

# NATIONAL TRANSPORT STRATEGY - DELIVERY PLAN IMPACT ASSESSMENTS

Response to Transport Scotland consultation

5 January 2022

## 1. Timing of Impact Assessments.

The timing of the impact assessments undertaken is unusual and unfortunate. The point of impact assessments, particularly on those groups with protected characteristics, is to inform policy development and correct any undue bias or inadvertent discrimination before adoption of the policy. To undertake impact assessments after adoption and publication of the policy or plan is a missed opportunity and could lead to the acceptance of a flawed approach or policy in practice when earlier efforts to undertake the impact assessments would have resulted in a more considered understanding of the likely impacts. We would recommend that in future Transport Scotland undertakes the impact assessments either before the development of policies and plans or at the very least in parallel with their development so that the integrated impact assessment can inform policy development and not lag behind it to the potential detriment of disadvantaged groups or policy issues.

## 2. Whole Plan Approach.

It is important that a whole systems approach is taken to the development and implementation of transport policy and its implementation. Indeed, as the NTS Delivery Plan makes clear, no single policy stands alone, they are interdependent and the purpose is to make them mutually supportive in pursuance of the policy goals and outcomes. It was therefore surprising to us that a number of the impact assessments were "carried out as appropriate at the individual policy level, as opposed to the overarching Delivery Plan". This clearly undermines a whole systems approach and given the interdependence of policies could result in cumulative impacts on particular groups or policy areas being lost or completely ignored.

This is particularly the case with regard to the environment and the clear impacts of climate change across a range of policy areas, from health to the economy, as outlined so clearly in the recent COP26 event. As such, we are extremely concerned at the conclusion that no Strategic Environmental Assessment (SEA) is required for the NTS Delivery Plan. With transport now being the sector with the greatest emissions and little progress being made over the last decade, we would consider it an imperative that all strategic transport policies and interventions now require an SEA and would encourage Transport Scotland to undertake one either in retrospect (as per the current impact assessments) or certainly at the next iteration of the Delivery Plan.

The approach to the screening of impacts includes reference to "key datasets and where available considering future trends" and we would ask the question whether this included the scenario plans that have been used in development of the NTS2?

## 3. Addressing the Impacts of Climate Change.

With reference to the headings in the Executive Summary and in relation to our concern that there was no SEA undertaken, we would like to focus first on climate change and then the related issue of tackling noxious emissions from road transport.

Perhaps the most inclusive thing that Transport Scotland could do is to take serious and concerted action to address the unequal impacts of climate change. Climate change is projected to be a poverty multiplier. The risks that come with global warming are unevenly distributed and are generally greater for disadvantaged

people and communities in countries at all levels of development. Those at greater risk are the least likely to be the cause of the problem.

A recent Oxfam report shows that the richest 10% of the world's population are responsible for more than half of global greenhouse emissions, depleting the world's carbon budget by nearly a third in 25 years.<sup>1</sup> Moreover, within the EU, consumption emissions of the poorest half of citizens fell by nearly a quarter in the years between 1990 and 2015 and grew by 3% for the richest 10%.<sup>2</sup> This disparity raises questions around who is currently shouldering the burden of emission reduction efforts. It brings into focus issues of fairness and justice and singles out high-consumption lifestyles, including private ICE car travel, as the major emissions culprit. With a finite amount of emissions available within a limited carbon budget, we need to make decisions on how to distribute these resources and where to target reductions.

Transform Scotland is on record expressing concerns as to how the NTS2 addresses climate change:<sup>3</sup>

*"It is distressing that this new strategy, despite being more than three years in the making, sets out absolutely no new action to tackle the Climate Emergency. We don't need more platitudes about the need for change, we need a concrete programme of action for decarbonising the transport sector. Transport is the largest source of Scotland's emissions. These continue to rise and nothing has been done to reduce them in 30 years. Yet there is nothing of substance in this strategy that will reverse that trend."*

(Colin Howden, Director of Transform Scotland)

While there have since been some subsequent welcome announcements, such as the increase in the proportion of Transport Scotland's budget spent on Active Travel initiatives so that by 2024-25 at least £320 million or 10 per cent of the total transport budget will be allocated to active travel, overall, the record of the NTS2 Delivery Plan on addressing climate change falls short of what is required.

For low-income families, access to a bike or e-bike can be just as daunting as access to an electric car. Transport Scotland should encourage every local authority to adopt mobility share schemes that cater for a range of incomes and cycling abilities which do not depend on the ability to pay.

At a strategic level, we would urge Transport Scotland and its RTP and local authority delivery partners to adopt science-based carbon targets to measure the impact of the NTS2 Delivery Plan and the emerging STPR2 proposals via a uniform and consistent modelling tool such as SCATTER,<sup>4</sup> with specific proposals to reduce carbon inequalities in transport provision.

## 4. Reducing Emissions.

The inequalities exacerbated by climate change are heightened when the impacts on health are considered. The UK Health Expert Advisory Group was formed by the Committee on Climate Change (CCC) in 2020 to advise on developing an approach to assessing the health impacts of setting the sixth carbon budget covering 2033-2037, which will set a new path towards the target date of net-zero carbon emissions by 2050.<sup>5</sup>

The key conclusion is that climate change is already damaging the health of populations in the UK and globally and has the potential to increase health inequalities. Actions to combat climate change, done in the right way, could improve health and health equity. Conversely, actions to improve health and health equity have the potential to reduce greenhouse gas (GHG) emissions.

The group identified four key areas in which action would bring benefits to public health and reduction of health inequalities whilst contributing to the mitigation of, and adaptation to, climate change: transport, buildings, diets, and sustainable economic and employment models that better support health and well-being. A further theme that ran through all of these was air pollution.

The Executive Summary of the Impacts Assessment highlights the issue: Low Emission Zones can help to reduce emissions and provide cleaner air for those who are most vulnerable to the adverse health effects of air pollution including children, older people, disabled people and pregnant women.

The primary focus of LEZs is to protect public health by improving air quality and reducing exposure to high concentrations of air pollutants and it is gratifying to note that the proposals for all cities now include all

vehicle types. However, as the impact assessments point out, “deprived areas are also more likely to suffer from poor air quality as a result of transport related emissions”.

Following the dramatic world-first ruling that the death of 9-year-old, Ella Kissi-Debrah, was caused by air pollution, we would urge the Scottish Government in supporting the coroner who made the verdict to call on the UK government to bring its pollution limits in line with the World Health Organization.<sup>6</sup>

It is clear from the evidence gathered that while the LEZ proposals will go some way towards reducing air pollution, it will not eradicate it. As such, the transport sector needs to accelerate efforts to decarbonise all modes of travel including bus, rail, ferry and air travel. Clear action plans must be published, and target dates accelerated for the decarbonisation of each mode, and consideration given to moving existing LEZs into Ultra Low Emission Zones (ULEZ).

## **5. Affordability, Accessibility and Availability.**

Transform Scotland welcomes the commitments made in the NTS2 Delivery Plan for additional support for public transport in building back after the pandemic and for the commitments made on concessionary fares for older and disabled people and those entering the labour market. We also commend the Scottish Government for introducing the policy of free bus travel for those residents in Scotland under the age of 22 who will be eligible from 31 January 2022.

Having said that, we believe the Scottish Government could be bolder in advocating for free bus travel in certain circumstances. At the last count, 98 of cities and countries around the world have now introduced schemes for free public transport. Not surprisingly, patronage has increased and while the modal switch from private car has been modest, we believe in Scotland that the combination of policies such as the 20% reduction in car kilometres by 2030 and the introduction of LEZs in our major cities could have a cumulative beneficial effect and result in a potential renaissance for public transport.<sup>7</sup>

Following the issuing of free multi-modal transport passes to the delegates at COP26, it is no surprise that there has been an outcry as to why a similar service is not available to Scottish citizens. With the success of this pilot scheme, there are no longer any excuses for not rolling-out a national smart ticketing system available to all. This would play an important role in delivering the integrated public transport network that Scotland urgently needs.

There are recent examples from the United States, where federal pandemic relief money has been used to offer fare-free bus service for more than a year. For example, the city of Lawrence eliminated fares on three downtown routes in 2019, just before the pandemic hit. Lawrence officials say the trial is working. Ridership has jumped nearly 25%, and the mayor recently announced plans to extend the pilot program for another two years.<sup>8</sup> In Scotland, trials could be adopted on a city-wide basis, in a rural area or on specific routes that the IMD (Index of Multiple Deprivation) coupled with user data indicates could be beneficial to target groups.

We support the consultation programme working towards the adoption of the Accessibly Framework Delivery Plan and the proposal to have an effective national assistance card building on the success of the Thistle Assistance Card. Rather than putting the onus on passengers to self-identify, this should in future be integrated into the national entitlement card scheme.

The accessibility programme for rail stations should be accelerated and Network Rail be urged to play their full part in making the railway network fully accessible by 2024.

In order to explore the options of making transport more affordable and accessible, we would suggest the Scottish Government establish a ‘Fair Transport Commission’ building on the work of the Fair Work Commissions around the country and working with the proposed Future of Transport Forum. This option should be embedded into the ‘Working with Partners’ document so that it is seen as a responsibility of all delivery partners. This could be undertaken on a national basis or alternatively, the RTPs could be asked to establish regional commissions feeding into the Forum.

Of course, considerations of affordability and accessibility can only be applied when a service exists and in too many parts of the country the transport services are either non-existent or the frequencies are so

spartan as to present a real barrier to accessing employment, education, health and other essential services. This phenomenon is not just related to isolated rural areas but in parts of our urban areas poorly served by public transport. One of the key tasks of the Fair Transport Commission and the Future of Transport Forum would be to set minimum standards for the availability of transport to all communities across the country.

A good start would be to adopt a public transport accessibility tool for Scotland, similar to the one that is available for England.<sup>9</sup>

## 6. A Human Rights Approach.

Transform Scotland fully supports the stated commitment to adopt a legal framework that protects the rights of individuals and advances equality of opportunity. As the previous comments have made clear we feel that the NTS2 Delivery Plan falls somewhat short of that ambition. Transport policy and proposed delivery in Scotland remains significantly skewed towards those that have wealth, assets and an existing high quality of mobility. The balance of spend, both through capital investment and revenue support, while paying lip service to the hierarchy of investment remains stubbornly fixated on a high carbon and largely exclusive transport system. This needs to change if Transport Scotland is to become an active agent for a just transition.

We would be keen to participate in the future development of the Delivery Plan and the forthcoming STPR2 proposals and we would suggest adding NGOs to the list of those engaged in collaborative working, reference second bullet point under 'Increasing Accountability', p.9 of the NTS2 Delivery Plan.



- 1 <https://oxfamlibrary.openrepository.com/bitstream/handle/10546/621052/mb-confronting-carbon-inequality-210920-en.pdf>
- 2 [https://oi-files-d8-prod.s3.eu-west-2.amazonaws.com/s3fs-public/2020-12/Confronting%20Carbon%20Inequality%20in%20the%20EU\\_0.pdf](https://oi-files-d8-prod.s3.eu-west-2.amazonaws.com/s3fs-public/2020-12/Confronting%20Carbon%20Inequality%20in%20the%20EU_0.pdf)
- 3 <https://transform.scot/blog/2020/02/05/new-transport-strategy-fails-to-set-out-concrete-programme-of-action-to-tackle-the-climate-emergency/>
- 4 <https://scattercities.com>
- 5 Sustaining Health Equity: Achieving a Net-Zero UK - <https://www.theccc.org.uk/publication/ucl-sustainable-health-equity-achieving-a-net-zero-uk/>
- 6 <https://airqualitynews.com/2021/11/15/failure-to-act-has-led-to-thousands-of-air-pollution-related-deaths/>
- 7 <https://www.inverse.com/culture/free-public-transportation-scientific-studies>
- 8 <https://www.wbur.org/news/2021/07/21/massachusetts-fare-free-public-transit-debates>
- 9 <https://www.nao.org.uk/other/transport-accessibility-to-local-services-a-journey-time-tool/>

# Scotland's alliance for sustainable transport

Transform Scotland  
5 Rose Street, Edinburgh, EH2 2PR  
t: 0131 243 2690  
e: info@transform.scot  
w: transform.scot

**transform**  
scotland

We campaign for walking, cycling and public transport to be the easiest and most affordable options for everyone. Our diverse membership brings together public, private and third sector organisations from across Scotland. We are a registered Scottish charity (SC041516).