development of active travel networks also forms part of the green network.

**16. Rediscover urban coasts and waterfronts:** Recognition of Ayrshire/outer Clyde coastal tourism and leisure opportunities is required, in line with the Ayrshire Growth Deal, albeit much of area is not specifically urban.

**18. Invest in net zero housing solutions:** While the diversification of areas which are largely residential in nature is supported in principle, achieving this will be a challenge and requires a clear delivery pathway, including defined roles and responsibilities for different partners across the private, public and third sectors.

**20. Reimagine development on the urban fringe:** This action must recognise that this part of Scotland includes a range of rural areas that cannot simply be considered part of the urban fringe including parts of Argyll and Bute, Ayrshire, and Lanarkshire as well as Loch Lomond & the Trossachs National Park.

**21. Improve urban accessibility:** In line with STPR2, Glasgow Metro should be referred to as Clyde Metro. Clyde Metro should be seen as an enhancement to, rather than a displacement of, current transport provision. This action should reflect the importance of existing bus, rail and Subway provision, alongside the need for enhancements to transport interchange and infrastructure standards.

Rural and island accessibility is also an issue that should be addressed in this area.

**Q18: What are your overall views on this proposed national spatial strategy?**

Consideration should be given to the spatial needs and challenges faced by the freight industry. Such consideration should include what support the sector needs in the following areas:

- The decarbonisation journey and the relationship with energy networks;
- infrastructure requirements to support the shift from road to rail;
- infrastructure requirements to minimise the impact of freight and logistics on our towns and cities. This should include consideration of consolidation centres and opportunities, where appropriate, to include provision for cycle logistics as part of active travel route development.

## **Part 2 - National developments**

**Q19: Do you think that any of the classes of development described in the Statements of Need should be changed or additional classes added in order to deliver the national development described?**

### **2. National Walking, Cycling and Wheeling Network**

SPT supports this national development. It is crucial to accelerate delivery of high-quality active travel infrastructure to meet climate change targets and improve health.

The need for road space reallocation to deliver a National Walking, Cycling and Wheeling Network should be recognised within the supporting text in NPF4 alongside the intrinsic relationship between active travel and green networks and the role of green infrastructure in this national development should be set out.

There is also the opportunity for the needs of local logistics movements achieved through the use of cargo bikes to be considered alongside the development of this network.

The designation and classes of development should also be clarified. The 'The Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009' does not include active travel infrastructure within the transport infrastructure category of major development, therefore such infrastructure would be considered under "other development." It is not clear how this designation would support the development of an integrated and cohesive network.

The primary aim of NPF4 in relation to active travel must be to enable delivery of high-quality infrastructure at an accelerated pace commensurate with achieving national targets for a 20% reduction in car km by 2030 and statutory carbon emission reduction targets. Therefore, it is crucial that the spatial framework and delivery mechanisms for this national development are clarified including the relationship with STPR2 Active Travel Infrastructure recommendations.

### **3. Urban Mass/Rapid Transit Networks**

SPT welcomes this national development which supports the Spatial Principle of Compact growth within the city region and will support a place-based approach at regional, city-wide and local level, building on the concepts set out in ClydePlan.

Alignment with STPR recommendations 11-Clyde Metro, 12-Edinburgh & South East Scotland Mass Transit and, 13-Aberdeen Rapid Transit should be made clear, recognising that STPR is yet to be approved.

Clyde Metro aligns with National Development 14: Clyde Mission. This relationship should be highlighted.

Clyde Metro has the potential to facilitate the transformative change required in terms of investment in the public transport network of the west of Scotland which SPT has long advocated. However, we believe that Clyde Metro should be seen as an enhancement to, rather than a displacement of, current transport provision. The national development should reflect the role of local bus services and Bus Rapid Transit as well as the Subway in Clyde Metro. The benefits of integrating Clyde Metro with active travel should also be reflected.

The designation should be linked to forthcoming specific interventions identified through the Clyde Metro business case processes rather than the high level STPR recommendation.

The designation and classes of development must:

- be clear that development relates to new and existing mass transit modes that may come under the banner of Clyde Metro, including local bus, BRT and Subway; and
- clarify that only track or road infrastructure associated with public mass/rapid transit is included in the development.

To support the business case for Clyde Metro, the principles of compact growth and sustainable development, associated enabling/ancillary development such as high density mixed used development linked to Metro Interchanges, stations or key stops should form part of the designation for this national development.

#### **10. Hunterston Strategic Asset**

The national development should include the sea, road and rail connectivity and access requirements for the site and be linked to STPR2 recommendations on improving resilience of trunk road network including the A78.

#### **12. Strategic Renewable Electricity Generation and Transmission Infrastructure**

This National development should recognise and respond to the increased energy demands and infrastructure requirements of the decarbonisation of transport, including public transport and mass transit, road and rail freight and logistics and personal travel.

#### **13 High Speed Rail**

We welcome the inclusion of a national development that supports increased rail capacity and connectivity between Scotland and England. The relationship with STPR 2 recommendation 43 (Major station masterplans) and Recommendation 45 (High speed and cross Border rail enhancements) should be set out, including the need for further work to determine the future of High-Speed Rail in Scotland. SPT supports enhancements to the WCML as the potentially key High Speed Rail line for Scotland with direct connection to Glasgow.

The designation and classes of development should be expanded to include major station masterplans and high-speed rail termini. SPT believes the development of High-Speed Rail in Scotland must include a direct connection to central Glasgow, preferably Glasgow Central station.

#### **14. Clyde Mission**

The inclusion of Clyde Mission as a national development is welcomed. The need for improved sustainable transport in support of the five mission areas should be emphasised and the relationship with Clyde Metro highlighted.

#### **18. Stranraer Gateway**

Inclusion of the transport links to Loch Ryan and Stranraer within this national development is welcome. The relationship with STPR Recommendation 40: Access to Stranraer and ports at Cairnryan should be set out. The designation and classes of development should be expanded to include improved connections between Stranraer rail station and Cairnryan ferry terminals.

## **Part 3 - National Planning Policy**

### **Policy 2: Climate emergency**

#### **Q 24: Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?**

The principle of designing development to minimise emissions is welcome. However, as transport emissions accounted for 36% of Scotland's greenhouse gas emissions in 2018, a key aim of this policy should be to reduce transport emissions associated with new development. There should be explicit reference to transport emissions and their implications within the policy.

### **Policy 7 – Local Living**

#### **Q29 Do you agree that this policy sufficiently addresses the need to support local living?**

The policy principles proposed will support the concept of local living, albeit the concept will be applied differently by place reflecting different contexts and characteristics. More local living means every day destinations such as shops and services should be more easily accessible by active travel and public transport where transport services and infrastructure are available to support these sustainable travel behaviours. It is acknowledged that interventions to help people live well locally are considered a key component of the Route Map to achieve a 20 per cent reduction in car kilometres and specific reference of this in Policy 7 would be welcome.

However, the policy principles alone are not sufficient to achieve the step change in behaviour required to meet the national targets for climate change emissions reductions and car km reductions. There are key challenges in relation to the delivery and sustainability of the services, facilities and infrastructure required to support the principle of 20-minute neighbourhoods, both within new development and when retro-fitting the concept into existing communities, particularly predominately residential communities. It is essential that a clear delivery pathway is developed, including defined roles and responsibilities for different partners at local, regional and national levels and private, public and third sectors. It is clear that local authorities will be the lead partner in delivering this policy and it is essential that local authorities are enabled and funded appropriately by central government, given the extent to which the achievement of key government goals (e.g. 20% car km reduction target) is conditional on the concept of the 20-minute neighbourhood being realised.

Connectivity within and between neighbourhoods is essential to supporting local living. The network of centres approach outlined in policy 24 and mechanisms to encourage sustainable travel behaviour, including Policy 8 Infrastructure First and Policy 10 sustainable travel & transport with its approach to private car constraint, are key to encouraging more local living. There must therefore be a co-ordinated approach to implementing these policies. In addition, it should be recognised there are cross boundary considerations within the concept local living. Therefore, there should be consideration of the need for neighbouring planning authorities to work together on these matters when appropriate.

Provision to support zero-emission last mile logistics, including community delivery points within neighbourhoods would be welcome.

Clarity would be welcome on the specific considerations that development proposals are required to address in relation to Policy 7 (b), and the transport assessment requirements in Policy 10 (c). Policy 10 (c) refers to new development likely to generate significant person



trips, while 7 (b) refers to all development proposals, but does not explain what is meant by 'consideration'.

### **Policy 8: Infrastructure First**

#### **Q 30: Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure-first approach to planning?**

The principle of this policy is supported. Key challenges for transport infrastructure and service provision relates to the timing of the intervention, its cumulative impact and the funding mechanisms available. There is a body of evidence demonstrating that major life events such as moving home potentially provide excellent opportunities to embed new, more sustainable behaviours. It is essential then that active travel infrastructure and public transport infrastructure and services are available at the first occupation to support this process.

We note that this policy requires Local Development Plans and delivery programmes to be informed by infrastructure delivery plans. This is a departure from current practice and will have significant implications for the way SPT contributes to the development planning process.

The infrastructure requirements to enable and facilitate sustainable movement of goods should not be overlooked.

Further work is required to ensure the levers are available to deliver an infrastructure first approach.

### **Policy 9: Quality homes**

#### **Q31: Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives?**

The delivery of high-quality sustainable homes is essential and where people live is a key determinant of their travel needs and behaviours. Direct linkages should therefore be drawn between this policy and the policies within the Liveable Places chapter that support reducing the need to travel and making the best use of existing transport networks.

### **Policy 10 - Sustainable Travel and Transport**

#### **Q32 Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?**

Transport is a function of derived demand created as a result of development decisions. The location of development, its connectivity with other places, and the types of transport modes and infrastructure that facilitate travel, are significant determinants on how people choose to travel. There is a significant challenge in reversing the impact of development decisions taken over the last 60 years that have increased and encouraged reliance on private car travel, and this challenge must be recognised adequately in national policy.

The planning system has as significant a role to play in shaping travel demand as it has in contributing to great places. This should be reflected in the introductory text for this policy.

The policy is consistent with the established policy frameworks and policy direction in NTS2 and supporting documents, and previous planning guidance. However, to deliver on the policy aspirations and create the seismic shift in travel demand and behaviour required to meet our climate change targets, particularly the 2030 targets, transport and land use planning need to accelerate the speed and scale at which action is taken.

Specifically, and essentially, policies that support car restraint and demand management, which include reallocation of road space from cars to active and sustainable travel modes, strong parking policies and road pricing, are required to meet the climate change targets and reduction in car km.

A priority for this policy should be to ensure that new development is actively reducing the need to travel, prioritising active and sustainable travel modes as well as facilitating any new or enhanced sustainable travel infrastructure required to achieve this. It should be made explicit within this policy that consideration should be given to how a development supports the reversal of unsustainable travel behaviour. Key to this will be the infrastructure first approach set out in Policy 8.

There should also be a requirement within the policy that for development or change of use that is likely to generate significant increase in person trips, mode share and modal shift targets are managed and monitored through an effective travel planning process funded by the developer.

Enabling uptake in zero emission vehicles is crucial to achieving climate change target commitments. The requirement for infrastructure provision is welcome.

This policy should be expanded to include consideration of the requirements of last mile deliveries and cycle logistic to support shifts to more sustainable and decarbonised “home” deliveries. This could include drop-off zones with low/no car development and provision for secure parcel delivery/storage within flatted or larger developments.

This policy should require consideration of the spatial requirements of the freight industry, including freight hubs, the infrastructure requirements to support the shift of freight from road to rail and infrastructure requirements to minimise the impact of freight and logistics on our towns and cities.

Finally, to reflect the cross-boundary nature of travel and travel demand there should be consideration of the need for neighbouring planning authorities to work together on these matters when appropriate.

### **Policy 12: Blue and green infrastructure, play and sport**

**Q34: Do you agree that this policy will help to make our places greener, healthier, and more resilient to climate change by supporting and enhancing blue and green infrastructure and providing good quality local opportunities for play and sport?**

This policy should recognise the role of green infrastructure in developing active travel networks that can also form part of the wider green network.

### **Policy 17: Sustainable tourism**

**Q38: Do you agree that this policy will help to inspire people to visit Scotland, and support sustainable tourism which benefits local people and is consistent with our net-zero and nature commitments?**

The transport and access requirements of sustainable tourism are, for the most part, different from everyday travels needs. This should be reflected in this policy.

### **Policies 24 to 27: Distinctive places**

**Q45: Do you agree that these policies will ensure Scotland's places will support low-carbon urban living?**

These policies are supported as they direct development to locations accessible by a range of travel modes and encourages the provision of goods and services within communities, while providing opportunity for diversification of uses.

We support the principle of the Town Centre first approach being applied to the provision of local services other than retail.

These policies will support reducing the need to travel unsustainably, making the best use of existing infrastructure and the development infrastructure such as Clyde Metro.

**Policy 29: Urban edges and the green belt**

**Q47: Do you agree that this policy will increase the density of our settlements, restore nature and promote local living by limiting urban expansion and using the land around our towns and cities wisely?**

This policy is supported as it will encourage the densification of communities and the reuse of brownfield land. It aligns with the compact city region approach of ClydePlan within the Glasgow City Region and will support reducing the need to travel unsustainably, making the best use of existing infrastructure and public transport services and the development of Clyde Metro.

**Policy 31: Rural places**

**Q49: Do you agree that this policy will ensure that rural places can be vibrant and sustainable?**

To facilitate alignment and consistency across all public policy areas, this policy should refer to the Scottish Government's Urban Rural Classification, using terminology consistent with the Classification.

It is acknowledged within Policy 7 - Local Living, that the application of the concept of 20-minute neighbourhoods will vary and need to be adjusted to support local circumstances, especially in rural areas.

To reflect this the final bullet under part c) of this policy should refer to contributing towards sustainable settlements *and* local living, rather than specifically 20-minute neighbourhoods, to give priority towards the objectives of localism rather than the specific concept.

**Policy 35: Coasts**

**Q53: Do you agree that this policy will help our coastal areas adapt to climate change and support the sustainable development of coastal communities?**

Coastal and Island communities have specific access and connectivity challenges which should be reflected within the policy in line with the actions set out the Spatial Strategy.

Climate change poses significant risks to coastal transport infrastructure in the SPT region. Key strategic problems are included in STPR2 recommendations. However, increased flooding events present on-going disruption to transport networks and services. These risks and challenges should be recognised and addressed through this policy.

# Consultation Questions

## The Route Map

*The route map - ‘Reducing car travel by 20% by 2030 for a healthier, fairer and greener Scotland’ – is a joint publication by the Scottish Government and COSLA and sets out the actions that the Scottish Government and local authorities in Scotland are taking to make it easier for people to reduce their car kilometres through four key sustainable travel behaviours.*

*These behaviours are:*

- i. to make use of sustainable online options to reduce your need to travel;*
- ii. to choose local destinations to reduce the distance you travel*
- iii. switch to walk, wheel, cycle or public transport where possible*
- iv. combine a trip or share a journey to reduce the number of individual car trips you make, if car remains the only feasible option.*

1. Do you agree with the overall behaviour change approach, and do you have any comments on the four behaviours outlined above? Please explain.

<p><b>Agree- disagree – don’t know</b></p> <p><i>Please explain your answer</i></p> <p>The behaviour change approach set out in the route map is welcome and aligns closely with the current output of SPT’s emerging Regional Transport Strategy. However, achieving the target will require a combination of carrot and stick measures. It will also require significantly greater investment in sustainable and affordable travel options to ensure people have the opportunity to change their behaviours.</p> <p>In particular, the need to underpin the approach with demand management measures will be critical to success. The significance of the transport sector’s contribution to climate change and poor air quality and the severity of the problems linked to this requires significant and rapid intervention.</p> <p>We are concerned that the timeframe for the public conversation on demand management and any subsequent action lacks the necessary urgency to enable the 20% target to be achieved by 2030 – a mere 8 years from now.</p>
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Given that we have spent decades embedding the private car into the fabric of our communities it will take time to reengineer our places to make them more liveable environments which support health and wellbeing. Behavioural change will be key to this but will not deliver the target alone.

While the rise of online services will play a significant role in addressing issues of access, it will be important to promote the sustainability of our urban centres and rural towns and villages through greater mixed use and transport-oriented development and increasing population densities closer to centres of employment and services that can help reduce journey distances and achieve better utilisation of transport networks and services.

A critical element to supporting behaviour change will be support for bus services. While the Scottish Government has committed to welcome investment in bus priority and fleet decarbonisation, there remains the issue of revenue support for bus services. Although the Scottish Government has provided unprecedented funding during the pandemic to maintain bus, rail and Subway services, a combination of pandemic factors has resulted in a significant and sustained fall in patronage. Public transport will require ongoing support for a considerable period of time if it is to be sustained and if it is to provide an attractive and viable alternative the private car.

Even before the pandemic there were severe challenges for the bus industry which provides the bulk of public transport trips. The challenge faced by people accessing bus services in the early morning, evenings and at weekends, particularly in rural areas needs to be addressed if we are to achieve the target but also to ensure people have access to jobs, services, education, training and friends and family.

Put simply, the scope for meaningful behaviour change will be significantly reduced without access to affordable, reliable, available and accessible public transport.

2. What are the key opportunities of reducing car kilometres

*Box for comments*

It is encouraging to see the level of public support outlined in the route map and annexe for measures to reduce the dominance of the private car. It will be important to build on this level of public support and the approach to awareness raising and education set out in the route map is welcome.

We also note and support the promotion of positive messages about the wider benefits that a reduction in car mileage can bring for health, wellbeing, the economy and helping to tackle inequalities. Again, as set out in the route map, it will be important to emphasise these benefits to maximise

opportunities to encourage modal shift. There is also the potential to make inappropriate car use a socially unacceptable behaviour similar to drink driving or smoking and public messaging to this effect should be considered.

Transport strategies such as SPT's emerging Regional Transport Strategy will be aligned to NTS2 and the emerging STPR2, NPF4 and Regional Spatial Strategy. Ensuring such policy alignment at national, regional and local levels provides a powerful opportunity to ensure a consistent and focussed approach to reducing car mileage. Another opportunity will be to ensure that transport policy is also aligned with the wider range of government policies and measures including integration with land use and energy strategies.

Well-funded, integrated, affordable and attractive public transport services will be essential if people are to be encouraged out of their cars. While the introduction of Metro services in the Glasgow City Region will be out with the 2030 route map timescale, it nevertheless sets a marker for the kind of ambition and direction of travel that will help to achieve a world class sustainable transport network. It also provides an opportunity to think about how we shape and organise the wider transport network in a way that is integrated, accessible, sustainable and attractive for public transport users and non-users.

The measures contained in the Transport Scotland Act 2019 provide scope to significantly improve the bus offer and in turn to promote modal shift and reduced car mileage. This includes maximising partnership working between Regional Transport Partnerships, Local Authorities and bus operators to improve the attractiveness and long-term sustainability of the bus network. SPT and Glasgow City Council have commissioned a review to consider the range of measures in the Act and how these can most appropriately be utilised to improve the bus offer and achieve wider goals for modal shift and reduced emissions and we look forward to sharing and developing the output from this.

These opportunities to improve bus services and networks are in addition to the previously committed Scottish Government funding to support the bus sector. This includes the £500m investment in bus measures and funding made available support the retrofit of diesel buses and the purchase of ultra-low emission vehicles. Such investment in transport is welcome and will help to promote better use of our transport network bringing gains to business through less congestion.

Enhancing inter-regional rural railways also presents a key opportunity to increase the effectiveness of our economy while helping to sustain rural communities and keep people connected to employment, education and training. This is all the more important given that as the route map points out a small number of longer journeys account for a disproportionate percentage of total car kilometres. On this point we would welcome more detail in the route map on how measures could be put in place to deliver more leisure and

rural trips, which are often longer journeys, by more sustainable means. While the route map makes reference to such trips, it does not address how the issue might be tackled. This will be an increasingly important consideration as Scotland's tourism sector opens up as Covid restrictions ease and given that there will be enhanced opportunities to promote sustainable tourism as more of the transport sector decarbonises.

Technological changes and innovation will continue to affect the way we travel and the reasons we travel whilst presenting opportunities for more efficient management and utilisation of transport systems. Key emerging opportunities include new forms of e-mobility, connected and autonomous vehicles and new transport services particularly shared mobility and future developments of these into fully formed Mobility as a Service ecosystems. These have the potential to make our transport network more responsive, efficient and less polluting but there are also significant risks.

We welcome the significant uplift by the Scottish Government in investment in the active travel budget over coming years. This is on a scale not seen previously and brings with it a challenge to deliver. SPT along with our partner Councils are committed to support the Scottish Government, Transport Scotland and Sustrans to help roll out this investment in ways that best help to promote modal shift and make walking and cycling the first choice for local journeys. To help ensure the funding and projects supported can be delivered on the ground we would welcome greater dialogue on how Regional Transport Partnerships, who have a proven track record of partnership working with partner Councils can directly support the process. Specifically, Local authorities and RTPs should be trusted to deliver high quality infrastructure in line with up to date local and regional strategies and existing national policy & guidance via ring-fenced budgets and without the need for ongoing challenge fund rounds.

3. What are the key challenges faced in reducing car kilometres?

*Box for comments*

There are a combination of historic, behavioural, funding, governance and Covid related challenges which will impact on the capacity to achieve the reduction in car kilometres. These include:

Current travel behaviours have been shaped and encouraged by decades of pro-car policies and changing our current travel behaviours will be extremely challenging. A range of hard and soft measures will be required if we are to achieve the target.

Transport research suggests that the two biggest issues for people using the transport network are cost and travel time. The current reality is that the costs of motoring have reduced over time while the costs of public traveller have increased. Public transport can also be viewed as an inconvenient form of travel that does not provide the door to door convenience of the private car.

As such there needs to be moves to improve the affordability, priority and availability of public transport services.

As noted in the route map, awareness raising, marketing and education will be important aspects of achieving behavioural change but will not achieve the target on their own.

One of the biggest challenges in reducing car kilometres is the impact of Covid on the transport network. While public transport use has fallen dramatically from pre Covid levels, car use is almost back to what it was before the pandemic. The impact of working from home and emerging more hybrid working patterns and the longer term impact of public messaging during lockdown, which discouraged trips other than for essential purposes. may have had a longer-term negative impact on public transport use.

It remains difficult to assess the full impact of these longer-term changes to travel behaviour and with that how we will meet and shape our future transport needs. There has been an unprecedented level of public funding to sustain the public transport network during Covid but we are currently seeing a reduction in rail frequencies and bus services reflecting reduced demand. At the same time car use has almost returned to pre pandemic levels. There is a danger that we will enter into a vicious cycle of reduced public transport services undermining the attractiveness and responsiveness of the public transport system and reinforcing moves to more car mileage.

The land use impacts of sustained pro-car policies have been huge. Part of this has been increasing suburbanisation which encourages and is reinforced by increasing car use. While we cannot return to a status quo ante we must act to halt further suburban sprawl and promote a return to more sustainable urban living. This will not be easy either culturally or in terms of the physical aspects of reshaping our city and town centres to accommodate the housing, services and amenities required to support greater population density. It will however be essential.

Inevitably with such a stretching ambition one of the biggest challenges will be achieving the target on time. This will depend on having the necessary, commitment, resources and capacity to act. Transport Scotland is currently working with partners to determine the appropriate governance arrangements for transport. Given current complex arrangements for transport in Scotland it will be crucial to develop improved arrangements which can enable sharper focus on achieving both the target for mileage reduction and wider targets for emission reduction.

While technological improvements provide the potential to improve the efficiency of the transport network they also bring challenges. We need to move to greater use of electric vehicles but this will not achieve emission reduction on its' own and as noted in the route map electric vehicles will continue to have negative impacts on air quality, congestion, accidents and



negative health impacts. While the move toward connected and autonomous vehicles, if not properly planned could increase transport demands particularly for personal car ownership and single occupancy car journeys. This could result in increased congestion and shifts away from public transport and active travel.

Policies that support car restraint, through the reallocation of road space from cars to buses, cyclists and pedestrians, parking restraint, introduction of the workplace parking levy and road pricing provide both opportunities and challenges but it is clear that we do not have much time if we are to achieve the 20% reduction. While engagement and developing public support are important, so too is action and leadership and these will be required in considerable measure if the target is to be met. We can have all the powers, funding and messaging we need but efforts to reduce car mileage will be undermined without consistent, long term leadership to support and drive the necessary change.

4. Are there any further actions you would like to see included in future to support behaviour change 1) - reducing the need to travel?

*Box for comments*

We welcome the move towards local options and the twenty minute neighbourhood which makes public transport and active travel more attractive and practical and concentrates journeys in smaller areas which in turn helps to sustain local economies. However, we are concerned that the approach to twenty minute neighbourhoods currently lacks any great substance and that the scope to achieve significant modal shift via this approach may be somewhat exaggerated.

The current model of public transport governance remains one characterised by modal silos and notional competition. This mitigates against effective integration of public transport and reduces its attractiveness and efficiency with duplicated journeys and excess capacity at some points of the day and no capacity at other times. Better coordination of transport services at a regional level would help to design services that are more locally viable and attractive while reducing unnecessary duplication and mileage across rail and bus services.

We note the support in the route map for a move to hybrid working and the establishment of local hubs to facilitate more local working. This has the potential to reduce the need to travel but there will need to be clear guidance to support these arrangements working effectively and to give employers and employees the confidence to take these forward and so contribute to a reduced need to travel.

5. Are there any further actions you would like to see included in future to support behaviour change 2) - choosing local options?

*Box for comments*

The policy move towards local options is welcome as is the promotion of 20 minute neighbourhoods although as noted we have reservations about the capacity of these to deliver significant mileage reductions. There have been significant moves over the past two decades to rationalise health facilities on fewer sites, along with a huge expansion of out of town retail and the loss of local shops, banks and post offices. Combined with a lack of sustainable travel options, this has encouraged more private car trips.

Even the moves noted in the route map to integrated 'local' health care facilities fail to recognise that accessing these can be challenging for people who rely on bus services. People accessing health care often have to make a number of trips since bus services are increasingly focussed on radial trips into urban centres rather than circumferential routes with all the issues of affordability that go with this.

The increase in the Scottish Government's active travel budget over coming years is very welcome as is the understanding of the need to prioritise investment on connections to and from more disadvantaged areas. It will be crucial to the success of the 20% target to get more people walking and cycling and part of this will be investment in segregated walking and cycle routes linking to key attractors and where people in local communities can easily access these routes.

6. Are there any further actions you would like to see included in future to support behaviour change 3) - switching to more sustainable modes of travel?

*Box for comments*

Actions to switch to more sustainable modes are of course welcome but at the same time we are doing things that undermine the process and result in wasteful spend.

For example, while increases in the budgets for active travel and bus priority measures are welcome, there continues to be huge investment in new road infrastructure with all the induced demand that this brings for the longer term.

Again, we welcome the extension of free bus travel for people under 22 but this is only of benefit where there is access to bus services. Too often there is insufficient funding available to provide better and more frequent local bus services, particularly in rural and island communities but also for urban areas in the evenings and at weekends.

We are also concerned that recent reductions in service frequencies on the rail network will militate against efforts to encourage a switch to sustainable modes.

Further to this, the moves to reduce the opening hours of ticket offices at rail stations would appear to be counter-productive in encouraging modal shift given concerns over safety, access to information on services and ticketing availability.

The slow pace of integrated ticketing reform is a significant barrier to behaviour change and encourages car trips for short journeys where convenient, easy to use public transport would be preferable. SPT has introduced smart ticketing on the Glasgow Subway and is currently reviewing the Zonocard multi-modal ticket to make it a genuinely smart product. Moves to introduce smart ticketing across the bus industry are also welcome but these will not enable the kind of flexible, responsive and capped ticketing available to use across all modes that will support behaviour change and encourage local trips by sustainable modes. Only once we have a truly integrated, affordable and multi modal ticketing system in operation will we be able to maximise opportunities for more local journeys by public transport.

The route map acknowledges the need for coordinated cross sector policy making which is welcome but it will be essential to also ensure that transport policy itself is properly coordinated and not a combination of mutually conflicting measures.

- 7. Are there any further actions you would like to see included in future to support behaviour change 4) - combining or sharing journeys?

*Box for comments*

We welcome the priority given to achieving behavioural change through more shared car journeys. In conjunction with Liftshare, SPT has a successful car sharing scheme, and it would be welcome if the proposals to support car sharing could reflect the role of RTPs in promoting this.

The increase in lift-sharing opportunities could have a related co-benefit in terms of potential inclusion and accessibility impacts across urban-rural geographies and we would welcome greater emphasis on the potential for this.

- 8. Do you have any comment to make on any of the specific policies contained within the route map?

*Box for comments*

It is clear from the route map and annexe how the 20% target has been derived and also what transport's overall contribution to emission reduction needs to be. We can also see how the route map draws on research to support the proposed measures set out. However, it is not clear how these measures, taken individually or collectively, will achieve the aimed for 20% reduction in car kilometres. There does not appear to be any modelling undertaken in advance to demonstrate the likely impact of the individual policies and to tie this in an evidence-based way against each of the measures to how the target will be met. It is hoped that as the route map develops and the approach to monitoring and evaluation is progressed that there will be more clarity on how the specific and combined measures are contributing to hopefully declining mileage.

The route map identifies a range of push and pull measures but the emphasis is very much on the latter. In terms of demand management measures these are being pushed further into the future and while there is a need for a public conversation there is still a requirement to demonstrate leadership. It is acknowledged that push factors will be insufficient to achieve the target for reduced mileage and that demand management will need to be a part of the answer.

A number of public transport options could be explored to ensure rural communities are not cut-off by other policies to tackle climate change. These might include trials of free public transport, introduction of autonomous vehicles and designing more flexible tailored transport services. Again, this widens opportunities for people and communities to be connected to the wider economy.

Scotland's climate change targets are highly ambitious and recognised as world leading and it will also be essential that they are backed by appropriate action including taking tough choices to reduce unnecessary car journeys and to promote better land use including investment in sustainable housing, creating better, safer more attractive places to live and ensuring that our people have healthier more active communities.

We welcome the reference in the route map to the importance of the planning system and the need to promote places designed for people rather than cars. We also welcome the reference to the coordination of forthcoming Regional Spatial Strategies with Regional Transport Strategies.

## Social and Equalities

*In creating the route map to reduce car kilometres, the public sector equality duty requires the Scottish Government to pay due regard to the need to the following:*

- *Eliminate discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010,*
- *Advance equality opportunity between people who share a protected characteristic and those who do not, and*
- *Foster good relations between people who share a relevant protected characteristic.*

*These three requirements apply across the protected characteristics of:*

- *age*
- *disability*
- *gender reassignment*
- *marriage and civil partnership*
- *pregnancy and maternity*
- *race*
- *religion and belief*
- *sex and sexual orientation*

*The Scottish Government must also include consideration of:*

- *children and young people (Child Rights and Wellbeing)*
- *socioeconomic disadvantage, low wealth, and area deprivation (Fairer Scotland Duty)*

*Section 8 of the Islands (Scotland) Act 2018 (Scottish Parliament, 2018) requires the Scottish Government to prepare an island communities impact assessment in relation to a policy, strategy, or service, which is likely to have an effect on an island community which is significantly different from its effect on other communities.*

*The current draft impact assessments have been published alongside the Route Map and are available on the Transport Scotland website.*

*The Scottish Government will consider the responses from the consultation process in determining any actions needed to meet its statutory obligations. Your comments will be considered in the completion of the impact assessments to determine whether any further work in this area is needed*

**Impact Assessment**

1. Do you think that the proposals set out in this plan could have positive or negative impacts on any particular groups of people with reference to the listed protected characteristics?

<b>Yes- No – don't know</b>
<i>Please explain your answer</i>

The proposals in the route map will have positive impacts for all groups of people but particularly for those with protected characteristics who have been most disadvantaged by current dominance of the private car.

The recognition that some groups of people including people with a disability and people in rural areas will still be reliant on car travel is both welcome and necessary.

The point is well made in the route map that “Widening access to private vehicles would only increase the prevalence of the negative external impacts of cars, which we know already falls proportionately on the most vulnerable in society.”

- a. If you think the proposals will have a particular impact on certain groups due to protected characteristics, what measures would you suggest to maximise positive impacts or mitigate negative impacts?

*Box for comments*

As noted in the route map measures to reduce car mileage could have potentially negative impacts on people who rely most heavily on access to car travel including people with a disability and people who live in rural and island communities.

Moving forward it will be essential to continue close engagement with people with relevant protected characteristics as the route plan moves to delivery.

- 2. Do you think that the proposals set out in this plan could have a particular impact (positive or negative) on island communities?

*[More Information - Engagement with island communities was undertaken as part of the development of National Transport Strategy (NTS2). This engagement identified unique transport challenges relevant to island communities, [click here for more information.](#)]*

**Yes - No – don't know**

*Please explain your answer*

While there is potential for negative impacts on island communities given the reliance of islanders on private cars, there is also recognition of the continuing role of private cars for community life and access to services.

- a. If you think the proposals will impact on island communities, what measures would you suggest to maximise positive impacts or mitigate negative impacts?

*Box for comments*

Negative impacts could be mitigated by investment in responsive local public transport including demand responsive travel and community transport.

As noted in the route map, there is scope for more online services but this can be hard for older people to access or people on lower incomes.

Improved broadband access will also be important to ensure access to services.

3. Do you think that the proposals set out in this plan could have a particular impact (positive or negative) on people facing socio-economic disadvantages?

**Yes - No – don't know**

*Please explain your answer*

The proposal will be beneficial for most people and will help to address issues of inequality.

For some people on low incomes they will continue to need access to a private car and it will be important to recognise their needs.

- a. If you think the proposals will have a particular impact based on socio-economic factors what measures would you suggest to maximise positive impacts or mitigate negative impacts?

*Box for comments*

Ensuring the affordable, responsive and reliable public transport options will be essential to the success of the strategy.

## The Environment

*The Environmental Assessment (Scotland) Act 2005 ensures those public proposals that are likely to have a significant impact on the environment are assessed and measures to prevent or reduce adverse effects are sought, where possible, prior to implementation.*

1. Do you think the actions proposed in the route map are likely to have an impact on the environment? If so, in what way? Please be as specific as possible in your reasoning.

**Yes- No – don't know**

*Please explain your answer*

The proposals will have the potential to positively impact on the environment through reduced emissions and improved air quality.

This, however, will only be achieved if action is taken to end unrestricted car growth and use and this will require the introduction of demand management measures.

## Other Comment

1. Do you have views you would like to express relating to parts of this consultation which do not have a specific question? If so, please elaborate

### *Box for comments*

The consultation questions concentrate to a large extent on the behavioural aspects of the route map but less so on the scope to achieve the target in terms of other measures.

As noted in our response it is clear that behaviour change on its own will not achieve the necessary outcome and that a combination of measures will be required including demand management measures; effective leadership; reformed transport governance; sustained and increased funding; and measures to address the attractiveness, accessibility and affordability of the transport network.

There is a danger that the difficult decisions needed to address the reduced mileage are either not being addressed or are being put off until a later date. As we note, time is short to achieve this ambitious but necessary target and there is a need for rapid interventions given the scale of the challenge ahead.

Finally, we would comment on more specific issues as follows:

We would welcome reference in the document to the impact of light goods vehicles which have a significant impact on emissions and have a damaging impact on our town and city centre environments. During the pandemic the number of light goods vans has increased and is likely to continue to do so as more people access goods online.

SPT believes the language in the route map should be strengthened to reference a presumption in favour of *comprehensive* coverage of 20mph speed limits in built up areas as opposed to “appropriate roads in built up areas”.