

23 October 2019

NTS Team
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Dear Sir or Madam

Ramblers Scotland response to National Transport Strategy consultation

Ramblers Scotland welcomes the opportunity to respond to this consultation. We have also contributed to and endorse the *Priorities for the National Transport Strategy* response submitted jointly with other bodies involved in active travel (including Sustrans, Living Streets, Paths for All, Cycling Scotland, Cycling UK Scotland, Transform Scotland, Forth Environment Link) so our comments below are additional to those in that submission.

Ramblers Scotland is the representative body for walkers in Scotland, recognised by **sportscotland** as a governing body of sport. We help everyone, across Scotland, enjoy walking and protect the places we love to walk. We are a membership organisation with 54 local walking groups in Scotland, running 3,500 group walks a year which are led and organised by 1,200 volunteers.

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.

- We welcome the references to health and equalities.

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?

- Generally yes

Please explain your answer.

- We are pleased to see the emphasis on planning for walking, cycling and public transport through reference to the Sustainable Travel Hierarchy, and also to see emphasis on enabling people to make healthy travel choices. However, the climate action priority simply says the NTS will '*promote greener, cleaner choices*' (our italics). Given the declared climate emergency we would suggest stronger action is signalled, such as 'reprioritise investment towards'. We are aware that a version of the sustainable transport hierarchy appeared in documents which date back to the establishment of the Scottish Parliament, such as [NPPG17](#), and yet it has had little influence in transport planning over the past 20 years, whether in rural or urban Scotland. This NTS is our last opportunity to truly implement this hierarchy, and that will only happen if the government's transport budget is similarly reprioritised away from supporting the status

quo and instead investing in public transport, walking and cycling. For many years we have supported the Association of Directors of Public Health's [call](#) for at least 10% of all transport budgets to be spent on walking and cycling. We now have a declared climate emergency in Scotland which means we need to rapidly reduce our emissions from transport. Allied with the government's very welcome emphasis on reducing inequalities in all policy areas and improving public health, we would suggest that 10% is an absolute minimum in order to implement a major programme of street design and behaviour change to bring about a population level modal shift in transport. Nevertheless it is important that this funding is targeted towards those suffering from transport poverty to ensure inequalities are reduced.

- With regard to public health, levels of physical activity and air quality will not be improved by continuing the reliance on private car use, even if those are electric vehicles. It should also be remembered that according to the Scottish Transport Statistics 2018, 28% of households still have no access to a car, and almost 36% of women and 25% of men have no driving licence.

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

- They are all important.

Please explain your answer.

- These are all interlinked and support each other.

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

- Yes, subject to comments below.

Please explain your answer.

- The paragraph related to tourism does not fully set out the range of challenges nor the opportunities for making changes. For example, a high proportion of tourism is currently based on vehicle use, which results in damage to the rural road network and therefore costs generally borne by that local authority, even though the vehicle may only be passing through that area and the visitors not contributing to the local economy. We have welcomed the introduction of the Rural Tourism Infrastructure Fund but suggest that this needs to be expanded to enable not only national investment in maintenance of (rural) roads and car parks, but also to look at more innovative ways of reducing car use such as shuttle buses linked to train stations or park and ride provision in honeypot areas such as Glen Nevis, east Loch Lomond or Glenmore in the Cairngorms NP. In addition, public transport is theoretically available for many trips for outdoor recreation and yet the reality is that train and bus services are often few and far between, meaning it's far less attractive for people to use these services than to drive. This needs to be improved so that the public transport option is at least as attractive as using the private car. There is also a need to create better options for cycle carriage on trains and buses.
- Cycling and walking tourism are mentioned, but it is noticeable that national road infrastructure which is promoted for vehicle use such as the North Coast 500 is paid for from general taxation and yet paths and offroad routes used for walkers and cyclists are mainly supported by charities, communities and trusts. Organisations tasked with delivering the current allocation of government funding for walking and cycling often struggle to find match-funding from the local authority, or local authorities lack the capacity to deliver active travel provision in partnership with these organisations, with the result that current structures are not able to support the exponential increase in walking

and cycling infrastructure that is needed, and revenue funding for maintenance of these routes is an ongoing problem. It is vital that all forms of transport are covered by National Transport Strategy and given equal weighting in terms of budget and organisational support.

Section B: The Policies to Deliver the National Transport Strategy

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

- Yes, subject to comments below.

Please explain your answer.

- We would add that the policy to “provide a transport system which promotes and facilitates travel choices which help to improve people’s health and wellbeing” should be reworded to “*ensures and facilitates*” rather than “promotes and facilitates” in order to recognise the urgency and importance of its delivery.
- There is no reference to the National Walking Strategy delivery plan, yet investment in this plan would help to deliver many of the NTS priorities and outcomes.

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

Please provide details.

- All these policies are important.

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.

- Decisions relating to walking and cycling are generally seen to be local, (or in some cases, such as long distance routes, regional), given that the majority of trips taken by these modes are local. However, we are concerned that this has led to a tendency to downgrade the importance of these transport modes and subsequently impact on the levels of national investment they need. The Scottish path network should be seen as a national resource and funded appropriately. For example, the National Walking & Cycling Network is a national priority in NPF3 and yet is far from being given equal priority with the roads network. In addition, core paths plans are locally managed and yet together they form a nationally-important network which provides sufficient levels of access throughout the entire country. Many of these core paths are also active travel routes but they are all used for leisure purposes and are an important way of achieving many of the government’s objectives with regard to health and wellbeing. We therefore believe that both these networks should become national priorities in terms of promotion and investment in their maintenance and further development.
- We are aware that there is an allocation for public access made within the government’s block grant to local authorities but our understanding is that the level of this has not changed for over a decade and of course it is not ring fenced, so it does not always filter through to the use it was intended for. This demonstrates the need for alternative national funding sources, such as an expansion of the Rural Tourism Infrastructure Fund as mentioned above.

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?

- Yes.

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

- Local communities are best placed to advise on the infrastructure required to increase walking, cycling and public transport use.

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?

- Yes, subject to the comments in this response.

Please explain your answer.

- The draft Strategy includes much welcome narrative flowing from the vision and priority outcomes.

Section E: Looking Ahead

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

- Scotland has a good network of walking and cycling routes, albeit the funding for development and maintenance of this network is insufficient and its promotion is also patchy, dependent on local efforts.

Please provide details.

- Ramblers Scotland is aware that the mapping of our path network is not available to the public as a complete, freely-accessible dataset. We are currently working with partner organisations to develop a nationally consistent dataset of paths to enable people to find paths both locally, so that they can be more active in their daily lives, but also away from home to encourage them to enjoy active travel and leisure pursuits more easily. We would welcome further discussion with Transport Scotland with regard to our Mapping Scotland's Paths project given that so many routes used for leisure purposes incorporate sections of the public road network, especially C roads.

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

Please provide details.

- We worked for a number of years with colleagues in the National Access Forum to try to get all core paths represented on publicly available maps, such as Ordnance Survey maps. This was not successful and led to the Mapping Scotland's Paths initiative which has now become a Ramblers funded project since August 2019. The NTS's aim to encourage more walking and cycling would be boosted by the better mapping of paths as we know that lack of information and knowledge of where to walk is a key barrier to people being more active.

8a. What aspects of the transport system do not work well at the moment? Please provide details.

- As noted above, walking and cycling need to be recognised as modes of transport that receive the same levels of support and investment as other modes.

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

- We have provided a range of actions in the joint response *Priorities for the National Transport Strategy* submitted along with other active travel bodies and referenced above.

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.

- As noted above, there are welcome commitments in this section, but in some cases this is not new; for example, the sustainable travel hierarchy is simply an updated version of a transport planning hierarchy that is at least 20 years old and has had minimal impact to date. Therefore the test of the strategy will be seen in the way it is delivered and whether truly transformational change in our transport behaviour is seen. The strategy also needs to be seen to influence other related policy documents, such as the forthcoming National Planning Framework 4 and the Strategic Transport Projects Review.

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

- No comment.

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.

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

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

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 comment

We hope the comments above are useful and would be happy to discuss them further.

Yours sincerely

Helen Todd
Campaigns & policy manager