



SCOTLAND'S NATIONAL TRANSPORT STRATEGY – A CONSULTATION

NESTRANS' RESPONSE

About Nestrans

Nestrans is the Transport Partnership for Aberdeen City and Shire. It was constituted as the North East of Scotland Transport Partnership in December 2005 under the Transport (Scotland) 2005 Act, but builds on four years of public-private sector joint working as a voluntary regional transport partnership. Nestrans published its regional transport strategy to 2011 – the Modern Transport System – in 2003, which sets out an integrated package of measures to improve the economy, accessibility and environment of the north east. The new regional transport strategy to 2021 that Nestrans is currently developing will build on the Modern Transport System and reflect the national framework set by the National Transport Strategy (NTS).

This response has been developed by Nestrans in conjunction with colleagues in Aberdeenshire and Aberdeen City Councils and was agreed by the Nestrans Board on 5 July 2006.

General comments

Nestrans welcomes the development of the NTS, which builds on the vision, objectives and strategic approach set out in the 2004 White Paper, Scotland's Transport Future. Nestrans welcomes the level of commitment given to transport in the past two spending reviews and considers it essential that this level of commitment is maintained and enhanced to ensure that the outputs from both national and regional transport strategies can be supported and delivered.

The NTS will set the context for transport in Scotland for the next twenty years and it is vital that the strategy sets a clear framework and integrates with regional and local transport strategies to ensure a coherent approach to transport delivery. It is essential that the NTS meets the needs of all parts of Scotland and recognises the different issues and priorities that exist in different areas of the country.

The consultation paper is wide-ranging and seeks views on key issues and interventions. However it is noted that it focuses on a lot of areas of detail which fall more appropriately within the remits of regional and local transport strategies. There is therefore a risk that the NTS pays insufficient attention to the big strategic issues by concentrating on matters best dealt with by RTPs and local authorities.

While the consultation paper is comprehensive, it asks too many open-ended questions, requiring considerable time and resource input from consultees. It would perhaps have been better for the document to contain fewer questions, with a clearer focus on seeking input on the 'big picture' issues.

In this sense the Scottish Executive needs to be clear about the scope and purpose of the NTS. The NTS needs to set the context for RTPs and local authorities and be clear about the national priorities which they need to address. The strategy should also encourage ambition, innovation and vision, and indicate how central government can assist the implementation of regional and local transport strategies. There needs to be a clear focus on outcomes and what needs to happen at a national, regional and local level to achieve these.

The following provides detailed answers to the consultation questions:

CONSULTATION QUESTION 1.

Are: facilitate economic growth; promote accessibility; promote choice and raise awareness of the need for change; promote modal shift; promote new technologies and cleaner fuels; manage demand; reduce the need for travel; and promote road safety the right goals for transport in Scotland?

Nestrans broadly supports these goals. However in line with the economic growth strategy for the north east, we would support amending the economic goal to refer to 'sustainable economic growth'. The NTS should fully recognise the role of transport in promoting and sustaining economic growth and also the longer-term development and diversification of the economy.

The goal of 'Promoting accessibility' should contain explicit reference to reducing the real and relative peripherality of parts of Scotland which are furthest from key population centres and markets, and improving transport connections between towns and cities.

The goal to 'Promote choice and raise awareness of the need for the change' overlaps with the goal to promote modal shift. It should be recognised that feasible alternatives need to be in place to enable modal shift and should be complemented by initiatives to encourage behaviour change. There is also no explicit goal relating to reducing the environmental impact of transport. While modal shift and behaviour change will contribute to environmental objectives, consideration should be given to including a specific environmental goal.

In view of the statement in question 2 below, it would be appropriate for health improvement to feature explicitly in these goals. For example a goal might be: "To improve the health of the nation, we will promote measures that encourage people to walk and cycle more and to use public transport instead of the car".

CONSULTATION QUESTION 2.

Do consultees consider that the aim, vision and objectives need to be amended, for example to reflect Scottish Ministers' expectation to see Health Improvement at the heart of Scottish Executive policy?

Nestrans is supportive of the Aim, Vision and Objectives set out in Scotland's Transport Future, the 2004 White Paper, which are currently setting the context for the local and regional transport strategies. Nestrans believes it is helpful that there is continuity between the White Paper and NTS.

There is currently an explicit objective to "Protect our environment and improve health". This objective does not need modified but health should feature in the transport goals in paragraph 35.

The "Protect our environment" objective could be strengthened to promote transport which reduces (rather than 'minimises') emissions. This will be necessary if we are to meet the national and international targets on greenhouse gas emissions.

CONSULTATION QUESTION 3.

Are there areas of work in relation to local/regional transport that would merit the national dissemination of best practice examples? If so, what are they and who would be best placed to lead this?

There is much good practice across Scotland at a local and regional level that would benefit from dissemination. The creation of regional transport partnerships should enable sharing of

good practice between member authorities and between partnerships. There are also networks, such as SCOTS and ATCO, through which good practice can be shared, but the Executive may wish to give consideration to the role it and Transport Scotland can play in sharing good practice.

In the north east, some particular examples of good practice include:

- Bringing public and private sectors together through Nestrans and developing the Modern Transport System strategy.
- Launching a travel awareness programme – including a sustainable travel grants scheme, which provides match funding for companies implementing sustainable travel measures.
- Supporting the establishment of the Dyce TMO – the first Transport Management Organisation in the UK.
- Supporting public-private sector initiatives to promote rail freight through the North East Scotland Rail Freight Development Group (NESRFDG).
- Innovative demand responsive transport services operated by Aberdeenshire and Aberdeen City Councils. The A2B Dial-a-bus scheme developed by Aberdeenshire Council won the Rural Transport award at the Scottish Transport Awards in 2005.
- Public-private sector joint working through Aberdeen Airport Business Development Forum to develop and maintain the role of the Airport.
- Aberdeenshire Council taking a lead role in European Union funded Interreg III C projects – Concept, SustAccess and Northern Maritime Corridor.

CONSULTATION QUESTION 4.

What issues must the NTS address, to ensure that the Strategic Projects Review (SPR) which will follow it is as effective as possible? For example, should the NTS identify key transport corridors, or key types of investment which are most effective at growing the economy, to inform the SPR? If so, which ones?

The NTS must look at transport issues across all of Scotland and in particular look at how well different parts of Scotland are connected to key population centres and markets. This suggests that the strategy, and the Strategic Projects Review (SPR) which follows it, should identify key transport corridors and focus on improving the connectivity to and accessibility of all parts of Scotland. It should not just focus on investment which will give short-term economic growth, but needs to invest in measures that will support longer-term development and diversification of the economy and should support areas of existing growth to ensure their long term economic sustainability. This is likely to involve a focus on improving journey times by road and rail and improving access to rail, air and maritime hubs.

The Strategic Projects Review must not be driven solely by economic and regeneration objectives and the needs of business, but must also take account of social and environmental objectives and benefits. It is also crucial that the SPR is aligned with land use planning. The intention to adopt the objective-led STAG approach to determining appropriate solutions, having regard to wider economic, environmental and social impacts and objectives is supported.

The SPR and its outputs must be aligned with the key objectives of emerging National and Regional Transport Strategies. As indicated above, it is important that essential investment in measures to address the needs of the more peripheral areas of Scotland are not crowded out by investment which is focused in the Edinburgh and Glasgow areas. Whilst it is accepted that some schemes which improve access in these areas will have benefits for the north east, it is essential that the SPR also improves regional and local transport infrastructure and delivery and improves the north east's relative connectivity.

CONSULTATION QUESTION 5.

Do we have the balance of investment right between spending on new and existing infrastructure and other non-infrastructure activities and between different modes of transport? If not, how should it change over time?

The Executive's current commitment to investing in improving transport infrastructure and increasing support measures which enhance transport service delivery is supported and should be maintained at least at current levels throughout the period of the NTS. The intention of spending a higher share of available funding on public transport and other sustainable modes, including reducing the need to travel, is also supported. However, the application of a blanket 70% allocation to public transport is not necessarily appropriate for all areas of Scotland. There are key pinch points in the national transport network, including trunk and principal roads, which require to be addressed in the interests of delivering a more efficient and safer transport system to meet the economic and social needs of the north east, which must be recognised.

Much of the current investment in improving rail services is focused on a small number of high cost projects in the central belt. In previous consultations, the Executive has hinted that, after these have been delivered, investment priorities in rail will switch from new projects towards maintenance. Maintenance of the transport network is vital, and there is a need to tackle the backlog of maintenance on both the road and rail network. However, there is also a need to sustain investment in improving the capacity and availability of reliable, efficient and attractive public transport beyond the currently committed schemes. It is important that projects which are undergoing detailed appraisal, such as Aberdeen Crossrail and Laurencekirk Station are delivered, if existing network capacity constraints and the full potential of public transport are to be realised.

More consideration needs to be given to the benefits that can be accrued from revenue based schemes compared to major capital projects. A particular issue relates to the fact that Regional Transport Partnership funding is currently allocated for transport improvements as Capital only, which restricts the options and interventions available to RTPs to meet their objectives. It also ignores the fact that Capital expenditure creates additional Revenue expenditure in later years, for which RTPs have a limited income stream. This current funding constraint should be removed, to allow for both Capital and Revenue funding allocations to RTPs.

CONSULTATION QUESTION 6.

To what extent should transport spending be targeted specifically at areas with significant potential for regeneration? How should transport spending be balanced between regeneration areas and other key areas, such as rural Scotland?

Transport can play an important role in regenerating communities though improving their accessibility and attractiveness as places to live or work. However it is essential that successful wealth creating areas are not disadvantaged by a focus on regeneration (which the question implies are urban areas). In many parts of Scotland, there is a role for transport investment in supporting sustainable economic growth, in order to prevent these areas becoming the regeneration priorities of tomorrow.

It is also important to recognise that within cities and regions that are, on the whole, affluent, there exist pockets of deprivation and unemployment. This is true of rural areas as well as towns and cities and the NTS should give equal consideration to the needs of urban and rural areas.

CONSULTATION QUESTION 7.

What further steps need to be taken in Scotland to facilitate the development of international connectivity both by air and by sea?

International connectivity by air and sea is vital to sustaining the economic growth of Aberdeen City and Shire.

Nestrans supports the Air Route Development Fund, which has been successful in encouraging new routes out of Aberdeen Airport. Nestrans was also a founding member of the Aberdeen Airport Business Development Forum, which has worked to encourage and support development of the airport.

Aberdeen Airport plays a crucial role in supporting business and economic growth in the north east and Nestrans supports proposals contained in BAA's Outline Masterplan to increase the capacity of the airport and enable direct routes to a wider range of destinations. Development of Aberdeen Airport should be viewed as a priority in the NTS. The range of direct international services should be increased and links with the major hub airports in London and Europe should be maintained. It is recognised that aviation developments need to be balanced with concerns over the environmental impact of air travel. Surface access to air and sea ports should be improved, particularly by public transport.

The NTS should give a stronger emphasis towards maritime transport. Aberdeenshire Council's participation in the Interreg IIIC Northern Maritime Corridor/Motorways of the Northern Seas project is demonstrating that there is significant potential for developing short sea and coastal shipping, as an alternative to road freight. Good, integrated rail/sea connections are important to realising these potential benefits. Opportunities also exist for developing existing and new passenger ferry connections and routes between the north east and Europe, particularly to Scandinavia and the recent EU accession countries in the Baltic.

The NTS must clearly articulate the important role of both air and maritime transport within the context of UK and European transport policy development, for example, in relation to Trans European Transport Network priorities and investment.

CONSULTATION QUESTION 8.

Do consultees consider that there are issues relating to cross-border connectivity by rail and road, and within devolved competence, that the Strategy should consider?

The existing direct rail services, operated by GNER, between Aberdeen and London provide important links, not just with the UK capital but with key regional cities en route. Nestrans would support an increase in the number of rail services connecting the north east and London and a reduction in journey times. Currently there is one service per day to Birmingham, operated by Virgin Cross Country. Nestrans would support further direct connections to other parts of the UK, which would provide benefits to business and leisure travellers and provide an alternative to flying. However Nestrans would not support improved journey times being achieved at the expense of reducing station stops within the north east, which would reduce transport opportunity. Sleeper services play an important role in cross-Border travel and they must be retained and developed.

There are continuing concerns that the north east is becoming relatively more peripheral within the UK, as a result of improvements to the East Coast and West Coast Main Lines, which are not being complemented by investment north of Edinburgh and Glasgow. This results in north east businesses facing competitive disadvantage, in terms of journey times to UK and European markets. These route sections must be recognised within the NTS as key parts of the cross-

border network, with equal priority being given to the increased investment required to improve connectivity to UK and continental freight and passenger markets. The Scottish Executive has powers to influence the shape of cross-border rail franchises and investment decisions, and these priorities should be clearly articulated within the NTS and the subsequent rail strategy.

CONSULTATION QUESTION 9.

What view do consultees take on whether there is a need for a faster Scotland to London rail service, to provide an alternative to flying in the long term?

Faster journey times between the north east of Scotland and London would provide benefits to business and leisure travellers, however we recognise that it would take a major step-change in service to be competitive with air travel between Aberdeen and London.

That step-change may be in the form of a High Speed Rail Link, which is currently topical. However the current debate has focused on a high speed rail link between Glasgow (and/or Edinburgh) and London and has not considered the benefits to the north of Scotland.

Faster journey times between Glasgow/Edinburgh and London, via conventional or 'high speed' means, would increase the attractiveness of rail compared to air travel and would provide some benefit to passengers travelling to London from the north of Scotland. However there is a real risk that major improvements to journey times and rail services south of Glasgow/Edinburgh would result in the north of Scotland, particularly the cities of Aberdeen and Inverness, becoming relatively more peripheral.

The high speed proposals currently being discussed in the industry would mean that London would be two and a half hours from Glasgow, but that Aberdeen would still be almost three hours from Glasgow. It would simply not be credible to have to explain to a business person or tourist, travelling to Scotland from London, that their journey from Glasgow to Aberdeen or Inverness will take even longer than their journey from England. Therefore any consideration of high speed rail or other cross-Border improvements needs to include the full route to Aberdeen and should not stop at Glasgow or Edinburgh.

CONSULTATION QUESTION 10.

How do we ensure that all local authorities spend their Grant Aided Expenditure allocation for local roads on local roads? Do consultees think anything more needs to be done to ensure appropriate management, maintenance and operation of the Trunk Road Network?

It is up to local authorities to determine how Grant Aided Expenditure is best spent to meet local priorities. If the Executive wish to prioritise particular objectives, it should do so by providing additional funding. The Executive may also wish to look at the reasons why some local authorities are not spending the full GAE allocation on local roads and consider whether the overall settlement needs to be increased to enable this to happen.

Local roads are a major asset and Nestrans supports the work being undertaken through SCOTS to develop Asset Management Plans.

With regards to the trunk road network, it is essential to consult with Local Authorities and RTPs on the content of the trunk road maintenance contract to ensure that local standards and issues will be met through delivery of the contract.

CONSULTATION QUESTION 11.

What are the issues relating to the management and maintenance of the road and rail networks over the long term that the Strategy should address?

It is important that vital road and rail networks are well-maintained and that maintenance is arranged to minimise disruption to users. Management and maintenance of the road and rail networks should include consultation with the local authorities and Regional Transport Partnerships to ensure that local standards and issues are met or mitigated.

CONSULTATION QUESTION 12.

What should the NTS say about freight, bearing in mind that a freight strategy is under development? In particular, what should the NTS say about meeting the different needs of freight and passengers on the road and rail network, and how to balance these competing demands?

The NTS should emphasise the importance of freight transport to the economy and in particular the challenges arising from distance from markets, rising fuel costs, the feasibility of alternatives to road haulage and the availability of intermodal facilities.

Paragraphs 43-46 also say nothing about the role of rail, sea or air freight. In particular sea and rail freight offer an environmentally more sustainable alternative to road haulage, but require good interchange facilities and connections to the road network. Air freight has a more specialist role and clearly carries with it the environmental costs of aviation but is vital to success of many businesses.

The north east's geographical position in relation to the rest of Scotland and the UK makes transport a crucial factor in its continuing economic success. Goods and raw materials have to travel long distances to key markets and from suppliers. Transport costs, transit times and journey time reliability are therefore major factors in the competitiveness of north east firms with current deficiencies in the transport infrastructure, both locally and beyond the region, presenting additional challenges. Through groups such as the North East Scotland Rail Freight Development Group and the North East Freight Quality Partnership, Nestrans has worked with the industry to ensure that the needs of freight transport are fully taken into account in transport strategies.

CONSULTATION QUESTION 13.

What, if anything, should the NTS be saying about skills, bearing in mind the leading role that the Sector Skills Councils have in reducing skills gaps and shortages in the public and private sectors and the role Transport Scotland has in promulgating good practice across the industry? Is it right to integrate skills issues into the NTS?

A specific skills strategy is probably not required, now that we are to have a National Transport Strategy. The NTS should recognise the importance of training and development in the transport sector, at operational, managerial and planning levels. A workforce that is skilled, well-trained and well-motivated is important in delivering excellent customer service in public transport, ensuring that bus and rail services are planned to meet customers' needs, delivering best value in construction and engineering projects and ensuring that sound decisions are taken by public bodies on transport planning and investment priorities.

CONSULTATION QUESTION 14.

Bearing in mind that investment in new transport infrastructure is not covered in the NTS, as it will be addressed in the forthcoming Strategic Projects Review, what specific steps, if any, does the NTS need to set out to support tourism?

The 2004 White Paper recognised the important role of our external connections in attracting both leisure and business tourism and the importance of providing visitors with a good first impression. This includes the availability of information, reliability of services and quality and integration of public transport. The White Paper also highlights the role of our airports, ferry terminals, railway and bus stations as 'gateways' to Scotland. The NTS needs to recognise the role of transport in supporting tourism and that action is required in different ways, by both public and private sectors to ensure that transport system supports the tourism industry in Scotland.

CONSULTATION QUESTION 15.

What are the key barriers to developing effective Demand Responsive Transport and how should they be overcome? For example, legislative, regulatory or operational barriers?

The main barriers to developing DRT are legislative and financial. Current constraints preventing the use of Local Authority owned vehicles for public use (other than Education vehicles which can be used under Section 46 of the PPV Act 1981) should be removed, in the interests of enabling an Efficient Government approach to service delivery, freeing up the potential to use accessible passenger carrying vehicles for wider public benefit. The current limitations, which are placed on use of vehicles and drivers operated under Sections 19 and 22 of the Transport Act, should also be reviewed to enable wider use, whilst ensuring that public safeguards exist in relation to driver and passenger care standards.

Funding and financial sustainability are also significant barriers to introduction and development of many, particularly community-based services. Current Executive funding through the DRT pilot scheme and RCTI scheme should be maintained. Existing constraints on eligibility of certain types of non-scheduled Community Transport and DRT services for Bus Service Operator Grant should be removed. Aberdeenshire Council provides Concessionary Travel support to scheduled DRT and Community Transport services and this principle should be extended to all publicly available DRT schemes, under the auspices of and funded through the National Concessionary Travel scheme.

CONSULTATION QUESTION 16.

Where are there examples of particularly good practice in demand responsive transport?

Aberdeenshire Council's A2B demand responsive transport scheme was launched in 2004, with support from the Scottish Executive. Since its launch, five services have been introduced in the contrasting Central Buchan and Donside areas of Aberdeenshire, with a mix of partnership approaches to service delivery with commercial bus and taxi operators, the community transport sector and using Council-owned vehicles. The scheme was successful in winning the Rural Transport Award at the 2005 Scottish Transport Awards, and is proving increasingly popular with users and is also generating numerous requests for service extension.

Through Aberdeenshire Council's involvement in the CONCEPT Interreg IIIC project, we are aware of and have shared good practice on DRT provision with project partners in Norway, Sweden, Austria and Italy.

Aberdeen City Council's Dial-a-Bus Scheme is a demand responsive accessible service available to all. It operates for residents within the City on a first come, first served basis for any journey purpose, unless a comparable journey can be made by a local bus service. As a pilot service in a large urban area operating anywhere to anywhere, usage is continually growing and demand already exceeds capacity.

CONSULTATION QUESTION 17.

Is accessibility planning something that should be considered for local or regional transport strategies in Scotland? If so, should it be compulsory, or (as at present), one of a suite of possible approaches?

Yes. An accessibility planning approach has clear benefits but different ways in which it can be used in the development of transport strategies and the appraisal of transport proposals. There is also potential for accessibility analysis to be used in Transport Assessments for new developments.

Rather than making the approach compulsory, the NTS should promote the concept and encourage the sharing of good practice.

CONSULTATION QUESTION 18.

How can we improve the accessibility of public transport to disabled people? For example, how far should concessions be extended for disabled people?

Improving the accessibility of public transport to disabled people is not just about providing concessionary travel. Ensuring that vehicles are accessible, that information is available in an accessible format, that staff are helpful and well-trained, that appropriate waiting areas are provided, that the personal safety of vulnerable users is protected and that services are provided that meet people's needs are all important factors. It is important that public transport planners and operators consult with disabled people and ensure that their services meet their needs.

Demand responsive transport services have been able to provide a more tailored service for disabled people than regular public transport, but these services should not act as a substitute for accessible public transport vehicles and services. Taxis act as a lifeline for many disabled people and are an important link in the public transport network. It is important that there is an adequate provision of accessible taxis.

Aviation is still a major weak spot in terms of the accessibility of aircraft to disabled people, but this probably requires action at a national and international level in partnership with the airlines.

CONSULTATION QUESTION 19.

How do we make sure that transport operators and drivers follow best practice in dealing with older people, with disabled people and other groups who may have difficulties with transport? For example, should it be a condition of funding that such best practice is demonstrated?

Transport operators should have clear policies on customer service, including older and disabled people, and it is important these are enforced and implemented, supported by specific staff training. There is also a role for MACS in continuing to develop and disseminate guidance and good practice and providing advice to transport operators. Operators should also consult with older and disabled people on how their practices could be improved. It may be that simple changes could make a big difference to the travel experience for disabled people.

It is not clear how practical it would be to make 'demonstration of best practice' a condition of funding.

CONSULTATION QUESTION 20.

What more could be done through transport means to tackle social exclusion in rural areas?

Many of the issues and solutions are addressed under answers to other questions. For example, improving the availability and flexibility of public transport through suggested improvements to legislation and funding; expanding the role of DRT as a complement and supplement to the conventional bus network; expanding the role of the voluntary and community transport sector, supported by changes in legislation and funding; improving the quality and availability of conventional public transport; addressing the relative costs of public transport and fares levels which act as a major barrier to social inclusion in rural areas; maintaining and increasing current Government Revenue funding support for socially necessary public transport services and schemes, through GAE, RCTI, and the Rural Transport Fund beyond current three-year funding commitments; development of Accessibility Planning techniques and associated solutions; will all help in overcoming social exclusion.

In addition to public transport interventions, measures which recognise and address the higher level of car dependency which exists in rural areas for access to employment, education, health and other key facilities, coupled with the higher cost of motoring in rural areas, are also needed. The previous Rural Fuel Grant scheme did not provide significant assistance in overcoming these issues in many rural areas.

CONSULTATION QUESTION 21.

What do we need to consider in reflecting on the future of the lifeline air and ferry network?

Lifeline ferry and air services to island and peninsular communities clearly play a vital role. Aberdeen is an important arrival point for air and ferry passengers from the Northern Isles. In particular, the role of Aberdeen Harbour as the terminal for ferry services to Kirkwall and Lerwick should be maintained.

While there is clearly a need for the Scottish Executive to achieve best value and balance spending priorities, it is important that lifeline services are maintained and developed.

CONSULTATION QUESTION 22.

What more should be done to ensure that there are connections from outlying estates to towns and cities?

Ensuring social inclusion requires accessibility to employment, education, health, retail, leisure and other services. Planning of new developments should consider the provision of and access to local services and the need for transport links, including public transport, walking, cycling and demand responsive transport. This is relevant to all outlying settlements.

The requirement to address transport links into town and City centres within Guidance on Regional Transport Strategies, referred to on page 39 of the document, needs to be supported by the allocation of additional Revenue funding to Regional Transport Partnerships, to support development of new transport links, where required, without impacting on existing Revenue Support budgets within Councils. Consideration could be given to adopting an approach similar

to Bus Route Development Grant to Regional Transport Partnerships, as a means of funding strategic public transport enhancements on the basis of their seeking to achieve longer-term financial sustainability.

CONSULTATION QUESTION 23.

Are there any specific areas or events in Scotland where transport particularly well or particularly poorly supports access to cultural opportunities? Are there any specific societal groups disproportionately disadvantaged in accessing cultural activities because of transport issues?

It is important for the planners and operators of public transport services to consider whether enhanced or dedicated services should be provided to facilitate access to cultural or sporting events, to meet the needs of visitors and mitigate traffic increases. Cultural and sporting venues should provide information to visitors about public transport options, consider how accessible they are to pedestrians and whether they provide sufficient facilities (such as cycle racks/lockers) for cyclists.

In general, rural and peripheral areas, which are not well served or connected by public transport, so are often excluded from access to cultural opportunities, particularly where these are concentrated in the main urban centres. Where public transport is available, lack of evening and weekend services and affordability can also prevent young people, families, older people and those on low incomes from achieving access to cultural opportunities.

CONSULTATION QUESTION 24.

Should travel plans be required of all "larger" employers? If so, how should we define "larger" and should Travel Plans be required of all public bodies such as local authorities and Health Boards to show public sector leadership on this issue?

Travel plans need to be meaningful, have the support of employers, have funding to support them and be implemented. For these reasons a voluntary approach (except when required as a planning condition) is probably best.

The TMO model, which Nestrans has supported in Dyce, provides an opportunity for travel planning to be pooled by a number of companies through the establishment of a Transport Management Organisation or Association.

Public sector organisations should lead by example. This should include central government as well as local authorities and NHS Boards.

CONSULTATION QUESTION 25.

What should the relative roles of the Executive, regional transport partnerships and local authorities be in increasing the uptake and how might it be ensured that travel plans required of developers under the planning system are systematically enforced?

Through their travel plan officers, regional transport partnerships have a lead role to play in promoting travel planning their areas. However this needs to be supported at a national level by policy, funding and, perhaps (as in suggested later) a national brand.

Enforcement of travel plans required through the development planning system is the responsibility of the planning authority.

CONSULTATION QUESTION 26.

Should we be investing in "smart measures" to promote modal shift? If so, what degree of investment is required; what measures are most effective; and what should be the role of the Scottish Executive (for example, promotion of the concept, sharing best practice, running a scheme or funding others to run a scheme)?

Yes. Smart measures should be included within the wider strategy to promote modal shift. The Executive should promote the concepts nationally and should provide continued funding to Regional Transport Partnerships to support ongoing development of Travel Awareness at a regional level beyond the current two-year allocation, and to local authorities to enable ongoing development of School Travel Plans and extension of this within Councils to address wider Travel Planning and other "smart measures". The document correctly identifies that a long-term approach to encouraging travel behavioural change is needed and the funding support provided to Regional Transport Partnerships and local authorities needs to reflect this commitment.

CONSULTATION QUESTION 27.

Is there a need for a single national travel awareness "brand" that the Executive, RTPs and local authorities could all use? If so, what should it be?

There may be some merit in this, but it would need to be developed in consultation with and have the support of, the regional transport partnerships and local authorities who would be expected to use it.

Any national brand would need to be recognisable and durable across all of Scotland and be properly supported. Past travel awareness 'brands' have perhaps not reached their full potential through lack of consistent support and development.

CONSULTATION QUESTION 28.

We want to promote walking and cycling as healthy, sustainable ways to travel - what more should be done in this regard?

Scotland is still lagging behind Europe in relation to the provision of dedicated facilities for cyclists. The current dedicated funding for Cycling, Walking and Safer Streets should be continued, as there is much more that can be done at a local level to improve facilities for cyclists and walkers. A national awareness campaign, aligned with national targets for increasing cycling, would provide assistance in education/awareness of the benefits of encouraging increased walking and cycling.

There is limited provision for cycle commuting within the trunk road network and the Scottish Executive should take a national lead by improving the provision for cyclists and, where relevant, walkers, in its maintenance and management of the trunk road network.

Although there have been recent improvements in provision of cycling facilities within the rail network, there is much more that can be done to improve integration of cycling with public transport services.

CONSULTATION QUESTION 29.

How can the NTS maximise its contribution to improving the health of the nation?

By making health improvement an explicit transport goal as suggested in the answer to Question 1 and supporting measures which improve air quality, encourage modal shift and an increase in walking and cycling.

There are already initiatives at local, regional and national levels and the NTS should seek to provide encouragement of active travel and the sharing of good practice.

CONSULTATION QUESTION 30.

How do we make buses more attractive for people to use, and therefore allow them to make the choice to take the bus rather than using their car? How do we ensure that the quality of the travelling experience is made a priority by bus operators?

There is a range of solutions which could make bus travel more attractive and encourage modal shift. Key elements include providing high quality, fast, frequent, reliable and well-publicised services with competitive fares and convenient ticketing arrangements. The relative attractiveness of bus services is increased by the provision of bus priority measures which reduce journey times and enable buses to keep to reliable timetables.

Much has been achieved in recent years on improving the quality and availability of bus services in north east Scotland through a voluntary joint Quality Partnership between Aberdeenshire, Aberdeen City, First Aberdeen and Stagecoach Bluebird. The Quality Partnership approach could be developed further to include stronger commitments on fares and integrated ticketing.

It is important that bus services, the majority of which are commercially operated are able to adapt to changing patterns employment and residential locations and that market research is undertaken by operators to ensure that they are meeting the needs of their customers and potential bus users.

The Bus Route Development Grant scheme is welcome and services in both Aberdeen City and Aberdeenshire have benefited from this initiative. However the scheme should be amended to ensure that rural areas are not disadvantaged by the current requirement that services be commercially viable after four years.

CONSULTATION QUESTION 31.

Is there a need for change in how the bus industry operates, or are the current arrangements working? If so, what should this change be?

It is recognised that the effectiveness of the current system differs across the country and that there has been very limited take up of the measures available to local authorities under the Transport (Scotland) Act 2001. Any changes to the legislative framework would require detailed analysis, consultation and consideration of the impact on different parts of the country.

The current system would however benefit from amendment to include constraints on the ability to change bus services so that these are, for example, limited to no more than two or three times per year, much in the same way as the rail timetable, in the interests of maintaining public confidence in and familiarity with the bus network and improving inter-modal integration. As indicated in answer to question 30 above, the system of Quality Partnerships could also be usefully reviewed to include stronger commitments on fares and integrated ticketing.

CONSULTATION QUESTION 32.

How do we make rail more attractive for people, and therefore allow them to make the choice to take the train rather than use their car?

As the question suggests there should be a positive drive to attract people to use the railways, particularly as an alternative for long-distance or commuter journeys. Improvements to frequency are important – for instance on the Aberdeen-Inverness line where track constraints restrict the service that can be provided. Aberdeen Crossrail seeks to unlock the potential for increased rail travel in the north east by providing a frequent, cross-city service between Inverurie-Aberdeen-Stonehaven, with new stations serving residential and employment locations. Journey times are a key factor in ensuring that rail is competitive with travel by road. Increasing capacity on trains, particularly at peak times, is also important. Overcrowding is uncomfortable for passengers and acts as a disincentive to use rail, particularly for longer distance journeys. Reliability of services, combined with good passenger information, gives passengers confidence in using the rail network.

Accessibility to the rail network is also a factor. Significant parts of the north east, such as Peterhead and Fraserburgh, are not covered by the rail network. Interchange with bus services, or park and ride facilities are therefore important in enabling access to rail. Nestrans supports the re-opening of a station at Laurencekirk, which will open up the rail network to communities in south Aberdeenshire.

The affordability of rail travel is also a consideration. The present system of fares and pricing is confusing and should be simplified and marketed in a clearer and more consistent way.

CONSULTATION QUESTION 33.

What else should be done at a national level to support improvements in travel information? How do we capitalise on the potential opportunities created by new technologies - such as 3G mobile phones - to improve the provision of travel information?

Passenger information that is reliable, accurate and presented in a clear and accessible format is a basic requirement of any public transport system. There is a role at a national level for the development and promotion of Traveline Scotland and the sharing of good practice on passenger information. There may perhaps be merit in setting national standards for easy-to-read and accessible travel information.

With funding from the Public Transport Fund, real-time information has been introduced on the majority of bus routes in Aberdeen and bus stop flags promoting the Traveline SMS service are being rolled out across the region.

New technologies provide opportunities for new ways of communicating travel information. However while technology can be helpful, it should be used in conjunction with more conventional information – for instance displaying bus times and fares information at a bus stop or on board a bus.

CONSULTATION QUESTION 34.

Do you consider that we need to change the cost of public transport fares and, if so, what changes should be brought in?

Public transport often appears expensive compared to car use and the cost of public transport is frequently quoted as a major barrier to switching from private to public transport, even where the bus or train provides a frequent and reliable alternative. This often relates to public perceptions of the cost of public transport relative to private car running costs but also reflects

the fact that the cost of motoring has steadily declined over the past 20 years in real terms, while bus and rail fares have increased.

Bus operators are very often reluctant to include fares within Quality Partnership agreements. Consideration should be given to strengthening the scope of voluntary and statutory Quality Partnership arrangements on fares, for example through the introduction of maximum fares and/or more consistent pricing between routes and areas, coupled with integrated ticketing arrangements.

Simpler, more flexible ticketing arrangements – enabling integration between different operators and modes could also help make public transport more attractive. While discounted advance purchase rail tickets play a useful role in encouraging demand, it is important to have competitively priced ‘walk-on’ fares.

CONSULTATION QUESTION 35.

If you support lower fares, would such reductions need to be funded by tax revenue, or are there schemes which consultees consider could pay for themselves through modal shift (i.e. because more people would be travelling, albeit paying somewhat lower fares)?

Any initiatives directed at delivering lower fares would need to be aligned with achieving NTS outcomes and additional funding would need to be tied into a system which ensured that these outcomes were delivered. Research is needed on the most effective method of funding and achieving these outcomes. The application of a blanket reduction in fares may not necessarily achieve objectives such as reducing congestion or overcoming social exclusion. Where modal shift is successful, consideration also needs to be given to funding the additional capacity costs that are likely to have to be addressed, in ensuring that any increase in demand is accommodated by maintenance of quality and reliability standards.

CONSULTATION QUESTION 36.

How can we promote integrated ticketing between different operators?

There is potential to develop integrated ticketing schemes at a regional level where they do not exist and there is a role for regional transport partnerships in facilitating this. There is a role for the Executive and Transport Scotland in providing guidance and a national framework within which different schemes could operate. Transport Scotland might also take a lead in developing a multi-modal integrated ticketing system which can be implemented on a Scotland-wide basis, in partnership with operators. The implementation of such a system would be assisted by simplifying and removing the constraints which exist in relation to Competition legislation.

CONSULTATION QUESTION 37.

How do we promote additional modal shift from road freight to rail and waterborne freight?

The existing Freight Facilities and other grant schemes are important incentives to operators and freight forwarders. Further investment is needed in removing current capacity limitations on the rail network and improving multi-modal integration on the rail network and at harbours, in order to release the full potential of freight by rail and water. The forthcoming Freight Strategy should include a review of freight terminal capacity. Stronger encouragement should be given to the rail freight operating companies in relation to marketing and exploiting opportunities for freight by rail. Actions taken to encourage modal shift in favour of rail and water must recognise

that, in many parts of Scotland and for particular commodities, road haulage will continue to be the most readily available and effective option for business. Consequently, any proposals to encourage modal shift should not be based on blunt fiscal measures which penalise and add costs for road haulage.

CONSULTATION QUESTION 38.

How do we ensure that people are safe, and feel safe, on public transport, at stations and bus stops, and while travelling by foot, bike or car? For example, what needs to be done to tackle anti-social behaviour on public transport and on our roads?

Addressing real and perceived safety issues is important in encouraging people to use public transport, walk or cycle. Waiting and interchange facilities that are good quality, well lit and covered by CCTV help to overcome concerns over safety whilst travelling by public transport. CCTV on buses can help deter and detect crime, while reassuring passengers. The lack of staffing at some stations is also an issue in terms of real and perceived safety when using the rail network.

Street lighting, streetscape design and the provision of pedestrian crossing facilities improve safety for pedestrians, but there is a particular need to provide safe crossing facilities on busy trunk roads which bisect communities. Segregated cycle ways reduce conflicts between cycles and vehicles and increase the safety of users.

Excessive speed, particularly through residential areas, can be considered anti-social behaviour. Issues associated with anti-social behaviour should be addressed through Police enforcement and stronger penalties for this type of behaviour when being dealt with through the Courts.

CONSULTATION QUESTION 39.

Within a UK market, what, if anything, should Scotland specifically do to promote the uptake of biofuels?

There is a need for better awareness of what biofuels are, their availability and benefits. A key element in promoting uptake is attaining critical mass and there is potential for public transport to take a lead role. Incentives to operators could be provided through Bus Service Operators' Grant and start-up funding could be made available for fuelling infrastructure.

CONSULTATION QUESTION 40.

Where are the commercial opportunities for biofuels in Scotland? What, if anything, is the role for the public sector in supporting commercial biofuels developments? Are there down-sides of an increased bio-fuel market in Scotland?

The high price and finite supply of oil suggests there are opportunities for the development of alternative fuels. As described above, there is potential for public transport, and also fleet vehicles, to take the lead in demonstrating the viability of biofuels. This could also benefit passengers through reduced fares as a result of a reduced fuel bill for operators. Rolling out biofuels will require central government support and funding.

CONSULTATION QUESTION 41.

Within the context of a UK regulatory framework, what more, if anything, should be done to make motor vehicles in Scotland cleaner to run?

Greater encouragement by Government to manufacturers and fuel suppliers to accelerate the development and availability of more fuel efficient vehicles and cleaner fuels.

CONSULTATION QUESTION 42.

Where are the potential gains in terms of new transport technology in Scotland? How do we capture the potential economic benefits of developing them in Scotland? What, if anything, is the role for the public sector in supporting the development of such new technologies?

New fuel technologies, integrated ticketing developments, information and communications technology, all have potential benefits in this context. The public sector could provide support through partnering with public transport operators and private sector suppliers to trial new technology developments in transport. The Executive should provide “pump prime” funding to such partnership arrangements to test the potential for new technologies.

CONSULTATION QUESTION 43.

What needs to be done to ensure that parking policy - on-street parking, bus and rail park and ride and so on - is more effective in managing demand and promoting modal shift?

This will depend on local circumstances and is primarily a matter for local authorities operating within the context of regional and local transport strategies. The NTS may wish to provide guidance on appropriate approaches towards parking policy in support of achieving national objectives.

CONSULTATION QUESTION 44.

How might park and ride schemes best be developed to further encourage modal shift and reduce congestion? How should enhancements be funded and what should pricing policies be?

This depends on local circumstances and the NTS should not be prescriptive about the detail of such schemes. Across Scotland Park and Ride has developed in different ways and serves different objectives. There are currently three bus-based Park and Ride sites in the north east, along with parking facilities at commuter stations. Further Park and Ride sites are planned to link with the Aberdeen Western Peripheral Route and Aberdeen Crossrail. Nestrans has recently commissioned research to consider options for the future development of Park and Ride in the north east, drawing on experience from elsewhere in the UK and possibly Europe. We would be happy to share the results of this study when complete.

Park and Ride needs to be viewed and developed as part of a fully integrated transport system. Pricing strategy should have regard to the level of local public transport fares and car-parking charges, in order to ensure that there is no undermining of existing public transport services by "reverse modal shift" and that the service is perceived as offering an attractive cost-effective alternative to car travel. There is no “one size fits all” approach to service delivery or pricing policy. These matters need to be developed on the basis of a regional approach to fulfilling the objectives of the RTS.

The future capital funding of Park and Ride facilities is likely to be secured through capital allocations to Regional Transport Partnerships, levering in local and developer contributions where appropriate. A Bus Route Development Grant revenue stream could assist the start-costs of new services and encourage innovation. The Scottish Executive should also contribute directly to the capital costs of construction and ongoing Revenue Support costs where Park and Ride schemes give congestion relief to trunk roads.

CONSULTATION QUESTION 45.

Should we pilot new approaches to improving demand management on the trunk road network? If so, which approaches should we pilot (for example, bus priority measures, multiple occupancy vehicle and heavy goods vehicle preference, metering, more park and ride) and do you have any views about where and when they should be piloted?

As it works to develop its role as a centre of excellence, we would expect Transport Scotland to consider the benefits of such measures. However their implementation would need to be linked to clear objectives and their appropriateness at particular locations. We would expect there to be consultation with regional transport partnerships and local authorities prior to their introduction to ensure the fit with the regional transport strategy.

CONSULTATION QUESTION 46.

Given the difficulties in managing demand for road space by other means, do consultees agree that, in principle, national and/or local road pricing in Scotland could be an effective way to manage demand?

In principle, we would agree, provided that this was only taken forward as part of a national scheme, including trunk roads. The detail of any scheme is crucial and such an approach would need to be considered in the context of its fit and complementarity with other demand management strategies which may be being considered or implemented at Regional or Local Authority level.

CONSULTATION QUESTION 47.

Does the Executive need to do more to build support for road pricing? Should there be funding made available to local authorities and regional transport partnerships which wish to promote local/regional road pricing schemes. If so, what model should be used to provide such funding?

We would look to the Scottish Executive to take the lead on a national road pricing scheme, in consultation with regional transport partnerships and local authorities.

CONSULTATION QUESTION 48.

What should be the objectives of any future national road pricing scheme? For example: Should it primarily be concerned with cutting congestion levels? Or should it also reflect environmental concerns about CO₂ and other emissions? Should it be a means by which, in Scotland, we try to achieve our aspiration of stabilising road traffic volumes at 2001 levels by 2021 (see Chapter 4)? Should it aim to reflect better the true cost of motoring (including the costs to other people, the economy and the environment), or should it cost about the same to drive overall as at the moment?

It is important that clear objectives are established for any system of national road pricing, these objectives should stem from the NTS and support regional and local objectives. Reducing congestion, reducing carbon dioxide emissions, improving air quality and improving the efficiency of the transport network would appear appropriate objectives for such a scheme. Road user charging should seek to tackle the relative cost differentials between private and public transport by internalising the costs of congestion and levying charges appropriately, with the incomes generated being ring-fenced and re-invested in providing effective transport solutions and alternatives to the congestion and capacity problems being addressed.

The detail of any national scheme would need to be subject to further specific consultation.

CONSULTATION QUESTION 49.

If there were no UK-wide national road pricing scheme, should a Scotland-only scheme be considered?

No, any road pricing scheme should be developed at a UK level.

CONSULTATION QUESTION 50.

Do consultees support the inclusion of surface transport in any future CO₂ emissions trading mechanisms? What impact could this have on transport's emissions of CO₂?

There may be merit in this, but insufficient detail on such a scheme is provided in the consultation document. Further specific consultation would be required prior to the introduction of such a scheme.

CONSULTATION QUESTION 51.

What more, if anything, needs to be done to ensure that transport considerations are taken into account in the location decision, for example of health services and schools?

Guidance on transport considerations in land use planning is provided in SPP17 and PAN57. The Executive should ensure that this guidance is reinforced within its own Health Department and NHS Boards. There should be early and meaningful consideration of transport accessibility at an early stage of the location planning process, involving consultation with regional transport partnerships and local authorities. The Accessibility Planning approach discussed earlier could provide assistance in this.

CONSULTATION QUESTION 52.

What contribution can broadband and flexible working practices make to reducing individuals' need to travel? What else should be done to reduce the need to travel?

The development of technology such as broadband and video-conferencing, which facilitates mobile working and the introduction of more flexible working practices can reduce the need to travel, and have a role in play in ensuring work-life balance. However it is important not to overplay the importance of new technologies in reducing business travel. Many people still prefer to meet face-to-face, business travel appears buoyant, and new technologies have not made the impact it was once thought they might.

CONSULTATION QUESTION 53.

We are tackling road safety and are on track to meet our targets. But is there more that should be done at the national (rather than local) level?

While the progress towards meeting national targets is encouraging, it is appropriate to ask whether they are sufficiently challenging and whether tougher or more specific targets need to be set in the NTS. There are still far too many deaths and serious injuries on our roads and consideration should be given to adopting a "zero tolerance" approach to death and serious injury on the transport network. A key element of this should involve targeting particular risk groups, such as newly qualified and young drivers and motorcyclists.

The NTS should be specific about the approach taken at a national level to meet these targets, including specific interventions on the trunk road network and a framework for local authority / regional transport partnership activity to contribute towards the national targets. This is also an area where Transport Scotland could take the lead in developing new approaches and sharing good practice with local authorities.

Many fatal and serious accidents in the north east occur on the trunk road network and inappropriate speed is a major contributory factor in a high proportion of these. More needs to be done at a national level to tackle this, in a way which makes speeding as socially unacceptable as drink driving has become. In particular, the contribution to improving road safety should be a major consideration in determining investment in road improvement schemes. Safety Camera revenues should be able to be invested in a wider range of road safety measures. Stronger enforcement and sentencing for motoring offences should also be considered.

CONSULTATION QUESTION 54.

What more can be done to make our streets safer and more pleasant places to be?

There is a range of measures that can make residential and urban streetscapes safer and more attractive. This is an important element of encouraging people to walk and cycle more and enhancing the quality of the environment. These measures should be based on a consideration of the needs of pedestrians and cyclists, good quality design and might involve the installation of crossing facilities, improved street lighting, traffic-calming and well-designed bus stops and shelters. The condition of footpath and other infrastructure causes complaints and relates to the need to tackle and fund the current backlog of infrastructure maintenance.

The “home zones” concept has potential for new developments but is difficult and expensive to apply on a “retro-fitted” basis. Stronger encouragement and guidance should be re-issued at a national level to developers to reinforce the benefits and principles of “home zones” and “safer streets”.

The expansion of 20 mph zones raises public expectations in relation to enforcement. Consideration should be given to relaxing the current criteria for Safety Camera activity to enable increased activity in 20 mph zones and at 20 mph limits outside schools, to reduce driver speeds in these areas, even though there may not be a specific accident problem.

CONSULTATION QUESTION 55.

What issues should be considered in implementing the NTS following its publication later in 2006?

The NTS should include an implementation plan, detailing how the strategy will be implemented, the role of Transport Scotland, regional transport partnerships, local authorities and others in contributing to delivery and arrangements for monitoring and review of the strategy. As outlined in the consultation, appropriate indicators should be developed and good practice identified and shared. There needs to be close policy and strategy integration with and between emerging regional transport strategies and integration with emerging guidance and developments in relation to land use planning and delivery. Early appraisal of projects which are currently undergoing or are about to be subject to transport appraisal will also be important, in terms of maintaining momentum on investment in key enhancements to the transport network and system, in particular through the Strategic Projects Review.

CONSULTATION QUESTION 56.

Do consultees consider that "traffic intensity" is likely to be a useful overall indicator of our success with the forthcoming NTS? If not, what alternative(s) would be preferable?

This is a potentially useful indicator but it is questionable whether it is appropriate as an overall indicator of success in progressing the NTS, bearing in mind the strategy's wide-ranging nature. It would appear to relate to measuring road-based traffic and as such is unlikely to capture the economic, environmental, social and other benefits of transport modes such as rail or maritime. The notion of traffic intensity would benefit from further explanation within the strategy document.

CONSULTATION QUESTION 57.

Are the indicators outlined for each transport goal useful? If not, what alternative(s) would be preferable?

The indicators as described in this section are fairly broad and would require further detail to be provided in the final strategy. For instance the indicator for economic growth should be specific about measuring journey times for particular modes and both passenger and freight traffic. As discussed earlier, consideration should be given as to whether the targets on road safety should be strengthened. It is also important that indicators have equal relevance to urban and rural communities and personal, business and freight transport.

CONSULTATION QUESTION 58.

Are consultees content that the target of quadrupling cycle use should now be reviewed? What, if anything, might replace it (for example, local authority-level targets on the DfT model)?

We accept that a target which is unlikely to be achieved should be reviewed. Targets should be measurable, realistic and linked to initiatives that support the achievement of the target. Targets for increasing cycling should relate to local circumstances and current baseline figures and are probably best set at a regional or local level. However there is a role for the Executive in providing support at a national level and funding for measures initiated by regional transport partnerships and local authorities.

CONSULTATION QUESTION 59.

Are there other measures which should be considered in Scotland which would move us towards the target to stabilise road traffic volumes at 2001 levels by 2021, recognising that significant fiscal measures would have to be agreed by the UK Government?

Measures and targets which clearly relate to the NTS' environmental and anti-congestion goals should be appropriate, realistic and deliverable. These need to take account of the issues raised elsewhere in this response regarding sensitivity and relevance to the contrasting transport issues and associated problems facing urban and rural areas, and the also the economic implications for both types of area.

CONSULTATION QUESTION 60.

**Do consultees agree with the proposals to:
Continue to have stabilisation of road traffic as a high level aspiration;**

Use indicators measuring modal shift to measure how our modal shift policies are working; and
Redirect our efforts more clearly at the environmental and congestion issues which underpin the traffic stabilisation aspiration, by:
Considering new transport-related target(s) for CO₂ (see further below); and
Continuing to monitor congestion trends on our trunk roads as at present, and considering what further measures might be required.

Generally all of the above are supported. The identification of transport related targets for CO₂ needs to be sensitive to other environmental and economic impacts and benefits of transport measures.

CONSULTATION QUESTION 61.

Do consultees have any views on the idea of a move to regional traffic reduction targets in place of a national target?

The identification of regional traffic reduction targets should be a matter for Regional Transport Partnerships and constituent local authorities to determine, if they consider such targets to be appropriate in supporting emerging Regional Transport Strategies.

CONSULTATION QUESTION 62.

Given the difficulties with the national traffic stabilisation aspirational target, do consultees agree that realistic, deliverable milestones towards its delivery cannot be put in place at present?

Yes. But the Executive should investigate the identification of other milestones which identify progress towards meeting the overall economic, environmental and social objectives of the NTS and informs future investment priorities and decisions.

CONSULTATION QUESTION 63.

Do consultees agree that setting a level of contribution for reductions in Scotland's CO₂ emissions which are directly linked to the impact of our policies in areas which are devolved would be the best measure of the Scottish Executive's effectiveness in tackling transport emissions?

Yes.

CONSULTATION QUESTION 64.

What specific reduction level(s) for CO₂ should be put in place for transport?

The identification of a sensible and appropriate target should be the subject of further detailed consideration and consultation with transport providers and Regional Transport Partnerships and local authorities.

CONSULTATION QUESTION 65.

Do consultees have any views about the timing or scope of reviews of the NTS?

Progress towards meeting objectives should be reviewed annually, in line with the requirements for Regional Transport Strategies and Local transport Strategies. The proposal to review the

NTS on a four-yearly basis is consistent with the Guidance on and relationship with Regional Transport Strategies and is supported.

Annex D

The section on key policy linkages seems misplaced in Annex D. The integration with other policies and the European context might more appropriately set the scene for the NTS at the start of the document. In the discussion on the EU context, there is also no mention of the current projects focusing on sustainable transport, which are being undertaken through Interreg III C.

Conclusion

The development of new strategies at a national and regional level which will set the course of transport over the next decade present a unique opportunity to secure Scotland's economic future, enhance our communities and quality of life and reduce our impact on the environment. It is important that there is integration between the National Transport Strategy and the strategies developed by the regional transport partnerships, and that Executive ensure that the NTS joins up with other strategies and policies across government to ensure that transport and wider objectives are met.

There is a challenge for all involved in transport to ensure that the strategies which result from this process are genuinely strategic, tackle the difficult issues and set a clear course for the future of transport in Scotland. Nestrans welcomes the opportunity to be part of this process and considers this consultation to be a key part of ensuring that the strategy addresses the needs of all parts of Scotland and has buy-in from the wider community. We look forward to the publication of the final strategy document in due course.

If you wish further information or clarification of any points raised here, please contact either Peter Cockhead or Ben Kerfoot at the address below.

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