ITEM No …5…………

REPORT TO: **CITY DEVELOPMENT COMMITTEE – 28 OCTOBER 2019**

REPORT ON: **NATIONAL TRANSPORT STRATEGY CONSULTATION**

REPORT BY: **EXECUTIVE DIRECTOR OF CITY DEVELOPMENT**

REPORT NO: **353-2019**

1 PURPOSE OF REPORT

1.1 This report outlines the purpose and content of the Transport Scotland's draft National Transport Strategy (NTS2) and asks Committee to note the NTS2 and endorse Dundee City Council's response in Appendix B of this report. The NTS2 contains issues relating to transport governance and these should be noted.

2 RECOMMENDATION

2.1 It is recommended that the Committee:

    a   notes that the National Transport Strategy (NTS2), a Draft Strategy for Consultation, was issued by Scottish Government on 31 July 2019;

    b   approves the proposed response to the consultation questions as detailed in Appendix B to the report and responds; and

    c   remits the Executive Director to enter discussions with neighbouring local authorities, Tactran, Transport Scotland and Tay Cities Region Joint Committee to investigate Transport Governance for the region.

3 FINANCIAL IMPLICATIONS

3.1 There are no direct financial implications associated with this report although future regional transport governance arrangements may have financial impacts for the Council and Tactran to consider.

4 BACKGROUND

4.1 The draft National Transport Strategy has been developed by Transport Scotland on behalf of the Scottish government over the last 2 to 3 years. This strategy sets out the visions and key priorities to meet the significant challenges going forward for Scotland and should give direction of future Transport Governance and deliver including the second iteration of the Strategic Transport Project Review which has just started to proceed. The development of the strategy was undertaken with an extensive network of partners including local government, academia, third sector groups, interest/ action groups alongside business and industry. The NTS2 has a foreword and five further chapters as outlined below:

    1   Foreword by Cabinet Secretary;

    2   A vision for transport in Scotland;

    3   Current and emerging challenges;

    4   Meeting the challenges;

    5   Transport governance; and

6   What we will do.

The National Transport Strategy can be seen at the following link:

https://www.transport.gov.scot/our-approach/national-transport-strategy

4.2   Chapter 2 "A vision for transport in Scotland", is outlined below:

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

4.3   The vision is underpinned by four Priorities, each with three associated Outcomes. The vision will be the basis upon which Scottish Government take major strategic decisions and evaluate the success of transport policies going forward. All four Priorities are interlinked to deliver the vision.

4.4   The four priorities and their associated outcomes from the Strategy are detailed below.

a   Promotes equality:

- will provide fair access to services we need;

- will be easy to use for all; and

- will be affordable for all.

b   Takes climate action:

- will adapt to the effects of climate change;

- will help deliver our net-zero target; and

- will promote greener, cleaner choices.

c   Helps our economy prosper:

- will get us where we need to get to;

- will be reliable; and

- will use beneficial innovation.

d   Improves our health and wellbeing:

- will be safe and secure for all;

- will enable us to make healthy travel choices; and

- will help make our communities great places to live.

4.5   Chapter 3 "Current and emerging challenges" identifies and discusses a number of positive trends in Transport in recent years. Notwithstanding these positive developments, the draft NTS2 acknowledges that Scotland's transport system continues to face a number of challenges: many people encounter problems when trying to access the services they need; businesses still face congestion and delays when reaching their customers; and vehicles continue to emit greenhouse gases and pollute the places we live and work.

4.6   NTS2 identifies a number of challenges that the strategy needs to address and these are listed below.

- poverty and child poverty;
- social isolation;
- gender inequalities;
- the changing transport needs of young people;
- ageing population;
- disabled people;
- Scotland's regional differences;
- global climate emergency;
- technological advances;
- air quality;
- decline in bus use;
- productivity;
- labour markets;
- fair work and skilled workforce;
- trade and connectivity;
- freight;
- tourism;
- digital and energy;
- spatial planning;
- reliability and demand management;
- safety and security;
- health and active travel;
- information & integration; and
- resilience.

4.7   There is significant discussion and links to evidence within the draft NTS2, to support these main issues associated with the challenges and their inclusion as factors to influence the strategy.

4.8   Chapter 4 "Meeting the challenges", proceeds to identify 14 high-level policy statements of intent aimed at achieving the vision and outcomes. Further detail is provided through a series of enablers which represent mechanisms for delivering the high- level policies. A total of 38 enablers are identified and the full list of policies and enablers is included as Appendix A.

4.9   The Policies and Enablers were tested, using a Scenario Planning Tool, to understand how they perform under different plausible futures. These futures include a range of different scenarios, such as where the economy is weak or strong, where society is less or more equal, where the environment has or has not addressed the effects of climate change, or where we have a healthy or unhealthy population that takes high or low levels of active travel. The aim is to understand how effective policies are under different futures and how flexible the policies can be changed as the future changes.

4.10   Chapter 5 "Transport Governance" - democracy, decision-making and delivery, discusses at a very strategic level how transport is delivered in Scotland. This work was undertaken by a Roles and Responsibilities Working Group as part of NTS2.

4.11   The following key challenges were identified and need to be addressed:

- financial constraints limiting investment at a regional and/or local level;

- lack of support for all transport modes;

- limited resource capability and skills;

- difficulties working across boundaries and responsiveness to local needs;

- disconnect between long-term goals and short-term action;

- mixed local accountability, overall leadership and influence;

- complex governance arrangements;

- lack of ongoing maintenance of assets;

- inconsistent and/or unclear accountability;

- disconnect with Planning, Economic and Health agendas;

- lack of clarity on roles and responsibilities, particularly for the public; and

- responsiveness to the conflicting pressures of business/public sector.

4.12   The Roles and Responsibilities Working Group made three broad recommendations to the Scottish Ministers:

a   the case for change has been made and that the current arrangements are no longer sustainable;

b   our future transport governance arrangements should be on the basis of some form of regional model allowing for variations in approach between different geographic regions; and

c   governance is a complex issue, and further work needs to be done to develop a model for future transport governance in Scotland that is capable of being implemented.

4.13   Scottish Ministers agreed with the recommendations made by the Group and propose that further collaborative work to look at implementable models will follow on from this consultation to ensure we successfully achieve better outcomes for our citizens, communities, and businesses.

4.14   From a transport perspective, a regional approach to governance provides an effective means of addressing cross-boundary issues and reflecting travel to work catchments. Moreover, a strong regional approach to transport together with alignment with economic, planning, marine planning, and housing objectives supports approaches to place-shaping.

4.15   Chapter 6 "What we will do", outlines that all stakeholders involved in Transport have a role to play in delivering the Strategy and making it a success. However, in particular NTS2 identifies what action Scottish Government will take. In order to deliver the Strategy, the Scottish Government will take immediate action in three key areas: Increasing Accountability; Strengthening Evidence; and Managing Demand.

4.16   It is proposed to establish a Transport Strategy Delivery Board and Transport Citizens' Panels to increase accountability.

4.17   In terms of managing demand it is proposed to embed the Sustainable Travel Hierarchy in decision making, promoting walking, wheeling, cycling, public transport and shared transport options in preference to single occupancy private car use. In doing so Transport Scotland will review and update the Scottish Transport Appraisal Guidance (STAG) and investment decision-making processes.

4.18   NTS2 is a crucial piece of national policy and the above summary seeks to provide board members with the key information within the Strategy to enable them to make informed comment on the Strategy. Discussion on the key aspects of the draft NTS2 now follow.

4.19   Sustainable Travel And Sustainable Investment

   a   An important element in the draft strategy that will impact on future investment decisions is that the Sustainable Travel Hierarchy will be embedded into the decision making process, promoting walking, wheeling, cycling, public transport and shared transport options in preference to single occupancy private car use. The sustainable travel hierarchy is represented below.

   b   The primary purpose of this hierarchy is to seek to influence and manage transport demand.

   c   Overarching this demand management approach is the adoption of the Sustainable Investment Hierarchy which will be used to inform budgetary decisions at a national level. The Sustainable Investment Hierarchy has ranked priority the following modes of transport:

      •   walking and wheeling;

      •   cycling;

      •   public transport;

      •   taxis & shared transport; and

      •   private car.

4.20   The combination of these two hierarchies should result in national investments that favour active travel modes and sharing above single occupancy private car use.

4.21   Whilst individual local authorities can develop and deliver policies in support of the delivery of the national strategy at a local level, the critical success of the policy will depend on how the wider transport demand management measures can be delivered at a regional level. The travel to work areas to our major towns and cities are approximately reflected in the RTP areas and the travel to work demand is a significant cross boundary impact that is best considered and demand manged at a regional level.

4.22   Governance Arrangements

   a   The Council welcomes the acknowledgement within the NTS that a case for change has been made and that the current transport governance arrangements are no longer sustainable.

   b   The Council agrees that future transport governance arrangements should be on the basis of some form of regional model allowing for variations in approach between different geographic regions. It is proposed that the Council enter discussions to with neighbouring local authorities, TACTRAN, Transport Scotland and the Tay Cities Region Joint Committee to explore Regional Governance arrangements for transport. It is acknowledge

that given the financial pressures facing the Council that it has very limited resources and this must be considered in any future discussions to minimise the impact on the Council. The Council response to regional Governance is contained within Appendix B of this report.

c   Governance is indeed a complex issue and further work needs to be done to develop a model for future transport governance in Scotland that is capable of being implemented.

5   POLICY IMPLICATIONS

5.1   This report has been subject to an assessment of any impacts on Equality and Diversity, Fairness and Poverty, Environment and Corporate Risk.

5.2   The NTS2 has been subjected to an EQIA and Strategic Environmental Assessment as Transport can have many policy implications. These assessments can be seen at:

EQIA   -   https://www.transport.gov.scot/publication/national-transport-strategy-2-equality-impact-assessment/

Strategic Environmental Assessment - https://www.transport.gov.scot/publication/national-transport-strategy-2-strategic-environmental-assessment-environmental-report/

6   CONSULTATIONS

6.1   The Council Management Team were consulted in the preparation of this report.

7   BACKGROUND PAPERS

7.1   None.

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APPENDIX A

NATIONAL TRANSPORT STRATEGY REVIEW

Appendix A: NTS2 Policy Measures and Enablers

Policies and Enablers	Assessed Using Scenario Planning Tool
Policy A - Continue to improve the reliability, safety and resilience of our transport system	
Enabler 1. Increase safety of the transport system and meet casualty reduction targets	
Enabler 2. Increase resilience of Scotland's transport system from disruption and promote a culture of shared responsibility	
Enabler 3. Implement Enablers that will improve perceived and actual security of Scotland's transport system	
Enabler 4. Increase the use of asset management across the transport system	
Policy B - Embed the implications for transport in spatial planning and land use decision making	
Enabler 5. Ensure greater integration between transport, spatial planning, and how land is used	
Enabler 6. Ensure that transport assets and services adopt the Place Principle	
Enabler 7. Ensure the transport system is embedded in regional decision making.	
Policy C - Integrate policies and infrastructure investment across the transport, energy and digital system	
Enabler 8. Ensure that local, national and regional policies offer an integrated approach across all aspects of infrastructure investment including the transport, digital, and energy system	
Policy D - Provide a transport system which enables businesses to be competitive domestically, within the UK and internationally	
Enabler 9. Optimise accessibility and connectivity within business-business and business-consumer markets by all modes of transport	
Enabler 10. Ensure gateways to and from domestic and international markets are resilient and integrated into the wider transport networks to encourage people to live, study, visit and invest in Scotland	

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Appendix A: NTS2 Policy Measures and Enablers

Enabler 11. support Enablers to improve sustainable surface access to Scotland's airports and sea ports	
Policy E - Provide a high-quality transport system that integrates Scotland and recognises our different geographic needs	
Enabler 12. Ensure that infrastructure hubs and links form an accessible integrated system that improves the end-to-end journey for people and freight	
Enabler 13. Minimise the connectivity and cost disadvantages faced by island communities and those in remote and rural areas	
Enabler 14. Safeguard the provision of lifeline transport services and connections	
Policy F - Improve the quality and availability of information to enable better transport choices	
Enabler 15. Support improvements and innovations that enable all to make informed travel choices	
Enabler 16. Support seamless journeys providing the necessary infrastructure, information and interchange facilities to connect all modes of transport.	
Enabler 17. Ensure that appropriate real-time information is provided to allow all transport users to respond to extreme weather and incidents	
Policy G - Embrace transport innovation that positively impacts on our society, environment and economy	
Enabler 18. Support Scotland to become a market leader in the development and early adoption of beneficial transport innovations	
Policy H - Improve and enable the efficient movement of people and goods on our transport system	
Enabler 19. Ensure the Scottish transport system efficiently manages needs of people and freight	
Enabler 20. Promote the use of space-efficient transport	
Policy I - Provide a transport system that is equally accessible for all	
Enabler 21. Ensure transport in Scotland is accessible for all	
Enabler 22. Identify and remove barriers to public transport connectivity and accessibility within Scotland	

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Appendix A: NTS2 Policy Measures and Enablers

Enabler 23. Reduce the negative impacts which transport has on the safety, health and wellbeing of people	
Enabler 24. Continue to support the implementation of the recommendations from, and the development of, Scotland's Accessible Travel Framework	
Policy J - Improve access to healthcare, employment, education and training opportunities to generate inclusive sustainable economic growth	
Enabler 25. Ensure sustainable labour market accessibility to employment locations	
Enabler 26. Ensure sustainable access to education and training facilities	
Enabler 27. Improve sustainable access to healthcare facilities for staff, patients and visitors	
Policy K - Support the transport industry in meeting current and future employment and skills needs	
Enabler 28. To meet the changing employment and skills demands of the transport industry and upskill workers.	
Enabler 29. Support initiatives that promote the attraction and retention of an appropriately skilled workforce across the transport sector	
Policy L - Provide a transport system which promotes and facilitates travel choices which help to improve people's health and wellbeing	
Enabler 30. Promote and facilitate active travel choices across mainland Scotland and islands	
Enabler 31. Integrate active travel options with public transport services.	
Enabler 32. Support transport's role in improving peoples' health and wellbeing	
Policy M - Reduce the transport sector's emissions to support our national objectives on air quality and climate change	
Enabler 33. Facilitate a shift to more sustainable modes of transport for people and commercial transport	
Enabler 34. Reduce emissions generated by the transport system to improve air quality	
Enabler 35. Reduce emissions generated by the transport system to	

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Appendix A: NTS2 Policy Measures and Enablers

mitigate climate change	
Enabler 36. Support management of demand to encourage more sustainable transport choices	
Policy N - Plan our transport system to cope with the effects of climate change	
Enabler 37. Increase resilience of Scotland's transport system to climate change related disruption	
Enabler 38. Ensure the transport system adapts to the projected climate change impacts.	

APPENDIX B

DUNDEE CITY COUNCIL CONSULTATION RESPONSE TO NATIONAL TRANSPORT STRATEGY

Section A: The Vision and Outcomes Framework

Question 1

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

DCC Response

Yes – The Council considers that the vision is clear concise in that it states what we would like to achieve, for who and why. The vision is easily understandable.

Question 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?

DCC Response

The Council considers that the four priorities identified are the correct priorities for the strategy and this is reflected in the Councils own city plan where the Council has identified very similar prioritises/challenges going forward. The Council's focus is largely around;

- *Social Challenges*
- *Economic Challenges*
- *Environment Sustainability Challenges*
- *Community Safety Challenges*
- *Health and Wellbeing Challenges*

While the Council supports the four NTS priorities there seems to be some disconnection between the problems, issues, outcomes, policies and enablers. The strategy should clearly demonstrate a continuing theme that runs right through the strategy. This continuity is not apparent and it makes the strategy look disjointed. It appears as though the chapters have been prepared in isolation, nevertheless the Council considers the priorities are the correct.

For some priorities there is a reasonably clear way forward as the climate change and transport emissions can be tackled through the uptake of electrics vehicles and active travel however there much less clarity on the how the strategy will deal with the economic and equality priorities. It is acknowledged that these are more difficult to give clear direction but it is considered that some level of specificity is required to give focus to the strategy and future projects. The strategy identifies the four priorities and although gives no detail if they are all equal and that more emphasis should be on one or two of the priorities. The lack of prioritisation does not really give a clear steer to local authorities and other bodies and it suggests that the strategy is 'all things to all men' and that this weakens the impact and direction of the strategy. The Council consider this is a crucial issue and hopefully it can be addressed in the final NTS. A strategy is all about prioritisation of actions and resources to meet the vision.

Question 2b

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

DCC Response

The Council considers that the while it generally agrees with the four main priorities it is still necessary to have clear focus and that the 4 four priorities are not all equal.

Without setting priorities there is a risk that tensions are created which are unresolved and which will act as a constraint on decision-making, investment and delivery. The Strategy should directly compliment other Government priorities and policies and that it needs to align itself with them to ensure a consistent and logical approach.

There are clear policy imperatives, set by the Scottish Government, which should help identify priorities, the most important being ranked (see below) with equality running through them all:

1   Inclusive Growth
2   Net Zero Carbon
3   Improved Health Outcomes

The Council agrees with these ranked priorities above and considers that whilst the purpose of the Strategy should be to deliver a holistic approach to delivering transport solutions it is difficult to get people and organisations leading/support healthier and more sustainable lives when they are more concerned with their own economic circumstances. This applies to both individual people & families and organisations including local authorities. Nonetheless, we must also consider the limited timescales we have to undertake actions to address climate change issues and this needs to be recognised.

Question 3

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

DCC Response

Chapter 3 is a list of challenges, and emerging issues and it seems to present them in the order of the four priorities but this is not clearly apparent. It would be far better to have a structured approached and have an idea of what are the underlined major issues and challenges, and the question is are all challenges & issues equally important? The Council considers that most of the issues have been covered in a high level way and the Council are aware of many of the issues. The NTS2 should have a summary of what it considers the key issues and clearly link them to the 4 priorities and this will help understanding of the Strategy overall.

The NTS2 states that Bus passenger decline is very much caused by congestion and while this may be the case in some areas the Council considers that the reasons for this is much more complex and that it is a combination of factors such as demographics, cost of travel, changes in employment practices, service levels, car ownership, income levels and numerous other issues. It should be noted that Local Authorities have had to reduce bus subsidies as they have been forced to focus on core functions as overall funding has reduced over many years and likely to continue in the foreseeable future.

Although the bus network in Dundee is generally good and is provided on a commercial basis there are still areas within the city where it does not meet the needs of its citizens. As the population ages, older people become more reliant on bus services as they have to give up driving, although they still have to make necessary journeys to access key services. The problems in rural areas may be even more acute and social isolation will be a growing issue. Young people are also less likely to drive as the cost of buying and insuring a car has become prohibitive, however social media has also reduced the need to travel and this is a notable issue going forward. The Council welcomes the new Transport Bill that allows local authorities more powers to provide bus services however these can only be implemented with significant funding that is currently not available.

The NTS2 does mention the cost of travel and its disproportional impact for poorer people and this should be addressed as part of the strategy. Rail fares are of particular concern as the cost of intercity rail travel is very prohibitive especially to lower income groups and this should be reviewed. These high fare costs also restrict tourists travelling beyond the main Central Belt conurbations and therefore are a barrier that needs addressed. With the V&A museum opening, the city has increasingly become a major tourist attraction and looks to build on this success going forward and growing tourist numbers is

an ambition for the city. The Council are also very keen to provide Park and Ride around the city and would wish that these are progressed as part of STPR2.

Climate Change is very much an emerging issue and the Dundee City Council have made significant strides in reducing emissions through electrifying its own fleet and have supported the uptake of Electric Vehicles by installing charging infrastructure throughout the city. The city also has one of the largest electric taxi fleets in Scotland. However the move to EVs seems to be well on the way as more and more car manufacturers move away from the internal combustion engine and this brings its own issues. There will be very significant infrastructure challenges to be dealt with as the explosion of EV numbers will require an exponential uplift in the number of EV charging points which needs to be supported by an enhanced power grid. The good aspect is at least there seems to be an identified solution that it will limit future greenhouse gas emissions and improve air quality. The Council would anticipate that the delivery plan will have a variety of actions supported by funding to ensure that the Scottish Government 2032 target is met. Autonomous vehicles may be just around the corner and this will also set many challenges many with many of them likely to be unknown at present.

Local authorities are under very significant financial pressure and have required to prioritise limited resources. This appears to be underestimated in the NTS2, though it has a major impact as Local Authorities are one of the main delivery agents for Transport and are responsible for the vast majority of the road network. The NTS2 should also consider all the risks that could impact in achieving the vision and priorities and funding is a major risk that needs redressed and it must include capital and revenue funding. Potentially a risk register should be included in the NTS2.

Section B: The Policies to Deliver the NTS

Question 4a

Are these the right policies to deliver Priorities and Outcomes of the National Transport Strategy?

DCC Response

The Council considers that there is few linkages between problems/ emerging challenges and the priorities and polices/enablers. The draft NTS2 should be more joined up, with better continuity connecting all the important chapters and elements. It would be also beneficial to the include a summary of the policy assessment review with other key Scottish Government documents such as the Economic strategy , Climate Change action plan, National Planning policy documents. This is to ensure that tensions and overlaps in Government Policy is highlighted and overall policy alignment is consistent. It would be good to get an understanding of what policies are the main priorities for central government that can be influenced by the NTS2. Potentially the draft NTS2 should use a more STAG/DPMTAG based approach to ensure the connection between issues/emerging challenges and priorities/policies and enablers.

The policies/enablers themselves are all commendable and the Council generally agrees with them but the real substance is how they then go on to meet the challenges issues and priorities. Some of the enablers add very little to the policies and are nothing more than a rewording of the policy. There is a feeling that there may be too many policies and enablers and this suggest that the strategy lacks focus and it's trying to do too much which is considered a significant weakness. The strategy needs focus. Enablers that add little and are lost opportunities to present a clear direction for workstreams to address the challenges identified. Again the question is are there some policies more important than others? What policies are likely to have the biggest impact on meeting the priorities and tackle the problems and emerging challenges? This is unclear.

The NTS suggests alternative scenarios have been tested and it would be beneficial if some assessment of the scenarios that were tested could be presented within the main consultation document with explanation. This would help confirm why the strategy has settled on its current position and make sure it is the right strategy for Scotland.

Question 4b

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

DCC Response

This really follows on from 4a and there is an assumption that all policies/enablers are equal and this is the crux of the problem as the strategy lacks prioritisation and these are inter-related between the issues, challenges, priorities with the policies/enablers. Without setting priorities, there is a risk tensions are created which are unresolved and which will act as a constraint on decision-making, delivery and investment. What policies are likely to have the biggest impact on meeting the priorities and tackle the problems and emerging challenges? This is unclear.

Without prioritisation the NTS will become less meaningful and will provide little direction. The Council considers that inclusive growth is the priority followed by climate change and health & wellbeing are the ranked priorities as mentioned in Q2a. This should be reflected in the policies and enablers going forward.

The Scottish Government are consulting on the STPR2 and it would be useful on what policies will be main focus of major investment. How will major Rail, Road and Public Transport schemes be considered and investment determined given the new strategy. The new NTS seems to be very people/local focused and while this place principle is endorsed by the Council there seems some disconnection from major strategic schemes that may come out of the STPR2. The strategic case for these projects may still remain and needs to be considered in conjunction with the final NTS2 going forward into STPR2.

The new Transport Act places many and significant new responsibilities and duties on Local Authorities and it is not clear how the new legislation will sit within the NTS, but it is very likely that this legislation will have far greater impact on Councils than the NTS. It would be good to know how the NTS2 will utilise the new legal framework in the Transport Bill to deliver the priorities. It seems unclear and hopefully this will be included in the final NTS2 when the Transport Bill receives Royal assent.

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

Question 5a

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

DCC Response

The Council recognises the regional dimension relating to Transport as Dundee is one of the smallest local authorities' areas in Scotland and has little influence on demand generated by other local authority areas which can significantly impact the city's residents and its transport network. The city is a regional centre serving approximately 500000 people and the Council accepts the case for change has been made and a regional governance model is necessary to steer delivery of the NTS2 and the Regional Transport Strategy.

The Council has not yet established a definitive view on how Regional Governance should be developed although it is agreed that it is fundamental to the delivery of the NTS2. Each local authority/RTP will have to decide on this, however any model going forward cannot add significant resource burdens to existing Councils and duplication of functions and responsibilities should be avoided. The Council recognises the key challenges relating to Roles and Responsibilities mentioned in the NTS2 and understand that this is a sensitive area for Councils. Local authorities may be reluctant to concede further transfer of responsibilities to a regional body would without a clear understanding of the likely costs and benefits. The Council has a small transportation team, with limited budgets and therefore limited scope to provide additional resources to any new regional body.

Significant Scottish Government funding would be required to meet the challenges of the strategy It is proposed that officers should explore this further with other local authorities, TACTRAN and the Tay City Deals Regional Transport Working Group to establish the future governance arrangements for a regional organisation.

The delivery of the NTS will rely on strong and clear governance being in place and this should be pursued as a priority. It would add strength and pace if a timeframe for completion of governance review is set eg by end of 2020 to coincide with STPR2 completion. There is clearly a strong case that supports a regional approach to transport planning and for this to be aligned with regional economic development and regional spatial planning.

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

The Council also requests that there are imbalances in funding for Transport as Councils are working with very much reduced and squeezed budgets there are other organisations such as Sustrans who have given very significant resources and are using these funds to directly influence transport projects but ultimately have no responsibility or accountability to ongoing issues such as future maintenance and traffic management.   Potentially national agency funding including Sustrans funding should be allocated to support the new Regional Governance bodies or local authorities if they are to be the main vehicle for delivering the NTS. The current situation is considered less efficient than it could be as a means of allocating resources. Overall funding of Transport has to be considered as part of the NTS2 especially as Governance changes are on the agenda.

Question 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.

DCC Response

The Council agrees that Communities should be involved in Transport decision making are this is very much at the heart of what the Council does. The Council has consulted on many Transport schemes and has had very open consultations relating to all aspects of Transportation. parking/traffic/cycle schemes, 20 mph speed limits, Public Transport and very recently Low Emission Zones which is a Government priority. The level of consultation is determined on the size and impact of the scheme and the Council will engage the community to get their input on many transport related issues. The Council undertakes web based consultation and attends Local Community Groups, Community Councils, Local Community Planning Partnerships , Resident groups and other relevant organisations.

Section D: The Strategy as a whole

Question 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?

DCC Response

As mentioned previously there is a lack of cohesiveness relating to the Draft NTS2 and it seems that there is a lack of focus. It is considered that the strategy is under-developed and in its current state will not influence the national agenda to achieve the priorities set down in the document. From a City

Council perspective NTS2 as currently drafted will not greatly influence the Council's transportation work. The Council already adheres to the Sustainable Travel Hierarchy and Place principle and in this aspect, NTS2 adds limited value to the Council's direction or knowledge. The Council welcomes the revision to STAG appraisal guidance in capturing inequality issues and sustainable transport impacts and hopefully this can be followed through in the STPR2. The Council considers this very important and the NTS2 should have significant influence on the future investment in the transport network. The draft NTS2 pays little reference to the Transport Bill that currently is working its way through the Scottish Parliament and this piece of legislation will likely have far greater impact on local authorities than the NTS2. Dundee is already involved in the delivery a LEZ by 2020 to meet the Scottish Government commitments to tackle air quality issues and it is considered that air quality issues will reduce over time as the vehicle fleet inevitably gets 'greener'.

The new bus service and parking legislation (including work place parking Levy) have very significant implications for Councils who are currently overstretched both financially and in number of skilled staff. Local authorities will be fundamental to the success and delivery of the NTS and there seems a disconnect between current resourcing and the aspirations and vision.

The three immediate action areas of increasing Accountability, Strengthening Evidence and Managing Demand do not seem to have any relationship to the priorities set down in the beginning of the NTS. The Strategy mentions the development of a delivery plan and this is welcomed as this is the most important part of the strategy and this is very much required as this is where interventions, actions and projects will come from. It would have been reasonable to have some more details on these within the consultative draft especially given that a new Transport Bill is about to go through it final stages and attain Royal ascent. We would hope that the delivery plan will be open to consultation and that it will be possible to clearly see how schemes coming forward links back to the priorities and issues.

Section E: Looking Ahead

Question 7a

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

DCC Response

Dundee City Council does not have full visibility of the Transport Network as a whole and therefore cannot comment full about the position Scotland wide. It would also be useful to have a bench mark for comparison purposes of similar countries. There are parts of the system that could be said to be improving due to investment in recent years but there is some way to go before the transport system could be said to be "working well". These elements are getting better:

- *Some Inter-city connectivity with improvements due to electrification and the phased introduction of Revolution of Rail services. Reduction in journey times to and from Dundee is welcome, and it is hoped that this can continue to improve.*
- *Station enhancements at the Dundee, Haymarket, Waverley and the ongoing works at Queen Street.*
- *Road Safety Causality statistics.*
- *Travel information, eg Traveline Scotland and at local level, Real Time bus information system at bus stops.;*
- *Delivery of major schemes, eg Queensferry Crossing, M74 extension and Aberdeen Western Periphery Route.;*
- *Funding increases for Active Travel;*
- *Commitment to improved Air Quality: LEZs and the proposed phasing out diesel/petrol cars vans by 2032.*
- *Initial Investment in EVs and infrastructure.*
- *Maintaining the concessionary fares scheme;*
- *Addressing the travel needs of young people.*

Question 7b

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

DCC Response

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

- *Deliver Revolution in Rail in full and overhaul the franchise system;*
- *Rail fare review – improve affordability and remove regional disparities;*
- *Provide Rail Journey Time enhancements particularly from Central Belt to/from Aberdeen/Dundee*
- *Review the Electrification of rail network towards Dundee/Aberdeen and connect all cities to ensure a level playing field for all four major cities.*
- *Deliver road improvements to key problem locations, this supports road safety and reduces congestion particularly within Cities.*
- *The A90 as it passes through Dundee (the Kingsway) is a particular problem causing congestion, road safety and air quality issues.. The delay in discharging the commitment in STPR1 to evaluate options to address this problem further is a concern, and should be addressed*
- *Extend funding into MaaS beyond the £2m MaaS Investment Fund to initiate further improvements in travel information, planning and journey management;*
- *Provide incentives, eg introduction of additional Park and Ride sites in major cities, fiscal benefits and rewards schemes, to support behaviour change and more active travel;*
- *Funded transport accounts for young people up to age 26 on the NEC (National Entitlement Card);*
- *Conduct a pilot scheme for free public transport as per Estonia & Luxembourg;*

Question 8a

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

DCC Response

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

- *Lack of integration of rail infrastructure, services and rolling stock;*
- *Market failure in both rail franchising and bus deregulation; Bus passenger decline and service reductions indicate there are significant issues within Bus Sector.*
- *Limited or no implementation of important STPR1 projects, eg Park & Ride; A90 through/around Dundee.*
- *Lack of foresight in national implementation of MaaS and other technology solutions.*
- *Continuing issues in terms of access, ease of use and affordability of transport system for many disadvantaged groups.*
- *Recognising and addressing Local Authority funding limits ability in investment in Public Transport for subsidised services, road infrastructure and maintenance.*
- *Reducing pool of Transportation Staff, skill set and little or no succession planning in the industry.*
- *Timescales to deliver key transport infrastructure is excessively long, complex, expensive and difficult.*
- *Lack of commitment on behaviour change for active travel;*
- *Lack of vision for a smart, integrated, affordable and clean public transport network.*
- *Lack of equal commitment to walking & cycling infrastructure investment and current funding model via Sustrans creates tensions and difficulties for local authorities.*
- *All transport networks not yet accessible for all and lack of vision.*
- *Lack of vision of the future development of EVs and supporting infrastructure given the 2032 target. How is the large increase in EVs going to managed and supported going forward in the future?*
- *Some limited development of Hydrogen as a fuel source and this needs to be expanded particularly for freight transport and possibly rail.*

Question 8b

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

DCC Response

As per answer to 7b

Question 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.

DCC Response

Increasing Accountability – as mentioned there are key issues to be addressed in NTS2 to make the document more focused and this work strand needs to be improved to add value to the delivery of the strategy. Collaboration is important for the delivery board however it will be hampered with the lack of direction in the draft strategy. The current NTS2 lacks focus and will have little strategic intent or use. Any delivery board should include representation from local authorities and RTPs and there may be the need to go beyond mere collaboration to ensure projects and interventions are delivered within reasonable timescale. This is very likely to be influenced by the NTS2 delivery plan and its funding coming forward.

Strengthening Evidence – we would support the design of a robust monitoring and evaluation frame work and would suggest that this be closely aligned to the logic modelling and benefits realisation work flows that take vision – outcome – action – delivery – results – impact. There is increasing need to access reliable data sources and we would suggest that Transport Scotland establish a 'Transport Data Warehouse' or else a meta-data index that indicates where open source data can be obtained for variety of transport uses.

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

Managing Demand – we would support reference to the Sustainable Travel Hierarchy though we believe the Scottish Government and Transport Scotland will need to be more robust in addressing the continued reliance on private vehicles particularly for shorter trips. We would also support reference to the Sustainable Investment Hierarchy and reference to climate change, inclusive growth and innovation. It would also very useful to have a similar freight investment hierarchy as this is a very important aspect that is very much under-reported in the NTS2.

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

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

STPR2 – it is to be welcomed that the scope has been extended to encompass Active Travel and other initiatives, however, in the context of the collaborative partnership approach, particularly at a regional and local level, the delivery of projects to support NTS2 outcomes is a wider responsibility than just Transport Scotland and will involve investment by a variety of partners and hence the objectives need to be determined at the regional and local level of governance.

Question 10

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

DCC response

As mentioned previously the NTS2 needs to be more explicit on how the sits with overall government policy and investment plans to ensure alignment. There needs to be an overarching statement incorporating a published diagram as to how recent reviews and legislation integrate and support each other including:

- *Enterprise & Skills Review;*
- *Scotland's Economic Strategy;*
- *Planning Bill;*
- *Transport Bill;*
- *National Transport Strategy;*
- *Strategic Transport Projects Review 2;*
- *Local Governance Review;*
- *National Infrastructure Commission; etc.*

Section F: Strategic Environmental Assessment (SEA)

Question 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.

DCC Response

The Council does not have any significant comments.

Question 12

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

DCC Response

The Council does not have any significant comments.