

About you

Please indicate how you wish your response to be handled and, in particular, whether you are content for your response to be published. If you ask for your response not to be published, we will still take account of your views in our analysis but we will not publish your response, quote anything that you have said or list your name. We will regard your response as confidential, and we will treat it accordingly.

To find out how we handle your personal data, please see our privacy policy <https://beta.gov.scot/privacy/>

What is your name?

Lindsay Haddow

What is your email address?

Lindsay.haddow@midlothian.gov.uk

Are you responding as an individual or an organisation?

☐

Individual

☒

Organisation

What is your organisation?

If responding on behalf of an organisation, please enter the organisation's name here.

Midlothian Council

If responding on behalf of an organisation, please indicate which category best describes your organisation.

- | | |
|-------------------------------------|----------------------------------|
| <input checked="" type="checkbox"/> | Local Authority |
| <input type="checkbox"/> | Third sector or Community Groups |
| <input type="checkbox"/> | Private Sector |
| <input type="checkbox"/> | Regional Transport Partnership |
| <input type="checkbox"/> | Transport Operator |
| <input type="checkbox"/> | Academia/education |
| <input type="checkbox"/> | Other Public sector |
| <input type="checkbox"/> | Other |

If other, please specify.

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- ☐ Publish response with name
- ☐ Publish response only (without name)
- ☐ Do not publish response

We are providing a response that is subject to council meeting for any elected member approval or amendments.

Information for organisations only:

The option '*Publish response only (without name)*' refers only to your name, not your organisation's name. If this option is selected, the organisation name will still be published.

If you choose the option '*Do not publish response*', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

- ☒ Yes
- ☐ No

Overview

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

Why we are consulting

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

NTS Consultation questions

Section A: The Vision, Priorities and Outcomes Framework

Vision

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

Four priorities shown in bold, each with three outcomes

Promotes equality

Will provide fair access to services we need
Will be easy to use for all
Will be affordable for all

Takes climate action

Will adapt to the effects of climate change
Will help deliver our net-zero target
Will promote greener, cleaner choices

Helps our economy prosper

Will get us where we need to get to
Will be reliable, efficient and high quality
Will use beneficial innovation

Improves our health and wellbeing

Will be safe and secure for all
Will enable us to make healthy travel choices
Will help make our communities great places to live

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

Yes ☒ No ☐

Please explain your answer

The vision is aspirational and forward looking.

Whilst safety is mentioned in 'Improves our health and wellbeing', it appears to be lost in the overall transport system reference to 'incidents'. This would appear to play down the relevance of the injury and death rates on Scotland roads. Road Safety for all users specifically sustainable transport users should be a high priority and should be identified as such in the National Transport Strategy.

Climate change targets will be difficult to meet if major changes to the national and local transport networks are not facilitated.

There is concern that funding is not allocated adequately and specifically towards tram, train and bus networks across the country. Smaller local authorities will need financial support and resource to access and develop a sustainable transport network.

Q2a: Are the Priorities and Outcomes that the Strategy is trying to achieve the right Priorities and Outcomes for transport policy over the next 20 years?

Yes ☒ No ☐

Please explain your answer

Yes with the exception of highlighting death and injury on Scotland's roads. This must be high priority particularly for vulnerable road users and in conjunction with a shift to sustainable modes. In not highlighting this specifically there is a danger that at regional and local levels, resource and funding is reduced.

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

Please explain your answer

All are of equal importance but must be funded at respective national, regional and local levels. The National Transport Strategy should explore the current and future imbalance in funding between the trunk roads operated by Transport Scotland and the local roads network operated by local authorities. An effective local roads network is essential to enable people, communities and businesses to thrive and prosper.

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

Please explain your answer

Drive to net-zero emissions

Whilst walking, cycling and public transport networks are key, the use of electric vehicles and other sustainable vehicles is essential. LEZ areas will encourage this change.

The statistics regarding the willingness of people to change to electric vehicle use is good news however the practicalities to access and operate these are key. There are issues with the basics regarding electric charging points, specifically, and conflict with planned legislation in allowing householders to cross the public footpaths. This could be alleviated if a utility company was set up to take ownership and whilst this could be deemed a localised issue and one of detail, it is something that could be resolved at national level facilitating change.

Active Travel Delivery

The rise in active travel funding is welcomed. The process and procedure however is proving detrimental in a number of ways.

- Competition and application processes may work well for large or city councils, however resource in smaller councils means that opportunities are not equitable across the country.
- Most Councils in Scotland now have Active Travel Strategies that have been through rigorous consultation processes with local community groups, active travel organisations and the general population to arrive at an agreed active travel network. Although future development can provide part of the network through the planning process, a large part of the network will not be achieved in the short term due to limited resources to achieve the strict criteria for active travel infrastructure funding via Sustrans.
- Match funding again is something that smaller councils struggle with and applying for match funding from other organisations/funding streams often results in issues with non-aligned application dates and the results of successful applications not meeting parallel timeframes for match funding. Sources for match funding also appear to be diminishing.
- The model used for marketing, training and persuasion (soft measures) works far better than that for infrastructure. The difference being funding is allocated to each council and the submission is about ensuring that expenditure, objectives and outcomes are correct. Match funding issues are still problematic.
- Applications for infrastructure are highly cycling centric. Pedestrian improvements are hard to justify and public transport, in particular bus priority, do not feature. There are other conflicts with cycling design that counter road safety and don't take into account speed, volume and, or public awareness of priority, in practice. Funds and design standards and guidance should take all of this into account and seek to prioritise all sustainable modes safely.
-

Increase in rail travel

The Borders Railway is welcomed. However, it is disappointing that a new railway would not be electrified, twin tracked and future proofed for extensions and expansion at the outset. To enjoy economic benefit from Scotland's strategic transport network, adequate investment must be made as Scotland appears to be behind in comparison to European if not worldwide counterparts.

Section B: The policies to deliver the NTS

Through the process to develop the National Transport Strategy, 14 policies have been identified that will deliver its Priorities and Outcomes and address the Challenges. These are listed below:

- plan our transport system to cope with the effects of climate change
- continue to improve the reliability, safety and resilience of our transport system
- embed the implications for transport in spatial planning and land-use decision making
- integrate policies and infrastructure investment across the transport, energy and digital system
- provide a transport system which enables businesses to be competitive domestically, within the UK and internationally
- provide a high-quality transport system that integrates Scotland and recognises our different geographic needs
- improve the quality and availability of information to enable better transport choices
- embrace transport innovation that positively impacts on our society, environment and economy
- improve and enable the efficient movement of people and goods on our transport system
- provide a transport system that is equally accessible for all
- improve access to healthcare, employment, education and training opportunities to generate inclusive sustainable economic growth
- support the transport industry in meeting current and future employment and skills needs
- provide a transport system which promotes and facilitates travel choices which help to improve people's health and wellbeing
- reduce the transport sector's emissions to support our national objectives on air quality and climate change

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

As in the previous answer reducing death and injury on Scotland's roads does not appear to have high enough priority.

The opportunity/ability to embed the implications for transport in spatial planning and land use decision making will be key to ensuring further environmental assessment of necessary physical transport interventions (via LDP and project EIA at planning application stage) and delivering sustainable development.

In the context of climate change and emissions generated by the transport sector there should be a policy which advocates the urgency to achieve greater modal shift, including options to incentivise such a step change and how to adapt to changing requirements of different age/mobility groups.

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

Please provide details.

Given the references throughout the document to climate change and acknowledgement that the transport section is the largest source of greenhouse gas emissions in Scotland perhaps the first and last policies on the list could be combined into one and be the overarching priority.

Also as in the previous answer reducing death and injury on Scotland's roads does not appear to have high enough priority.

The opportunity/ability to embed the implications for transport in spatial planning and land use decision making will be key to ensuring further environmental assessment of necessary physical transport interventions (via LDP and project EIA at planning application stage) and delivering sustainable development.

In the context of climate change and emissions generated by the transport sector there should be a policy which advocates the urgency to achieve greater modal shift, including options to incentivise such a step change and how to adapt to changing requirements of different age/mobility groups.

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

Q5a: Are there specific decisions about transport in Scotland that are best taken at the national level (e.g. by Transport Scotland or the Scottish Government), at a regional (e.g. by Regional Transport Partnerships), or at a local level (e.g. by Local Authorities)?

Please explain your answer, by providing examples of where you believe transport related decisions should be taken.

Projects such as trams, trains, and major bus routes should be dealt with at a national or regional level in order that routes are not subject to restrictions of local authority boundaries.

Electric Vehicles – charging points, see previous answer

A National freight quality partnership scheme should be considered, rather than various independent local schemes operating. Such a scheme should target the largest and most polluting fleets operating in Scotland.

Whilst LEZs aim to tackle air pollution, it is considered that the concept be expanded in a sensible, programmed and proportionate way to gradually phase out the older / more polluting vehicles throughout Scotland.

Q5b: Should local communities be involved in making decisions about transport in Scotland? If so, how should they be involved, and on which specific issues should they be involved in making decisions on?

Please explain your answer, by providing examples of which transport decisions local communities should be involved in, also suggesting how they should be involved

Wider Community engagement is difficult as pressure groups and interested parties are heard and the general public are not as involved.

Communities should clearly be taken through the consultation process but care must be taken to ensure that the general population rather than pressure groups, land owners and the views of people directly affected are not taken as a general public view.

Section D: The Strategy as a whole

Q6: Does the National Transport Strategy address the needs of transport users across Scotland, including citizens and businesses located in different parts of the country?

Yes ☒ No ☐

Please explain your answer

Section E: Looking ahead

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

Please provide details

Unfortunately, Scotland does seem to have a less impressive and less efficient integrated transport system than the majority of Europe.

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

Please provide details

Targeted investment, benchmarking against other countries. A sustainable transport system that is not seen as second rate to private vehicles.

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

Please provide details

Speed and efficiency of trains
Lack of trams especially in the East
Congested trunk road (City Bypass)
Underfunded maintenance of roads, footpaths and cycleways.
This impacts on sustainable transport as much if not more than private vehicles.

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

Please provide details

Targeted investment.

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

Please provide details.

Strategic transport projects are taking increasingly longer to put in place due to the processes surrounding accountability. Streamlining this process perhaps by benchmarking with other countries may improve this. This will also save costs.

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

Please provide details

Section F: Strategic Environmental Assessment (SEA)

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

The information covers all the SEA categories and includes references to acknowledged published and publicly available sources.

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

The NTS is a policy document. It is not a framework for funding or for prioritising infrastructure interventions. In this context the strategy is limited in its ability to assess the likely environmental effects beyond the identification of an assumed set of issues and possible outcomes. That said the matters it does raise are perfectly valid and rightly, related to the Climate Change emissions reduction targets. The publication of the revised STPR along with replacement LDPs will provide the chance to reflect the environmental impact of some of these issues/scenarios more clearly, together with any associated mitigation measures.

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

Agree and support the mitigation and monitoring measures identified, particularly the focus on actions designed to support a reduction in Greenhouse Gas emissions and the closer integration between land use and transport planning. Given that the transport sector is the largest source of Greenhouse Gas emissions it is imperative that an effective monitoring system is in place to record change and identify future action. On this last point it would prudent to at least acknowledge the role of monitoring to inform and feed into subsequent reviews of the strategy, either in line with the agreed review period and/or as and when required.

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

N/A

Thank you for your time and your contribution.

Return address:

NTS2 Review Team
Transport Scotland
Buchanan House
58 Port Dundas Road
Glasgow
G4 0HF

Tel: 0141 272 7999

For further information, contact the NTS Review Team at:

NTSReview@transport.gov.scot