Aberdeenshire
COUNCIL **Infrastructure Services**

REPORT TO INFRASTRUCTURE SERVICES COMMITTEE – 3 OCTOBER 2019

RESPONSE TO THE NATIONAL TRANSPORT STRATEGY DRAFT FOR CONSULTATION

1   Reason for Report/Summary

1.1   The Scottish Government's National Transport Strategy has been published for consultation. Members are requested to consider and approve a response from the Council to the consultation.

2   Recommendations

The Committee is recommended to:

2.1   Consider the draft National Transport Strategy; and

2.2   Approve the Council's consultation response to the draft Strategy.

3   Purpose and Decision Making Route

3.1   The Scottish Government, through its agency Transport Scotland, has published a consultative draft National Transport Strategy (NTS) which sets out the Government's aims and priorities for the transport system in Scotland over the following 20 years. The Committee is being asked to approve the draft response to the consultation.

3.2   The policy direction set by the NTS will go on to influence the direction of the new Regional Transport Strategy, aspects of the City Region Deal funded Strategic Transport Appraisal, and a future revision of Aberdeenshire's Local Transport Strategy. The closing date for responses to the consultation is 23 October 2019. Members of Nestrans Board will also be asked to consider a separate consultation response prepared from a regional perspective.

4   Discussion

4.1   The consultation document is available at: https://www.transport.gov.scot/media/45149/national-transport-strategy-draft-for-consultation-july-2019.pdf. Transport Scotland are asking consultees to determine whether the Vision, Priorities and Outcomes are appropriate for the next twenty years, and whether the policies contained in the draft strategy are the right ones to help deliver it. Questions are asked about transport roles and responsibilities. A Strategic Environmental Assessment (SEA) Environmental Report is also available for consultation.

4.2   Officers have prepared a draft consultation response, which is contained in **Appendix 1**. Overall, the direction and policy framework is supported. There is some disappointment that the draft strategy does not go further in some areas by indicating the means by which many of the policy priorities will be delivered.

Furthermore, there is significant discussion on some of the wider societal issues related to transport, such as social isolation, child poverty, gender inequality. Whilst these are really important issues, and ones in which transport can be part of the answer, there is sometimes an implication that "more and better" transport is the answer. Officers suggest that in many cases, tackling the issue at source, prior to moving people around, can achieve more sustainable and effective response to these issues.

4.3 The revised NTS will replace the previous NTS which was originally published in 2006 but refreshed in January 2016. The consultative draft is the product of a significant amount of evidence gathering and collaborative work amongst stakeholders, to which officers of Aberdeenshire Council, and our regional partners have contributed.

4.4 The Strategy sets out an overarching vision and is underpinned by four priorities and associated outcomes, as set out in the table below.

Table 1 – Draft NTS – 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.
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

4.5 The proposed new NTS places a greater focus on environmental and social impacts than previous strategies. The stated 'global climate emergency' and the role of transport in helping to deliver net-zero carbon emissions by 2045 is a key priority, along with how transport can play its part in building a fairer society - including reducing child poverty. The strategy seeks to redefine investment priorities, putting sustainable and public transport at the heart of decision-making.

4.6   There is significant discussion on the report of what the Government means by each of their priorities as well as the challenges facing the transport system from the changing use of transport, declining bus patronage, economic development, and climate change. There is also discussion on how transport affects those with low-incomes, unseen gender bias, the elderly, young and disabled.

4.7   Perhaps the most significant policy statement in the report is that Scottish Government "will not be building infrastructure to support forecast demand – we will reduce the need to travel by unsustainable modes in line with the Sustainable Travel Hierarchy." It remains to be seen how this policy statement will be manifest in practice and resource allocation. It is worth noting that this reflects the position already taken by this Council in our Local Transport Strategy as approved in 2011 with the objective to Travel Less, Travel Actively and Travel Effectively.

4.8   An indication of how the vision outlined in the draft NTS may be applied in the longer term can be seen from the Programme for Government announced on 3 September. This included significant funding proposals for Bus Priority measures and new "Green City Deals".

4.9   The NTS concludes with a discussion on future governance arrangements for transportation in Scotland. The document promotes regional approaches – as exemplified locally by Nestrans, work on the Regional Economic Strategy, Strategic Development Plan authority and the City Region Deal – but does not make any specific proposals on changing the existing governance arrangements. A national Working Group is proposed to look at models.

4.10   The NTS will be underpinned by a delivery plan which will encompass actions not only from the NTS but also the Climate Change Action Plan and the Infrastructure Commission for Scotland, recognising the key role of transport in delivering the objectives of these programmes. No detail of the delivery plan is yet available. There is however a table of 'policies and enablers' at the end of the document which hints towards possible future actions or commitments. The Program for Government as published on 3 September does contain a number of commitments on public transport infrastructure, low emission vehicles and active travel (https://www.gov.scot/programme-for-government/).

4.11   The Strategic Transport Projects Review (STPR2) is the Scottish Government's vehicle for prioritising transport spending and investment and is underway in parallel with the NTS process. The STPR is at an early, evidence gathering, stage and will be subject to more stakeholder consultation early in 2020. The work undertaken as part of the City Region Deal Strategic Transport Assessment will significantly inform Aberdeenshire and Aberdeen City's input to the STPR.

5   Council Priorities, Implications and Risk

5.1   This report helps deliver Council Priority 1 - Support a strong, sustainable, diverse and successful economy;

This report helps deliver Council Priority 2 - Have the best possible transport and digital links across our communities;

This report helps deliver Council Priority 5 – Encouraging active lifestyles and promoting wellbeing with a focus on obesity and mental health; and

This report helps deliver Council Priority 11 – Protecting our special environment, including tackling climate change by reducing greenhouse gas emissions.

5.2   This report helps deliver on the LOIP Priority – Connected and Cohesive Communities

5.3   The table below shows whether risks and implications apply if the recommendation(s) is(are) agreed.

Subject	Yes	No	N/A
Financial			x
Staffing			x
Equalities			x
Fairer Scotland Duty			x
Town Centre First			x
Sustainability			x
Children and Young People's Rights and Wellbeing			x

5.4   An equality impact assessment is not required because this report relates to a consultation response to a Scottish Government policy which has been subject to its own Equalities Impact Assessment and does not have a differential impact on any of the protected characteristics.

5.5   The following Risk has been identified as relevant to this matter on a Corporate Level:

- ACORP002 - Changes in government policy, legislation and regulation

The following Risks have been identified as relevant to this matter on a Strategic Level:

- ISSR001 - Active Travel
- ISSR003 - City Region Deal

5.6   Changes to Government policy and funding priorities could impact on both Council budgets and trunk road and rail capital schemes which would have a negative effect on the area's economy and undermine work to develop the region. It is important to stress that at present, apart from the statement in the

NTS that the Government will no longer "building infrastructure to support forecast demand", (which would be in line with the Council's wider sustainability and active travel policy goals) there is no current indication that this may be the case.

6   Scheme of Governance

6.1   The Head of Finance and Monitoring Officer within Business Services have been consulted in the preparation of this and their comments are incorporated within the report and are satisfied that the report complies with the Scheme of Governance and relevant legislation.

6.2   The Committee is able to consider and take a decision on this item in terms of Section F 1.1.f of the List of Committee Powers in Part 2A of the Scheme of Governance as issues raised in the consultation falls within its policy remit.

Stephen Archer
Director of Infrastructure Services

Report prepared by Paul Finch, Strategic Transportation Manager, Robert McGregor, Strategic Transport Officer and Helena Leite, Strategy Development Officer

18 September 2019

Appendix 1 – Proposed Response to Specific Consultation Questions

Appendix 1 – Proposed Responses to Specific Consultation Questions

Section A: The Vision and Outcomes Framework

1. Is the Vision that is set out for the National Transport Strategy the right Vision for transport policy over the next 20 years? Please explain your answer.

Yes.

Aberdeenshire Council agrees with all aspects of the vision and would currently anticipate following the same broad approach in their Local Transport Strategy (LTS), alongside with the approach adopted by Nestrans' emerging Regional Transport Strategy (RTS).

2a. Are the Priorities and Outcomes that the Strategy is trying to achieve the right Priorities and Outcomes for transport policy over the next 20 years? Please explain your answer.

Yes.

Aberdeenshire Council endorses the four priorities and outcomes, although in some cases – like the Climate Action priority – we would encourage the development of clearer and more specific commitments instead of intentions.

In many instances (such as "Will provide fair access to services we need"), the means to achieving some of these outcomes are not necessarily wholly transport related. Instead, they may involve consideration of digital, technological, strategic and local planning, and community based options and interventions.

Indeed, transport provision is frequently a <u>necessary</u>, but not <u>sufficient</u> condition for achievement of the outcomes that are desired. Frequently, it is the interactions with other areas of interest (health, education, housing, planning, technology, commercial/leisure development, social trends) that will facilitate the outcomes being sought.

2b. Are some of these Priorities and Outcomes more important than others or are they equally important? Please explain your answer.

Taking Climate Action is key requirement for transport – this will impact the other 3 Priorities under the vision and is therefore arguably the first among equals. Well maintained and functioning infrastructure and its connectivity is vital for health and wellbeing, economic prosperity and promoting equality.

However, when considered across the different regions and areas of Scotland, different emphases and challenges may emerge between the outcomes.

If these outcomes are going to be achieved, the main challenges may be the requirement for much of society to re-learn its historical car dependent lifestyle which has arguably become embedded across much of society for several generations. Wider decisions in civic society and private sector are often implicitly biased towards assuming near universal car ownership or car access. This can make it very difficult, if not impossible, for the various strands of public and community transport to mitigate against the resultant accessibility gap for those without car ownership, particularly in context of revenue cuts affecting transport, and particularly in areas outwith main towns and cities.

3. 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

This element is very important and progress is welcomed. Challenges relate to commercialising the deployment of charging points; ensuring growth in charging points is related to growth in Ultra Low Emission Vehicles (ULEVs), and also making ULEVs affordable for all.

The hierarchy of transport modes needs to continue to place lower carbon options ahead of those with higher emissions – this should be included in planning and place making decision making. For example, safe and effective cycle and walking lanes (properly segregated), full bus only lanes, ensuring an end to end journey approach is taken.

Nationally, to support regions in lowering emissions from the transport sector, requires investment in the charging infrastructure network (electric and hydrogen) across all sectors – rail, bus, service fleet, marine (eg harbours – for ferries, fishing boats etc) and aviation. It also requires additional investment for trialling technologies and implementing the necessary retrofitting and procurement of vehicles/vessels.

Active travel delivery

Key indicators and outcomes to measure Active Travel features must not be related exclusively to funding. They should clearly demonstrate the benefits related to these investments, especially that it is getting more people walking and cycling. There needs to be a robust and consistent monitoring regime adopted across Scotland by all Local Authorities, so that we are all collating the same data set at a macro level. This does not need to be exhaustive but, at the moment, the Scottish Household Survey and Travel Diaries are such a small data set the figures become almost statistically irrelevant. The current system of distributing active travel funding in Scotland is seen to be failing from a perspective of local accountability and best value and requires urgent overhaul if the program is to continue the positive progress of previous periods.

Increase in rail travel

The use of passenger journeys is a good indicator but should also be read alongside passenger kilometres (or miles) travelled. Whilst it is good for Edinburgh and Glasgow to benefit from journey time reductions, there is an expectation that meaningful journey time improvements will also be delivered between Aberdeen and the Central Belt. Furthermore, the electrification of the rail system is needed to tackle environmental impacts across the whole of the country, not only in Edinburgh, Glasgow and Stirling.

We welcome the investment made to date in improvements on the Aberdeen to Inverness line, and in particular the benefits that this will bring to North East (Inverurie to Aberdeen, and Kintore Station). In order to take full advantage of the investments being made at Glasgow, Edinburgh and Perth to increase capacity, the wider inter-city network requires a clear investment plan. It has been evident in recent months that a single issue early morning can cause significant disruption on the East Coast main line which reverberates through a day.

We anticipate further opportunity to explore regional plans for rail investment in the North East of Scotland in the context of the City Region Deal and Strategic Transport Projects Review.

Linking our cities

We would highlight that Aberdeen Western Peripheral Route (AWPR) is not about "linking our cities", although it represents one of the most significant beneficial regional projects delivered in the UK. Indeed, it demonstrated how the initial consideration of projects at a regional level can then be adopted nationally and delivered collaboratively. We are now seeing issues of level of service on the dual carriageway South of Aberdeen to Dundee but no current strategic consideration of how that will be tackled.

It can be quicker (and on fuel costs alone, cheaper compared to a standard return ticket) to drive to certain destinations in the central belt from Aberdeen than by train, so the continued commitment and development of plans to improve rail travel times between Aberdeen/Edinburgh/Glasgow is welcomed.

Poverty and child poverty

These are undoubtedly important aspects to consider. The priority would appear to be getting the opportunities, services and interventions in the right place, at the right time, and in the right format, to fulfil the needs of all of society. Transport has a part to play in what will be a complex jigsaw of interventions and policies.

It is worth highlighting that as with many of the issues set out in the NTS the funding streams that will be needed to deliver them will require to be annual and ongoing Revenue rather than Capital that is focussed on infrastructure. How these can be aligned and managed across agencies and authorities should form part of the Action Plan that supports the Strategy.

Social isolation

Again, this appears a far wider societal issue, and the most sustainable long term interventions and options may be focussed on community capacity building, providing local activities and facilities, and neighbourhood support networks which will link to the Place Standard work already being rolled out. Transport, moving people around the country to address social isolation, is possibly a "lower priority" response to social isolation.

Gender inequalities

The challenges related to gender outlined in the consultative draft are fully recognised and in part explains dependence on private car for those able to afford this mode. Whilst many elements to address these issues rest with the design, delivery and adaptation of the transport network; wider economic, social, and planning decisions are also relevant to consider.

Changing Needs of Young People

There is ongoing engagement by Aberdeenshire Council with youth representatives which revealed particular concern related to provision of bus services and fares. There are strong parallels with the concerns from older residents who may have a concession card to allow free travel but that travel is then not even possible as there are so few services operating. This is a particular issue for areas such as Aberdeenshire with expanding populations of young and old people spread over a large geographic area in a very dispersed way.

Ageing Population

In rural and semi-rural areas such as Aberdeenshire, challenges can occur in meeting the accessibility requirements of the elderly population who do not have access to private car, with alternative forms of community and demand responsive transport filling the accessibility gap. This can be expensive to provide, albeit essential for enabling a person's independence within their community.

Disabled People

There are many varied barriers related to travel and transport across the many different forms of physical, sensory and mental impairment. Sometimes the solutions for one group of people may conflict with another. Education and awareness raising with service providers and designers is essential, including effective linkages to the different communities of need. One of the major issues that emerges is the design of vehicles that can meet access standards, provide suitable numbers of accessible seats and still provide the level of ride quality/comfort on inter-urban routes.

Scotland's regional differences

There seems to be two visions of Scotland in this document – either central belt towns and cities, or rural/remote/islands. The document refers to towns in the title of this section but only gives city examples. This is an omission that can and should be easily addressed not least given the provision of a town centres fund by Scottish Government earlier in 2019. This also misses out huge swathes of the area and population of Scotland living in rural areas proximal to urban cities, which can experience significant accessibility issues across all modes, other than by private car. We understand that over the last fifty years, the most significant economic and percentage population growth in Scotland was registered in the North East region. It is inaccurate to state that the population is growing particularly in the central belt towns, and we have to understand that we are often missing out small to medium town "rural" challenges.

It is not possible to look at rural transport on its own, without considering changing patterns of service provision, patterns of employment, digital connectivity, economically sustainable communities, and land use planning influences.

Global climate emergency

It is not explained how the net-zero emission target for 2045 will be managed and accomplished. The crucial role of active travel for short trips and reducing the overall need for travel of any type or distance needs to be emphasised in the document.

Aviation

The NTS acknowledges a role for aviation but does not recognise that some regions of Scotland are also remote from key markets and flying may be a requirement to do business. It is important to consider the separate needs of Aberdeen, relative to the differing needs of Edinburgh and Glasgow. Scotland is not a node – different cities have different flight requirements determined by their different markets and the distances to European and international hubs.

Adapting to climate change

The consultation document stresses the importance of maintenance of assets, but also the role of individuals and businesses. Landslips, damage caused by flooding on structures etc, seem to be particularly important considerations. For instance, the experience of Aberdeenshire Council has been the frustration of being unable to enforce legal obligations on or elicit financial compensation from landowners whose land has slipped, affecting the road network, and where the significant expense of shoring up the hillsides is borne by the public purse. The transport network is especially susceptible to the impact of climate change and the scale of investment that will be required to adapt and mitigate for the changes to our transport network will need to be an important part of the Action Plan and the Strategic Transport Projects Review (STPR). While much of the emphasis nationally and internationally is on designing innovative and resilient infrastructure to cope with climate change a greater impact might be felt by investing more in simple revenue maintenance such as clearing gullies and roadside ditches

which tend to be the sort of cyclical work disproportionately impacted by revenue cuts to roads maintenance.

Technological advances/changes

These areas could lead to substantive/disruptive changes to the current mode of operating public transport and road infrastructure, in both urban and rural areas. However, the fundamental requirement for that infrastructure will remain, and for that infrastructure to have sufficient capacity and design standards is essential. New technologies may require the standards of asset maintenance, information, and network control to be higher than at present for example where intelligent vehicles of the future require 5G connectivity, well maintained signs and lines and access to suitable energy sources. With 5562km (3456 miles) of roads in Aberdeenshire and the vast majority of the road network being within Local Authority control, the NTS will need to consider how the technological advances will be delivered for the whole network and not just the trunk road and motorways.

Air quality

It is one of the main concerns regarding public health at the moment, so it should be closely monitored. This must consider legal limits and acceptable levels of different air pollutants, in order to allow fast intervention if necessary. The practical lessons around implementation of Low Emission Zones should be reflected in the NTS Action Plan.

Decline in bus use

This feels particularly acute in a rural area such as North East Scotland and the challenges around public transport need to be addressed. Costs in the North East are high, routes and times are limited, types of buses available are not always appropriate for the passengers that use them (eg upper deck only challenging those who are older or have disabilities), lack of space for bicycles meaning cycling and using public transport for a longer commute can be a challenge.

The draft strategy appears to look at this problem in isolation: parking strategies, city centre employment; less shoppers in city centres due to internet shopping; a more dispersed population - are all important issues to consider. Whilst acknowledging the decline, the document does not specify any intended direction to resolve it. Moreover, the pressure on local authorities' support for socially necessary bus services is increasing, but the availability of fund this pressure is declining. The recently completed State of the Bus Network report by the North East Bus Alliance is an example of how these issues can be joined up
http://committees.aberdeenshire.gov.uk/committees.aspx?commid=495&meetid=19384

Productivity

It is important to ensure that we have the correct core infrastructure in place. In Aberdeenshire this means appropriate standard trunk road and principal road

connections to our towns, and to other cities in Scotland. It also means safe and reliable links to the region's ports, airports and other key travel hubs.

Labour Markets

The narrative in this section of the strategy appears to set an unrealistically high expectation for the accessibility to workplaces that can be provided by the bus network, particularly when considered in the context of the earlier section on the decline in bus use. Commercial public transport networks work best when feeding a primary centre via radial routes which benefit from priority measures. This emphasises the importance of carefully considering where to concentrate employment opportunities, particularly if the expectation is that they will be served effectively by bus. The NTS also needs to consider what the current profile of bus users is across the different areas of Scotland and what the realistic opportunities are to increase the numbers using the bus to access employment.

Trade and Connectivity, and Freight

The value of the North East's food and drink export requires to be captured, particularly as it is wholly dependent on just in time deliveries both to the central belt, but also key European Markets.

Over £200m worth of fish is landed through Peterhead port and relies on efficient and consistent journey times to market elsewhere in the UK and beyond. The A90 corridor connectivity between Peterhead/Fraserburgh may leverage further opportunities to grow the fishing landings post Brexit.

Tourism

This is an important and growing element of the North East's economic future. The imminent arrival larger cruise ships using the new Aberdeen South Harbour will change the nature of the regional tourism market. There is a demand for sustainable access to areas attractive to tourists – but frequently these areas are remote, and the demand can be very seasonal and relatively thin. This can make it hard to provide any form of public transport. Opportunities arise when tourism demand overlaps with wider travel demand patterns, such as on the A93 Aberdeen to Braemar corridor.

Digital and Energy

These appear to be two quite separate issues, and we are surprised that they have been combined in the document. Achieving effective digital connectivity across the whole of Scotland is essential, given the opportunity that this brings to improve access to services, facilitate flexi working, and support sustainable and viable rural economies and businesses. It is core to travelling less and to the ability to change behaviours. As a Council we have invested in ICT systems which have enabled remote working and reduced the need to travel. We would encourage Scottish Government and its agencies to make a similar investment and so enhance connectivity and communications across Scotland.

The issue of energy is separate, with a focus on energy transition, and to follow the North East's example with trialling hydrogen vehicles. It also relates to availability and alternative approaches for enabling ULEV and their supporting energy infrastructure. The ability of the supply chain to provide suitable vehicles that are over 3.5T will need to be a core part of the action plan to deliver the NTS vision.

Greater detail should be given to the development of hydrogen technology, which is just given passing reference on page 25/26. The North East of Scotland has the largest fleet of hydrogen buses and is trialling the development of other hydrogen technologies. Hydrogen vehicles offer greater potential in rural areas where range anxiety is a constraint for electric vehicles. Scotland has potential to grow its economic base as a centre for hydrogen vehicle and supply chain development in the UK alongside electric vehicles. The North East of Scotland is at the centre for this.

Spatial Planning

Given the importance of spatial planning to transportation, the recent decision to effectively discontinue a statutory approach to regional spatial planning in Scotland has to be highlighted as an apparently backward step which ignored the successful approach in the North East.

Reliability and demand management

This aspect, alongside the climate change agenda, is possibly one of the most fundamental elements of the strategy, given its direct implications for priorities for future transport investment. Digital investment, changing working practices, re-thinking our relationship with the car, promotion of effective active travel and public transport priority networks are required alongside measures to manage demand. These will include parking controls, traffic management strategies, and road space reallocation. The consultative strategy is relative silent on the approaches to be taken and the need for such solutions to be co-produced by all levels of government if they are to be successful as they have been in other countries.

Safety and Security

It is essential that progress on road safety for vehicles, is extended to road safety for all those travelling with increased emphasis on vulnerable groups such as active travel users.

Overall, the draft strategy is surprisingly restricted when referring to road safety. We are surprised at the lack of direct reference to the national Road Safety Framework (RSF) and its links to the NTS. We would expect the NTS to look forward to the next iteration of the Framework document and how it links to the desired outcomes of wider transport strategy.

The draft NTS states:

'*Scotland's roads are getting safer and we also have one of the safest rail networks in the world. In 2018, total reported road casualties fell by 11% compared to 2017; at around 8,400 casualties, these levels are at their lowest since annual records began in 1950.*'

This is a bold statement and while it may be evidenced that collisions and casualties are falling, what is the cause of this effect? The underlying reason for these reductions is difficult to isolate. What makes a road safer – is it the road itself or road users using it in a way which minimises the likelihood of collision? Is it socio economic factors or subtle societal changes which are influencing road user behaviour? There is need for further study and evidence to accurately explain the change in statistics.

Routes such as the AWPR, with its advanced and contemporary design will eliminate common dual carriageway based collisions (cross-overs and junctions) but - acknowledging the significant investment in the trunk road network, including the A9 and A96 programmes - we will have to work with the existing road network for decades to come. By asserting *roads* are 'safer', there is an underlying suggestion that all the road improvements, new designs, strategies and routes are the reason for falling casualty numbers but what of the impact of behaviour change, or the observed fall in the number of younger people learning to drive or owning cars?

December 2020 will see the conclusion of the existing National Road Casualty Reduction target period and plans are now being made for the next iteration. This will likely set further casualty reduction targets, presumably more challenging, however no direct mention is made of Scotland's national RSF, including the targets, or its successor document in the draft Strategy. Given the direct linkages between NTS and the RSF, we would have expected it would have merited some form of specific reference.

We would acknowledge the safety related comments relating to technological advancements, and given time, would agree that some potential collisions will be prevented through the use of new driving aids. Clearly that will take some time to reach all road using vehicles, but it will be an interesting development.

We would reiterate the need for a clear statement linking the NTS and the RSF and acknowledgment of this as the driver for road safety policy for all users.

Health and Active Travel

The promotion of health and active travel needs to be an essential element for the NTS. The provision of high quality infrastructure alone will not be sufficient – promotion of active lifestyles, managing vehicle demand and speeds, appropriate location of accessible services, and well designed urban spaces are all appropriate and necessary responses. The achievement of these changes will happen at a local level and increased allocation of the resources to local and regional groupings will be far more effective than bidding to national funding pots. The work to link Health and Transport has been a core part of what we have done in our area through the Health and Transport Action Plan since 2008 (https://www.nestrans.org.uk/wp-content/uploads/2018/06/HTAP-Annual-Report-2017-2018.pdf).

Information and Integration

The challenge of travel information is increasingly being tackled due to the availability of digital information. The next challenge is appropriate information provision in instances where there is planned or unplanned network disruption.

Region wide ticketing schemes, such as the North East's *GrassHOPPER*, can effectively reduce the difficulty of using multiple operators to complete a bus journey. Ongoing work on contactless payments, apps, real time information systems will require partnership working between operators, manufacturers, local/regional transport bodies and Scottish Government. The complexities of this area the role of the private sector will need to be fully understood and addressed.

Resilience

It is perhaps surprising that the issue of resilience appears to have been included at the very end of the discussion on challenges. Transport network resilience is not only about being able to cope with and recover from severe weather events. It also relates to long term resilience, including network maintenance of roads, footways, cycle routes, structures and other assets (see comments on climate change adaptation). This maintenance is coming under increasing pressure and the work on Road Maintenance is being considered by the Scottish Parliament's Rural Economy and Connectivity Committee following Audit Scotland consideration. The Aberdeenshire response was approved on 22 August
http://committees.aberdeenshire.gov.uk/committees.aspx?commid=495&meetid=19384

Section B: The Policies to Deliver the NTS

Through the process to develop the NTS, 14 policies have been identified that will deliver its Vision 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; and
- Reduce the transport sector's emissions to support our national objectives on air quality and climate change.

4a. Are these the right policies to deliver Priorities and Outcomes of the National Transport Strategy? Please explain your answer.

Aberdeenshire Council supports all the 14 policies, which appear to be a coherent response to the challenges and issues previously discussed, particularly when read alongside the associated "enablers".

However, we are eager to see, and be consulted upon, the specific actions and funding decisions that will be taken in response to the policies and enablers.

4b. Are some of these policies more important than others or are they equally important? Please explain your answer.

The 14 policies are complementary and aim to achieve the outcomes and objectives. Therefore, at a national level none should be given more weight than others. Reflecting upon the regional differences across Scotland, some elements may have greater emphasis in different areas.

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

5a. Are there specific decisions about transport in Scotland that are best taken at the national level (e.g. by Transport Scotland or the Scottish Government), at a regional (e.g. by Regional Transport Partnerships), or at a local level (e.g. by Local Authorities)? Please explain your answer, by providing examples of where you believe transport related decisions should be taken.

Yes, it is appropriate that specific decisions about transport are made at national, regional and local levels.

In the North East of Scotland, the Regional Transport Partnership (RTP) and Local Authorities work in a collaborative manner, avoiding duplication. Nestrans tends to focus on strategic transport, liaison with national bodies such as Transport Scotland, Network Rail and train operating companies, whereas Local Authorities focus on delivery at a local level such as active travel, bus operations, road maintenance, etc.

There is a great deal of ambition at a local level to deliver transport schemes that are fit for their local communities. Sometimes, differing approaches are required between urban and more rural areas. There needs to be a recognition that Local Authorities have a better understanding of the local issues, and for example applying a one size fits all method to evaluating funding grant applications is not affording Local Authorities the flexibility to deliver the right infrastructure in the right place. Some grant application

processes have become overly bureaucratic, requiring disproportionate amounts of staff resource to apply for funding and engage constantly with national agencies. A more simplified and streamlined process for grant funding is required. Significant Government funding is being used in the administration of active travel grants and is not being used to deliver the infrastructure required. Removing this level of administration and passing this to RTPs or Local Authorities to administer will provide more 'locality' to decision making and reduce the costs and overheads currently associated with grant management, in national agencies. The Smarter Choices Smarter Places (Paths for All) model works well and would be worth replicating.

The decisions and funding for regional level transport could also be strengthened by using the current governance models to deliver on projects/initiatives which are too large for Local Authorities but may not be a national priority but fit within the overall strategic framework. Allocating funds that would allow stations, park and ride sites, Intelligent Traffic Systems, active travel schemes or new junctions to be delivered regionally would be a more effective approach than currently taken.

Working across boundaries and agencies for a common outcome should be the norm for national, regional and local Government. This may involve passing responsibility, decisions and budgets to other more locally focussed groups. This Council is playing a key role in the collaboration in the roads sector through the formally established Northern Roads Collaboration Joint Committee. Whilst funding has been directed through other regional collaboratives for Education there would be merit in taking a similar approach for the Roads Sector given the formal Governance that is in place (http://committees.aberdeenshire.gov.uk/FunctionsPage.aspx?dsid=100409&action=GetFileFromDB).

5b. Should local communities be involved in making decisions about transport in Scotland? If so, how should they be involved, and on which specific issues should they be involved in making decisions on? Please explain your answer, by providing examples of which transport decisions local communities should be involved in, also suggesting how they should be involved.

Local communities should be involved through consultation and involvement, but not directly in making decisions. Decision making is appropriately for democratically responsible authorities, such as Scottish Government, Local Authorities and RTPs. For example, The Annual Trunk Road Programme in a Local Authority area could be taken to the relevant Committee for comment and input before final approval.

Working groups with varied stakeholders can help support understanding on how to change behaviours by addressing the challenges at source.   It can be a challenge however, as with all public participation, to get an accurate take on how transport affects the widest range of users and transport professionals would benefit from closer alignment with the work pioneered and promoted through the community empowerment teams in Scottish Government and community planning teams in Local Authorities as part of a whole place approach.

Section D: The Strategy as a whole

6. Does the National Transport Strategy address the needs of transport users across Scotland, including citizens and businesses located in different parts of the country? Please explain your answer.

No.

The NTS requires to effectively address the transport needs across all of Scotland. However, the consultative draft appears much more focused on either the central belt area, or remote rural and island communities, missing out on the needs and challenges of large parts of the population of Scotland in the process.

Rural areas and small/medium towns have specific challenges – often around the provision of effective and attractive commercial public transport services that meet the needs of the population. Active travel provision can also be a challenge where there is a dispersed population surrounding a small to medium sized town. Both can lead to high levels car dependence that can be difficult to change, frequently exacerbated by the withdrawal or centralisation of services and employment opportunities. Issues of congestion are limited, but journey time reliability and safety of the rural road network are key concerns.

Section E: Looking Ahead

7a. What aspects of the transport system work well at the moment? Please provide details.

In the North East, the system of regional collaboration and partnership is working well. This is focussed around the two Local Authorities working with Nestrans, but also alongside strategic planning and economic development interests.

The area also has formal partnerships, such as the Bus Alliance where operators, Local Authorities and Nestrans work collaboratively towards agreed outcomes. Other liaison groups include a Freight Forum and regular rail liaison meetings, thus ensuring a channel for discussion and efficient communications channels avoiding duplication or divisions.

The development of joint bus ticketing is also a good example, where a multi-operator smart cashless ticket has been developed and is proving popular with passengers.

Active travel initiatives are also being successfully developed, however often facing serious funding constraints due to inappropriate forms of funding governance from third parties with somewhat ambiguous links to democratic processes and local accountability. The rules for funding should be adapted to local specific characteristics, in order to make these funds effectively available for all Scottish regions.

The recent progression of the new railway station at Kintore also demonstrates how Local Authorities, RTPs, and the wider rail industry can effectively work together in order to provide a very beneficial outcome for the local and regional area.

Aberdeenshire Council has played a key role in enabling partnership working to reduce the level of casualties on our road network. Initially this was through a forum in 2007 that sat alongside our role as leads for the Safety Camera Partnership and then post 2013 we focussed on filling the gaps left in this area of work following the creation of Police Scotland. The common purpose of seeking this reduction has been set against steady decline in the numbers of people killed or seriously injured in our area and the recent RSF annual review recognised the approach taken in the North East.

Through the application of sound asset management principles, we have managed our local network so as to minimise the level of deterioration of the road condition in the period since 2004.

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

The NTS could and should do more to facilitate and encourage partnership working and reward success where this is shown to work. It is important to recognise that a one size fits all solution is rarely effective and partners in the North East have found ways to work collaboratively to produce effective and efficient means of delivering solutions.

We have seen with the City Region Deal approach, across Scotland, there needs to be good working relationships between national and regional partners, recognising both regional priorities and national priorities when agreeing such long term funding streams outwith the standard governance models.

8a. What aspects of the transport system do not work well at the moment? Please provide details.

For the North East of Scotland, transport and accessibility is likely to remain a major spatial and economic disadvantage for some time and may actually worsen in relation to other parts of the UK. CrossRail, Heathrow's third runway and HS2 and HS3 will have significant impacts for surface access times across much of England and the South East but there are currently no real proposals to extend investment in high speed rail beyond the North of England.

For future investment at Heathrow to be beneficial for North East of Scotland (as rail times are uncompetitive to South East England), the devolution of Air Passenger Duty to regional airports should be a consideration. Such devolution of fiscal powers to enable local areas and regions to enhance connectivity by providing a more favourable tax environment could help mitigate some of the competitiveness issues faced by areas such as the North East of Scotland.

Given the dispersed nature of the Aberdeen City Region there is a risk that if the required improvements to infrastructure and connectivity are not realised the trend of migration from rural to urban areas will be exacerbated, with the cost and challenges of

service delivery (including transport services) to rural communities continuing to rise to the point where it may become unsustainable. Digital investment may mitigate this.

The ability to innovate and trial new approaches to service delivery is constrained by governance and funding models. Other countries have put in place large innovation funding streams for transport which allow innovations to be trialled without the fear of failure. This would be worthy of developing in Scotland, ideally through locally and regionally based structures.

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

The document seems to lack information on practical actions. It contains high level statements but does not make commitments on how the stated objectives will be delivered.

The table on pages 49 to 51 states the policies and their enablers and the clarity this provides is welcomed. However, the table seems to miss a third column with the action required to reach the enablers. The information about what actions are going to allow this achievement would be valuable for a meaningful discussion in the consultation phase.

The approach to developing and co-producing the draft NTS utilised working groups and it may be worth retaining that type of structure to help address this question as well as oversee the co-delivery against the policies.

There will always be a place for thinking radically about addressing some of the issues identified in ways that are different for different part of the nation, particular in areas which are less accessible other than by private car. This includes consideration of rural car clubs, targeted support for driver training to enable young people access to these forms of transport, ongoing investment in digital technologies, and other innovative approaches.

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

The 3 key areas stated– Increasing Accountability, Strengthening Evidence and Managing Demand – together do not appear to meet the scale of the challenge will be required to achieve the priority outcomes set out in the document.

Increasing Accountability – Improving the linkages between existing consultations may offset the need to create a Citizens Panel. Some institutions at regional and local level, like chambers of commerce, businesses and Local Authorities, have deep knowledge of their population's needs and requirements. It is difficult to see how a national citizen's panel would be agile enough to increase accountability by itself. Local Authority

members are already held to account on a regular basis at a local level and so it may be that there need to be clarification on where the increased accountability is being sought.

Strengthening Evidence - Evidence needs to be relevant at local and regional level, not just national. Again, it can be resolved with existing data as long as there is a collaborative understanding between institutions and a willingness to share knowledge and intelligence around that data and how it is to be used.

Managing Demand – this is a fundamental aspect in the NTS. The reduction in the need to travel is a core part of what this Council set out in its 2011 LTS, but we also recognised that there is still a need to travel for many people with few options that do not involve roads. The NTS needs to recognise that basic infrastructure is still required and there should not be a suspension on new infrastructure all across Scotland. Indeed, if the aspirations around developing our economy and tackling climate change are to be realised, then we will need to provide the appropriate infrastructure.

In addition, but separately to these 'immediate actions', we note the announcements made in the Scottish Government's Programme for Government specifically related to greener transport. While welcoming the investment committed, we do wonder how the new Programme for Government 2019 does – 2020 fit with a nascent and emerging transport strategy which does not contain such concrete commitments, but which points to an action plan which presumably will include the programme already announced.

We welcome the announcements to:

- invest over £500 million in improved bus priority infrastructure to tackle the impacts of congestion on bus services and raise bus usage;
- reduce emissions from Scotland's railways to zero by 2035 through the continued electrification of the network, the procurement of battery-powered trains and exploration of the potential of hydrogen powered trains in Scotland. The North East is well placed for the latter, given its long-standing experience in the sector and hydrogen generation aspirations;
- provide an additional £17 million to support the demand for ULEVs through our Low Carbon Transport Loan scheme, while expanding the scheme to include used electric vehicles; and
- introduce Green City Region Deals.

10. Is there anything else you would like to say about the National Transport Strategy? Please provide details.

Regarding Annex A, please see below comments *in italics*:

Priority	Outcome	Indicators	Additional comments
Promotes equality	Will be affordable, *attractive and reliable* for all	1. Spend on transport and vehicles relative to income 2. Measure of Transport Poverty - TBC	*What is intended as measure of reliability?*
	Will be easy to use for all	3. Modal share of transport – focus on gender, income, geographic, age, and disability status segmentation	*How do you propose to measure "easiness"?*
	Will provide fair access to the services we need	4. Accessibility of key services	*How do you propose to "fairness"?*
Takes climate action	Will adapt to the effects of climate change	5. Proportion of petrol, diesel and EV cars and vans registrations *Hybrids, electric buses*	*Other approaches to energy provision?*
	Will help deliver our net-zero target	6. Use of sustainable transport modes/modal shift to sustainable modes *LEV charging points network (number of charging opportunities)*	*Electrification train network* *Will this include reducing the need to travel?*
	Will promote greener, cleaner choices	7. Rates of walking and cycling for everyday short journeys	*Should this include not travelling at all to carry out an activity.*
Helps our economy prosper	Will get us where we need to get to *timely, low cost, energy efficient*	8. *Affordable and quick* connectivity to employment and key services 9. Movement of freight *(LEV)*	*This also needs to build in the ability of the supply chain to deliver the types of vehicles.*
	Will be reliable, efficient and high quality	10. Satisfaction with public transport 11. Performance measures of public transport modes	
	~~Will use beneficial innovation~~ *Adoption of innovative technologies*	12. Indicator to be developed	*Apps, LEVS* *See approach by DfT on Innovation*

Priority	Outcome	Indicators	*Additional comments*
Improves our health and wellbeing	Will be safe, secure *and inclusive* for all	13. Transport casualties and accidents 14. Measure of air quality *at key locations*	*How will level of inclusiveness be measured?*
	Will enable us to make healthy *and active* travel choices	15. Availability of *safe, effective and attractive* ~~segregated~~ walking and cycling infrastructure *and public transport network / interchange options*	
	Will help make our communities great places to live	16. Rates of walking *and cycling*	*Multi-modal connectivity* *Rates vehicle access to city centres* *Public satisfaction surveys*

Section F: Strategic Environmental Assessment (SEA)

11. What are your views on the accuracy and scope of the information used to describe the SEA environmental baseline set out in the Environmental Report? Please give details of additional relevant sources.

The SEA recognises the appropriate key environmental issues associated with the transport system – greenhouse gas emissions, energy use, air pollution, habitat fragmentation, noise, cultural heritage and landscape values. We also agree with the decision of scoping all possible required topics in the Environmental Report, due to the wide nature of the NTS and implications such a program may impose in the environmental baseline.

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

The NTS sets environmental ambitious goals, that are expected to have a significantly positive impact in the environment and greatly benefit the population in terms of health and wellbeing.

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

The potential for adverse environmental effects must be accessed individually, according with the relevant statutory procedures. The Environmental Report acknowledges that each individual project will have its own assessment requirements, and that mitigation techniques and monitoring methods will be tailored to each specific case.

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

The environmental targets set by the NTS (like the net-zero emissions by 2045) are very positive and ambitious. However, there is a lack of detail in defining the way these targets will be accomplished, and that is reflected in the Environmental.