



**Community
Transport
Association**

Response to the Scottish Executive

Consultation on Scotland's National Transport Strategy

10 July 2006

The Community Transport Association

The CTA is a rapidly growing national charity giving voice and providing learning and enterprise support to member organisations, which are delivering innovative transport solutions to achieve social change. CTA UK promotes excellence through providing training, publications, advice and information on voluntary, accessible and community transport.

Voluntary and community transport exists to meet the travel and social needs of people to whom these would otherwise be denied, providing accessible and affordable transport to achieve social inclusion.

The CTA is the representative body for non-profit passenger transport operators in the UK. CTA Member organisations are involved in the provision of transport, especially accessible services.

The CTA is the UK's largest provider of training, advice and information on accessible, voluntary and community transport provision. The CTA is funded by the Department for Transport, the Scottish Executive, the Welsh Assembly Government and the Department for Regional Development (Northern Ireland).

CTA's Response to Consultation

The CTA welcomes the opportunity to contribute to the Scottish Executive's consultation process. The response is in the format requested by the Scottish Executive and is shown on the following pages.

Contact Details

The Community Transport Association is currently recruiting a Director for Scotland and future enquires will be redirected appropriately. In the meantime any queries regarding this response should be directed to:

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ANNEX A : SUMMARY OF 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?

CTA appreciates the need to focus the transport strategy on economic growth but it is important to recognise that this is not the main need for many residents. The main issues for many people are social inclusion and equal opportunities but these are included in the phrase “accessibility”. Consideration should be given to raising the profile of these two issues in the overall summary.

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?

In paragraph 4, the second bullet point mentions increasing accessibility of the transport network. This gives a false impression that the existing network just simply needs to be made accessible (as in ‘able to be accessed’). The fact of the matter is that in many cases the transport network needs to be expanded to include isolated areas both urban and rural. The proposed strategy goes on to mention the introduction of demand responsive transport and flexibly routed services. This element of new service provision should be included in these objectives.

The community transport sector must be seen as an integral part of the Scottish Transport Network because it is already promoting social inclusion and wellbeing by connecting remote and disadvantaged communities and increasing overall access to the public transport network.

In paragraph 2, the proposed strategy states that public transport is favoured because it is “sustainable”. For many people in Scotland community transport is already providing transport to meet key social needs in urban and rural areas where there are few, if any, alternatives. Community transport, like most public transport provision, requires financial support and is unlikely to be totally financially sustainable at any time. It is hoped this is understood and this wording is not misused in the future as a euphemism for profitable public transport.

We are also concern that passengers/ users could be excluded from any involvement in ongoing consultation once the strategy document is enacted.

In paragraph 9, the fourth bullet point, mentions delivery taking place at the most appropriate level, but does not explain the mechanism for deciding which level is appropriate.

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?

Although the following may not seem to relate to promoting economic growth, having a healthy, inclusive and active society are important to create economic optimism.

Community transport, both the rural initiative and the urban DRT pilots, have good examples of best practice that could be used throughout Scotland.

Good practice in social work, community education and health should be reinforced by a national minimum standard.

CONSULTATION QUESTION 4.

What issues must this 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?

Large subsidies of mainstream public transport are unlikely to be affordable. Demand responsive transport will be the key to providing the required services and needs to be promoted. Community transport operators are the best way of providing this form of transport.

Also, accessibility issues at railway stations and Glasgow underground to reduce barriers to travel and promote inter-modal travel need to be addressed.

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?

Various parts of the transport network will need financial support over the long term. Community transport and demand responsive transport are the two areas we are concerned about. Spending on infrastructure improvements and high level service improvements to rail, ferry and air services are needed but must not drain resources away from these vital services.

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?

Both regeneration and rural isolation issues are important. We would ask that minimum standards be set for transport to isolated communities. This will enable people to access services. This will start to determine the balance of funding priorities.

It is important to keep in mind the resources needed in island and rural communities, particularly the cost of providing transport, i.e. repairs, maintenance and a shorter lifespan of vehicle due to weather conditions.

Funding focuses should include:

- **Encouragement of modal shift**
- **Western Isles spinal route being trunked**
- **Equality of treatment between road and ferry travel (There should be a similar scheme to the air scheme on ferries with islanders getting a 40% reduction. It costs £200 to take a minibus by ferry from Lewis to the mainland)**
- **Ensuring villages and rural hamlets remain viable places to live and yet provide the facility to access employment and other services when no car is available.**

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?

This is not a community transport issue but many of our passengers live in rural / island communities and international journeys have to

start with a national journey. This can double the total cost. In particular, our passengers from Lewis say that they want Sunday ferry sailings to maximise export potential.

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?

We believe that the Strategy should deal with a simplified structure for the fare scales and reductions on rail and bus fares for disadvantaged people.

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?

This is not a community transport issue but our passengers tell us that quality, safety and reliability are often more important than speed. We would also wish research to be completed to establish whether the need for longer journeys could be met in some other way.

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?

This is not a community transport issue but we would question the mechanisms of allocating local authority spending. As an example, at present local authorities have been allowed to keep a discretionary budget for concessionary fare reimbursement to modes other than buses, but when they are approached about this for reimbursement of community transport fares they say they have no money for this purpose.

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?

This is not a community transport issue

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?

This is not a community transport issue but our operators would like to see encouragement for long distance and bulky freight to be transported by rail or sea, with particular incentives to encourage night time freight travel.

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?

With regard to voluntary sector skills (paragraph 47 sixth bullet point) the consultation suggests there is a lack of training available for the voluntary sector. The Community Transport Association's established Minibus Driver Awareness Scheme (MiDAS) and Passengers Assistant Scheme (PATS) are the established training programmes for the sector. These are fully supported by the employers and by GoSkills the passenger transport industry's Sector Skills Council. Across the UK there are over 67,000 drivers and over 5,000 passenger assistants trained to these standards. MiDAS is a membership scheme and once an organisation decides to adopt the scheme, they are obliged to train and assess all drivers and to facilitate refresher training every four years. There are 182 MiDAS and 212 PATS member organisations supporting and promoting training to volunteers within Scotland.

Both training schemes recognise that transport delivery is only part of the process of allowing some of the most marginalised and excluded people within society to access services. Like community transport in general, the training constantly strives to improve through best practice, operational feedback and legal requirements.

MiDAS and PATS offers a high quality training and assessment programme that is correctly balanced between effectiveness, standards and value for money. Although MiDAS is, de facto, the training standard for transport operatives in the voluntary sector it does not fit within the SVQ framework and, consequently, does not attract public training money. If the Strategy wishes to address any

residual skills issues in the community transport sector, a more active financial support of MiDAS and PATS is required.

A new member of the suite of training packages developed by the Community Transport Association is MiDAS for Cars and MPV's.

Feedback from our passengers suggests that customer care training for drivers on registered bus services needs to be a requirement.

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?

Although tourism is an important income generator, the needs of the local community must come first. Changing timetables to meet the needs of tourists can be problematic especially if infrequent lifeline bus services have lengthened routes because this creates problems for elderly people and people with a mobility impairment. Journey planning information for tourists with a lack of mobility or a disability needs to be made available.

Pressure should be applied through the existing subsidising of mainstream public transport to speed up the conversion of all vehicles to be accessible before the legal deadline. If this is not done the outcome could be a complete lack of suitable vehicles to run public transport services because of lack of investment by commercial operators.

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 issue is the availability of concessionary fares to community transport users. This needs to be made an obligation on Transport Scotland before an anti-discrimination test case forces this outcome.

The Community Transport Association, on behalf of its members, has been pressing for a review of the Section 19 & Section 22 permit system. Of particular interest to Scotland the Community Transport Association has called for

- **Section 22 permit drivers to be paid**
- **MPV's (vehicles with 8 or fewer passenger seats) to be brought into permit legislation, thus providing clear structure and guidelines**
- **Simplification of the current minibus permit system to reduce administration burdens**
- **Re wording of current legislation to allow prudent surpluses to be made on transport provision that can be channelled back into the organisation and help groups to be more self-sustaining**
- **Clear statements that confirms the Department for Transport's view that minibuses operated under Section 19 permits are allowed to undertake local authority contracts (home to school travel, social services work. etc.) on a not-for-profit basis**

CONSULTATION QUESTION 16.

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

Examples include:

- **Tagsa Uibhist (RCTI project)**
- **Disability Lewis(RCTI project)**
- **Buchan Dial a Community Bus(RCTI project)**
- **A2B (Aberdeenshire DRT Pilot Project)**
- **Other urban DRT projects**
- **Highland Council's subsidised taxis**

In the Scottish Executive commissioned document: 'Review of Demand Responsive Transport' (Halden 2005) there are many examples of good practice in DRT throughout Scotland.

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?

The accessibility planning requirements in English local transport plans go beyond simply providing transport where a need arises. Access to goods and services can be achieved without transporting people to central locations. The Community Transport Association believes that insufficient work has been done on this aspect of the concept. Nevertheless, accessibility planning needs to be a requirement of transport strategies in Scotland and such planning requirements should include community transport resources in each

area because travel solutions are provided to people who cannot use other forms of public transport.

In Scotland, opportunities exist to study the emerging needs of people to access services and take a more integrated view of meeting these needs. When services are planned to meet needs (either transporting people to services or services to people) there must be consideration given to solutions beyond public transport. Currently social work, education and health provide transport for eligible clients and no charge is made for these services. However there is an assumption that those people who do not quite fit the eligibility criteria will be transported by other means. The voluntary sector is often cited as their available option. This expectation of service provision by one section of a public authority is very rarely backed with proper funding from the same authority.

Common standards of fare structures need to be established across ambulance, social work and education transport. Even if this results in the charging of fares with those eligible or entitled to free travel being reimbursed to the operator through the national concessionary travel scheme. This would be a basis on which fully integrated transport systems can be designed.

A particular comment from Voluntary Action Lewis shows that the above point is valid because they have seen a rise in passenger numbers from non-emergency ambulance patients who have been deemed ineligible; requests being made for weekend journeys (inpatients returning home) and additional early morning and evening transport journeys to and from health facilities. The Scottish Ambulance Service has not responded to requests to fund this additional work being completed by the voluntary sector.

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?

Accessibility of public transport for disabled people is a multi-faceted issue. Physical barriers are being addressed but financial and emotional barriers remain. These manifest themselves as follows.

- Concessionary fare travel is not available on all service used by disabled people. E.g. community transport
- In some areas of Scotland accessible bus services of any kind do not exist

- **On coaches the current design for ‘accessible coaches’ is focussed on wheelchair users. Less than 1% of the total population is a wheelchair user but it is estimated that between 25 and 30% of the population have a mobility problem. Their options are to struggle to climb the coach steps or to risk the resentment of the driver and other passengers by requesting that the lift be deployed to get them on the vehicle. The specification of accessibility requirements for coaches should be reviewed to improve this situation.**
- **Solving access problems on the transport system should not be seen in isolation. The external physical environment (streets, kerbs, bus interchanges, entrances, etc.) must not be a barrier to movement or access to transport.**

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?

In the community transport sector, MiDAS (Minibus Driver Awareness Scheme) fulfils this requirement and funding linked to best practice, such as MiDAS, is commonplace in our sector.

Transport provided by local authorities, health service and other not-for-profit bodies could equally be required to meet the same standards.

Some mainstream bus operators do provide training to their drivers but this is not universal. Research suggests operators and drivers are not succeeding in self-regulating best practice standards, therefore some form of persuasion is needed. It would be difficult to link disability training standards to the Bus Service Operators Grant paid to operators of registered services because this is a UK-wide scheme. However, it would be possible, we believe, for the Scottish Traffic Commissioner to make it a condition of the operators licence.

CONSULTATION QUESTION 20.

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

It is important to retain the current funding of transport in rural areas. All aspects of strategic planning changes including devolved

decision-making must ensure that no reduction in support is experienced.

The Community Transport Association requests that the Rural Community Transport Initiative continues to be funded directly by the Scottish Executive and is expanded to enable a greater contribution towards tackling social exclusion by community transport.

As a longer-term endeavour, the Scottish Executive should encourage and enable the voluntary sector by supporting social enterprise. Facilitating community organisations to operate services for their whole community area, including tendering for social work, education and public transport contracts if they wish, would make community transport more self-sustaining in the future. The Community Transport Association has been working with several English areas to grow a public contract capability amongst community transport operators.

CONSULTATION QUESTION 21.

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

This is not a community transport issue.

CONSULTATION QUESTION 22.

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

A combination of demand responsive transport schemes and grant mechanisms similar to the RCTI would begin to address this issue. In the longer term, social enterprise could be a more sustainable option in these areas.

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?

In the experience of community transport operators, people living in an isolated community have difficulty accessing cultural and sporting events on an individual basis. The solution offered by community transport is 'group travel schemes'. This is a more appropriate transport enabling process because access to these events is often

required by like-minded people who are already formed into informal or formal social groups. Groups travel schemes are often seen as outside the definition of public transport. It would be hoped that the National Transport Strategy would cover all modes of passenger transport and therefore should include group use of vehicles.

Once an investment has been made in a community minibus there should be encouragement to maximise the use of these vehicles and in the process help to build financial reserves for the purchase of a replacement. Other measures advocated by the Community Transport Association in this response would address this issue and provide community transport schemes with both DRT and group transport facilities use that are available for the entire day.

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?

The process of creating a Travel Plan, where employers have a responsibility to guide and enable employees to get to their place of work benefits

- **the employer (by increasing the range of skilled employees they can recruit);**
- **the employee (by easing any transport problems they have with getting a job) and**
- **society in general (by reducing the impact of travel arrangements on the rest of the community and the environment.**

On this basis, all new planning applications or change of use applications whatever the size of their business should be required to show the travel planning process in action. All public authorities should be required to produce travel plans for all their locations.

Community based transport solutions have been shown to benefit travel to work but legislation changes (detailed elsewhere in our response to this consultation) are needed to make this more effective.

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.

Our response to this question is covered in our answer to question 24

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)?

Investment in modal shift schemes is a valid use of public money. Based on information from our passengers we believe the following priorities need to be addressed on public transport:

- **Integrated ticketing where more than one operator is involved**
- **End to end ticketing for multi modal journeys**
- **Cashless payment systems**
- **Reward schemes to encourage travel by public transport**

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?

An incentive scheme using SMART technology (cashless payment systems) giving rewards, reductions in fares and removing premium single ticket prices.

CONSULTATION QUESTION 28.

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

This is not fundamentally a community transport issue however many of our passengers with mobility problems point out that they do not have this option. Community transport operators believe that providing safe walking and cycle routes and separating cyclists from other road users would be safer.

CONSULTATION QUESTION 29.

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

If all appropriate areas, rural and semi urban, were covered by a reasonably priced, good quality, demand responsive transport

system, individuals would be encouraged to take walking trips which can be turned into public transport for the return journey.

We have previously commented on group travel issues. This is an important way in which members of clubs and societies access healthy activities and facilities.

Particular notice needs to be taken of the requirements of people with mental health problems.

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?

Travel by public transport becomes more attractive when high quality, comfortable clean buses are used, with courteous staff and are reliably operated at a reasonable cost. Routes and interchanges also need to be integrated. Services such as long distance and mainstream local services must be within easy reach of each other. Information and advice on how different services and modes interconnect must be easy to access and understand.

The public transport passenger network needs to support a range of services (including DRT or Dial-a-Ride) that can connect an individual's home address with their final destination. This is particularly important for people with a mobility difficulty.

Confidence and trust in the services needs to be increased by better staff training and quality of service. Perceived lack of personal safety is also a paramount issue.

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?

We believe that it is agreed that bus deregulation has produced problems because bus operators only operate where they can make a profit. Subsidies for the provision of non-profitable services are subject to tendering by the local authority and in some cases there is not a lot of competition for these routes resulting in dramatically overpriced contracts.

Community transport operators believe that they can assist in solving this problem although there has been resistance amongst bus operators to allow community transport groups to provide services.

Community transport groups are not generally trying to compete but to provide services to meet the needs of their local community. There has to be a change to allow “not for profit” operators to provide routes which the bus operators are not operating commercially.

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?

Comments from our passengers suggest that railway stations are not accessible and are perceived to be unsafe. The fare structure for rail travel mitigates against casual travel with single fares often nearly as expensive as the return fare.

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?

Feedback from our passengers suggests that the current systems are not ideal. The comments are:

- **You have to pay a national rate to phone for information and then the operator often cannot help with directions between bus stops**
- **Using postcodes for direction finding and travel planning is only relevant if you are aware of the postcode, this is unlikely unless you are travelling to and from a specific address**
- **Mobile phones are only an option where there is a signal. There are large tracts of rural Scotland without mobile signals.**

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?

Some savings in fare prices can come from increased public subsidy but this should be restricted to people in need. Other savings can come from integrated transport solutions and these should be passed on to the ticket price. Savings can be generated using SMART cards, enabling cash free transactions. Alternatively, encouraging the

purchase of tickets in a variety of outlets saves time on the vehicle. In other European counties this is a common arrangement.

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)?

It is thought that it will be difficult to get public transport operators to buy in to self-funded reduced fares as they are operating to maximise profit. However, Megabus is a good example of modal shift and increased usage through vastly reduced fares. Having a low price transport operator has been the catalysts in other transport industries to cause mainstream operators to reduce fares (e.g. Easyjet)

CONSULTATION QUESTION 36.

How can we promote integrated ticketing between different operators?

Introducing SMART card cashless technology as a requirement would promote integrated ticketing. Issues of Fair Trading need to be addressed.

CONSULTATION QUESTION 37.

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

An answer that may arise in other consultees' responses may be additional road charging for freight transport. However, in Scotland this would discriminate against island communities

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?

To combat the anti-social behaviour on public transport, the installation of CCTV cameras on buses as is already the case in London; emergency driver telephone link to the Police, lighting improvements and CCTV cameras in bus shelters, railway platforms and access walkways would all assist.

Unsocial behaviour on the road (road rage, speeding, illegal parking) should be tackled by making it easier to report incidents, possibly with web-based systems linked to the Police

CONSULTATION QUESTION 39.

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

It is difficult to judge if Scottish devolved legislation can promote biofuels. Financial or planning support for local production facilities would help.

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?

Local authorities operate a large number of passenger transport vehicles. The Scottish Executive could influence the uptake of these fuels in this area. The private sector is unlikely to be pioneers in this area so the public sector will have to give encouragement.

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?

It is difficult to judge if Scottish devolved legislation can be used to promote environmentally cleaner vehicles.

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?

The public sector should invest now in research and development to enable new technology to be rolled out across Scotland. This may be in the form of support to Universities or others in the private sector. Technological solutions that are appropriate for mainland / urban areas may not be suitable for island and rural communities.

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?

Not specifically a community transport issues but operators feel that insufficient use is made of regulatory powers to prevent abuse of disabled parking facilities.

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?

Park & Ride schemes are only addressing part of a journey and, although this can have an impact on congestion reduction etc. it introduces a further modal change point in journeys.

The strategy should be addressing the reduction in the need for a car for any part of the journey.

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?

This is not a community transport issue.

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?

Road pricing is a very difficult and unpopular topic. The difficulties seen are that introducing road pricing when alternative public transport does not exist could only increase isolation in rural areas and introducing road pricing on selected “busier” roads could create “rat runs” on local roads.

If road charging were introduced, exemptions for bio-fuel vehicles could apply to encourage use of this technology.

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?

The Scottish Executive needs to give guidance on any policy and ensure that it is available to all areas and transparent in its operation. There should be clear gains for the travelling public, set out and available from the start. This may cost the Executive in the short term for (say) new public transport schemes to be eventually paid for by road pricing but this might be justified.

CONSULTATION QUESTION 48.

What should be the objectives of any future national road pricing scheme? For example:

Road pricing should be seen as a policy that has several positive outcomes. These include:

- **Reduced congestion levels, speeding up the supply of goods and services.**
- **Reduced environmental concerns about CO² and other emissions**
- **Achieve our aspiration in Scotland of stabilising road traffic volumes at 2001 levels by 2021 (see Chapter 4)**
- **Improvements in public transport provision that will lead to the first three benefits on this list being increased many fold**

CONSULTATION QUESTION 49.

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

This is not a community transport issue but the chance to set out a way of improving public transport within Scotland seems to be opportunity not to be missed.

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?

CO² emission from all sources need to be included and monitored.

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?

Centralisation of services causes transport problems. We would propose that any proposal to centralise public services should include the costs arising to individuals for transport. It is unfair to count only the service centralisation savings without taking into account the costs to individuals arising from the change. Typically, health boards should fund all transport if they centralise a service.

Locating services on the outskirts of town creates transport problems. Public transport services and infrastructure must be part of the planning process for all developments. Final planning decisions from local authorities should not be approved until transport requirements are detailed and agreed.

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 Community Transport Association believes that this area represents the largest opportunity to effect positive change in people's lives. The promotion of home working, booking systems for multiple occupancy vehicles, flexible working arrangements, video conferencing, web based ordering, etc. can be beneficial.

Community transport operators are keen to become involved in getting people to work but can be prevented by legislation (see earlier comments)

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?

More work could be done to raise awareness of why road traffic incidents happen. An increased use of safety training programmes (full details of the community transport's MIDAS scheme detailed earlier)

CONSULTATION QUESTION 54.

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

The management of parking facilities with bus priorities (including community transport services in pedestrian areas) would help. Previous comments about web based reporting of traffic violations are also relevant.

CONSULTATION QUESTION 55.

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

Detail plans should be prepared and be the subject of consultation.

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?

We would like to see top level measures related to individuals and their ability to access goods and services (like the accessibility planning model) being used to make sure that economic growth is not at the expense of disadvantaged people.

CONSULTATION QUESTION 57.

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

The subsidiary measures seem to be appropriate

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)?

This is not a community transport issue

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?

See our earlier response concerning road pricing and public transport provision

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 CO 2 (see further below); and
- Continuing to monitor congestion trends on our trunk roads as at present, and considering what further measures might be required.

No specific comments

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?

No specific comments

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?

No specific comments

CONSULTATION QUESTION 63.

Do consultees agree that setting a level of contribution for reductions in Scotland's CO 2 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?

No specific comments

CONSULTATION QUESTION 64.

What specific reduction level(s) for CO 2 should be put in place for transport?

No specific comments

CONSULTATION QUESTION 65.

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

No specific comments