

Response ID ANON-KEGA-A924-R

Submitted to **A Consultation on Scotland's National Transport Strategy**

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Section A: The Vision and Outcomes Framework

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

Yes

Please explain your answer.:

This has to be the vision for National Transport over the next 20 years. Delivery of this vision presents many challenges but there is an opportunity to build on a desire by people to move closer to places where they work and take leisure. This puts place-making at the heart of the National Transport Strategy.

Placemaking is vital around a good infrastructure (particularly transport) with access to a mixture of property uses including retail outlets, employment, leisure and ideally residential uses. Our members believe that this is important for both commercial and residential development with similar aspirations applying to both. The key will be to associate transport and development correctly. Mixed development of residential and commercial centres can also help (thus minimising private transport use).

There is a need to explore innovative methods of forward funding major transport infrastructure to facilitate the economic development that Scotland needs. It will be insufficient to rely on landowners and the development industry to fund major infrastructure as the economics of this are unsustainable.

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

Yes

Please explain your answer.:

Yes - and building on our answer to Question 1 we believe there is support within both the business sector and wider communities to deliver this Strategy. The SPF will be pleased to work together with local and national Government to deliver these Outcomes.

2b Are some of these Priorities and Outcomes more important than others or are they equally important?

Please explain your answer.:

While we see all the Priorities and Outcomes as important, we would default to the economic priorities, because without a successful economy Scotland will find it is increasingly difficult to deliver the wider vision for Inclusivity and Well-being prioritised by the government.

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

Please explain your answer.:

We do not disagree with the challenges identified, in particular the demands on the commuter rail networks and road congestion. This last challenge is seen prominently at peak commuter times in Edinburgh and Glasgow but it is also a severe challenge at times in more rural locations, where there is often little choice in road transport and the need for HGVs to move goods through communities between agricultural or commercial locations. This can be highly disruptive for small towns on A roads, for example along the A77 Ayrshire coast or around the Longman Industrial Estate roundabout near Inverness.

Above all, the main challenge for the National Transport Strategy is the sheer cost of transport improvements, needed in many cases to deliver the Priorities and Vision identified in Chapter Two. The SPF recognises need for innovative funding mechanisms for infrastructure delivery but we continue to have concerns about the introduction of an infrastructure levy as provided for in the Planning (Scotland) Act 2019. The evidence of previous research for the government suggests this Levy will provide only a small portion of transport costs (or indeed wider infrastructure costs) and the similar mechanism in England appears to have had limited impact.

Section B: The Policies to Deliver the NTS

4a Are these the right policies to deliver Priorities and Outcomes of the National Transport Strategy?

Please explain your answer.:

We support these ambitions for the National Transport Strategy.

4b Are some of these policies more important than others or are they equally important?

Please provide details.:

Looking forward, we believe the key policy will be to embed transport implications in future land use plan making. This should support the delivery of the wider objectives identified above for the purposes of future place-making. A number of major development proposals are already embedding greener transport policies and proposals within their plans. For example, Murray Estates are seeking to introduce an electric bus loop to integrate communities, services, public transport and business locations as part of their Garden District proposals in West Edinburgh.

There is little doubt however that innovation and investment will be needed to address existing communities and transport networks, in the light of NTS2 and the challenges it will be prioritising, such as climate change.

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

5a Are there specific decisions about transport in Scotland that are best taken at the national level (e.g. by Transport Scotland or the Scottish Government), at a regional (e.g. by Regional Transport Partnerships), or at a local level (e.g. by Local Authorities)?

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

The scale of major transport initiatives, such as the Queensferry Crossing for example, will require national decision making. The Scottish Parliament will debate at least major transport proposals as well, particularly through NPF4. A further part of the recent Planning Act is the introduction of Regional Spatial Strategies for local authorities to collaborate on key issues that cross authority borders. We believe it is imperative that we have Regional Infrastructure Plans which will inform the RSS, NPF and LDP processes.

Our members have argued for many years that the Development Plans should highlight the infrastructure needed for a development to proceed. Members find that this is done in a very generic way i.e. a site may need education provision, may need health provision, may need road improvements. In fact, what members have found is that the local authority knows what infrastructure is needed to serve the entirety of the LDP releases but has no concept of the phased provision of the infrastructure. It then falls to the developer of a site to demonstrate how many homes or floorspace can be provided before certain things occur.

We believe there is a case for greater flexibility in the negotiation of contributions by the development industry towards required transport infrastructure. We are concerned about the application of a purely formulaic approach to planning obligations. This could mean that a local authority is able to say that permission can only be granted if the contribution is made, rather than looking at what road improvements, or other facilities, are actually required for that development, then considering whether suspensive conditions could be used, before resorting to legal agreements. The SPF thinks that the purpose for which the contribution is required for transport purposes should be tied to identification of the particular piece of infrastructure, and not just payment into a broader fund which is not always transparent. There should also be the opportunity to phase in contributions and demands as major development sites grow. If demands for major transport contributions from the private sector are too great at the early stage of a development, then that project may simply not be viable, or its delivery could well be significantly delayed.

It is important to remember that any future Infrastructure Levy is adding to an existing mix of taxation on development. Capital Gains, LBTT, business rates, corporation tax as well as VAT and employee taxes. And of course, S75 contributions. It is important to maintain an overview of these levies because developers will assess taxes in the round.

5b Should local communities be involved in making decisions about transport in Scotland? If so, how should they be involved, and on which specific issues should they be involved in making decisions on?

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

Development plans have a wide system of consultation already and this should be used as the key method for the public to comment on infrastructure needs. The new Planning Act provides for Local Place Plans to be taken into account by Local Development Plans. This should allow for input into future planning.

It will be important for a representative approach to consultation and input to LPPs to be achieved or at least assessed by authorities. For example, local authorities consult frequently about changes to local bus services but the breadth of engagement achieved can sometimes be questionable.

Section D: The Strategy as a whole

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

No

Please explain your answer.:

The National Transport Strategy 2 is by necessity a very high level document and is therefore not specific to different regions within Scotland. Its policies however will have implications and positive suggestions for addressing the needs of transport users in different parts of the country.

Section E: Looking Ahead

7a What aspects of the transport system work well at the moment?

Please provide details.:

This will often depend on the time of use of the transport network. The new M8 and Glasgow motorway orbital roads have certainly helped these networks to function better but there are still major delays at peak commuter times. The increases in rail passengers on the reopened Airdrie-Bathgate and Border services are also successful projects.

Despite some initial negative publicity, the success of the Edinburgh Tram in terms of passenger numbers should also be highlighted.

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

Please provide details.:

There is clear demand for investment in rail commuter services and networks. There is also significant demand for improving rail services across Scotland away from the main commuter zones. The success of the light rail in Edinburgh also needs to be enhanced, with appropriate lessons learned in terms of project management.

8a What aspects of the transport system do not work well at the moment?

Please provide details.:

The major rail and road connections struggle at peak times currently. As mentioned in our answer to Question 3 there is also a considerable strain on road connections at times in rural locations on the routes of major A roads.

Again as described briefly in our reply to Question 3 there are already congestion pinch points within our major cities and towns. There is a need to deliver homes and business premises where there is an identified commercial and residential requirement. This must occur if we to allow the Scottish economy to flourish. There will be a requirement to resolve the tension between the sometimes contradictory demands of supporting the economy and maintaining effective (uncontested) and reliable transport connections. This is not just about links between the cities but what happens within urban centres. West Edinburgh is such an example – there are major allocations but also significant road constraints. Roads will continue to be an answer to meeting economic demands for enhanced transport infrastructure, but there will also be a need for better infrastructure support for electric vehicles and similarly supported public transport connections.

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

Please provide details.:

The City of Edinburgh Council is seeking to introduce a 'hop-on' and 'hop-off' small, electric bus service for its core city centre. This is part of a plan to reduce the use of cars within the centre. Our members have discussed this idea in other locations across Scotland, including Aberdeen, and we believe the idea has potential for wider use across Scotland. The NTS could consider wider support for these initiatives for towns and cities across Scotland.

Likewise it is important that transport agencies and authorities takes steps to deal with location of high demand. Although there is now a plan for Glasgow Airport to improve its connections to its wider metro area and major public transport networks, the current situation is not sustainable and requires early investment to meet the challenges identified by the NTS.

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

Please provide details.:

These are positive proposals. It will be important to make the use of citizen's transport panels as user-friendly as possible and inclusive. The danger is that the very people who make regular use of the transport networks are the ones unable to participate in citizen panels due to lack of personal time to do so.

More broadly, the SPF has supported calls for a form of Infrastructure Agency to co-ordinate and deliver key infrastructure that will enable development to come forward. The Scottish Futures Trust, with its blend of private and public sector know-how may be in a strong position to support this initiative. The lack of a national infrastructure co-ordination agency is a real missed opportunity, especially given the experience of some of our members, for example in schools funding. This causes unnecessary and long-term delays to projects that would bring major economic benefit to Scotland as a whole.

Our members are of the view that a National Infrastructure Agency is important to ensure that there is an accountable fair and transparent structure in place for the full co-ordination of diverse funding sources. This would cover funding across key agencies, utility providers, local authorities as well as other public bodies and arrangements for the funding where appropriate between public and private sectors. The Agency would be able to identify private sector led growth areas and coordinate this with public infrastructure plans.

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

Please provide details.:

The aspirations and overarching analysis of the NTS are welcome. What we now need are firm plans and the required resources that will help Scotland deliver on the NTS's aspirations.

The NTS should also consider the ability of the energy network to provide sufficient and reliable power to support the aspirations for electric vehicles and public transport.

The SPF will be pleased to work in partnership with communities, local and national government, to contribute towards the identification of infrastructure that is required to enable us to deliver the development that the Scottish economy needs to thrive.

Section F: Strategic Environmental Assessment (SEA)

11 What are your views on the accuracy and scope of the information used to describe the SEA environmental baseline set out in the Environmental Report?

Please give details of additional relevant sources.:

No comments

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

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

The SEA makes the point that we can future proof new developments in order to reduce their impact on the environment. This is true but there will remain a requirement for significant reinvestment in our existing infrastructure and built environment, if wider environmental objectives for transport are to be achieved.

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

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

No comments

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

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

No comments

About you

1 What is your name?

Name:

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2 What is your email address?

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3 Are you responding as an individual or an organisation?

Organisation

4a What is your organisation?

Organisation:

Scottish Property Federation

4b If responding on behalf of an organisation, please indicate which category best describes your organisation.

Other

If other, please specify.:

Industry representative body.

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

Publish response with name

6 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

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very dissatisfied

Please enter comments here.:

This form of responding to consultations inhibits the ability of organisations representing large groups of members to consult on its details easily.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly dissatisfied

Please enter comments here.:

It is the method of response not the concept that is wrong.