



**TRANSPORT
SCOTLAND**
CÒMHDHAIL ALBA

NTS2 Delivery Plan Impact Assessments Consultation Report

Contents

1. Introduction.....	1
1.1 Purpose of consultation	1
2. Consultation Overview	3
2.1 Consultation form	3
2.2 Consultation dates and duration	3
2.3 Methods of responding	3
2.4 Responses.....	4
2.5 Survey analysis	6
3. Summary of Responses.....	7
3.1 SEQIA Feedback.....	7
3.2 HIIA Feedback.....	10
3.3 ICIA Feedback.....	11
Appendix A: Consultation form and responses	i
Appendix B: Respondent Information Form.....	i

1. Introduction

1.1 Purpose of consultation

Scotland's National Transport Strategy 2 (NTS2) sets out the vision for Scotland's transport system to the year 2040. The NTS2 outlines the four priorities for Scotland's transport system as:

- Reduces inequalities;
- Takes climate action;
- Helps deliver inclusive economic growth; and
- Improves our health and wellbeing.

The first NTS2 Delivery Plan (for 2020 to 2022) sets out strategic policies and the broad actions the Scottish Government (SG) is taking to deliver on the NTS2's vision and priorities to the end of March 2022, taking account of the impact of the COVID-19 pandemic.

Impact assessments (IAs) are being undertaken by AECOM on 37 strategic policies within the 2020-2022 NTS2 Delivery Plan. The impact assessments are:

- Social and Equality Impact Assessment (SEQIA (incorporating an Equality Impact Assessment (EqIA), Children's Rights and Wellbeing Impact Assessment (CRWIA) and Fairer Scotland Duty Assessment (FSDA));
- Island Communities Impact Assessment (ICIA);
- Health Inequality Impact Assessment (HIIA); and
- Business Regulatory Impact Assessment (BRIA).

Impact assessment screening reports were produced in October 2021 for consultation purposes. This report provides a summary of the consultation responses and feedback relating to the SEQIA, HIIA and ICIA screening reports. A separate report has been produced outlining the BRIA responses. The feedback and findings of the consultation presented in this report will contribute towards completing full IAs on the 2020-2022 NTS2 Delivery Plan.

2. Consultation Overview

2.1 Consultation form

A consultation survey form (see Appendix A) was developed to capture a combination of quantitative and qualitative information, allowing respondents to share their views on the impact assessment screening reports and provide feedback to inform the development of future NTS2 Delivery Plans, strategic policies and actions.

One survey form was created with each impact assessment addressed through a specific section of the form. It was recognised that some of the survey questions would not be directly relevant to all, and therefore, respondents were encouraged to comment on the specific strategic policies of most relevance with the opportunity to skip questions.

The survey form adhered to best practice principles of survey design following guidance available from Delib and the Scottish Government. It was designed to be compliant with the General Data Protection Regulations (GDPR).

2.2 Consultation dates and duration

The consultation was open to the public and stakeholders from the 3rd November 2021 to 5th January 2022. The consultation was carried out over a two month period to give respondents adequate time to review the impact assessment reports and consultation form and provide their responses.

2.3 Methods of responding

The consultation form was accessible via the following formats:

- Online via the Scottish Government's consultation hub, Citizen Space.¹
- A downloadable version of the survey form available for return via email or by post.

¹ <https://consult.gov.scot/>

- Respondents could also request a paper version of the survey form via email.

Those using Citizen Space to respond, were directed to the 'About You' page before submitting responses. This captured details about the respondents as well as asking them to indicate how their responses were to be handled and, in particular, whether they were content for their response to be published.

Those responding via email or post were asked to complete a Respondent Information form (see Appendix B) to return with their survey forms.

Respondents were made aware that the Scottish Government is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to the consultation. Respondents were directed to the Scottish Government's [privacy policy](#) for information on how personal data would be handled as part of this consultation.

2.4 Responses

Overall, the consultation received a total of 16 responses (including BRIA responses) from the following organisations:

- British Ports Association (BPA);
- Community Transport Association;
- Killiecrankie and Fincastle Community Council;
- Mobility and Access Committee for Scotland;
- NatureScot;
- Perth & Kinross Council;
- Poverty Alliance;
- Radiant and Brighter Community Interest Company;
- Scottish Chambers of Commerce;
- Sight Scotland and Sight Scotland Veterans;
- South Lanarkshire Council;
- Tayside and Central Scotland Transport Partnership (Tactran);
- Transform Scotland; and
- UK Logistics.

One response was received from a community organisation (who want to remain anonymous) and one individual response from a member of the public was also

received.

It should be noted that some respondents provided feedback on more than one of the impact assessment areas and that other surveys were only partially completed. A breakdown of responses provided for each IA is as follows:

- SEQIA - 8 responses;
- HIIA - 5 responses;
- ICIA - 2 responses; and
- BRIA - 7 responses.

Within the SEQIA:

- All respondents (8) answered the following questions:
 - S1 detailing how socio-economic impacts have been taken into account;
 - S5 recommending actions for future NTS2 Delivery Plans; and
 - S6 commenting on specific policies.
- While fewer responses were received for questions identifying impacts on children and young people and how scoring should be adjusted.

In the HIIA:

- Questions regarding unidentified health inequality impacts, unidentified vulnerable groups, access to a healthy diet and impacts on social environments all received the highest responses.
- While responses regarding the scoring criteria received the fewest comments – ranging from 0 to 2.

In the ICIA:

- The majority of questions received no responses.
- One response was received on specific policies within the Delivery Plan in addition to the provisional scoring assigned to policies.

For a detailed breakdown of response rates for each question, refer to Appendix A.

2.5 Survey analysis

At the end of the consultation period, completed consultation forms were reviewed and any confidential information redacted by Transport Scotland, in line with GDPR requirements. All email responses were also uploaded to Citizen Space.

Consultation analysis has focused on the qualitative feedback received. This has involved reviewing each submission individually, identifying and categorising the points raised in feedback.

3. Summary of Responses

This section sets out a summary of feedback from the consultation, highlighting the main issues raised.

3.1 SEQIA Feedback

The SEQIA consultation feedback covered a range of issues. However, the most common response across all consultees was to highlight the **importance of transport affordability for socio-economically disadvantaged and protected characteristic groups**.

Feedback supported the extension of National Concessionary Travel to include priority low-income groups, including women aged 22 to 59, those aged under 26, single parent families and larger families. While it is recognised that free bus travel for people aged under 22 supports a reduction in child poverty, Perth & Kinross Council suggests that extending concessionary travel to those aged under 26 could help to counteract the age-related impacts of the COVID-19 pandemic. They evidence that under 26-year-olds experienced a higher chance of furlough, precarious unemployment, disrupted education and work in low paid sectors.

Further support from the Institute for Financial Studies revealed that nearly a third of all employees in sectors most affected by COVID-19 were under the age of 25. Thereby, free transport could remove financial barriers to employment, education and training to assist recovery from the pandemic. Poverty Alliance also stated that extending free bus travel to women aged 22 to 59 would improve opportunities to access employment and education.

Further reference to transport affordability is made by Sight Scotland and Sight Scotland Veterans, who specifically advocate for concessionary travel for blind and partially sighted people and their companions. A review of the National Concessionary Travel Scheme for disabled and elderly groups is encouraged ahead of ScotRail's move into public ownership, because this provides an opportunity to assess the budgetary implications of this inclusion.

Mobility and Access Committee for Scotland also stated that the SEQIA;

“generally underestimates the significant costs that disabled people incur using transport and this is a barrier for the disabled people who are on low

incomes. While many disabled people benefit from free travel by bus via the national entitlement card for disabled people, the remaining modes of transport still affect disabled people financially when they are on low incomes”.

Associated with transport affordability issues, Perth & Kinross Council advocate the inclusion of sustainable transport in the school curriculum;

“so that active and sustainable transport is the aim for all [rather than because you are seen as] too poor to own a car”.

Accessible transport for the elderly and disabled people was also a common response topic. The Community Transport Association (CTA) highlighted the importance of Community Transport for disabled and elderly groups. They stated that this service is often neglected in legislation and excluded from funding opportunities. For example, CTA express that the new Blue Badge legal guidance does not recognise Community Transport operators as care providers which has influenced local authorities’ refusal to renew long-standing organisational Blue Badges.

Furthermore, the Smart Pay Grant Fund is only available to commercial transport providers which does not include Community Transport operators. Consequently, CTA advocate an extension of this funding to support the digitisation and modernisation of Community Transport as a social service which does not operate for a profit. They also noted that there are significant up-front capital costs associated in purchasing and retrofitting Electric Vehicles which meet accessibility standards, especially for small local operators. The full roll out of the Plugged-In Communities Grant Fund should therefore also consider financially supporting the cost of Electric Vehicle uptake within Community Transport organisations.

Tactran makes additional reference to elderly groups, focusing on the importance of accessible transport for mobility, wellbeing and independence. They encourage a more nuanced understanding of what constitutes mobility, in replacement of conventional understanding that emphasises mobility as movement in physical space. Mobility, wellbeing and independence should be recognised as intricately connected, especially in later life, so that;

“Mobility allows older people to engage in everyday activities outside the home that are meaningful and enhance wellbeing, whilst independent living

gives older people control over the times and places in which activities are carried out.”

Losing mobility does not only compromise physical mobility, but adversely affects fundamental psychology including life-satisfaction, happiness and sense of self. Thereby, loss of mobility can be perceived as;

“significantly diminishing wellbeing for the elderly.” (Tactran).

The **health, safety and wellbeing of passengers** with protected characteristics was also raised as concern with regards to vulnerable passengers.

“The first and last mile is often a barrier to accessing public transport and often individuals in the protected characteristic groups will utilise taxi and private hire vehicles to access public transport for their longer, onward journey. It is suggested that taxi and private hire vehicles are therefore included and also safety concerns highlighted about their use and this being a potential barrier – particularly if it is one passenger travelling alone in a taxi/PHV”. (Perth & Kinross Council)

The vulnerability of those with certain protected characteristic groups at bus or rail stations which are unstaffed and relatively remote was also raised. Further issues were highlighted with regards to the ability for social distancing on public transport and community transport services.

Intersectionality and systemic barriers for different groups were also raised, with particular reference to ethnic minority groups being disproportionately affected.

“The issue around intersectionality that often affects those from the BAME communities hasn't been mentioned or captured in this report... also there is no acknowledgement of the systemic barriers such as the systemic racism that affects people from the BAME communities.” (Radiant and Brighter Community Interest Company)

General feedback on the overall NTS2 Delivery Plan and structural process was also provided.

“In order to explore the options of making transport more affordable and accessible, we would suggest the Scottish Government establish a ‘Fair Transport Commission’ building on the work of the Fair Work Commissions

around the country and working with the proposed Future of Transport Forum.” (Transform Scotland)

The importance of meaningful engagement with different groups and understanding the ‘lived experience’ of vulnerable groups rather than basing evidence on statistics was also raised as part of SEQIA (and other impact assessment) feedback.

3.2 HIA Feedback

One of the main feedback response topics for the HIA was the **importance of community transport** for vulnerable groups, especially elderly and disabled people. CTA recognise community transport as a;

“preferred mode of transport, compared to public or even private transport, for elderly, disabled or vulnerable people as they offer a safe, high-quality, personalised and door-to-door service”.

The important role of Community Transport in accessing healthcare facilities was highlighted, for example:

“The journey length and required public transport connections, would not make public transport a viable option for many people requiring to attend these [healthcare] facilities. This is why Community Transport and Hospital Care Schemes are a crucial service in this regard and this should be incorporated here [...] Co-ordination and timing of hospital appointments by geographical location of the patients should also be planned in partnership with community transport providers and the local bus network. This would result in one Community Minibus or car being able to take several people from one area for their appointments all in the one day for example.” (Perth & Kinross Council)

Perth & Kinross Council also share feedback on the intersectionality of policies to reduce travel and **accessing affordable healthy food**. Some communities may have to travel lengthy distances to access affordable healthy foods, which conflicts with targets to reduce the need to travel. To counteract this conflict, the Council suggests that by supporting local businesses in providing healthy food, the 20-minute neighbourhood model will also be encouraged.

Feedback on **policy actions targeted at narrowing health inequality gaps through the promotion of active travel** were raised. For example:

“Evidence suggests that many broad public health campaigns, including various active travel initiatives, have higher take-up among already healthier people, hence improving overall public health but widening inequalities between groups. The strategic policies need, therefore, to be more specific, challenging and ambitious about narrowing gaps with regards health inequalities. We want all to travel healthily, but there is a strong need to put more focus on some communities than others. It is not clear that the set of actions in the strategy are specific enough to achieve this.” (Tactran)

3.3 ICIA Feedback

Although a limited number of responses were received to the ICIA, a key issue was raised around the accessibility of **island transport for elderly and disabled passengers**. The Mobility and Access Committee for Scotland (MACS) specifically link the limited provision of public transport with disabled populations’ vulnerability to exclusion, social isolation and loneliness. Disabled islanders’ reliance on ferry services with onward rail travel indicates the importance of rail information to journey planning, especially where alternative modes of transport may not be appropriate.

Furthermore, MACS recommend that active travel options make inclusive provisions for disabled people, such as cycling infrastructure (e.g. storage and cycle paths) appropriate for disabled tricycles. Consequently, these considerations highlight that the;

“lived experience of disabled people is critical and will greatly inform any development of accessible travel”.

CTA emphasise that;

“transport affordability is a significant challenge in island communities”

This is especially challenging for disabled and elderly populations accessing healthcare services. Community Transport provides a demand-responsive service for isolated, less mobile residents, however some are not funded or supported by a public body. This exacerbates health inequalities for those with chronic or serious

health conditions whose only alternative method of transport are lengthy and expensive journeys to the mainland.

CTA advocate reforming the existing National Concessionary Travel Scheme regulations to enable Community Transport operators to be eligible for reimbursement. This would not only increase access to free travel services for the elderly and disabled residents, but also provide financial security for the Community Transport sector.

Appendix A: Consultation form and responses

This report was created on Monday 14 March 2022 at 10:29

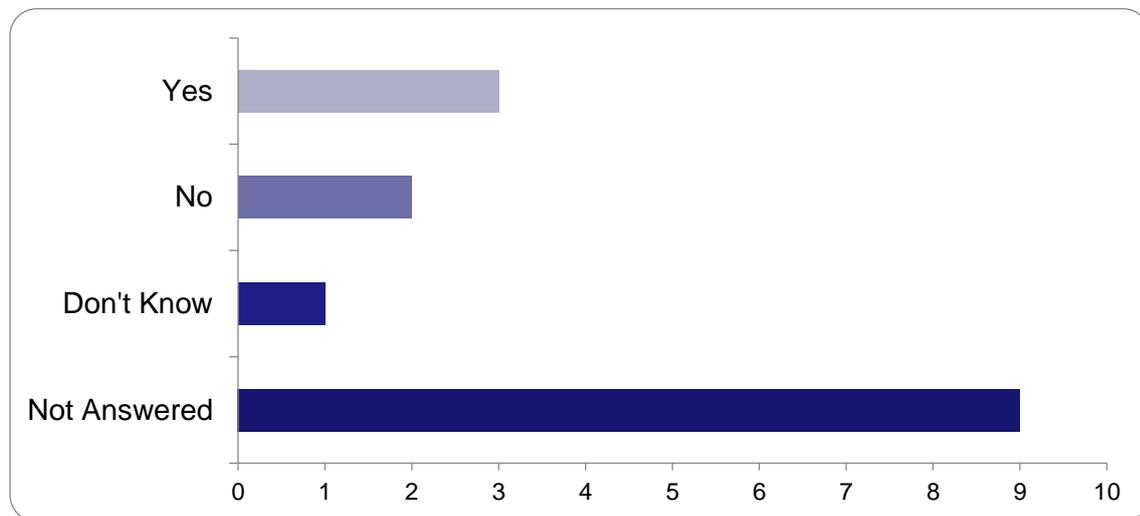
The activity ran from Wednesday 3 November 2021 to Wednesday 5 January 2022

Responses to this survey: 16

Social and Equality Impact Assessment Consultation

SI: Taking into account the SEQIA screening, do you think there are any impacts we have not identified for those living in poverty or facing socio-economic disadvantage? This includes both positive and negative impacts.

There were 6 responses to this part of the question.



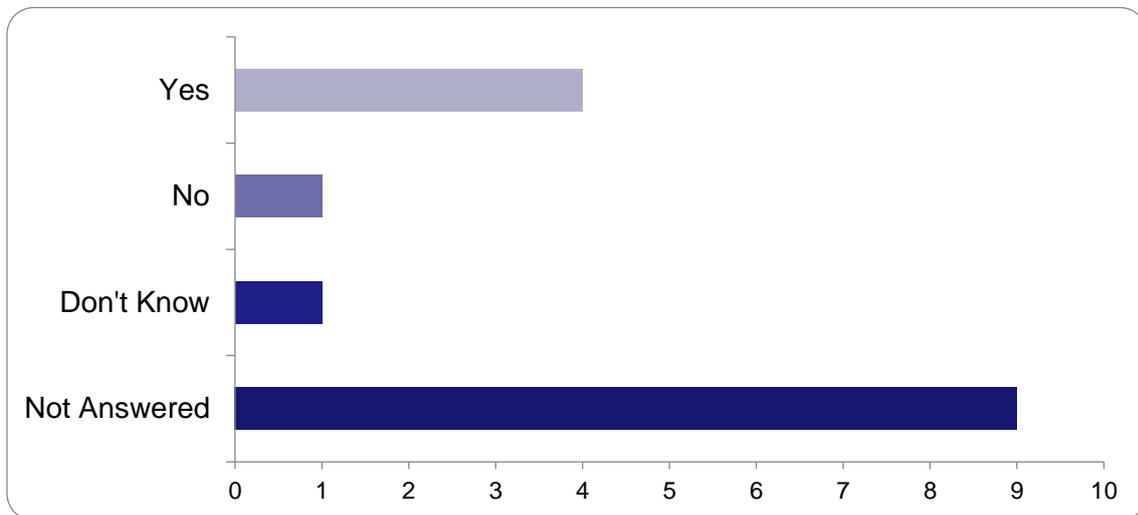
Option	Total	Percent
Yes	3	20.00%
No	2	13.33%
Don't Know	1	6.67%
Not Answered	9	60.00%

Please provide detail on the impacts:

There were 8 responses to this part of the question.

S2: Taking into account the SEQIA screening report, do you think the strategic policies within the NTS2 Delivery Plan 2020-2022 will support efforts to reduce child poverty for the priority groups most at risk*?

There were 6 responses to this part of the question.



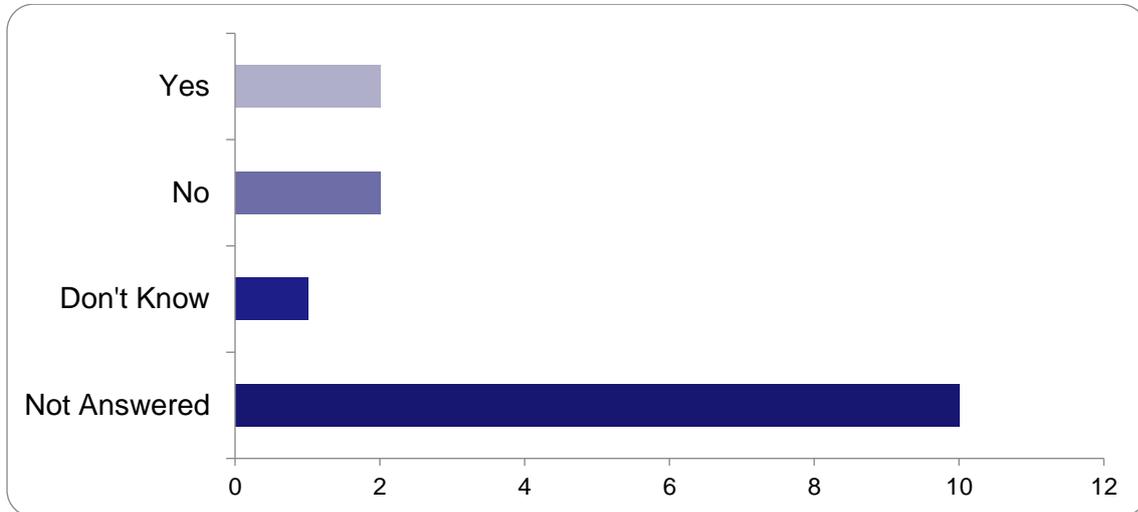
Option	Total	Percent
Yes	4	26.67%
No	1	6.67%
Don't Know	1	6.67%
Not Answered	9	60.00%

Please explain the reasons for your answer:

There were 5 responses to this part of the question.

S3: Taking into account the SEQIA screening report, do you think there are any impacts we have not identified for children and young people? This includes both positive and negative impacts.

There were 5 responses to this part of the question.



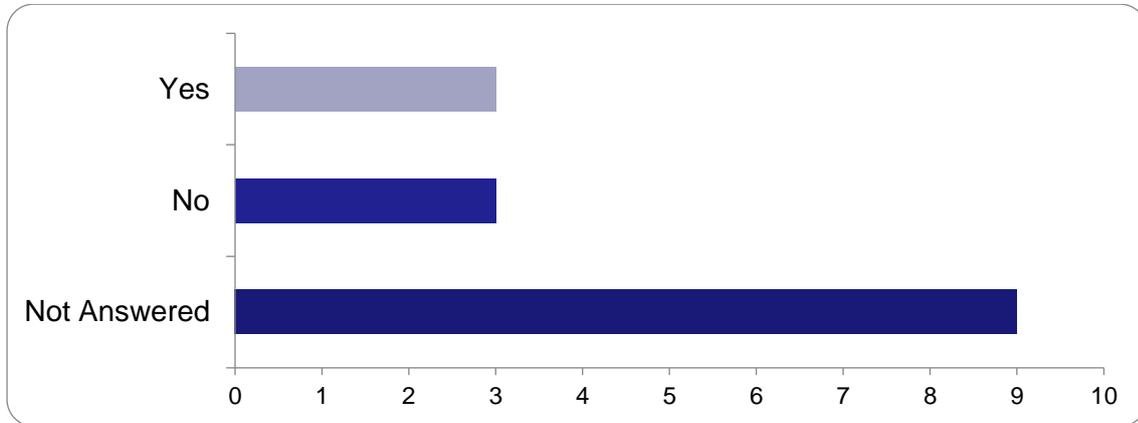
Option	Total	Percent
Yes	2	13.33%
No	2	13.33%
Don't Know	1	6.67%
Not Answered	10	66.67%

Please provide detail on the impacts:

There were 4 responses to this part of the question.

S4: Taking into account the SEQIA screening report, do you think there are there any impacts we have not identified related to the protected characteristics? This includes both positive and negative impacts.

There were 6 responses to this part of the question.



Option	Total	Percent
Yes	3	20.00%
No	3	20.00%
Don't Know	0	0.00%
Not Answered	9	60.00%

Please provide detail on the impacts:

There were 5 responses to this part of the question.

S5: What further actions do you think should be included in future NTS2 Delivery Plans?

Please provide details:

There were 8 responses to this part of the question.

S6: Would you like to comment on any of the specific policies contained within the NTS2 Delivery Plan 2020-2022?

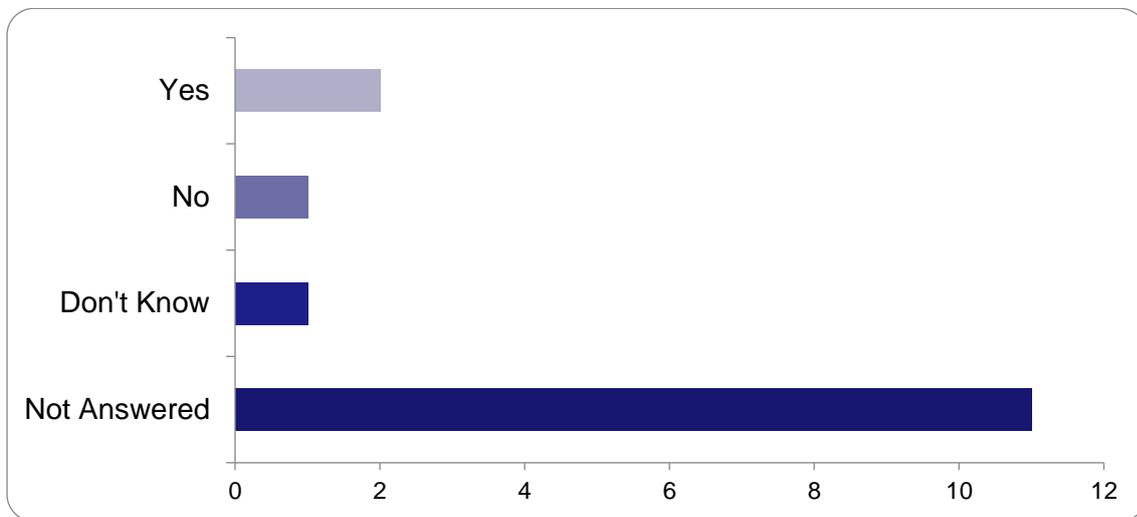
Please write the reference numbers of each policy to help us identify which one you are referring to. (If you wish to comment on scoring, please respond at Question S6a.)

There were 8 responses to this part of the question.

S6a: Do you agree with the provisional SEQIA score assigned to the policy (or policies) that you have commented on? (See 'SEQIA: Scoring Criteria' for scores.)

Part 1, Q7

There were 4 responses to this part of the question.



Option	Total	Percent
Yes	2	13.33%
No	1	6.67%
Don't Know	1	6.67%
Not Answered	11	73.33%

Please include all reference numbers with your comments:

There were 6 responses to this part of the question.

S6b: In your opinion, what should the SEQIA score be for the policy (or policies) that you have commented on?

Please include all reference numbers with your comments:

There were 5 responses to this part of the question.

S7: Please leave any additional comments on the assessment for the policies you have commented on.

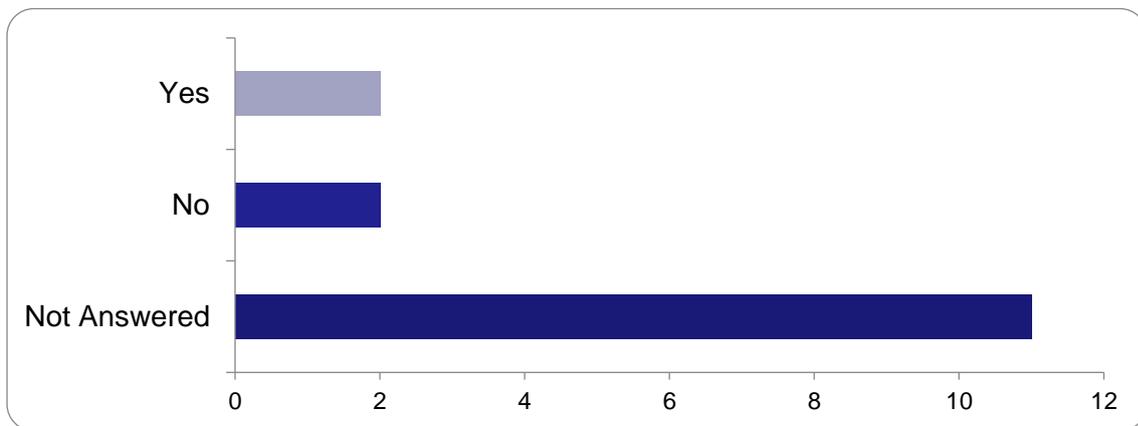
Please include all reference numbers with your comments:

There were 2 responses to this part of the question.

Health Inequalities Impact Assessment Consultation

H1: Taking into account the HIIA screening, do you think there are any health inequality impacts we have not identified?

There were 4 responses to this part of the question.



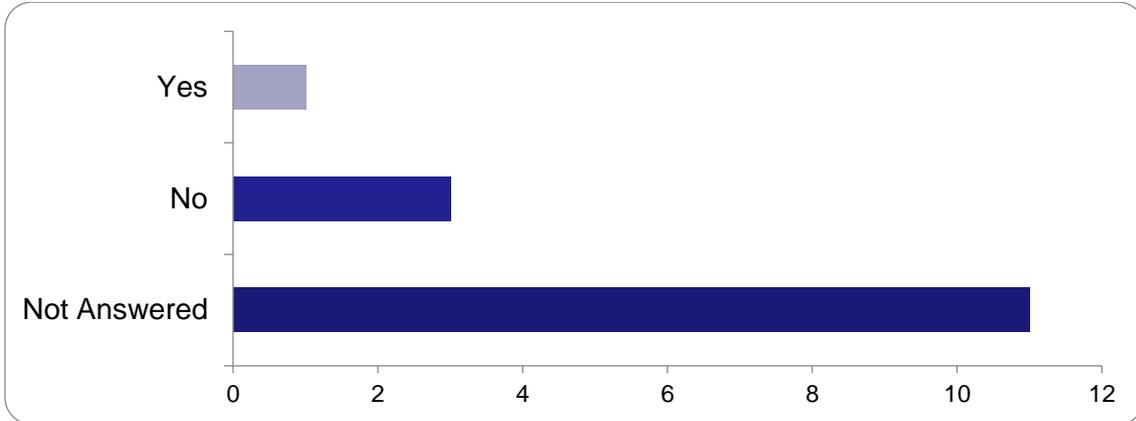
Option	Total	Percent
Yes	2	13.33%
No	2	13.33%
Don't Know	0	0.00%
Not Answered	11	73.33%

Please provide detail on the impacts:

There were 4 responses to this part of the question.

H2: Taking into account the HIIA screening, do you think there are any vulnerable groups we have not identified?

There were 4 responses to this part of the question.



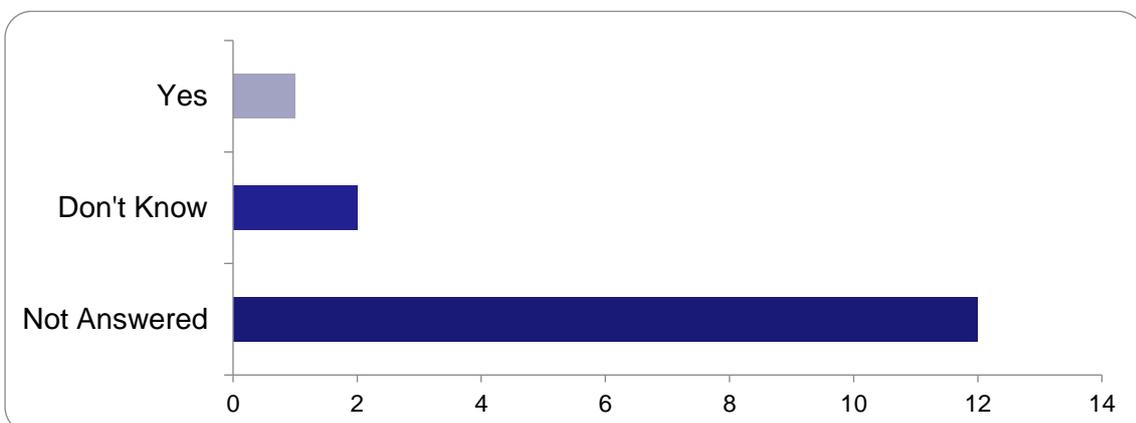
Option	Total	Percent
Yes	1	6.67%
No	3	20.00%
Don't Know	0	0.00%
Not Answered	11	73.33%

Please provide detail on the impacts:

There were 2 responses to this part of the question.

H3: Taking into account the HIIA screening report, to what extent do you think the strategic policies within the NTS2 Delivery Plan 2020-2022 will impact on access to healthcare, in particular in relation to the protected characteristics?

There were 3 responses to this part of the question.



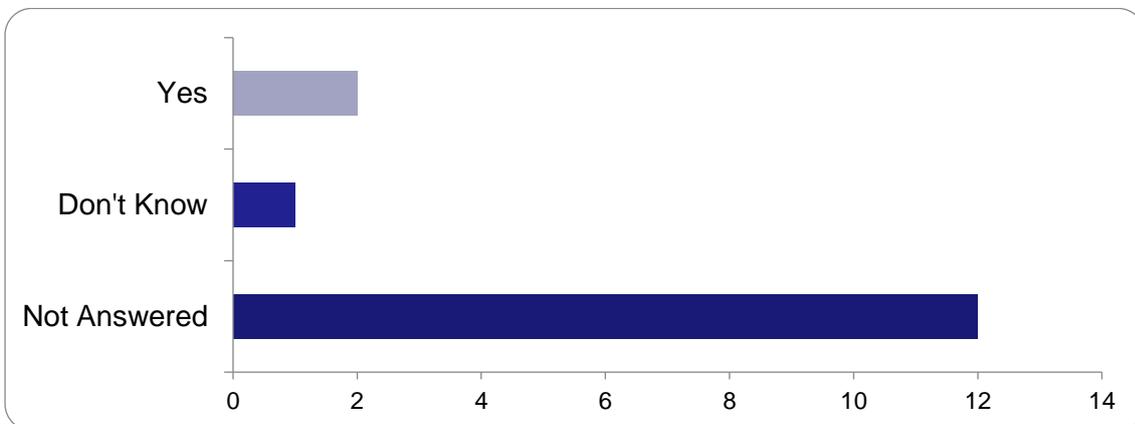
Option	Total	Percent
Yes	1	6.67%
No	0	0.00%
Don't Know	2	13.33%
Not Answered	12	80.00%

Please give reasons for your response:

There were 3 responses to this part of the question.

H4: Taking into account the HIIA screening report, do the strategic policies have a significant impact on air quality, particularly for those where air quality is poorer, for example in deprived communities?

There were 3 responses to this part of the question.



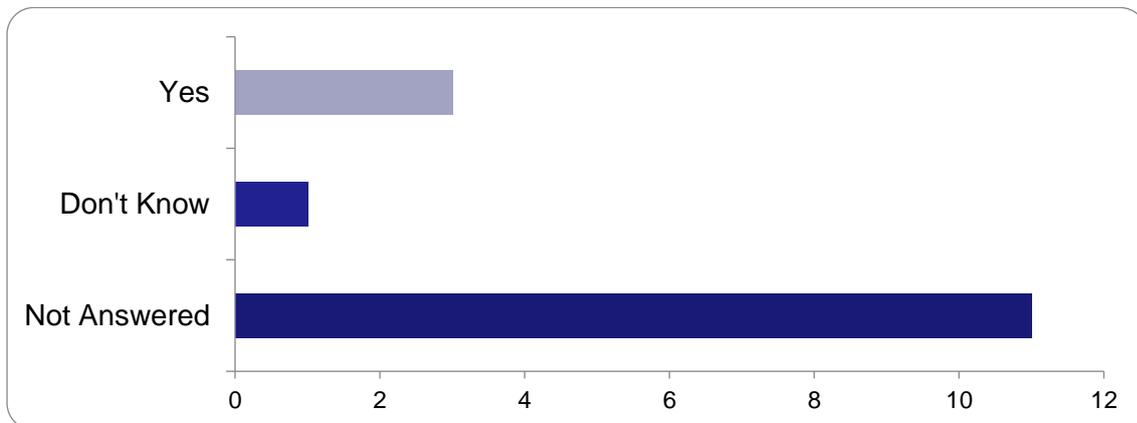
Option	Total	Percent
Yes	2	13.33%
No	0	0.00%
Don't Know	1	6.67%
Not Answered	12	80.00%

Please give reasons for your response:

There were 4 responses to this part of the question.

H5: Do strategic policies within the NTS2 Delivery Plan impact positively or negatively on access to a healthy diet, for example, through increasing access to shops, markets and supermarkets with greater availability and affordability of healthier foods?

There were 4 responses to this part of the question.



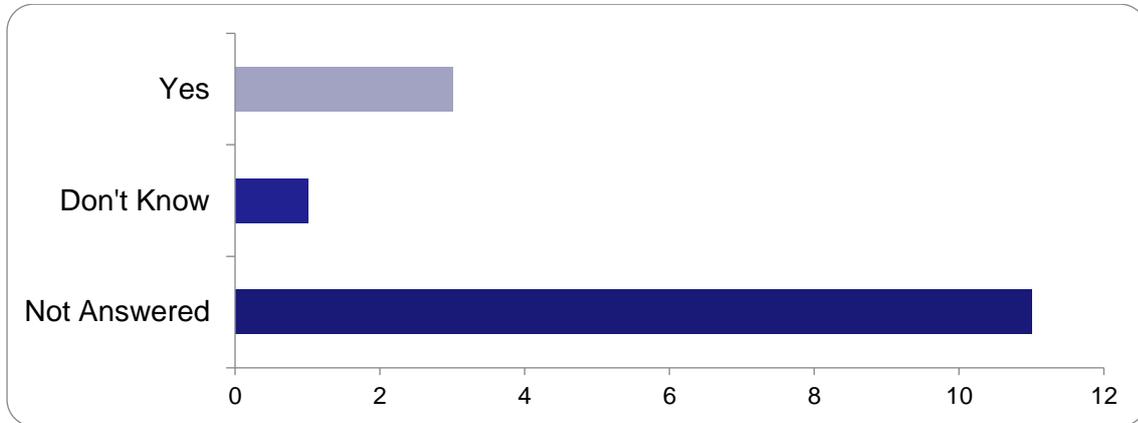
Option	Total	Percent
Yes	3	20.00%
No	0	0.00%
Don't Know	1	6.67%
Not Answered	11	73.33%

Please give reasons for your response:

There were 3 responses to this part of the question.

H6: Do you think that the strategic policies within the NTS2 Delivery Plan will positively or negatively impact on the social environment?

There were 4 responses to this part of the question.



Option	Total	Percent
Yes	3	20.00%
No	0	0.00%
Don't Know	1	6.67%
Not Answered	11	73.33%

Please give reasons for your response:

There were 4 responses to this part of the question.

H7: What further actions would you like to see included in future NTS2 Delivery Plans?

Please add details here:

There were 3 responses to this part of the question.

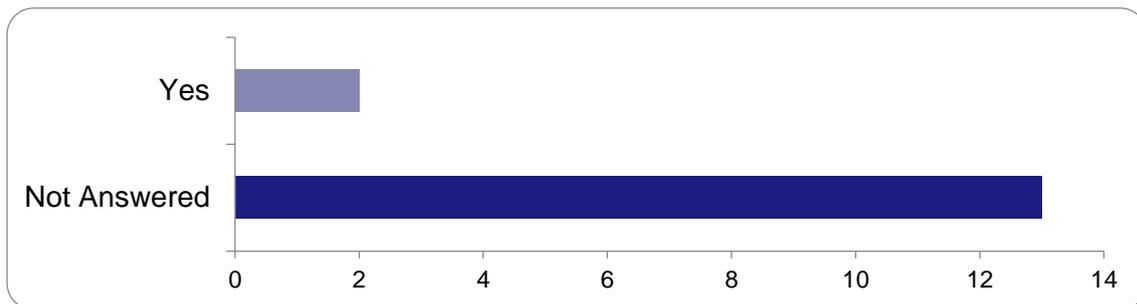
H8: Would you like to comment on any of the specific policies contained within the NTS2 Delivery Plan 2020-2022?

Please write the reference numbers of each policy to help us identify which one you are referring to. (If you wish to comment on scoring, please respond at Question H8a.)

There were 3 responses to this part of the question.

H8a: Do you agree with the provisional HIIA score assigned to the policy or policies you have commented on? (See 'HIIA: Scoring Criteria' for scores.)

There were 2 responses to this part of the question.



Option	Total	Percent
Yes	2	13.33%
No	0	0.00%
Don't Know	0	0.00%
Not Answered	13	86.67%

Please include all reference numbers with your comments:

There were 3 responses to this part of the question.

H8b: In your opinion, what should the HIIA score be for the policy or policies that you have commented on?

Please include all reference numbers with your comments:

There was 1 response to this part of the question.

H9: Please leave any additional comments on the assessment for the policies you have commented on.

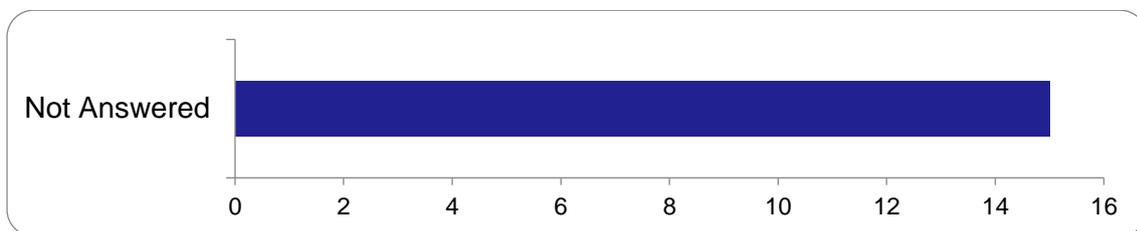
Please include all reference numbers with your comments:

There were 0 responses to this part of the question.

Island Communities Impact Assessment Consultation

I1: Taking into account the ICIA screening, do you think there are any impacts we have not identified for island communities? This includes both positive and negative impacts.

There were 0 responses to this part of the question.



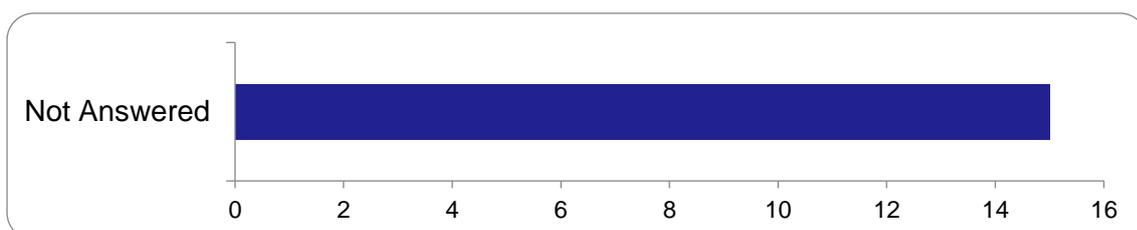
Option	Total	Percent
Yes	0	0.00%
No	0	0.00%
Don't Know	0	0.00%
Not Answered	15	100.00%

Please provide detail on the impacts:

There were 0 responses to this part of the question.

I2: Taking into account the ICIA screening report, do the strategic policies within the NTS2 Delivery Plan 2020-2022 effectively address the unique transport challenges faced by island communities?

There were 0 responses to this part of the question.



Option	Total	Percent
Yes	0	0.00%
No	0	0.00%
Don't Know	0	0.00%
Not Answered	15	100.00%

Please give explanations for your response.

There were 0 responses to this part of the question.

I3: What further actions would you like to see included in future NTS2 Delivery Plans?

Please provide details here:

There were 0 responses to this part of the question.

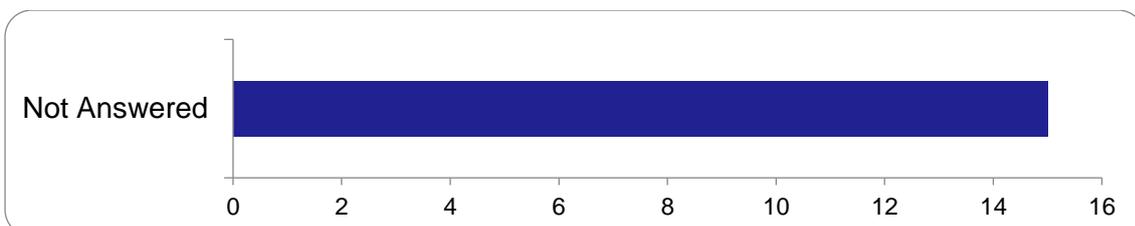
I4: Would you like to comment on any of the specific policies contained within the NTS2 Delivery Plan 2020-2022?

Please write the reference numbers of each policy to help us identify which one you are referring to. (If you wish to comment on scoring, please respond at Question I4a.)

There was 1 response to this part of the question.

I4a: Do you agree with the provisional ICIA score assigned to the policy or policies that you have commented on? (See 'ICIA: Scoring Criteria' for scores.)

There were 0 responses to this part of the question.



Option	Total	Percent
Yes	0	0.00%
No	0	0.00%
Don't Know	0	0.00%
Not Answered	15	100.00%

Please include the reference number for each policy you wish to comment on:

There was 1 response to this part of the question.

I4b: In your opinion, what should the ICIA score be for the policy or policies that you have commented on?

Please include the reference number for each policy you wish to comment on:

There were 0 responses to this part of the question.

I5: Please leave any additional comments on the assessment for the policies you have commented on.

Please include the reference number for each policy you wish to comment on:

There were 0 responses to this part of the question.

Appendix B: Respondent Information Form



Scottish Government
Riaghaltas na h-Alba
gov.scot

Title

RESPONDENT INFORMATION FORM

Please Note this form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy:

<https://www.gov.scot/privacy/>

Are you responding as an individual or an organisation?

Individual

Organisation

Full name or organisation's name

--	--

Phone number

Address

--

Postcode

--

Email

--

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

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in for example the analysis report

- Publish response with name
- Publish response only (without name)
- Do not publish response

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

- Yes
- No



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