

RESPONDENT INFORMATION FORM

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

Are you responding as an individual or an organisation?

- Individual
 Organisation

Full name or organisation's name

Children in Scotland

Phone number

0131 313 2322

Address

Level 1, Rosebery House, 9 Haymarket Terrace, Edinburgh

Postcode

EH12 5EZ

Email

awoodhouse@childreninScotland.org.uk

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

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If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

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



National Transport Strategy Consultation

23 October 2019

About Children in Scotland

Giving all children in Scotland an equal chance to flourish is at the heart of everything we do.

By bringing together a network of people working with and for children, alongside children and young people themselves, we offer a broad, balanced and independent voice. We create solutions, provide support and develop positive change across all areas affecting children in Scotland.

We do this by listening, gathering evidence, and applying and sharing our learning, while always working to uphold children's rights. Our range of knowledge and expertise means we can provide trusted support on issues as diverse as the people we work with and the varied lives of children and families in Scotland.

Children in Scotland is pleased to respond to the Scottish Government Consultation on the National Transport Strategy. We are aware of the key role that transport plays in the lives of children and young people. It impacts on their family life and on how they access their community. We were supportive of the recent Scottish Youth Parliament campaign on Transport and believe the Scottish Government should consider the recommendations from the campaign's three themes: reducing fares; accessibility; and bus standards.

Our response will focus on the impact of the proposed new strategy for children, young people and families. In particular we will focus on the equality, climate action and health and wellbeing strands of the strategy. Our response draws on the learning from our project work, the experiences of our members and our wider policy work.

1 Is the Vision that is set out for the National Transport Strategy the right Vision for transport policy over the next 20 years?

Children in Scotland agrees in principle with much of the overarching vision for transport policy. However, we have a number of concerns with the emphasis in some areas. We will discuss our areas of concern and where we believe the strategy could be strengthened in more detail below.

Ultimately, we agree that the Vision contained within the finalised National Transport Strategy should present the basis for strategic decisions about transport over the next 20 years. We believe this timescale will allow for a longer-term view over the reform to transport infrastructure in Scotland and should provide a platform to

ensure that it works for children, young people and families across Scotland. It is worth highlighting here that the vision must still be supported with appropriate levels of resource and meaningful policy action to deliver the transformation of transport in Scotland.

Children in Scotland believes that the proposed vision presents an ambitious view of how the transport system can be used to support better outcomes for children, young people and families. However, we believe that the overarching vision could be improved by making direct reference to the needs of specific stakeholder groups such as children, young people and families. The impact of transport policy and the transport system makes them a key stakeholder and beneficiary of any proposed reform.

In this regard we are also particularly concerned about the emphasis on business within the current proposed vision when no direct reference to other stakeholder groups is made. At present it feels that business interests outweigh community interests within the Strategy. We also believe that if business is to be included within the Vision it would be of value to make direct reference to the labour market to emphasise the importance of the transport system in supporting people to access work.

Furthermore, it would be of value for the Scottish Government to make direct reference to cost/affordability within the Vision. Cost is reflected under the Priorities and Outcomes, however we are keenly aware of the high cost associated with public transport in Scotland. As the consultation paper notes, cost is a key barrier to accessing transport for those in poverty, it was also a key point raised in the SYP campaign¹². Identifying that affordability is central to the transport system as well as accessibility would strengthen the vision and ensure that a system all can afford it at the heart of future decisions about transport in Scotland.

We are also pleased that the Scottish Government wishes to measure the success of its transport policies against the proposed Vision. It is important that national strategy of this nature is accountable. Evaluation is a key way of ensuring this. However, we have concerns about how the Scottish Government would measure against the Vision in its current form. The nature of the language is not entirely suitable for meaningful evaluation as it does not contain specific indicators. We would encourage the Scottish Government to consider how it will take forward evaluation of the strategy and consider the inclusion of specific measurement criteria for the success of the proposed new Strategy.

2 a Are the Priorities and Outcomes that the Strategy is trying to achieve the right Priorities and Outcomes for transport policy over the next 20 years?

Children in Scotland is pleased to see a broad range of Priorities and Outcomes contained within the proposed National Transport Strategy. We believe having a broad focus reflects the impact that transport and transport policy have on the lives of children, young people and families. It is worth reiterating here that while the priorities and objectives are important these must be supported by meaningful policy action to ensure they are met.

¹ <https://www.transport.gov.scot/media/45149/national-transport-strategy-draft-for-consultation-july-2019.pdf>

² https://d3n8a8pro7vhmx.cloudfront.net/scottishyouthparliament/pages/2916/attachments/original/1555340914/All_Aboard_report.pdf?1555340914

A first overarching point is that we are pleased to see that the Priorities and Objectives in the Strategy reflect the key campaign themes from the recent Scottish Youth Parliament campaign³.

In our response to this consultation we plan to focus on three of the priority areas:

- Promotes Equality
- Takes Climate Action
- Improves our Health and Wellbeing

We will deal with each of these priority areas in turn and have reflected on whether the specific policy actions noted in chapter 5 will support the Scottish Government to meet the priorities and objectives outlined.

Promotes Equality

We are pleased that the Scottish Government expects the transport system to promote equality over the next 20 years. We are also pleased to see that this considers both the impact of poverty but also wider issues of accessibility in relation to protected characteristics, particularly for people with disabilities. We are aware of the range of issues faced by children and young people with disabilities in accessing transport and the impact this can have on the accessing other services⁴. We are also aware that action is required to ensure that the public transport system is accessible for families with young children in prams and buggies. It is clear that improvements are required with the physical accessibility of the public transport stock to develop a transport system that works for all children, young people and families.

The new Strategy will need to take clear action to support rural access to transport. Rural communities tend to have access to fewer travel routes and less regular services. The new Strategy must set out a clear plan for how rural transport links will be improved to support children, young people and families.

However, while we are pleased to see a commitment to promoting equality within the Priorities and Objectives of the proposed new National Transport Strategy, we are concerned about the lack of tangible policy action that relates directly to cost and affordability in the actions contained in chapter 5 of the document. At present actions relating to equality seem to be focussed on accessibility and we have concerns that meaningful action to reduce costs will be missed.

The Scottish Government rightly points out in the consultation paper that the relationship between poverty and transport is multi-faceted. The Proposed Strategy notes that cost is the single biggest factor in why people experiencing poverty face barriers to accessing transports⁵. The cost of transport can contribute to poverty while access to affordable transport can support families out of poverty. We know that transport plays a key role in access to the labour market and will be a key factor in supporting families to access the upcoming expansion of hours for Early Learning

³https://d3n8a8pro7vhmx.cloudfront.net/scottishyouthparliament/pages/2916/attachments/original/1555340914/All_Aboard_report.pdf?1555340914

⁴ Activate, Young disabled people's issues and activism across Scotland, A report about Activate: Scotland's Disabled People's Annual Summit

⁵ <https://www.transport.gov.scot/media/45149/national-transport-strategy-draft-for-consultation-july-2019.pdf>

and Childcare from anecdotal evidence from the CHANGE project⁶. Ultimately, we believe that the focus on accessibility without an equally strong focus on affordability is not in keeping with the Scottish Government's stated aims of supporting people experiencing poverty to access public transport or make healthier transport choices.

Takes Climate Action

Children in Scotland is pleased to see that taking climate action appears to be at the heart of the proposed new National Transport Strategy and as such the strategy is cognisant of the importance of this issue for children and young people. Climate change has been highlighted by Changing our World, our children and young people's advisory group as a key topic that they wish to focus on. We also know from the most recent cabinet meeting with Children's Parliament and the Scottish Youth Parliament that these concerns are shared more widely and have been taken on as the current Scottish Youth Parliament campaign.

"Car fumes worry me! Adults need to get on it!" – MCP, age 13⁷

We would encourage the Scottish Government to consider the views of members of projects runs by Children in Scotland and Changing our World, which articulate a range of action required to tackle climate change^{8,9}.

We believe that the Scottish Government is correct in saying the transport system has a key role to play in getting Scotland to its net zero emissions targets. Given transport is the biggest contributor to emissions in Scotland it is clear action is required in this area. It is worth highlighting here that our previous points relating to cost will have a central role here. Reduced costs and better availability of public transport, along with increased opportunities for active travel, are likely to reduce car usage and ultimately lower emissions. Therefore, both will have a clear role in supporting progress against the Takes Climate Action Priority.

Children in Scotland is not best placed to reflect on whether the wider range of suggested policy activity outlined in chapter 5 will support the Transport System to take climate action. It would be of use for an environmental impact assessment to be provided to ensure that measures are being appropriately targeted to reduce emissions.

Improves our Health and Wellbeing

We are also pleased to see the role of the transport system to support better health and wellbeing recognised within the priorities in the proposed National Transport Strategy. In terms of the specific objectives we are pleased to see commitments towards active travel included and agree with the Scottish Government that it is a cog in supporting reductions in some of the public health issues raised in the consultation paper.

One key concern for Children in Scotland in this regard is supporting the development of safe walking and cycling routes for children and young people. This

⁶ <http://change-childcare.org>

⁷ Children's Parliament Recommendations to Scottish Cabinet - Children and Young People's Evidence Bank <https://evidencebank.org.uk/evidence/rights/childrens-parliament-recommendations-to-scottish-cabinet/>

⁸ <https://youtu.be/SGwhOME7PIc>

⁹ <https://youtu.be/LfkysW4OwPM>

includes, but is not limited to, routes that are well-lit and free of cars or buses. The recently reformed Planning (Scotland) Act provides a key opportunity here to develop safe, active travel routes that support children, young people and families to make healthy travel choices.

This is particularly important in the context of wider Scottish Government policy actions, including the recent Diet and Obesity Strategy and the Good Food Nation. Children in Scotland agrees active travel has a role to play here. However, we would reiterate points made in responses to the papers mentioned above and highlight that moves to support individual behaviour change of this sort must also be supported by structural change which removes other barriers such as poverty that are linked to lower levels of active travel¹⁰.

We are also pleased that the role of transport in place-making and community is identified within the objectives under the health and wellbeing priority. Our award-winning Beyond4Walls project showed the importance of the areas that children and young people live in for their wider wellbeing. Young people in the project were clear that good transport links could help them access what they wanted to, while poor transport caused frustration for young people¹¹. Transport clearly has a key role to play in supporting children, young people and families to access different parts of their communities and to benefit from different resources and services.

*"The buses get in and out of x depending on where you're going every half an hour and are crap buses that are always breaking down and don't run on a Sunday."*¹²

We would also like to see specific reference to air quality within any action on how the transport system can promote better health and wellbeing. Call 25 of our 25 Calls campaign outlined clearly the impact of cars around schools on the health of children and young people¹³. There is wider increasing evidence of the impact of air quality on experience of respiratory illness, strokes and lung cancer¹⁴. We would like to see clear action to reduce the numbers of cars around school drop-offs and a range of other healthier alternatives including public transport, walking buses and a range of active travel opportunities.

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

Children in Scotland believes that all the Priorities and Outcomes are important as parts of the new National Transport Strategy. Tackling child poverty and improving health and wellbeing are ongoing priorities for Children in Scotland and across the children's sector and as such we believe it is essential that the National Transport Strategy supports improvements in these areas. However, it is also clear to us that action on climate change is essential as we must secure the future for coming generations. As such we view these 3 priorities as vitally important.

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

¹⁰ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5633838/>

¹¹ https://childreninscotland.org.uk/wp-content/uploads/2018/01/Beyond4Walls_Report.pdf

¹² https://childreninscotland.org.uk/wp-content/uploads/2018/01/Beyond4Walls_Report.pdf

¹³ <https://childreninscotland.org.uk/call-25-cut-cars-from-school-drop-offs-to-boost-active-travel-and-improve-air-quality-for-our-children/>

¹⁴ <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

Children in Scotland believes some of the challenges in chapter 3 should be presented differently. For example, child poverty is included as a challenge for transport. However, from our perspective the challenge for transport is cost/affordability and how this contributes to and exacerbates poverty. It may be more useful for the final National Transport Strategy to begin from this perspective and identify how challenges from within the transport sector contribute to wider issues in society as opposed to the other way around.

While Chapter 3 also presents an extensive list of challenges that are related to the transport sector we are concerned how certain issues appear to have been missed. One key area is the intersection between poverty, transport and access to early learning and childcare (ELC) provision. We know anecdotally from our CHANGE project that many parents find that cost and reliability of bus services can impact on families' ability to access ELC provision.

Children in Scotland co-ordinates the Children's Sector Strategic and Policy Forum; the Forum aims to ensure joined-up policy making across Scottish Government. One of the Forum's priority areas is tackling child poverty, a key issue raised by the Forum is ensuring that the costs of transport may prevent parents from accessing their funded early learning and childcare provision. We are concerned that this is missing from the proposed Strategy and encourage the Scottish Government to consider how the Strategy can support uptake of ELC provision in 2020.

While it also does not relate directly to children and young people, we are confused as to why challenges relating to customer satisfaction, delays and cancellations are not included in the challenges section. These present key issues for children, young people and families and have an impact of use of the transport system. Without action in this area we are concerned there will not be progress towards to the positive vision, priorities and objectives contained within the strategy.

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

We have already discussed the need for action in a range of areas in our answer to question 2. We would take this opportunity to reiterate the need for commitment to tangible policy action across this range of issues to ensure success in delivering the Priorities and Outcomes contained with the National Transport Strategy. It is also clear that the success in meeting the Priorities and Outcomes will be dependent on the success of policies tackling other Scottish Government priorities such as reducing child poverty. Action going forward to tackle issues such as child poverty should therefore be considered in terms of how it will support the Scottish Government to meet the vision it has for Scottish transport.

The Scottish Government should also consider how the policy recommendations from the recent Scottish Youth Parliament campaign across the themes of fares, accessibility and bus standards can be utilised in delivering the Priorities and Outcomes contained within the National Transport Strategy¹⁵.

We are also concerned that most of the 'policies' contained in the proposed strategy are broad statements about potential action as opposed to confirmed policy and legislative commitments. As such we are concerned about whether they

¹⁵https://d3n8a8pro7vhmx.cloudfront.net/scottishyouthparliament/pages/2916/attachments/original/1555340914/All_Aboard_report.pdf?1555340914

can currently be considered the right policies to refresh the delivery of transport in Scotland to meet the priorities and outcomes in the National Transport Strategy. We would encourage the Scottish Government to clearly articulate the specific policy and legislation it aims to pursue to meet the range of priorities within the proposed Strategy.

It may also be of value for the Scottish Government to consider developing three-year delivery plans to sit alongside the 20-year National Transport Strategy. This would allow for ongoing monitoring of progress towards delivering the Priorities and Objectives contained within the Strategy.

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

Children in Scotland views efforts to make public transport more affordable as central to the success of the Strategy as a whole. This will support progress across all the Priorities and Outcomes outlined by the Scottish Government as it should increase usage of public transport. We believe this will be the most effective policy lever in increasing bus and train usage against cars and as such will have the biggest impact.

It is also essential that policies to promote active travel are brought forward. Children in Scotland would particularly support clear guidance for Local Authorities on how the reformed Planning (Scotland) Act can be used to promote active travel.

5a. Are there specific decisions about transport in Scotland that are best taken at the national level (e.g. by Transport Scotland or the Scottish Government), at a regional (e.g. by Regional Transport Partnerships), or at a local level (e.g. by Local Authorities)?

Children in Scotland is not well placed to comment on the specifics of where decisions should be taken on this topic. In general, we would support decisions being taken across a number of levels as appropriate.

There are clearly key strategic decisions that should be taken nationally, as should a wider discussion about travel costs and how to reduce these. However, it is clear that some decisions need to be made locally. In particular we believe that there should be a clear role for children and young people to be involved in decisions about transport. We will explore this in more detail in response to Q5b.

5b. Should local communities be involved in making decisions about transport in Scotland? If so, how should they be involved, and on which specific issues should they be involved in making decisions on?

Children in Scotland is a children's rights-focused organisation. We have consistently argued for the full incorporation of the United Nations Convention on the Rights of the Child (UNCRC). Under Article 12 of the UNCRC children and young people have a right to be involved in decisions that affect them¹⁶. As a key stakeholder in Scottish transport we believe they have a right to be involved in decisions taken about policy and delivery.

¹⁶ https://downloads.unicef.org.uk/wp-content/uploads/2010/05/UNCRC_united_nations_convention_on_the_rights_of_the_child.pdf?_ga=2.86027288.1283768479.1571834905-289933329.1497964764

We believe that the recently reformed Planning (Scotland) Act presents key opportunities for children and young people to be involved in these decisions locally. As a member of the Scottish Alliance for People and Places (SAPP) we were actively involved in strengthening the Act. We believe the Act and the supporting guidance that is to be developed will provide the legal basis and the practical support for children and young people to be involved in decisions about planning which will include transport. Specifically, we believe that Local Development Plans and Local Place Plans provide key opportunities to involve children, young people and families in decisions about transport locally.

The Act contains a new duty to ensure that children and young people have a chance to contribute to Local Development Plans and we see this as a key opportunity for them to be involved in developing and designing new transport opportunities.

We were disappointed that a similar duty was not included to ensure that children and young people would be involved in Local Place Plans. However, we hope to see guidance produced over the coming months to support the involvement of children and young people in Local Place Plans.

Local Development Plans and Local Place Plans will provide a route for children, young people and families to discuss decisions about transport routes, active travel and other issues relating to local planning. Transport Authorities also must consider how they can provide opportunities for local communities to comment on cost, service delivery and wider satisfaction with local transport provision.

We also believe that the Scottish Government should consider how it can support children and young people to be involved in national, strategic level transport decisions. This should either involve direct involvement about strategic transport decisions or a clear link between the engagement conducted locally and how this feeds into national transport decision making.

It is worth highlighting that any engagement work with children and young people should be led by skilled practitioners who understand how to meaningfully engage children and young people in decision-making processes. We are aware that the Scottish Government is currently developing its Strategic Participation Framework. Children in Scotland believes that decision makers looking to involve children and young people in decision making about planning locally and nationally should learn from the framework and in particular should make use of Children in Scotland's recently refreshed Principles and Guidelines for the Participation and Engagement of Children and Young People¹⁷.

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

Children in Scotland is not well placed to discuss areas that work well in the current transport system. Most recent work involving children and young people has focussed on improvements that could be made to the system based on their experiences.

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

Children and young people have identified a range of aspects of the transport system that do not currently work well in Scotland. The 2018-19 Scottish Youth

¹⁷ <https://childreninscotland.org.uk/wp-content/uploads/2019/09/CiS-Participation-2019.pdf>

Parliament campaign focused on transport. The three themes of their campaign included reducing fares, accessibility and bus standards. We agree that there are important issues across these three areas and would encourage the Scottish Government to consider how it can progress their recommendations¹⁸.

As we have articulated through this response we are particularly concerned about the costs associated with travel. We believe the Scottish Government must progress action in this area if it wishes to begin progress towards the Priorities and Outcomes contained in the strategy. This will be particularly important in supporting children, young people and families experiencing poverty and benefit them in a number of ways including supporting them to access childcare and the labour market and stay in contact with family and friends.

9. Chapter 6 of the Strategy sets out immediate actions the Scottish Government will take in three key areas: Increasing Accountability; Strengthening Evidence; and Managing Demand. Is there anything you would like to say about these actions?

We have already articulated that we believe that the Scottish Government should ensure that there is an opportunity for children and young people to feed into national decision-making about transport in Scotland. This would also provide an opportunity for children and young people to be involved in the wider governance of transport in Scotland by providing an oversight and accountability role.

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

Children in Scotland believes that the Scottish Government should reconsider the layout and structure of the strategy for the final publication. In particular the current presentation of the issues within chapter 3 is difficult to follow. It may be easier if a range of issues within the transport system such as cost, congestion or lack of services were laid out with reflection on the people affected by this.

It is also worth considering how Annex A can be utilised within the main body of the strategy. Annex A provides a clear graphic of the Priorities, Outcomes and Indicators that would support people reading the Strategy to understand the proposals. At present this provides a clearer outline what will be done to implement the strategy than the main body of the proposed Strategy.

We are pleased to see that a Child Rights and Wellbeing Impact Assessment has been conducted to support the National Transport Strategy. In particular we are pleased that the CRWIA gives a comprehensive view of the range of UNCRC rights the proposed strategy will affect. However, we would still prefer to see the CRWIA used to clearly assess the impact of the Strategy in a more tangible sense and also to use this as a more proactive decision-making tool. We believe that CRWIA's should be used as a way of informing the most appropriate policy decision to further children's rights and wellbeing as opposed to a way of legitimising a decision that has already been taken.

¹⁸https://d3n8a8pro7vhmx.cloudfront.net/scottishyouthparliament/pages/2916/attachments/original/1555340914/All_Aboard_report.pdf?1555340914