Transport and Environment Committee

10.00am, Friday, 11 October 2019

National Transport Strategy 2 – Response to Consultation

Executive/routine	**Executive**
Wards	**All**
Council Commitments	**16, 17, 18, 19, 20, 21, 22, 26, 27, 48**

1. Recommendations

1.1 It is recommended that the Transport and Environment notes the findings from a coordinated review of the 'National Transport Strategy 2 – Draft for Consultation' contained within this report, and authorise the submission of the responses appended to this report on behalf of the Council.

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Report

National Transport Strategy 2 – Response to Consultation

2.   Executive Summary

2.1   This report summarises the 'National Transport Strategy 2 – Draft for Consultation' and provides the Council's formal response to the consultation. It identifies opportunities for how the National Transport Strategy could better support Edinburgh's developing City Mobility Plan (a strategic framework for the effective movement of people and goods around Edinburgh) and the future Edinburgh and South East Scotland Region Growth Framework (aimed at delivering a joined up approach to regional economic growth, planning, transport, infrastructure and housing).

3.   Background

3.1   Transport Scotland published the 'National Transport Strategy 2 – Draft for Consultation (NTS2)' at the end of July 2019, and are seeking feedback through a formal consultation period that ends 23 October 2019.

3.2   NTS2 sets out the vision for transport in Scotland over the next 20 years. The global climate emergency and the role of transport in helping to deliver net-zero emissions by 2045 is a key priority, along with how transport can play its part in building a fairer society.

3.3   NTS2 follows a full and comprehensive review of the 2006 National Transport Strategy. The review process sought to identify opportunities and ways to address the strategic challenges facing the transport system over the next twenty years, whilst considering the consistent or different needs between rural, coastal, island, city and urban areas.

3.4   Since 2006 there have been a number of key regulatory and other changes which impact upon transport, including those relating to governance arrangements[1]:

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[1]Current governance arrangements for transport in Scotland:
- Scottish Ministers provide overall strategic direction through the National Transport Strategy, which is delivered by Transport Scotland the national transport agency.
- Seven statutory Regional Transport Partnerships (RTPs) cover Scotland with boundaries based on travel-to-work areas to strengthen the planning and delivery of regional transport. RTPs have a statutory duty to produce a Regional Transport Strategy with the current strategy for SEStran (RTP for south east Scotland) covering the period up to 2023.
- 32 local authorities are responsible for a broad range of transport matters in their areas, including the development of a Local Transport Strategy, and land-use planning and economic development activities which impact upon transport.

3.4.1 Voluntary Regional Economic Partnerships developed to support the delivery of city region and growth deals and wider economic development, with the Edinburgh and South East Region City Deal arising through this.

3.4.2 Scottish Planning Policy update (2014) and the 2019 Planning Act have also brought forward changes to how land use, transport and infrastructure planning are considered.

3.5 A key function of the review was to establish clearly defined strategic transport objectives, to enable a subsequent and full update to the Strategic Transport Projects Review (STPR) following the adoption of the finalised NTS2; and whilst NTS2 is defined as providing the strategic framework within which future decisions on investment options will need to be made, NTS2 itself does not however set a funding framework or identify specific infrastructure priorities.

4. Main report

The Edinburgh context

4.1 As previously reported to Committee in March 2018 and May 2019, Edinburgh faces significant mobility and transport challenges, including:

4.1.1 19% of peak driving time in Edinburgh is spent in congestion, which adds 40% travel time to each peak time journey (Inrix traffic scorecard report, 2016). The cost of Edinburgh's congestion to the local economy is estimated at £225M per annum (Tom Tom Traffic Index);

4.1.2 almost 45% of Edinburgh's workforce commute to work by private car daily, with half of these (63,000) being residents of neighbouring local authority areas who drive into the city for work purposes[2];

4.1.3 whilst road casualty levels in the city are reducing, there is opportunity to further reduce the levels of people killed and seriously injured;

4.1.4 whilst air quality trends show slight reductions in nitrogen dioxide (NO_2) across Edinburgh, there are a number of roadside locations which exceed legal Air Quality Objectives; and

4.1.5 low levels of public transport accessibility in certain areas of the city, and lengthy public transport journey times especially to/from the Bioquarter and Royal Infirmary of Edinburgh.

4.2 In Edinburgh population is forecast to grow by a further 15%, taking the number of people living in the capital to nearly 583,000 by 2041, whilst for the city region the SESplan Cross Boundary and Land Use Appraisal study (2017) forecast that if all committed (and non-committed development) in the city region materialises then by 2024 the population will increase by a further 84,000 (7%).

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[2] 63,500 of Edinburgh residents also commute to work in Edinburgh by private car daily.

4.3   The range of challenges outlined above will therefore be amplified by city and regional growth forecasts, and are therefore challenges that cannot be tackled by Edinburgh alone. Regional planning is essential to address such issues.

The Draft Strategy

4.4   The 'National Transport Strategy 2 – Draft for Consultation' (NTS2) includes a Strategic Framework (Appendix 1) for transport in Scotland over the next twenty years, comprising a 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")* underpinned by four Priorities. Under each Priority there are three associated Outcomes. The draft NTS2 sets out to balance social, economic and environmental considerations, with the four Priorities viewed as interlinked to deliver the Vision. Within these priorities, there is an emphasis on promoting equality and taking climate action.

4.5   This approach aligns with the wider policy and legislative context in which the draft NTS2 was developed, including Scottish Government policy and ambitions on climate change adaption and mitigation, sustainable economic development, improving physical and mental wellbeing and tackling inequalities. The importance of policy cohesion was also set out in a recent National Outcomes consultation, which was part of a broader review of the National Performance Framework.

4.6   The draft NTS2 also sets out a number of draft High Level Policies and Enablers developed to address the current and emerging challenges in order to achieve the draft NTS2 Vision and Outcomes. Appendix 1 also sets out these draft policies and enablers.

4.7   The Council can support a broad range of aspects that feature in the strategy. This section highlights some key examples from the perspective of supporting transport and mobility policy in Edinburgh through the developing City Mobility Plan and South East Scotland Regional Growth Framework.

4.8   The vision of NTS2 is closely aligned with the draft vision for the City Mobility Plan - *"Edinburgh will have a greener, safer, inclusive and connected transport system delivering a healthier, thriving, fairer and compact capital city, and a higher quality of life for Edinburgh residents"- as are NTS2's* priorities and outcomes with the City Mobility Plan's draft objectives - to improve health, wellbeing, equality and inclusion; to protect and enhance our environment; and to support inclusive and sustainable economic growth. It is welcomed that there is 'greater focus on promoting equality and taking climate action' through the priorities of NTS2, which resonates for example with the ambitious Council commitment of working towards net zero emissions by 2030 (supported by an achievement target by the end of 2037).

4.9   NTS2 targets equality and climate action by redefining investment priorities, putting sustainable and public transport at the heart of decision-making with the sustainable transport hierarchy emphasised throughout the draft, and shown overleaf:

Prioritising Sustainable Transport

Walking and wheeling
Cycling
Public transport
Taxis & shared transport
Private car

4.10 Prioritising sustainable transport is also supported in NTS2 by welcome statements including 'we will not be building infrastructure to support forecast demand [in car usage]', 'we will reduce the need to travel by unsustainable modes' and 'Not taking steps to effectively manage demand for car use is no longer an option'. Walking, cycling, public transport, taxis and shared transport options are the suite of mobility options to be progressed over journeys by private car, and these options are at the core of the developing City Mobility Plan.

4.11 Differentiation is also made within the strategy to the varying and specific issues and needs of cities and urban areas (and rural areas, islands etc.), rather than a one-size-fits-all strategy. A key component of this will be creating effective governance arrangements to oversee and tackle the challenges unique to Edinburgh and the broader city region.

4.12 It is therefore strongly supported that governance challenges and arrangements are a pertinent feature of NTS2:

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

4.12.2 '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';

4.12.3 'a regional approach to governance provides an effective means of addressing cross-boundary issues and reflecting travel to work catchments'; and

4.12.4 'a more coherent and joined-up approach to national, regional and local transport together with closer integration between spatial planning, economic development and transport ... supports approaches to place-shaping'.

Opportunities to improve NTS2

4.13   From a coordinated review of NTS2 in developing the Council's formal response to the consultation questions (see Appendix 2), the following recommendations have emerged to improve upon the current draft NTS2.

Strategic challenges to be addressed

4.13.1   Need to clearly set out cross-boundary in-commuting as a key challenge for urban areas (70% of Scotland's population), and seek to address this as a key priority. Current governance arrangements are a significant impediment to tackling this notable issue. The Edinburgh and South East Scotland Regional Growth Framework could be cited in NTS2 as an example of a streamlined approach to regional planning, housing, transport and economic development that is guided by a set of simpler governance arrangements to manage its growth and deliver inclusive growth across the region.

4.13.2   Need to more clearly identify the carbon and air quality challenges to be addressed at a national level from the fossil fuel based transport system predominant across the country. Further onus is required on transport opportunities to support a net-zero economy, for examples furthering the uptake of electric or alternatively fuelled vehicles, or tackling emissions associated with aviation. This would reflect the strengthened ambition of climate change targets and in recognition of the global climate emergency.

4.13.3   A far stronger focus is required on nationally led demand management approaches rather than simply 'support[ing] management of demand'. 'Not taking steps to effectively manage demand for car use is no longer an option' is a welcome bold statement, however, this is followed on by weaker statements including:

- 'We need to consider alternatives that encourage single occupancy drivers to shift, whenever possible, from making their journeys by car'. Considering alternatives does not go nearly far enough to tackling the fundamental issues associated with increased car use.

- 'We all need to take responsibility for [our] actions and the impacts caused by [our] travel decisions'. The onus cannot be placed on people choosing to change their travel behaviour as the car will continue to be the easiest and most attractive choice without demand management approaches (combined with appealing alternatives). This requires strong leadership from the national level rather than simply encouraging alternatives.

- 'We need to consider alternatives that encourage single occupancy drivers to shift, whenever possible, from making their journeys by car'.

4.13.4   There is a need to include new demand management opportunities including a workplace parking levy, which is absent from the draft.

4.13.5   There is no mention of rail connectivity to the rest of the UK, and the broader need to connect to and trade with the UK (NTS' current focus is 'beyond the UK') regardless of the Brexit outcome. Key trade arrangements and high speed rail connections with the rest of the UK must be included in the final strategy.

4.13.6   Service capacity especially on peak time services, punctuality, reliability and price increases are also significant issues for the Scotrail network, and serve as key barriers for modal shift from car to rail commuting. These challenges should be included within the draft strategy.

4.13.7   Another notable challenge in encouraging modal shift from car to public transport commuting, which is absent from the draft strategy, is the need for an effectively integrated public transport system across the country. There is no mention in the draft of the nationally led integrated ticketing scheme.

4.13.8   Planning and Transport being planned separately. There is a significant opportunity for greater integration between spatial planning especially by aligning the National Planning Framework 4 with the development of Strategic Transport Projects Review 2 (STPR2).

The Document and process

4.13.9   The NTS in essence is made up of seven layers (vision, 4 priorities, 12 outcomes, 14 policies, 38 enablers, an as-yet undefined number of actions, and indicators) which is overly complexed making it hard to monitor and evaluate against. Suggest the structure is simplified to vision, objectives, policy measures and indicators – as per European best practice that is shaping the City Mobility Plan.

4.13.10 Clarity is required on the details and timings of the associated delivery plan which is proposed as also comprising measures developed from STPR2, the 2020 Infrastructure Investment Plan, and transport elements of the updated Climate Change Plan. The policies and enablers set out are vague with a need for specific policy measures/integrated package of measures to be included.

4.13.11 A national commitment is required to agreeing funded regional plans. Currently STPR2 is the mechanism by which infrastructure will be funded at a national level, which is welcomed by the Council. Regional plans are being developed to coordinate regional planning, housing, transport and economic development (eg The Edinburgh and South East Scotland Regional Growth Framework) yet there is no national commitment to agreeing a funded plan to tackling strategic transport and mobility issues pertinent to a region, notably access to jobs and opportunities. It cannot and should not be left to local partners to attempt to fund solutions to regional cross-boundary challenges. For example, the ambitions and outcomes set out by the Edinburgh City Centre Transformation programme

cannot be realised without a combination of regional measures (eg Park and Ride interchanges and rapid mass transit options) and demand management approaches to influence travel behaviour away from the private car.

5. Next Steps

5.1 Submit the Council's formal response to the 'National Transport Strategy - Draft for Consultation' by the 23 October 2019.

5.2 Continue to engage with Transport Scotland through the Edinburgh and South East Scotland City Region Deal's Transport Appraisal Board – the Board through which Transport Scotland engages directly with the City Region Deal projects. As well as overseeing the two City Region Deal Transport projects (A720 and West Edinburgh) this Board considers transport elements of other City Region Deal projects, particularly in the Housing and Innovation themes. It also provides input as a region into other regional strategic projects e.g. Strategic Transport Project Review 2.

6. Financial impact

6.1 There are no financial impacts associated with responding to this consultation.

7. Stakeholder/Community Impact

7.1 In responding to this nationally led engagement exercise, this report and supporting Appendix reflect the coordinated views of officers and senior management from the Planning and Transport service areas of the Council, and elected members with responsibility for Transport.

8. Background reading/external references

8.1 National Transport Strategy 2 – Draft for Consultation published by Transport Scotland, 31 July 2019

8.2 Edinburgh and South East Scotland Regional Growth Framework, report to Edinburgh and South East Scotland City Region Deal Joint Committee, 3 September 2019

8.3 City Mobility Plan – strategic framework and package of policy measures, report to Transport and Environment Committee, 16 May 2019

8.4 Edinburgh's Local Transport Strategy review, report to Transport and Environment Committee, 9 March 2018

8.5 Strategic Transport Projects Review, published by Transport Scotland in 2008

8.6	[Sustainability Approach](#), report to Corporate Policy and Strategy Committee, 14 May 2019

# 9.	Appendices

9.1	Appendix 1 Draft National Transport Strategy 2 Strategic Framework

9.2	Appendix 2 Response to Consultation

Appendix 1 - Draft National Transport Strategy 2 Strategic Framework

The draft Strategy sets out a Vision of: *'We will have a sustainable, inclusive and accessible transport system, helping deliver a healthier, fairer and more prosperous Scotland for communities, businesses and visitors"*

As shown below, the Vision is underpinned by four Priorities and under each Priority, there are three associated Outcomes.

The draft NTS2 also sets out a number of draft High Level Policies and Enablers developed to address the current and emerging challenges in order to achieve the draft NTS2 Vision and Outcomes. The tables starting overleaf set out these draft policies and enablers.

Policy	Enabler
Continue to improve the reliability, safety and resilience of our transport system	Increase safety of the transport system and meet casualty reduction targets
	Increase resilience of Scotland's transport system from disruption and promote a culture of shared responsibility
	Implement measures that will improve perceived and actual security of Scotland's transport system
	Increase the use of asset management across the transport system
Embed the implications for transport in spatial planning and land use decision making	Ensure greater integration between transport, spatial planning, and how land is used
	Ensure that transport assets and services adopt the Place Principle
	Ensure the transport system is embedded in regional decision making
Integrate policies and infrastructure investment across the transport, energy and digital system	Ensure that local, national and regional policies offer an integrated approach across all aspects of infrastructure investment including the transport, digital, and energy system
Provide a transport system which enables businesses to be competitive domestically, within the UK and internationally	Optimise accessibility and connectivity within business-business and business-consumer markets by all modes of transport
	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
	Support measures to improve sustainable surface access to Scotland's airports and sea ports
Provide a high-quality transport system that integrates Scotland and	Ensure that infrastructure hubs and links form an accessible integrated system that improves the end-to-end journey for people and freight

Policy	Enabler
recognises our different geographic needs	Minimise the connectivity and cost disadvantages faced by island communities and those in remote and rural areas
	Safeguard the provision of lifeline transport services and connections
Improve the quality and availability of information to enable better transport choices	Support improvements and innovations that enable all to make informed travel choices
	Support seamless journeys providing the necessary infrastructure, information and interchange facilities to connect all modes of transport
	Ensure that appropriate real-time information is provided to allow all transport users to respond to extreme weather and incidents
Embrace transport innovation that positively impacts on our society, environment and economy	Support Scotland to become a market leader in the development and early adoption of beneficial transport innovations
Improve and enable the efficient movement of people and goods on our transport system	Ensure the Scottish transport system efficiently manages needs of people and freight
	Promote the use of space-efficient transport
Provide a transport system that is equally accessible for all* * all includes everyone across Scotland but particularly those with protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation and people living in poverty.	Ensure transport in Scotland is accessible for all
	Identify and remove barriers to public transport connectivity and accessibility within Scotland
	Reduce the negative impacts which transport has on the safety, health and wellbeing of people
	Continue to support the implementation of the recommendations from, and the development of, Scotland's Accessible Travel Framework

Policy	Enabler
Improve access to healthcare, employment, education and training opportunities to generate inclusive sustainable economic growth	Ensure sustainable labour market accessibility to employment locations
	Ensure sustainable access to education and training facilities
	Improve sustainable access to healthcare facilities for staff, patients and visitors
Support the transport industry in meeting current and future employment and skills needs	To meet the changing employment and skills demands of the transport industry and upskill workers
	Support initiatives that promote the attraction and retention of an appropriately skilled workforce across the transport sector
Provide a transport system which promotes and facilitates travel choices which help to improve people's health and wellbeing	Promote and facilitate active travel choices across mainland Scotland and islands
	Integrate active travel options with public transport services
	Support transport's role in improving people's health and wellbeing
Reduce the transport sector's emissions to support our national objectives on air quality and climate change	Facilitate a shift to more sustainable modes of transport for people and commercial transport
	Reduce emissions generated by the transport system to improve air quality
	Reduce emissions generated by the transport system to mitigate climate change
	Support management of demand to encourage more sustainable transport choices
Plan our transport system to cope with the effects of climate change	Increase resilience of Scotland's transport system to climate change related disruption
	Ensure the transport system adapts to the projected climate change impacts

Appendix 2 - Response to Consultation

About you

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

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

What is your name?

Spatial Policy / City of Edinburgh Council

What is your email address?

spatial.policy@edinburgh.gov.uk

Are you responding as an individual or an organisation?

| | Individual | Y | Organisation |

What is your organisation?

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

The City of Edinburgh Council

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

Y	Local Authority
	Third sector or Community Groups
	Private Sector
	Regional Transport Partnership
	Transport Operator
	Academia/education
	Other Public sector
	Other

If other, please specify.

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

☐ Publish response with name

☐ ***Publish response only (without name)***

☐ Do not publish response

Information for organisations only:

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

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

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

☐ ***Yes***

☐ No

Overview

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

Why we are consulting

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

NTS Consultation questions

Section A: The Vision, Priorities and Outcomes Framework

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

Four priorities shown in bold, each with three outcomes

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

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

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

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

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

Yes ☒   No ☐

Please explain your answer

> This vision is closely aligned with the draft vision for Edinburgh's City Mobility Plan: *"Edinburgh will have a greener, safer, inclusive and connected transport system delivering a healthier, thriving, fairer and compact capital city, and a higher quality of life for Edinburgh residents".*

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

Yes ☒   No ☐

Please explain your answer

> The priorities and outcomes align closely with the draft objectives for Edinburgh's City Mobility Plan:
>
> - People objectives to improve health, wellbeing, equality and inclusion:
>   - Improve air quality associated with road transport.
>   - Improve travel choices for all travelling into, out of and across the city.
>   - Improve the safety for all travelling within the city.
>   - Increase the proportion of trips people make by healthy and sustainable travel modes.
>
> - Place objectives to protect and enhance our environment:
>   - Reduce carbon emissions from road transport and respond to climate change.
>   - Reduce the need to travel and distances travelled.
>   - Reduce vehicular dominance and improve the quality of our streets.
>
> - Movement objectives to support inclusive and sustainable economic growth:
>   - Maximise the efficiency of our streets to better move people and goods.
>   - Improve public transport journey times and reliability.
>   - Research and harness future technology, innovations and digital connectivity.

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

Please explain your answer

> The priorities are derived from the three pillars of sustainability: social, economic and environmental, therefore all three should carry equal weighting. It is welcomed that 'within these priorities there is 'greater focus on promoting equality and taking climate action', compared to the previous strategy which tended to favour infrastructure proposals to stimulate economic growth.

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

> The Council supports the challenges presented, but would suggest adding the following aspects.
>
> 'The recent and predicted trends in the volume of cars and the adverse impacts this will continue to have' must be cited as a critical challenge facing Scotland's transport system. This is especially true for urban areas as 'Around 70% of people live in urban areas, covering just 2% of Scotland's land area' (accompanying Draft SEA, page 7 – this fact needs to also feature in the draft NTS).
>
> A notable challenge for urban areas not reflected is in-commuting by private car from outlying areas beyond the suburbs, and beyond administrative boundaries. For example, according to the 2011 Census of the 285,500 people working in Edinburgh 95,000 commute from other local authority areas, and of that 95,000, 63,000 commute by car. So almost one quarter of Edinburgh's workforce drives in from other local authorities, which places significant pressure on road networks in peak periods.
>
> The fossil fuel based transport system predominant across the country, with its associated air pollution emissions, is a fundamental challenge to be addressed at a national level. The current draft is light on the issues and evidence related to the carbon and air quality challenges.
>
> And whilst there is growing interest in electric and other low emission vehicles as cited, it must be stated that such vehicles are not a panacea as they, especially private vehicles, are still primary contributors to congestion and road safety issues. The 66% single occupancy car rate cited will not be remedied by cleaner vehicles.

[3 continued] Brexit and its implications is another notable challenge which is absent from the draft strategy. Regardless of the political outcome(s) trade links and connectivity with the rest of the UK (key market) will be imperative to a prosperous Scottish economy. Key trade arrangements and high speed rail connectivity with the rest of the UK therefore need to be identified as notable challenges to be addressed nationally.

Service capacity especially on peak time services, and price increases are also significant issues for the Scotrail network, and serve as key barriers for modal shift from car to rail commuting. These challenges need to be included within the draft strategy.

Another notable challenge in encouraging modal shift from car to public transport commuting, which is absent from the draft strategy, is the lack of an effectively integrated public transport system across most of the country.

Section B: The policies to deliver the NTS

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

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

- continue to improve the reliability, safety and resilience of our transport system

- embed the implications for transport in spatial planning and land-use decision making

- integrate policies and infrastructure investment across the transport, energy and digital system

- provide a transport system which enables businesses to be competitive domestically, within the UK and internationally

- provide a high-quality transport system that integrates Scotland and recognises our different geographic needs

- improve the quality and availability of information to enable better transport choices

- embrace transport innovation that positively impacts on our society, environment and economy

- improve and enable the efficient movement of people and goods on our transport system

- provide a transport system that is equally accessible for all

- improve access to healthcare, employment, education and training opportunities to generate inclusive sustainable economic growth
- support the transport industry in meeting current and future employment and skills needs

- provide a transport system which promotes and facilitates travel choices which help to improve people's health and wellbeing

- reduce the transport sector's emissions to support our national objectives on air quality and climate change

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

No. Reduce/tackle car in commuting needs to be a key policy set out, as this is a key omission from the draft. Cities and towns of all sizes face unprecedented levels of car traffic impacting upon business, the environment and the quality of life of their citizens. The range of Policy Enablers set out are not forceful enough in tackling this critical issue: '*Support* management of demand', '*Promote* use of space-efficient transport', '*Facilitate* a shift to more sustainable modes of transport'. Stronger verbs/onus must be attached to these key enablers eg 'Ensure', 'Lead' 'Reduce' or 'Increase'.

Otherwise, the structure of the draft strategy, and the range of aspects contained within, makes it challenging to clearly judge if these are the most effective policies. The NTS in-essence is made up of seven layers (vision, 4 priorities, 12 outcomes, 14 policies, 38 enablers, an as-yet undefined number of actions, and indicators) which is overly complex, making it hard to follow/evaluate and clearly respond to this question asking about the fit between policies, priorities and outcomes. The breadth of challenges set-out in the NTS make it especially challenging to appraise how well the policies 'address the challenges' as the 'Current and emerging challenges' section spans pages 11-46 of the 64 page document. It is suggested that challenges are crystalised to make clear the key issues to be tackled by the NTS, and its associated policies. See also answer to Q4b and Q9/evidence.

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

The priority policies set out in the NTS from the perspective of helping to tackle Edinburgh's mobility issues are:

- Embed the implications for transport in spatial planning/land use decision making. This has strong links/could be merged with the 'Integrate policies and infrastructure investment across transport, energy and digital systems' policy.

- Provide a high-quality transport system that integrates Scotland and recognises our different geographic needs, especially infrastructure hubs and links to form an integrated system for people and freight journeys. There should be a clearer link between this the (information policy) enabler to 'Support… interchange facilities to connect all modes of transport'

- Reduce the transport sector's emissions to support our national objectives on air quality and climate change, especially the demand management enabler. This has strong links/could be merged with the other related climate change policy.

- Continue to improve the reliability, safety and resilience of our transport system, especially increasing safety to meet casualty reduction targets.

- Other priorities: 'Improve and enable the efficient movement of people and goods on our transport system'; 'Provide a transport system that is equally accessible for all'; and 'Provide a transport system which promotes and facilitates travel choices which help to improve people's health and wellbeing'.

Key absent policies relate to reducing/tackling car in commuting and/or increase the proportion of trips people make by foot, bike and public transport. These need to be a set out as key policies or as higher level objectives.

As cited in Q4a the various layers are confusing what are policies and what should be higher level objectives. It is suggested that not all are policies, with some being more suited to being objectives e.g. 'provide a high-quality transport system that integrates Scotland and recognises our different geographic needs' or 'provide a transport system which enables business to be competitive domestically, within the UK and internationally'. Others, however, are more suited to being policies e.g. 'Improve the quality and availability of information to enable better travel choices' - the objective of this would be to improve travel choices, or 'Support the transport industry in meeting current and future employment and skills needs' – this policy supports the objective cited above: "provide ['support the development of' would be better than 'provide' in this context] a transport system which enables business to be competitive domestically, within the UK and internationally'. In this last example, skills enable the broader economy objective.

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

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

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

Current structural arrangements are a significant impediment to tackling the critical issue Edinburgh faces from car-commuting into the city for work purposes, by people who live across the broader city region. There is a need for national, regional and local strategies to have associated delivery plans aligned to tackling cross-boundary issues.

The interdependence between local partners across the Edinburgh and South East Scotland region has never been greater with increased mobility of workers and people choosing to live, work and invest in locations across the region irrespective of local authority boundaries. It has never been more important for the region to take a holistic, joined-up approach across transport, planning, housing and economic development.

The City of Edinburgh Council and its partners are developing the Edinburgh and South East Scotland Regional Growth Framework aimed at delivering greater alignment across all City Region Deal activities. At the core will be a streamlined approach to regional planning, housing, transport and economic development guided by a set of simpler governance arrangements to manage its growth and deliver inclusive growth across the region.

The Framework would provide the region with control over the future growth of the city region and ensure it is being properly planned for the benefit of all. It can enable the region to speak with one voice and make a strong case for resources and investment. It can deliver the coordinated, strategic improvements needed to help the region respond to key national policy changes and the Global Climate Emergency to ensure that future investment supports inclusive and sustainable growth in our communities.

A Framework of this nature while designed and led by local authorities, goes beyond those activities and areas of focus within their direct responsibility, and recognises the need for shared ownership and delivery via an effective regional partnership model, encompassing public sector, national agencies, private sector, and third sector contributors. This joint responsibility at all levels across transport, planning and economic development is an important requirement for decision making.

[5a continued] With reference to the decision making hierarchy in Scotland, the question should be broader by also encompassing planning, co-ordination and decision making. Rather than listing all existing aspects undertaken at national through to local level, select 'new' areas of transport and mobility planning are provided in the following examples.

National planning, co-ordination and decision making should aim to tackle country-wide issues, create country-wide consistency and enable regional or local authorities powers to tackle issues 'locally'. Examples include:
- Closer integration of transport planning with spatial planning and economic development to tackle the key common issue of private car dependency and use by creating places for people with key trip-generators (e.g. workplaces), sited close to where people live to reduce travel distances and network impacts
- Integrated national smart ticketing and payments
- New railway routes and infrastructure. The development of the Dalmeny Chord, for example, would offer increased flexibility and opportunities for services between Edinburgh, Glasgow and the north.
- Electric vehicles: tariffs, charging infrastructure, national standards, vehicle-to-grid, scrappage schemes, revenue etc.
- Oversight of major new transport projects proposed in regions or local authorities
- Providing clarity and oversight in addressing and responding to specific-projects that rely upon local and regional authority partnerships (e.g. city region deal, STPR2 and LEZs)
- Stimulate demand management measures at a national level, and coordination and oversight of regional/local demand management delivery.

Regional planning, co-ordination and decision making should aim to tackle cross-boundary movements to tackle travel-to-work areas beyond the boundaries of a single local authority jurisdiction, and strengthen the delivery of regional public transport so that it better serves the needs of people and businesses. Examples include:

- Delivery of regional rail, tram and bus infrastructure and services (cross-boundary schemes not easily deliverable by local authorities)
- Maximising the usage of existing rail stations and Park and Ride sites
- Mass transit infrastructure and services
- Spatial planning: infrastructure led growth; development management
- Park and Ride public transport interchanges linked by regional walking and cycling networks
- Freight consolidation and management
- Delivery of integrated national smart ticketing and payments to ensure people across cross-boundary travel-to-work catchment areas benefit from an integrated transport system for the region comprising a range operators and options.

Local planning, co-ordination and decision making should aim to tackle transport, mobility land-use planning and economic development matters within local authority boundary areas, by delivering local priorities through associated plans and projects. Examples include:

- Enable local authorities or regional authorities increased influence over public transport operators to better coordinate public transport locally *(in 2017 the UK government changed the law so that some local authorities in England - Combined Authorities with directly elected mayors - now have the power to re-regulate bus services, plan the bus network, and let contracts or 'franchises' to commercial operators to run services)*
- Enable local authorities to reduce the default speed limit from 30mph to 20mph (Edinburgh now has more streets at 20mph than 30mph – costs and clutter associated with ever increasing numbers of signs/markings)
- Enable local authorities powers to manage the traffic regulation order process and redetermination order process without referring to Scottish Ministers
- Enable local authorities enforcement powers to manage moving traffic offences using cameras and manage bus services using local authority networks
- Low Emission Zones
- Workplace Parking Levy
- Demand Management schemes
- Coordination of Development Plans and Transport/Mobility Plans
- Last mile delivery

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

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

[5b] Local communities should be involved in making transport decisions in Scotland.

As cited there is 'potential for more coherent and joined-up national/regional/local transport together with closer integration with spatial planning and economic development', which is aligned with the Scottish Government and COSLA's recent agreement to adopt the 'Place Principle' to enable more joined-up, collaborative approaches to services and assets within a place. By pursuing a place-based approach to planning and coordinating then community involvement and decision making is at the very heart of this approach.

As we have found in Edinburgh, when undertaking joint-engagement on the City Mobility Plan, a Low Emission Zone scheme for Edinburgh, and the City Centre Transformation project, citizens cannot always easily relate to Edinburgh on the whole when providing feedback or views. Where value is really added is when citizens are asked about the areas and streets that they use regularly, have lived experiences with, and have a variety of views as how to make improvements.

This is why Edinburgh's City Mobility Plan will be more spatially oriented in its focus as opposed to one size fits all policy measures for the city. The NTS is similarly reflecting this approach by beginning to differentiate city/regional/island issues. Doing so allows for a clearer focus on specific areas of the city, and in-turn specific communities. The city centre community is one such example, whilst another is likely to be Granton in the north west of the city as this is another strategic growth area associated with Edinburgh's Waterfront. The issues faced and views of these areas of the city are inevitably different and therefore involving them in project planning, design and decision making is essential in developing a successful localised project for the individual places.

That is not to say that local communities should not have a view on transport in the city, or indeed the country. They should. Again, people's lived experiences offer a valuable insight into planners and decision makers. People travel and are customers of our transport system and transport operators, therefore those travelling on our networks are a key stakeholder grouping and should be involved and engaged accordingly. Most have experiences of using transport systems coordinated at the national level whether that be air, rail or road, and therefore their views need to be accounted for. In the Edinburgh context, tens of thousands of residents living in neighbouring authorities travel into the city daily for work by both road and by rail, therefore residents of West Lothian commuting into Edinburgh for example need to be able to express their views on road or rail issues or help shape proposals through the national providers. It is not the place of West Lothian or Edinburgh to receive such views. And due to the role and responsibility of Regional Transport Partnerships, and also low levels of awareness of such bodies amongst the public, such bodies are not an effective point of contact for nationally coordinated schemes. As long as schemes are coordinated nationally then there needs to be community involvement in developing national transport projects.

Section D: The Strategy as a whole

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

Yes ☐   No   ☒

Please explain your answer

Whilst the draft NTS is a welcome improvement on its predecessor as it recognises differences in transport needs between cities, rural areas and islands, with select city issues/examples cited, it does not address 'the needs of transport users' in cities or city regions.

Responses provided for question 3 and 8 provide rational for this response, but one example regards freight management. While it is welcome that NTS2 states that 'It is a strategy for… (people and freight)' and 'we must ensure that the negative impacts generated by the movement of goods vehicles are tackled' (due to the forecast growth in these and the associated impacts upon congestion and emissions especially in busy urban areas during peak times), we believe that this could go further. Reference should be given to reducing the scale of large vehicles operating within centres of population, and the role of regionally coordinated consolidation centres to rationalise loads onto smaller and more environmentally sensitive vehicles for onward delivery, 'last mile' delivery being particularly important in an urban setting.

Section E: Looking ahead

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

Within Edinburgh, the public transport system works well with bus routes covering much of the city, and services extending out into the region. Tram services have exceeded all expectations with operating profits and patronage levels being higher than forecast, Public transport in the city is popular, with ticketing options available across Lothian Buses and Edinburgh Trams. Popular aspects include the low cost fares, the modern fleet, the frequency of the services, the expansive bus routes from the city centre, the real-time information systems and the Park and Ride sites serving the city.

[7a continued] The introduction of a bike hire scheme has added a further element to Edinburgh's growing public transport offering.

A popular car club initiative also provides additional travel choice for those wanting to use a car, but without needing to own one. Significant investment in walking and cycling infrastructure is also seeing increased usage of these networks.

There are fast and frequent bus and rail services connecting Edinburgh and Glasgow, while Edinburgh is well connected to cities across the UK by rail.

Collectively this growing level of choice is helping to give people attractive alternatives to journeys by private car.

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

Please provide details

The NTS should encourage public transport systems to include many of the constituent aspects currently in-place in Edinburgh e.g. low cost fares, modern fleets, real-time information systems. With Edinburgh having a (relatively) high modal share for journeys to work by foot and by bike then focus could be given in the strategy to focus on some of Edinburgh's existing initiatives to encourage this modal share. The same is true for the successful car club that has been operating for years within the city – we would be happy to share examples if interested.

The tram system is of regional importance and should be identified in the NTS as such. The tram provides wider connectivity to the region as it interchanges with heavy rail at key employment areas in the city, enabling journeys to/from work for employees living across the city region.

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

The fossil fuel based transport system predominant across the country, with its associated air pollution emissions if a fundamental challenge to be addressed at a national level. The constituent elements of this that do not work well are:

- The over-reliance on and usage of the private cars which results in congestion, vehicle emissions, road safety, and delays to road based public transport options.
- A focus on road infrastructure nationally that only generates additional demand for car travel.
- Regional planning and governance arrangements are not in place to tackle congestion associated with in-commuting from outlying local authorities. At both regional and local levels the powers and resources do not exist to effectively tackle cross-boundary issues
- Each public transport mode has individual ticketing, payment and timetable arrangements which are predominantly uncoordinated. This is a key deterrent to influencing people out of their cars and onto public transport.
- Whilst car is recognised as the dominant mode for transport emissions in Scotland, aviation is the second-most dominant alongside shipping. Considering the low levels of people moved around by aviation in relation to the volume of people moved by car, aviation produces disproportionately high levels of emissions. Too many domestic journeys in the UK are undertaken by air travel.
- Reliability and performance of the rail network in Scotland is rightfully cited as an issue within the strategy, but not in strong enough terms, as it merely downplays this problem in Scotland to that of rail performance elsewhere in Britain.
- Service capacity and the cost of rail travel are barriers to rail travel. In-terms of specific services connecting Edinburgh there are particular capacity issues on peak-time services to/from Fife, and the Borders. This, combined with increased prices are further adding to the pressure on the road networks as people are choosing the cheaper and more convenient car commute option.
- The resilience of the public transport network is a particular challenge to be tested more and more from anticipated severe weather episodes. The Winchburgh Tunnel is a particular issue with flooding a growing problem impacting upon Scotland's flagship and busiest rail route. The ability to respond to, plan and manage such incidents has proven challenging.
- Still low levels of cycling across Scotland, with no mention of the Cycle Action Plan and the targets it set that will not be met by 2020.

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

Please provide details

Far more significant steps are required to make public transport a more appealing choice to the many currently commuting by car. The most imperative missing aspect is the lack of an integrated national smart ticketing and payment scheme across the range of public transport modes and services. The NTS should seek to deliver an integrated national smart ticketing and payment scheme across the range of public transport modes and services. This measure was included in the previous NTS but is now conspicuous by its absence.

In Edinburgh there is already a smart card for use across most services of Lothian Buses and Edinburgh Trams. This arrangement however does not go far enough as the tens of thousands who travel in daily by car from surrounding local authorities have no opportunity to benefit from a broader integrated payment system applicable across the range of public transport operators serving the city. National leadership and coordination of a national smart payment scheme is essential to see a step-change away from car use, and stop the decline in bus patronage nationally.

Without this, travel choice is limited, and the real costs to passengers switching between modes makes public transport unappealing compared to the cost of private motoring. This has been evidenced through market research commissioned by City of Edinburgh Council.

Packaged alongside integrated ticketing is the requirement for integrated timetabling of services and operators to enable seamless transfers between modes via quality interchanges comprising facilities and real-time information. These are other notable aspects that need to be stated and enabled through the draft NTS.

Strategic cycling and walking routes can further help to connect areas of growth (homes and employment centres).

[8b continued] Further onus is required on the uptake of electric or alternatively fuelled vehicles – the 'ambition to phase out the need for new petrol and diesel cars and vans by 2032' is not a strong or clearly defined ambition, primarily by the addition of 'the need for'. To meet bold climate change targets there is a need to ban the sale of petrol and diesel cars rather than the looser variant of phasing out the need for them, which does not prevent fossil fuelled vehicles from coming to market. Stronger ambition is echoed by the SEA which proposes 'opportunities for actions which support a net-zero economy, reflecting the strengthened ambition of climate change targets and in recognition of the global climate emergency'. The City of Edinburgh Council is for example committed to working towards net zero by 2030, and sets a hard target of 2037.

More focus also must be given to tackling the challenges presented by increased air travel, especially for domestic flights. Rather than highlighting the importance of flights to the south west of England focus should instead be given to high speed rail connectivity to the rest of the UK – which is absent from the draft strategy. Aviation tax also needs to be addressed, otherwise statements like 'environmental impacts of aviation need to be recognised' and Scotland's airports can also take measures to reduce emissions on the ground' are insufficient and will not address growing greenhouse gas emissions from this transport sector.

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

Increasing accountability: the City of Edinburgh Council would welcome the opportunity to become involved in a Transport Strategy Delivery Board and in developing a regional model of transport governance. The Council has experiences in developing public transport, walking and cycling and a sustainable urban mobility plan for the growing city region, and will offer value to the developing governance arrangements in tackling the key cross-boundary commuting challenge.

Managing demand: the inclusion in the strategy of demand management statements is strongly supported by the City of Edinburgh Council:

- 'Not taking steps to effectively manage demand for car use is no longer an option'
- 'we will not be building infrastructure to support forecast [car] demand',
- 'we will reduce the need to travel by unsustainable modes'.

[9 continued] Yet the strength of these statements is diluted by other weaker statements:

- 'We need to consider alternatives that encourage single occupancy drivers to shift, whenever possible, from making their journeys by car'. Considering alternatives does not go nearly far enough to tackling the fundamental issues associated with increased car use.
- 'Support management of demand…' similarly is not strong enough. The Scottish Government must lead on demand management measures at a national level.
- 'We all need to take responsibility for their actions and the impacts caused by their travel decisions'. The onus cannot be placed on people choosing to change their travel behaviour as the car will continue to be the easiest and most attractive choice without demand management approaches. This requires strong leadership from the national level rather than simply encouraging alternatives.

Considering managing demand is categorised, rightfully, as a key area for action, it is surprising that there is no mention of workplace parking levy which features within the recent Transport Bill, or other charge-based approaches required to address the fundamental issue of congestion on our road networks.

Transport Scotland should continue its approach to leadership used in developing Low Emission Zones by, for example, tasking and enabling the four cities to develop further approaches to demand management. This offers synergies, consistency, and testing in a variety of contexts. Various demand management approaches are for example being enacted in Edinburgh, including extension of Controlled Parking Zones, resident permit parking prices linked to vehicle emission standards, tightening of parking standards for new developments, development of a Low Emission Zone including a citywide option, and exploring the development of a Workplace Parking Levy. The Council would be happy to share learnings and work with Transport Scotland in developing new approaches.

Strengthening evidence: An issue faced by Edinburgh's Local Transport Strategy, which is also true (as acknowledged by those responsible for) the previous NTS and SEStrans' Regional Transport Plan, was the inability to effectively monitor and evaluate against the broad range of outcomes, policies, actions etc. The risk with this seven layered approach to the NTS (see Q4a response) is an inability to effectively monitor and evaluate across this range of layers.

From Edinburgh's involvement as a leadership city in the European Union's two year best-practice Sustainable Urban Mobility Planning programme (involving 50 European cities), the recommended structure is to have a vision, objectives, policy measures and indicators; with these four layers easier to undertake monitoring and evaluation against and ensure a 'golden thread' between on the ground action, and higher level objectives.

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

The draft NTS contains clear aspirational statements which are welcome but these need to be balanced against specific and implementable policy measures to move towards such aspirations. No clarity or detail is provided on the proposed policy measures or the timing of the associated draft delivery plan which is described as comprise measures developed through the second Strategic Transport Projects Review, the 2020 Infrastructure Investment Plan, and transport elements of the updated Climate Change Plan.

In-terms of funding, a national commitment is required to agreeing funded regional plans to tackle strategic transport and mobility issues associated with regional access to jobs and opportunities. Also, there is limited flexibility for accessing national funding as when it becomes available, with single year allocations for spending and receiving creating challenges to effective spending.

The 'Safety and security' section is too vague with no mention given to the key Vision Zero principle of the current national road safety strategy, or performance against the national targets. Edinburgh too could cite declining road casualties, but this masks specific challenges that need to be outlined. For example, Edinburgh (like Glasgow) has issues with elderly pedestrians which is a growing concern due to changing demographics/ageing population. Edinburgh also has the issue that serious casualties are currently in breach of the national targets (maybe an issue nationally?). Cycle safety is a road safety issue for urban areas, whereas young drivers and speeding are likely issues for more rural locations. Such challenges therefore need to be more clearly defined and differentiated in this section, with a need for a more targeted approach to road safety priorities going forward.

It is welcomed that the draft strategy cites a transport system to support the mobility of older people to ensure older people are not socially isolated, and the 'importance of the National Concessionary Travel Scheme'. Following Transport Scotland's previous consultation on Concessionary Travel, however, which was set in the context of an ageing population and increasing cost pressures to support the national initiative, there is likely a need to reflect on these issues.

The 'Technological advances' section mainly focuses on vehicles without mention of how technology can be used to advantage pedestrians and cyclists.

Under the section 'changing transport needs of young people' no mention is given to lower levels of young people wanting to own cars especially in urban areas where alternatives are more readily available. This supports shared mobility with Madrid, for example, targeting young people and students through their Mobility as a Service system.

Section F: Strategic Environmental Assessment (SEA)

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

'The transport sector as a whole is likely to be benefit from a more integrated, multimodal transport system that supports sustainable modes of travel.' This is a fair assumption, but it is not aligned to a strong level of content within the draft NTS to lead on and enable integration of transport modes or services. Also a need to delete 'be'.

Relevant key environmental aspects that should be drawn out from the SEA and included within the NTS document itself:

- 'Just over a third of all car journeys are under two miles and could be made by bicycle or on foot instead' – this is a significant opportunity.
- 'Green infrastructure, such as walking and cycling paths, can help towns and cities become more sustainable, support wildlife and respond to the challenges of climate change, for example, by reducing flood risk.... improve, accessibility and connectivity, and can lead to wider benefits for air quality and health through increased physical activity and air quality.'

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

Cumulative impacts do not feature as a key environmental aspect. A specific pertinent example is housing growth targets placed on local authorities by the national government, which in a city and large town context is leading to housing growth in more peripheral and remote areas. This results in car-based lifestyles as public transport serving such low-density areas is uneconomic, creating a self-perpetuating cycle of car use. Edinburgh for example faces significant transport challenges from approximately 65,000 cars driving into the city daily for work purposes from people living in neighbouring authorities.

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

'giving consideration to cross-boundary implications' – as per the previous answer, much more is required to tackle regional in-commuting than merely giving consideration to cross-boundary implications. No one local authority can tackle cross-boundary issues so there is an essential need for national and regional coordination of such a broader issue facing large towns and cities especially.

The SEA must be stronger in emphasising the need to align national planning and transport decision making to ensure that car-based lifestyles are mitigated. Higher density living is required in towns and cities to mitigate sprawl and in supporting journeys by foot, bike and public transport.

The significant growth levels in car use and the associated emissions stated in the draft NTS should be a key reason stated for why a 'do nothing' scenario is not a 'reasonable alternative'. Focus has to be on mitigating private car usage.

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

No.

Thank you for your time and your contribution.

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