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18 June 2021

Dear Bruce

## **SPT Regional Transport Strategy 'Case for Change' document**

The report presents a high-quality snapshot of the position of transport within the SPT area pre-Covid, and how the situation has changed over the previous ten years. Facts are clearly presented with plentiful detail and analysis but are not overwhelming. Transform Scotland is pleased to note that the picture is by no means an entirely negative one, with reported levels of walking, cycling – particularly in Glasgow – and rail use all having risen in the period. It is further welcome that active travel by children and young people to schools as well as Subway ridership has remained at least stable.

However, this does have to be countered with the negatives. Bus services have declined both in their overall accessibility and frequency, and bus use has declined by a greater degree than overall levels in Scotland. Meanwhile, car ownership has increased, car occupancy has decreased and congestion has risen, reliability of buses on key corridors has been adversely affected, and overall satisfaction with local public transport has fallen. We regard all of these with great concern, as I'm sure you will also.

With regard to the target outcomes of the report, these are generally positive. In particular, the emphasis on increased sustainability, recognition that decarbonising existing transport networks is not sufficient to reduce carbon emissions to required levels and having a target of reducing road traffic are warmly welcomed. Change is necessary. However, the targets are worded vaguely and not clearly measurable. It is difficult to see how the targets can be achieved without clarification here.

Finally, in the long list of 'Options' for intervention given at the end of the report, it is again difficult to see how these offer potential solutions to the specific problems of transport in the SPT area or support the positive developments that have already been highlighted in the report. Furthermore, the links between these interventions and the targets of the report are simply stated rather than being explained, and many of the interventions relate to objectives outwith the scope of the report.

The problems of the report are really the problems of the RTPs in general. They are bodies which cover very large areas – in SPT's case ranging all the way from Scotland's largest urban core through to areas that are 'remote rural' – without a clear remit or responsibility, let alone resources, as to how to tackle this enormous range of transport problems. Most transport interventions are, by their nature, local and are best managed under the responsibility of local authorities. The continuing problem of cross-boundary planning, something which RTPs were intended to combat

(and highlighted in the report) needs to be tackled between each local authority and all of its neighbours. It is no less of an issue between South Lanarkshire (SPT) and Scottish Borders (SESTRAN) or East Dunbartonshire (SPT) and Stirling (TACTRAN), for example, than between constituent authorities of SPT (or any other RTP) itself. Strategic, national links – and, it would seem, anything on the rail network – lie with Transport Scotland. Even the very most visible potential development at a regional scale over the next 20 years, the development of a Glasgow Metro, and something which would appear to fit naturally into the remit of SPT, is being led by Glasgow City Council and the City Region Deal. Meanwhile, issues of bottlenecks in the existing system, reliability, decreasing bus patronage and a lack of comprehensive integrated ticketing remain stubbornly unsolved, leaving the west of Scotland with a transport system that is stuck in the 1970s. All of this makes us wonder at the ultimate objectives of the RTS and indeed, SPT itself. That there is a need for a cross-boundary transport authority in the Glasgow area is a given – uniquely in Scotland, the city's urban mass spreads seamlessly into every adjacent local authority, but including some of the further flung areas makes little sense.

More than that, the positive and negative developments which are highlighted over the past ten years are reflective of wider cultural and economic trends in Scotland, the UK and beyond, but have taken place within the context and duration of the previous RTS. However, there is a lack of assessment of whether or not the previous RTS has had any impact on these trends. This is a failure of the RTS process as a whole. The starting point of any follow-on strategy has to be not only where we are at the present time, but what was the impact of its predecessor, what worked, what didn't and what lessons are to be learned. Without this grounding, we have to wonder what the purpose and value of the RTS is as a document.

In conclusion, then, Transform Scotland found the narrative on the existing situation in the SPT area informative and indeed interesting. This, in itself is a truly worthwhile exercise and should be carried out in its own right every few years – a kind of 'State of the System' assessment. However, it is as a strategy, the document's core purpose, that we find the RTS a failure. It is not a strategy as a strategy needs vision of where we want to go and a clear route map of how we will get there. Sadly, the RTS in its current form falls very far short of providing this.

Yours sincerely,



Colin Howden  
Director, Transform Scotland