GCPH response to
SPT draft Regional Transport Strategy
(November 2022)

Glasgow Centre for Population Health

Note: questions/sections for which GCPH did not provide an answer have been removed.

2. RTS Strategic Framework

2.1	The RTS Strategic Framework, which includes the RTS Priorities, Targets, Objectives and Policies for the new strategy, is set out in Chapter 6 of the draft RTS document. Does the RTS Strategic Framework provide a strong basis for improving transport in the region?
	Yes
2.2	Please provide additional comments on the RTS Strategic Framework in the box below.
	We are broadly supportive of the framework and what it is trying to achieve. We do feel though that there are aspects that could be strengthened. The shift to a much more active and sustainable transport system is a major one and will require leadership from transport planners and providers and, also crucially, from politicians. We should be learning from other places where active and public transport systems work well, such as in Copenhagen, Berlin, and Vienna. Governance and ownership of public transport services need to be considered carefully. What are the best models to adopt to achieve key outcomes? Such outcomes would include: improved accessibility to transport; affordable and consistent ticket prices across different modes; one ticket across all modes and services; more coordinated transport services for communities; a clear focus on environmental and social duties, including reducing carbon emissions, clean air, social inclusion and creating healthy sustainable places. It is the models of governance and ownership that are best likely to achieve these outcomes that should be adopted. Reducing car use is as important as improving active travel and public transport services, and both need to happen concurrently. This will require the careful applications of a range of demand management measures e.g. reducing parking capacity, workplace parking levies and road pricing, avoiding disadvantaging people who already face transport poverty and accessibility difficulties. Indeed these approaches should seek to improve transport access for those groups that are currently excluded or disadvantaged ([Scottish Parliament Cross Party Group on Sustainable Transport. Targeting Traffic: Report of the Scottish Parliament Cross Party Group on Sustainable Transport's inquiry into the Scottish Government's commitment to reduce car mileage by 20% by 2030. Transform Scotland; 2022](#)). A cultural shift is needed also, away from prioritising the car, and will require political leadership. As an example, previous research focussed on active travel highlighted these key ingredients for success: strong visionary leadership (from politicians, civil servants and Council officers); sustained investment over several years and sometimes decades; and pedestrian and cycle-friendly zones which give greater priority over motorised transport, particularly private cars ([Warren J. Civilising the streets. Transform Scotland; 2010. Available from: Warren J. Civilising the streets. Transform Scotland; 2010](#)). This is an opportunity to reimagine public transport. Could a regional bikeshare scheme be created and integrated with other modes? How can car clubs be expanded and integrated with other transport services? How can all forms of public transport be made more accessible and affordable? A health impact assessment of any new transport proposals should be mandatory. Related to this, the Glasgow City Region team have recently been successful in a project bid for funds from the Health Foundation's Economies for Healthier Lives programme. The project aims to develop a ['Capital Investment](#)

	Health Inequalities Impact Assessment '(CHIIA) tool and to test it on capital infrastructure projects of various sizes, types and stages of development. The tool will help enable a new approach to large infrastructure projects that considers the likely health, wellbeing, and inequality outcomes of large-scale capital infrastructure investment. This aligns with the Health and Wellbeing Policy within the Draft National Planning Framework 4, which requires a health impact assessment for all proposed development likely to generate significant adverse health effects.

3. RTS Policies

RTS Policy Theme: Accessing and Using Transport

3.1A	How important is the policy theme 'Accessing and Using Transport' to you or your organisation?
	Very important
3.1B	Do you wish to comment on the individual policies within 'Accessing and Using Transport' theme? If you select 'no', please move to Question 3.6A.
	Yes
3.2A	*Policy: P.A1 Accessible transport* *Ensure the transport system is accessible to all. Support delivery of the Scottish Accessible Travel Framework (SATF) and Annual Delivery Plans within the region. Improve the convenience, comfort and certainty of experience for people when travelling by active travel or public transport, particularly people who have a disability including non-visible disability. Ensure accessibility is considered in the application of the sustainable travel hierarchy and is a core objective in transport innovations and new forms of transport services and infrastructure including Electric Vehicle charging infrastructure.* Do you support policy **P.A1 Accessible transport**?
	Yes
3.2B.	Please provide comments on policy **P.A1 Accessible transport** in the box below.
	Approximately 20% of all Scots reported having a long-term health problem or disability that limits their day-to-day activities. In Glasgow, that figure rises to 23%; above 65 years, a long-term health problem or disability affects two-thirds of Glasgow's population. Further, Glasgow's population is ageing. It is important that the public transport system remains accessible to people if they experience reduced mobility in order that they can maintain their independence. Apart from the moral and equalities case to be made for a truly accessible transport system, this is an issue that impacts on a substantial number and proportion of the city region's population. Additionally, there is often inadequate space on public transport for wheelchairs and prams, which needs to be addressed. Lack of accessible transport also contributes to the economic barriers disabled people face.
3.3A	*Policy: P.A2 Affordable transport* *Promote and facilitate public transport to be more affordable particularly for people living in poverty, in socio disadvantaged communities and in rural and remote areas. Ensure public transport passengers find it easy to choose and access the best value ticket for their journey. Facilitate public transport ticketing to be more flexible, affordable and integrated and to better reflect the way people need to travel, particularly people who have insecure, part time or shift work or unpaid care work. Ensure affordability is a core objective in developments and enhancements related to smart and integrated ticketing, Mobility as a Service and other relevant transport innovations. Develop and facilitate the role of active travel as an affordable transport option.*

	Do you support policy **P.A2 Affordable transport**?
	Yes
3.3B	Please provide comments on policy **P.A2 Affordable transport** in the box below.
	We support all the proposals under this policy. The Scottish Government (in their [Programme for Government)](#) estimates that 40% of households will be suffering fuel poverty even after the UK Government's energy cost mitigation measures. So, clearly, providing affordable public transport should be seen as a current as well as a long-term need. Evidence has shown that people are more likely to choose public or active transport over private cars if it is more affordable, as well as being safe and convenient ([Muirie J. Active travel in Glasgow: what we've learned so far. GCPH; 2017](#)). We agree that active travel should be expanded and supported as an affordable transport option. To do so will require new safe infrastructure but also better links between active transport and public transport. For example, integration of ticketing should include all modes of public transport and ideally also include an expanded regional bike hire scheme. Campaigns to encourage active travel would also be needed to ensure a modal shift from the car.
3.4A	*Policy: P.A3 Availability of Transport* *Ensure a minimum level of active travel and public transport coverage for all areas in the region to key locations, particularly town centres, employment centres, colleges and universities, hospitals and key sustainable transport hubs/interchanges, and aim for enhanced transport coverage where possible. Ensure transport networks reflect the needs of all communities, particularly groups and communities who are more likely to depend upon active travel or public transport for every day travel including women and single parent households, disabled people, young people, older people, lower income households, people who cannot drive and/or do not have access to a private car, and black and minority ethnic people. Improve the availability and stability of public transport services in rural, remote and island communities and socio-economically disadvantaged communities. Develop the role of local bus, Community Transport, taxis and other Demand Responsive Transport services, shared transport and shared mobility to ensure public transport is available to all communities.* Do you support policy **P.A3 Availability of Transport**?
	Yes
3.4B	Please provide comments on policy **P.A3 Availability of Transport** in the box below.
	"Ensure a minimum level of active travel and public transport coverage for all areas in the region to key locations…" This sounds rather vague and not particularly aspirational with the use of the term 'minimal'. A clearer description of the level of services and infrastructure envisaged to support active travel and public transport should be provided.
3.5A	*Policy: P.A4 Safety and Security of Public Transport* *Increase personal safety and security of people using and accessing public transport services. Ensure everyone is able to use public transport services free from fear of harassment and discrimination based upon ethnicity, disability, sex, sexual orientation, gender identity or age. Promote safety by design and involve equality groups in the design process. Improve perceptions of personal safety and security of public transport services.* Do you support policy **P.A4 Safety and Security of Public Transport?**
	Yes
3.5B	Please provide comments on policy **P.A4 Safety and Security of Public Transport** in the box below.

We believe this policy should be widened to include active travel, given the emphasis in the strategy on integrating transport modes and enabling multi-modal journeys.

In relation to active travel, improved safety would include: better designed, safe and accessible cycle routes and paths; reduced speed limits on roads; safe routes to school to enable more children to walk, scoot and cycle; and comprehensive safety awareness training for all road users.

Safety is a factor that may contribute to some people feeling it is not safe to access outdoor spaces. As pointed out earlier, people living in deprived areas are less likely to feel safe walking alone in their local neighbourhood after dark and women feel more vulnerable than men. In a city where it is dark more than 12 hours a day for 6 months of the year, this is a particular barrier to using public and active transport in the winter months.

A greater focus on gendered perspectives and lived experience is necessary when planning public spaces, transport systems, services etc, and can be achieved via place-based participatory planning with women from the local community (GCPH, Health in a Changing City: Glasgow 2021).

RTS Policy Theme: Reducing the need to travel and managing demand for car travel

3.6A	How important is the policy theme '**Reducing the need to travel and managing demand for car travel'** to you or your organisation?
	Very important
3.6B	Do you wish to comment on the individual policies within '**Reducing the need to travel and managing demand for car travel'** theme? If you select 'no', please move to Question 3.16A.
	Yes
3.7A	*Policy: P.R1 Integration of transport and land use* *Seek to minimise physical separation and travel distances between the places where people live and the places where people need to go to for work and other every day activities. Embed the sustainable travel hierarchy and sustainable transport investment hierarchy as key principles in land use policy and development plans and strategies. Support new development that is located in areas that are accessible by active travel and public transport, designed to facilitate movement by walking, wheeling, cycling and public transport, and integrated with existing and planned active travel and public transport networks, services and hubs.* Do you support policy **P.R1 Integration of transport and land use**?
	Yes
3.7B	Please provide comments on policy **P.R1 Integration of transport and land use** in the box below.
	The GCPH built environment and health evidence review describes how aspects of the built environment, which includes housing, neighbourhood design and transport infrastructure, can shape the social, economic and environmental conditions which determine health. Evidence has shown that people are more likely to make active travel choices when streets and public places are attractive and well designed. Increased levels of walking and cycling also contribute to safer, more appealing public spaces. Where motor traffic is lighter, people interact more and feel a greater sense of community. Neighbourhood designs that favour walkers, wheelers and cyclists, and provide access to a range of amenities which allow people to socialise, can help to build social networks. This policy should also encompass recognising parks and other publicly accessible greenspace as settings through which people can travel actively. Good quality greenspace with appropriate lighting can form part of a safe active travel network.

3.8A	**Policy P.R2: 20-minute neighbourhoods** *Support and facilitate development of 20-minute neighbourhoods including developing improved active travel, public transport and sustainable mobility hubs.* Do you support policy **P.R2: 20-minute neighbourhoods**?
	Yes
3.8B	Please provide comments on policy **P.R2: 20-minute neighbourhoods** in the box below.
	Many potential 20-minute neighbourhoods exist already, but many will need improved paths and pavements and road speed reductions. Addressing the issue of severance of communities caused by large roads, railway lines, canals and even river systems is important, but it is roads, and specifically road traffic, that has the most negative impacts. All aspects of perceived liveability have been shown to be affected adversely by increasing traffic intensity e.g. problems with noise, stress, pollution, environmental awareness; lower social interaction, fewer friends, attenuation of perceived neighbourhood; safety. (Donald Appleyard & Mark Lintell (1972) The Environmental Quality of City Streets: The Residents' Viewpoint, *Journal of the American Institute of Planners,* 38:2, 84-101; *Hart J, Parkhurst G Driven to excess: Impacts of motor vehicles on the quality of life of residents of three streets in Bristol UK 2011.*) Improving connections between neighbourhoods such as building new bridges and safer paths through neighbourhoods can help address community severance. Reducing road speed to a 20 mph limit as the default in built-up areas would also help in making people feel safer moving around their neighbourhoods and crossing roads.
3.9A	**Policy P.R3: Flexible working and remote access to services** *Reduce the need to travel by supporting development of digital & remote access to public services and flexible working models.* *Do you support policy **P.R3: Flexible working and remote access to services**?*
	Yes
3.9B	Please provide comments on policy **P.R3: Flexible working and remote access to services** in the box below.
	There is preliminary evidence of slightly lower levels of workday traffic across Scotland in the aftermath of the COVID lockdowns, which may be related to more hybrid working. If sustained, this could contribute to reducing road transport-related carbon emissions and air pollution. Those who are required to make complex journeys or who balance work with caring responsibilities are often very reliant on cars for the flexibility, ease and speed they offer, compared with active or public transport. GCPH research with lone parents found that, without access to a car, the complex and costly nature of public transport was an important barrier to employment and other connections with communities. More widespread support for, and availability of truly flexible working and family friendly policies could enable more parents to balance walking their children to and from schools and nurseries with employment. More active commuting to school would have health benefits for children and parents and if enough families adopted this, there would be knock-on emissions benefits and improved air quality around schools and elsewhere.

3.10A	**Policy P.R4: Road space reallocation**
	Encourage and support reallocation of road space to active travel and public transport where possible to increase and enhance capacity for active travel and public transport and tackle car-centric road systems.
	Do you support policy **P.R4: Road space reallocation?**
	Yes
3.10B	Please provide comments on policy **P.R4: Road space reallocation** in the box below.
	The success of such a policy will require support from road users and communities, as well as mutual respect between differing road users. There needs to be open community engagement on this in order to gain such support and to let communities have a voice in how road space reallocation is achieved. The health, social and environmental benefits of this type of change need to be clearly communicated, backed up by evidence (e.g. PHS, Road space reallocation in Scotland: A health impact assessment. 2022).
3.11A	**Policy P.R5: Car demand management – parking**
	Encourage and support development of local parking policies that encourage more sustainable travel behaviours, in line with the sustainable travel hierarchy. Investigate and develop pricing strategies for park and ride provision to encourage sustainable travel to bus, rail or Subway stations/hubs, where appropriate.
	Do you support policy **P.R5: Car demand management – parking**?
	Yes
3.11B	Please provide comments on policy **P.R5: Car demand management – parking** in the box below.
	Parking policy, if it is to help reduce car traffic, should be about reducing parking capacity and increasing the cost of parking. However, at the same time, public transport services need to be improved and made more affordable and more attractive to encourage more people to switch to using these services.

Employer subsidised parking policies should be removed where possible, and at a minimum should not be available in public sector organisations. We would also support the introduction of workplace parking levies by local authorities and the use of any surplus income to invest in active travel and public transport.

As well as improved park and ride provision, it is important that public and active travel is integrated to enable more people to move between transport modes safely, affordably, and conveniently without relying on private cars for part of the journey and, thus, on a park and ride facility. |
3.12A	**Policy P.R6: Car demand management – pricing**
	Support the investigation, development and implementation of road and parking pricing policies that encourage more sustainable travel behaviours and provide opportunities to fund active travel and public transport, in line with the sustainable travel hierarchy, and contribute to the development of the national Car Demand Management Framework. Support development of a Workplace Parking Licensing scheme in Glasgow and other towns in the region as appropriate.
	Do you support policy **P.R6: Car demand management – pricing**?
	Yes
3.12B	Please provide comments on policy **P.R6: Car demand management – pricing** in the box below.
	In addition to our suggestions above, there needs to be a dialogue with businesses, public sector and third sector organisations about how to disincentivise car use and to influence changes in parking policy in these organisations to support greater use of sustainable transport options.

3.13A	*Policy P.R7: Behavioural change*
	Facilitate a change in behaviours and attitudes towards travelling by car particularly travelling to school by car where high quality, active travel and public transport alternatives are available. Support Smarter Choices and promote more sustainable travel behaviours for all journey types including journeys made for leisure, recreational and tourism purposes.
	Do you support policy **P.R7: Behavioural change**?
	Yes
3.13B	Please provide comments on policy **P.R7: Behavioural change** in the box below.
	Encouragement and support for people to change their behaviour (for example through workplace and school travel plans, campaigns, public transport information and marketing, car sharing, and car clubs) are important in helping to shift societal perspectives, but there is limited evidence for the effectiveness of these 'soft measures' alone. To be effective, such initiatives need to be introduced alongside – and not instead of – a clear and consistent vision, strong leadership, adequate investment, supportive policy, and planning and infrastructure developments which recognise and address cultural barriers to increasing active travel, as well as early and ongoing community engagement which allows accurate information to be shared in a timely way with the communities involved, and local concerns to be expressed, discussed and considered as part of the planning processes. We therefore support the inclusion of behavioural change as part of the wider strategic approach proposed in this consultation.

As stated earlier, more widespread support for flexible working and for family friendly policies could help reduce car commuting and enable more parents to walk their children to and from schools and nurseries.

Policies are also needed to reduce/ban all but essential car journeys around schools. This needs to be backed up by good communication but also enforcement.

Organisations and businesses should be encouraged to support sustainable transport options for their staff commuting to and from work and for staff travel during work time.

Research is needed on the choices people make for leisure and tourist trips to understand how such trips can be made more sustainably, both in reaching tourist destinations but also once there e.g. within Loch Lomond and the Trossachs National Park. |
3.14A	*Policy P.R8: Shared transport and shared journeys*
	Facilitate and support improved and increased shared transport provision in the region. Support a shift in car ownership behaviours from private ownership to shared transport. Facilitate and support increased sharing of journeys in the region, aiming to increase car vehicle occupancies for journeys that need to be made by car.
	Do you support policy **P.R8: Shared transport and shared journeys e**?
	Yes
3.14B	Please provide comments on policy **P.R8: Shared transport and shared journeys** in the box below.
	Car clubs, community transport services and bikeshare schemes have a role to play here both in terms of reducing car journeys and reducing car ownership. Such schemes should be supported to expand in order that these transport choices are available across Strathclyde region and should be integrated with other public transport services.

RTS Policy Theme: Enabling walking, wheeling and cycling

3.15A	How important is the policy theme '**Enabling walking, wheeling and cycling'** to you or your organisation?
	Very important
3.15B	Do you wish to comment on the individual policies within '**Enabling walking, wheeling and cycling'** theme? If you select 'no', please move to question 3.22A
	Yes
3.16A	*Policy: P.AT1 Regional Active Travel Network* *Facilitate walking, wheeling and cycling to be the natural choice for every day, shorter journeys in line with the Sustainable Travel Hierarchy. Aim to make travelling actively more attractive than travelling by car as much as possible. Ensure active travel networks are convenient, safe, accessible, inclusive and promote good health and wellbeing, aiming for full segregation from motorised traffic as much as possible. Develop active travel as a mass transit mode on high travel demand corridors and support development of Active Freeways. Develop active travel networks in built up areas to include both direct routes and green networks as much as possible to provide choice and maximise opportunities for healthy and sustainable travel behaviours. Facilitate development and delivery of a regional active travel network to achieve excellent active travel connectivity in the region and ensure integration with other sustainable transport modes including bus, rail, ferry, Subway and Clyde Metro.* Do you support policy **P.AT1 Regional Active Travel Network**?
	Yes
3.16B	Please provide comments on policy **P.AT1 Regional Active Travel Network** in the box below.
	We whole heartedly support the aim of creating a regional Active Travel network. One important issue which will be important in achieving this is improving safety, particularly for pedestrians and cyclists. We would point out three key related issues that need to be addressed: Seriously injured cyclist casualties have risen in recent years and cyclists are disproportionately represented in casualty statistics. Cycling is not a dangerous activity. Cyclists have lower overall mortality (Kelly P, Kahlmeier S, Thomas Götschi T et al. Systematic review and meta-analysis of reduction in all-cause mortality from walking and cycling and shape of dose response relationship Int. J. Behav. Nutr. Phys. Activ.,11 (2014), p. 132 https://doi.org/10.1186/s12966-014-0132-x). However, perceived and real risk of cycling contributes to low cycling uptake. Adult and child pedestrian casualty rates are 2 – 3 times higher in the most deprived areas compared to the least deprived areas. (Whyte B, Waugh C. Pedestrian and cyclist casualty trends in Scotland. GCPH; 2015) One in ten vehicles in collision with a cyclist or pedestrian don't stop – so called *'Hit and run'* incidents (Young M, Whyte B. Cycling in Scotland: review of cycling casualties. GCPH; 2020). Safety on and close to roads is a major worry for many people and contributes to fewer people choosing to walk and cycle. Better, safer infrastructure will help, as will 20 mph limits but behaviour and culture change approaches will also be needed to change, in particular in driver behaviour. For example, the existence of safe routes to school, official crossings and patrols, and low perceptions of safety risks within school communities contribute to higher levels of active travel of all types (Glasgow Centre for Population Health. Briefing Paper Findings Series 36: Learning from success: active travel in schools. Glasgow: GCPH; 2013).

3.17A	**_Policy: P.AT2 Accelerated delivery of walking, wheeling and cycling infrastructure and facilities_** _Enable accelerated delivery of new and enhanced walking, wheeling and cycling infrastructure and facilities to achieve a step change in active travel provision as soon as possible. Facilitate and support delivery of Scotland's Active Travel Framework in the region._ Do you support policy **P.AT2 Accelerated delivery of walking, wheeling and cycling infrastructure and facilities**?
	Yes
3.17B	Please provide comments on policy **P.AT2 Accelerated delivery of walking, wheeling and cycling infrastructure and facilities** in the box below.
	We would support the use of experimental TROs as one way of accelerating the introduction of new infrastructure and assessing its long-term appropriateness. We saw this implemented successfully through the Spaces for People infrastructure brought in rapidly during the pandemic. Hearing the voices of communities with regard to such changes is really important, and there should still be community engagement undertaken to understand what local people want and what does and does not work. Currently the maintenance and upkeep of cycle routes, paths and pedestrianised areas is piecemeal at best. As more active travel infrastructure is built there also needs to be a dedicated funds for maintaining existing and new infrastructure to a safe standard.
3.18A	**_Policy: P.AT3 Access to bikes_** _Increase access to bikes and enable bike ownership including adapted bikes and other non-standard bikes._ Do you support policy **P.AT3 Access to bikes**?
	Yes
3.18B	Please provide comments on policy **P.AT3 Access to bikes** in the box below.
	Bike access needs to be supported in other ways through the expansion of secure residential bike lockers and the provision of secure storage and shower facilities at workplaces.
3.19A	**_Policy: P.AT4 Integration of walking, wheeling and cycling with other sustainable transport modes_** _Increase and enhance integration of walking, wheeling and cycling networks and facilities with other sustainable transport modes including bus, rail, ferry, Subway and Clyde Metro._ Do you support policy **P.AT4 Integration of walking, wheeling and cycling with other sustainable transport modes**?
	Yes
3.19B	Please provide comments on policy **P.AT4 Integration of walking, wheeling and cycling with other sustainable transport modes** in the box below.
	As stated earlier, we believe there would be health and environmental benefits if Glasgow's bikeshare scheme could be expanded into a regional scheme and integrated with other public transport services. Facilities to transport bikes on other public transport services should be improved and expanded, both for commuting journeys and for longer leisure journeys.

3.20A	**Policy: P.AT5 Integration of micromobility and walking, wheeling and cycling**
	Support development of emerging micromobility transport, such as e-scooters, and support the safe integration into active travel networks.
	Do you support policy **P.AT5 Integration of micromobility and walking, wheeling and cycling**?
	Yes
3.20B	Please provide comments on policy **P.AT5 Integration of micromobility and walking, wheeling and cycling** in the box below.
	Micromobility is already with us but has arrived with little in the way of any regulation.
	Research is needed to understand how e-scooters can be safely integrated with other modes. This should include considering the responsibilities of users and regulations as to their use in different environments.

RTS Policy Theme: Enhancing quality and integration of public transport

3.21A	How important is the policy theme '**Enhancing quality and integration of public transport'** to you or your organisation?
	Very important
3.21B	Do you wish to comment on the individual policies within '**Enhancing quality and integration of public transport'** theme? If you select 'no', please move to question 3.34A.
	Yes
3.22A	**Policy: P.PT1 Integrated public transport system** *Enhance the quality and integration of the public transport system, aiming for a highly integrated, world class, passenger focused system that attracts users away from less sustainable modes of travel particularly private car usage. Promote and facilitate integration of public transport systems including networks, services, ticketing, information, marketing, and passenger facilities, aiming for a more unified system that is easy and convenient for passengers to navigate. Improve public transport service quality particularly reliability, punctuality and frequency. Improve passenger satisfaction including value for money and increase perceptions of the public transport system as attractive, convenient and desirable. Facilitate and support integration of public transport with other modes. Ensure public transport governance models facilitate and enable delivery of the regional transport strategy.* Do you support policy **P.PT1 Integrated public transport system**?
	Yes
3.22B	Please provide comments on policy **P.PT1 Integrated public transport system** in the box below.
	We support all the overall points made here. We need a public transport system that is integrated, affordable, easy-to-use and convenient. Consistency and clarity on ticket pricing across modes should be an immediate and achievable aim.
	Consideration of free public transport for young people should be given strong consideration as a way to encourage and embed public transport use among our children as they grow up and become adults.

3.23A	*Policy: P.PT2 Ticketing and information* *Develop and facilitate enhanced integration of public transport systems for ticketing, travel information, booking and payment activities across all public transport modes in the region including inter-regional connections where appropriate. Aim for a single, integrated system, providing users with a high quality, simple and accessible experience for planning, booking and paying for travel on public transport. Integrate and align developments in ticketing and information with wider developments in Mobility as a Service.* Do you support policy **P.PT2 Ticketing and information**?
	Yes
3.23B	Please provide comments on policy **P.PT2 Ticketing and information** in the box below.
	Digital technology will be part of this, including electronic ticketing using portable mobile devices, but there should still be options for buying tickets with cash and people without access to portable mobile devices should not be disadvantaged.
3.24A	*Policy: P.PT3 Mobility as a Service* *Develop and facilitate Mobility as a Service (MaaS) in the region, building upon existing opportunities including ZoneCard where appropriate. Ensure MaaS platforms are inter-operable with cross-regional and national MaaS solutions where appropriate.* Do you support policy **Policy: P.PT3 Mobility as a Service**?
	Yes
3.25A	*Policy: P.PT4 Bus quality and integration* *Facilitate and enable development of an enhanced and fully integrated bus system for the region. Ensure the bus system provides reliable and punctual services, offers good value for money and high levels of passenger satisfaction. Ensure bus is perceived to be an attractive, convenient and desirable mode of transport that attracts users away from less sustainable ways of travelling. Facilitate and support development of an enhanced regional bus network to ensure excellent bus connectivity for the region and ensure integration with other sustainable transport modes including rail, ferry, Subway and Clyde Metro. Support development and delivery of bus priority measures including Bus Partnership Fund. Facilitate development of bus partnerships, bus franchising and municipal bus operations where appropriate.* Do you support policy **P.PT4 Bus quality and integration**?
	Yes
3.25B	Please provide comments on **P.PT4 Bus quality and integration** in the box below.
	This should include improving options for carrying bikes and integrating services with an expanded regional bikeshare scheme. As mentioned above, it is also important that buses are fully accessible with adequate space for wheelchairs and pushchairs/prams. In order for the bus service to be fully integrated and easy to use, it will be vital that passengers understand and can easily navigate the range of services and available routes, ticket pricing is clear, and tickets can be purchased easily.
3.26A	*Policy: P.PT5 Rail quality and integration* *Facilitate and support development of the regional rail network in the region and ensure the multi-faceted role of rail in the region is recognised by investment decision makers. Ensure the rail system provides reliable and punctual services, offers good value for money and high levels of passenger satisfaction. Increase integration of the rail system with other sustainable transport modes including bus, ferry, Subway and Clyde Metro.*

	Do you support policy **P.PT5 Rail quality and integration**?
	Yes
3.26B	Please provide comments on policy **P.PT5 Rail quality and integration** in the box below.
	This should include improving options for carrying bikes and integrating services with an expanded regional bikeshare scheme. As mentioned above, it is also important that trains – and train stations and all platforms – are fully accessible with adequate space for wheelchairs and pushchairs/prams.
3.27A	*Policy: P.PT6 Ferry quality and integration* *Facilitate and support development of the ferry network in the region. Ensure the ferry network provides reliable and resilient services and meets the needs of island residents, businesses and visitors. Ensure ferry is integrated with the wider public transport system including island transport services to reduce adverse impacts of visitor car travel on Island communities and help achieve modal shift to sustainable travel methods.* Do you support policy **P.PT6 Ferry quality and integration**?
	Yes
3.27B	Please provide comments on policy **P.PT6 Ferry quality and integration** in the box below.
	This should include improving options for carrying bikes and integrating services with an expanded regional bikeshare scheme. It is also important that ferries are fully accessible with adequate space and facilities for wheelchairs and pushchairs/prams.
3.28A	*Policy: P.PT7 Subway quality and integration* *Develop the Subway to be fully integrated with active travel, bus, rail and Clyde Metro. Ensure the Subway provides reliable and punctual services, offers good value for money and high levels of passenger satisfaction.* Do you support policy **P.PT7 Subway quality and integration**?
	Yes
3.28B	Please provide comments on policy **P.PT7 Subway quality and integration** in the box below.
	This should include improved integration with an expanded bikeshare scheme. The subway system should be accessible for wheelchairs and pushchairs/prams.
3.29A	*Policy: P.PT8 Clyde Metro* *Facilitate and support development and delivery of Clyde Metro and ensure integration with active travel, bus, rail and Subway networks. Ensure Clyde Metro provides reliable and punctual services, offers good value for money and high levels of passenger satisfaction.* Do you support policy **P.PT8 Clyde Metro**?
	Yes
3.29B	Please provide comments on policy **P.PT8 Clyde Metro** in the box below.
	This should include improving options for carrying bikes on buses and trains and integrating services with an expanded regional bikeshare scheme. The Clyde Metro should be accessible for wheelchairs and pushchairs/prams.

3.30A	**Policy: P.PT9 Community Transport, Demand Responsive Transport, Taxis and last mile connections**
	Increase and enhance the 'last mile' and community-level transport network. Develop the role and enhance integration of Community Transport, Demand Responsive Transport and taxis, active travel and shared transport with bus, rail, ferry, Subway and the future Clyde Metro. Integrate walking, wheeling and cycling networks and facilities with public transport. Do you support policy **P.PT9 Community Transport, Demand Responsive Transport, Taxis and last mile connections**?
	Yes
3.31A	**Policy: P.PT10 Park and Ride** *Increase and enhance Park & Ride facilities and Park & Ride systems where local active travel and public transport connections to stops/hubs/stations are limited.* Do you support policy **P.PT10 Park and Ride**?
	Yes
3.31B	Please provide comments on policy **P.PT10 Park and Ride** in the box below.
	This should include integration with an expanded regional bikeshare scheme. Also see comments above.
3.32A	**Policy: P.PT11 Sustainable mobility hubs** Facilitate and support development and enhancement of public transport interchanges and sustainable mobility hubs. Support development of national Mobility Hub Delivery Framework and ensure development of a sustainable mobility hub network is integrated with development of 20-minute neighbourhoods. Ensure that best use is made of existing facilities and integration with all sustainable modes including active and shared modes and Community Transport is assured. Do you support policy **P.PT11 Sustainable mobility hubs**?
	Yes
3.32B	Please provide comments on policy **P.PT11 Sustainable mobility hubs** in the box below.
	This should include improving options for carrying bikes on buses and trains and integrating services with an expanded regional bikeshare scheme.

RTS Policy Theme: Improving road safety

3.33A	How important is the policy theme '**Improving road safety'** to you or your organisation?
	Very important
3.33B	Do you wish to comment on the individual policies within '**Improving road safety'** theme? If you select 'no', please move to
	Yes
3.34A	**Policy: P.RS1 Road safety and vulnerable road users** *Support and facilitate delivery of Scotland's Vision Zero where no is killed or seriously injured on roads by 2045. Support implementation of the Road Safety Framework and local Road Safety Plans and help meet road casualty reduction targets in the region. Aim for a sharp and consistent reduction in the number and severity of road traffic collisions in the region with particular focus on vulnerable road users including people who are walking, wheeling and cycling, children and young people, older people and disabled people*

	Do you support policy **P.RS1 Road safety and vulnerable road users**?
	Yes
3.34B	Please provide comments on policy **P.RS1 Road safety and vulnerable road users** in the box below.
	Please refer back to the points we have made already **under 3.16 B.**
3.35A	*Policy: P.RS2 Safe speeds* *Support implementation of 20mph speed limits on a majority of roads in built up areas in the region including towns and villages. Support investigation and implementation of reduced speeds on rural roads in the region, where appropriate.* Do you support policy **P.RS2 Safe speeds**?
	Yes
3.35B	Please provide comments on policy **P.RS2 Safe speeds** in the box below.
	Slower road vehicle speeds improve safety by reducing the number and severity of road traffic accidents. There is clear evidence that pedestrians are more likely to be severely or fatally injured when hit by cars at higher speeds, and particularly when the car is travelling more than 30 mph. Slower road speeds also improve perceptions of safety which encourages more people to walk and to cycle (GCPH. Consultation response - Call for views on a 20mph speed limit. GCPH; 2019). A 20 mph speed limit should be the default on roads in built up areas. Any dilution of this – for instance retaining a significant proportion of such roads at higher speed limits – risks diluting the benefits of speed reductions. A consistent lower speed limit on built up roads in the region, and in Scotland as a whole, will also avert any potential driver confusion over speed limits on unfamiliar roads and should lead to a more effective safety impact. Police forces should be prepared to enforce these limits to gain maximum impact.
3.36A	*Policy: P.RS3 Regional road network safety measures* *Support implementation of road safety measures on the regional road network.* Do you support policy **P.RS3 Regional road network safety measures**?
	Yes

RTS Policy Theme: Decarbonising vehicles and improving air quality

3.37A	How important is the policy theme '**Decarbonising vehicles and improving air quality'** to you or your organisation?
	Very important
3.37B	Do you wish to comment on the individual policies within **Decarbonising vehicles and improving air quality'** theme? If you select 'no', please move to question 3.47A.
	Yes

3.38A	*Policy: P.GF1 Road transport vehicle decarbonisation* *Facilitate and promote an accelerated transition to ultra-low emission road transport vehicles. Support and facilitate implementation of electric vehicle charging infrastructure. Support the development of regional / cross boundary charging infrastructure networks including ensuring supply for rural and remote areas and integration with public transport and sustainable mobility hubs. Support introduction of tariffs for use of the electric vehicle charging network and support co-ordinated approaches to tariffs. Improve information and sharing of best practice related to road transport decarbonisation among consumers, business, freight sector and transport operators. Support and encourage bus operators to take up opportunities to decarbonise fleets, upgrade depots and develop partnerships with energy providers. Support and facilitate decarbonisation of the community transport sector in the region. Facilitate development of public charging infrastructure for bus and community transport particularly at SPT bus stations, and integrate with sustainable mobility hubs as appropriate. Support and encourage innovation and investment in alternative fuels and fuelling infrastructure including Green Hydrogen particularly to support decarbonisation of larger vehicles including buses and public sector fleets. Support alignment of transport decarbonisation and clean energy strategies and promote cross-sector working including improving data sharing.* Do you support policy **P.GF1 Road transport vehicle decarbonisation**?
	Yes
3.38B	Please provide comments on policy **P.GF1 Road transport vehicle decarbonisation** in the box below.
	While support for low carbon road transport – including electric vehicles – is understandable given our imperatives to reduce carbon emissions, there needs to be a balance and priority given to the most efficient ways to achieve this. For example, support for electric buses should be prioritised over facilities for private electric vehicles because buses enable the mass transit of many people. The cost of purchasing and running a private electric vehicle would be beyond the resources of the majority of households in the region, a high proportion of whom have no access to any motor vehicle. Equality and fairness needs to be a consideration in deciding where funding is invested and who will benefit. It is also important to note that while a move to electric vehicles will contribute to reduced carbon emissions and improved air quality, without a move to mass sustainable transit and active travel, the other public health benefits of a more sustainable transport system (including increasing physical activity, reducing weight gain and related ill health, improving mental wellbeing, reducing road casualties, improving social interaction within communities, and enabling more equal access to amenities, education and employment opportunities) will not be realised.
3.39A	*Policy: P.GF2 Rail decarbonisation* *Support and facilitate decarbonisation of rail services in the region. Ensure investment in decarbonisation of rail services provides opportunities for improved and more resilient rail services and infrastructure in the region.* Do you support policy **P.GF2 Rail decarbonisation**?
	Yes
3.40A	*Policy: P.GF3 Subway decarbonisation* *Develop and implement a net zero carbon strategy for the Subway.* Do you support policy **P.GF3 Subway decarbonisation**?
	Yes

3.41A	*Policy: P.GF4 Ferry decarbonisation* *Support decarbonisation of ferry services in the region and implementation of Island Connectivity Plan. Ensure ferry decarbonisation provides opportunities for improved and more resilient ferry services and infrastructure in the region.* Do you support policy **P.GF4 Ferry decarbonisation**?
	Yes
3.42A	*Policy: P.GF5 Aviation decarbonisation* *Support decarbonisation of regional air services particularly lifeline services to Argyll and Bute, Highlands and Comhairle nan Eilean Siar. Increase low carbon surface transport to Glasgow Airport and Prestwick Airport.* Do you support policy **P.GF5 Aviation decarbonisation**?
	Yes
3.43A	*Policy: P.GF6 Clyde Metro* *Ensure that Clyde Metro is developed on the basis of minimising carbon and other harmful emissions. Promote lower energy consumption by incorporating renewable energies and zero emission transport designs as far as possible.* Do you support policy **P.GF6 Clyde Metro**?
	Yes
3.44A	*Policy: P.AQ1 Low Emission Zones* *Support implementation and promotion of the Glasgow Low Emission Zone. Support investigation and implementation of additional Low Emission Zones in the region as appropriate.* Do you support policy **P.AQ1 Low Emission Zones**?
	Yes
3.44B	Please provide comments on policy **P.AQ1 Low Emission Zones** in the box below.
	As more is learnt about the impacts of air pollution on human health, and particularly on the young and clinically vulnerable, more stringent air quality targets may be required in future.
3.45A	*Policy: P.AQ2 Air Quality Management Areas* *Support implementation and delivery of transport improvements and measures to improve air quality within Air Quality Management Areas in the region. Aim to reduce the number of AQMAs in the region.* Do you support policy **P.AQ2 Air Quality Management Areas**?
	Yes

RTS Policy Theme: Moving goods more sustainably

3.46A	How important is the policy theme '**Moving goods more sustainably'** to you or your organisation?
	Very important
3.46B	Do you wish to comment on the individual policies within '**Moving goods more sustainably'** theme? If you select 'no', please move to

	No

RTS Policy Theme: Increasing resilience and adapting to climate change

3.50A	How important is the policy theme '**Increasing resilience and adapting to climate change'** to you or your organisation?
	Very important
3.50B	Do you wish to comment on the individual policies within '**Increasing resilience and adapting to climate change'** theme? If you select 'no', please move to question 3.56A
	Yes
3.51A	*Policy: P.RA1 Climate Change Adaptation* *Facilitate and support adaptation of the regional transport system to the impacts and effects of climate change including regional roads, coastal rail lines, ferry terminals and harbours, Subway, and flooding of rail, road and path networks. Adapt the transport system to protect the health and wellbeing of transport system users from climate change impacts including higher temperatures and heat stress. Ensure new transport investments including Clyde Metro are future proofed for impacts of climate change and a low carbon future.* Do you support policy **P.RA1 Climate Change Adaptation**?
	Yes
3.51B	Please provide comments on policy **P.RA1 Climate Change Adaptation** in the box below.
	We have nothing further to add this, other than to point to the WHO publication focussed on Glasgow, which presents a snapshot of key climate hazards, climate-sensitive health risks, and the potential health benefits of climate change adaptation and mitigation (WHO. *Health and Climate Change Urban Profiles: Glasgow.* WHO; 2022).
3.52A	*Policy: P.RA2 Resilience* *Increase resilience of the regional transport system from disruption. Reduce adverse impacts of transport system disruption on people and business.* Do you support policy **P.RA2 Resilience**?
	Yes
3.53A	*Policy: P.RA3 Flood risk management and mitigation* *Support increased integration of transport and flood risk planning. Encourage and develop opportunities to support flood risk management actions through transport projects and infrastructure, where appropriate.* Do you support policy **P.RA3 Flood risk management and mitigation**?
	Yes

RTS Policy Theme: Protecting and enhancing natural and built environments

3.54A	How important is the policy theme '**Protecting and enhancing natural and built environments'** to you or your organisation?
	Very important

| 3.54B | Do you wish to comment on the individual policies within '**Protecting and enhancing natural and built environments'** theme?

If you select 'no', please move to [question 3.60A](#) |
|---|---|
| | Yes |
| 3.55A | *Policy: P.EV1 Biodiversity and green infrastructure*

Protect and enhance biodiversity where possible. Develop and implement green infrastructure and other nature-based solutions as part of transport plans and transport projects where appropriate.

Do you support policy **P.EV1 Biodiversity and green infrastructure**? |
| | Yes |
| 3.56A | *Policy: P.EV2 Green networks*

Support and facilitate integration of green networks and active travel networks where appropriate particularly in built up areas.

Do you support policy **P.EV2 Green networks**? |
| | Yes |
| 3.56B | Please provide comments on policy **P.EV2 Green networks** in the box below. |
| | There are good examples of green active travel routes through parks and along canals. These should be acknowledged as key parts of the active travel network and maintained to a high standard.

Green travel routes should be developed and expanded where possible. Active commuting through natural environments has been shown to benefit mental health ([Zijlema WL, Avila-Palencia I, Triguero-Mas M *et al.* Active commuting through natural environments is associated with better mental health: Results from the PHENOTYPE project. *Environment International* 2018;121:721-727](#)). |
| 3.57A | **Policy: P.EV3 Built environment and high-quality places**

Protect and enhance the built environment where possible. Integrate placemaking and public realm plans and projects with transport plans and projects where appropriate.

Do you support policy **P.EV3 Built environment and high-quality places**? |
| | Yes |
| 3.57B | Please provide comments on policy **P.EV3 Built environment and high-quality places** in the box below. |
| | The [Place Standard tool](#) provides a simple framework to structure conversations about place, based around 14 questions. It allows you to think about the physical elements of a place (such as the buildings, spaces, and transport) as well as the social aspects (like whether people feel they have a say in decision making).

Use of this tool should be mandatory when engaging with communities on new public realm and transport developments. |

RTS Policy Theme: Connecting Places

3.58A	How important is the policy theme '**Connecting Places'** to you or your organisation?
	Very important
3.58B	Do you wish to comment on the individual policies within '**Connecting Places'** theme?

	If you select 'no', please move to question 4.1
	Yes
3.59A	*Policy: P.CP1 International connectivity* *Improve, increase and enhance sustainable inter-national connectivity of the region for passenger and freight transport and ensure the transport system supports a sustainable, inclusive, competitive, resilient and productive regional economy. The region's international transport gateways and routes to be maintained, improved or enhanced include:* • *Connections to Glasgow Airport and Prestwick Airport;* • *Connections to ports - Ocean Terminal, Hunterston,* • *Ardrossan, Ayr, Troon, King George V Docks, Inchgreen,* • *and connections to Cairnryan;* • *Connections to England – including Glasgow Central* • *station, Motherwell station, West Coast Mainline, Glasgow* • *and South Western line, A76, A71, A72 and M8/M77/M74* • *and High-Speed Rail* • *Connections to road and rail freight facilities – Mossend,* • *Eurocentral, and connections to Grangemouth* Do you support policy **P.CP1 International connectivity**?
	Yes
3.59B	Please provide comments on policy **P.CP1 International connectivity** in the box below.
	Between April and August 2022, rail overtook the plane as most popular method of transport between Edinburgh-London (Transform Scotland. News item. 2022). Priority should be given to shifting cross-border travel to London onto rail which is a far more sustainable option than air travel.
3.60A	*Policy: P.CP2 Inter-regional connectivity* *Improve, increase and enhance sustainable inter-regional connectivity of the region for passenger and freight transport and ensure the transport system enables a sustainable, competitive, resilient and productive regional economy. The region's inter-regional transport gateways and routes to be maintained, improved or enhanced include:* • *Connectivity to Argyll and Bute, Northwest and Western* • *Isles* • *Connectivity to Loch Lomond and Trossachs National Park* • *Connectivity to Falkirk, Stirling and the North/Northeast* • *Connectivity to Edinburgh, West Lothian and Scottish* • *Borders* • *Connectivity to Dumfries and Galloway* • *Connectivity of Arran – Argyll and Bute* Do you support policy **P.CP2 Inter-regional connectivity**?
	Yes
3.60B	Please provide comments on policy **P.CP2 Inter-regional connectivity** in the box below.
	Investment in extra road capacity in Scotland has resulted in a rise in cars on the road and road miles driven, neither of which are compatible with a net-zero transport system. Increasing road network capacity runs counter to otherwise strong policy on addressing climate change and several Government convened independent bodies have recommended ending increases in highway capacity (Scottish Government. Cleaner air for Scotland strategy: independent review. Edinburgh: Scottish Government; Infrastructure Commission for Scotland, 2020. Phase 1: key findings report).

	The health and environment working group of the Clean Air for Scotland (CAFS) Review (2019) made the following recommendation: *"To protect against future health and environmental impacts generally, consideration should be given to a presumption that any major new development (e.g. a new road or housing development) must not lead to a net increase in carbon emissions, must not worsen air quality, and must not exacerbate existing health inequalities."* Such a proposal, if adopted, would exemplify an integrated approach to development that takes as a starting point the principle of doing no further harm to health and the environment. Arguably, this recommendation does not go far enough, and the aim should be that any new development should reduce carbon and pollutant emissions, and help to reduce health inequality.
3.61A	***Policy: P.CP3 Intra-regional Connectivity*** *Improve, increase and enhance sustainable connectivity of regional strategic economic development and investment locations and intra-regional travel to work and freight corridors, and ensure the regional transport system enables sustainable development. Key strategic intra-regional connectivity priorities and corridors include:* • *HMNB Clyde / Faslane, Helensburgh Growth Area and* • *Helensburgh/HMNB Clyde – Balloch/Dumbarton –* • *Clydebank - Glasgow* • *Clyde Mission Clyde Corridor and Glasgow City Region City* • *Deal investment locations* • *Ayrshire Growth Deal strategic economic development and* • *investment locations* • *Glasgow - all cross-boundary radial corridors to/from* • *Glasgow* • *Intra-urban Ayrshire (Kilmarnock/Irvine/Kilwinning/3* • *towns/Troon/Prestwick/Ayr)* • *South Lanarkshire – North Lanarkshire* • *East Renfrewshire – Renfrewshire – West Dunbartonshire* • *Inverclyde - Renfrewshire* • *Ayrshire – Renfrewshire - Glasgow* • *North Ayrshire – Inverclyde* • *East Dunbartonshire – North Lanarkshire* • *East Dunbartonshire – West Dunbartonshire* • *Ardrossan – Arran, Largs - Cumbrae and Rosneath* • *Peninsula – Greenock* Do you support policy **P.CP3 Intra-regional Connectivity**?
	Yes
3.61B	Please provide comments on policy **P.CP3 Intra-regional Connectivity** in the box below.
	We would reiterate the points we make above regarding the need to not increase road capacity further and to give priority to investment in integrated active travel and public transport services.

4. Delivering the strategy: governance

Transport governance relates to issues such as what roles and responsibilities an organisation may have, how it makes decisions, how it is funded, and how it is held accountable. Respondents to our earlier consultation on the RTS Case for Change highlighted that they believed a change in transport governance in the west of Scotland was needed in order to deliver the improvements required. Previous work as part of the National Transport Strategy Roles and Responsibilities workstream concluded that a workable, regional model was the preferable option for governance, and further work is continuing as part of Transport Scotland's Governance and Collaboration review workstream.

The Transport (Scotland) Act 2019 also contains provisions which, if a case were made and approved, could affect roles and responsibilities in bus. The Draft RTS commits SPT to having dialogue with, firstly, our council partners and subsequently other partners to see if an agreed approach to future transport governance in the west of Scotland can be identified.

4.1	What are your views on transport governance in the west of Scotland? Is the right framework in place to deliver the vision and objectives of the Draft RTS? Please provide comments in the box below.
	We would reiterate the comments we made at the start of our response (Sec 2.2) that while we are broadly supportive of the framework and what it is trying to achieve, there are aspects that could be strengthened. We should be learning from other places where active and public transport systems work well, such as in Copenhagen, Berlin and Vienna.
4.2	What changes, if any, would you like to see made? Please provide comments in the box below.
	Governance and ownership of public transport services and integration of all transport services, including active travel, have to improve if key outcomes are to be achieved. We would argue these outcomes should include: improved accessibility to transport; affordable and consistent ticket prices across different modes; one ticket across all modes and services; more coordinated transport services for communities; a clear focus on environmental and social duties, including reducing carbon emissions, clean air, social inclusion and creating healthy sustainable places. Decisions on the shape of new governance models should be informed by learning from places where progress has been made. For example, in Edinburgh, where buses and trams are largely in public ownership and the main transport provider, Transport for Edinburgh, has clear environmental and social goals and provides a focus for integration of transport services (Transport for Edinburgh. Strategy for Delivery 2017-2021. TfE; 2017). It is notable that across Scotland, Edinburgh was unique in showing positive shifts in all transport modes used for commuting journeys between 2001 and 2011: train and bus use rose, car driving and being a passenger declined, while cycling and walking increased. Edinburgh also had the highest proportion of people who walked, cycled or took the bus to work of any local authority in Scotland in 2011 (Whyte B, Waugh C. Pedestrian and cyclist casualty trends in Scotland. GCPH; 2015 – page 54).

5. Delivering the strategy: resources

Resources to deliver what we aspire to achieve, be it capital funding (infrastructure) or revenue funding (operational services), skills, materials, or staff, is an ongoing and growing challenge for transport in the west of Scotland. Dialogue undertaken in developing the Draft RTS highlighted concerns from many people and stakeholders that the current position was unsustainable and needed change.

The Draft RTS commits SPT to further engagement with key partners on the issue of resources and funding in seeking to address the challenges, including consideration of how we pay for transport in future.

5.1	What are your views on resources and funding for transport in the west of Scotland? Is the current model suitable for delivering the aspirations of the Draft RTS? Please provide comments in the box below.
	Our main point on this would be that whatever the overall transport budget in the west of Scotland, more of it needs to be spent on active and public transport and less on roads, in line with the sustainable transport hierarchy and in order that we expand the provision of a good quality active travel network and integrated public transport services.
5.2	What are your views on how we pay for transport in future – from level of fares on public transport, through to road pricing / congestion charging? What changes, if any, would you like to see made? Please provide comments in the box below.

	The current cost of living crisis and ten years of UK austerity policy have created a situation where more and more households are affected by different aspects of poverty, including transport poverty. In order to make the shift to a sustainable transport system a 'just transition', we need to guard against increasing transport poverty further and indeed the aim should be to make sustainable transport choices more affordable.
	We need consistent and affordable pricing across public transport. In tandem, the cost of motoring which has risen at less than the cost of living rises and less than bus fares for most of the last ten years (RAC Foundation. Change in the cost of travel in the last ten years) needs to rise.
	The full external costs of motoring need to be better quantified and recognised. The negative external costs of motorised transport include costs associated with accidents, air pollution, climate change, noise and congestion, as well as other external costs from up and downstream processes, i.e. energy, vehicle, and infrastructure. Some examples are provided below:
	The WHO quantified the cost of traffic deaths and injuries to be equivalent of 3% of global GDP (World Health Organization. Global status report on road safety 2015.)
	Air pollution, to which transportation makes a significant contribution, is responsible for 16% of deaths worldwide, with costs equating to 6% of world GDP (The Lancet Commission on Pollution and Health. 2017).
	The UK Treasury collects around £35bn per annum in Fuel Duty and Vehicle Excise Duty, but road transport inflicts external costs of £99bn, almost 5% of UK GDP. (European Commission. Handbook on the external costs of transport. Version 2019 – 1.1)
	A recent study calculated the external and private cost of automobility compared to cycling and walking in the European Union. The findings estimated the cost of automobility to be about €500 billion per year while cycling and walking had external benefits worth €24 billion per year and €66 billion per year, respectively (Gössling S, Choi A, Dekker K, Metzler D. The Social Cost of Automobility, Cycling and Walking in the European Union, Ecological Economics, Volume 158, 2019, Pages 65-74).

6. Monitoring and evaluation framework

It is important to monitor and report on progress of the RTS on an on-going and regular basis to understand what is working well and what areas may need additional focus. A proposed monitoring and evaluation framework is set out in chapter 9. The framework includes monitoring indicators, which will be reported annually. The framework also includes a proposal to regularly evaluate progress towards the RTS Targets and RTS Priorities and a commitment to improve equality data and monitoring.

6.1	Are there any other monitoring indicators that should be included in the Monitoring and Evaluation Framework? If No or Not sure, please skip to 6.3.
	Not sure
6.2	Please describe these indicators including data sources.
	The distances that people cycle across the region is another potential indicator to include but would need enhanced survey data, possibly provided through the expansion of the Sustrans WACI surveys. This would be useful for measuring changing cycling trends and would be a useful denominator to use to create a better measure of cycling risk (e.g. cycle accidents/distance cycled). An accurate measure of changes in cycling risk is important in the context of the significant increases in active travel investment and recent upward trends in seriously injured cyclists (Young M, Whyte B. Cycling in Scotland: review of cycling casualties. GCPH; 2020)
6.3	Please provide any other comments on the Monitoring and Evaluation Framework in the box below.

As noted in the monitoring and evaluation framework, it will be important to breakdown many of these indicators by equalities and socio-economic variables where possible, as way of illustrating inequalities in access, use, affordability and safety.

The traffic reduction route map describes a range of policies to reach the national target of a 20% reduction in car kilometres travelled by 2030 ([Transport Scotland. A route map to achieve a 20 per cent reduction in car kilometres by 2030. 2022](#)). There should be clear information on the timing of implementation of new policies, their expected impact on traffic levels and emissions over time across Strathclyde.