Response ID ANON-KEGA-A9G8-H

Submitted to **A Consultation on Scotland's National Transport Strategy**
Submitted on **2019-10-22 12:59:10**

Section A: The Vision and Outcomes Framework

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

Yes

Please explain your answer.:
We support the vision set out in the National Transport Strategy. We strongly support the inclusion of health in this updated vision. Walking and cycling, as a single journey or as part of a multi-modal journey, can provide physical activity and is the most effective way of increasing daily energy expenditure. Regular physical activity can help to maintain healthy weight, support weight maintenance after weight loss, and support weight loss in combination with a change in diet[1].

[1] UK Chief Medical Officers' Physical Activity Guidelines (2019)
https://www.gov.uk/government/publications/physical-activity-guidelines-uk-chief-medical-officers-report

2a 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?

Yes

Please explain your answer.:
We broadly support the four priorities and outcomes that have been outlined in the Strategy. The priorities are inextricably linked and it is unclear how they inter-relate and impact on each other.

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

Please explain your answer.:
We believe that the priority to improve our health and wellbeing is important. Scotland has some of the highest incidences of obesity across OECD countries[1]. Currently 65% of adults are overweight or obese, and 29% of children aged 2 to 15 years old are at risk of being overweight including 16% who are at risk of being obese. Overweight and obesity has become a major health issue in Scotland, negatively impacting on quality of life, affecting productivity and often leading to serious chronic conditions such as type 2 diabetes, cardiovascular disease and cancer.

The current obesogenic environment makes it difficult for people of all ages to make healthy food and healthy travel choices. There are less opportunities to walk, cycle and take enough exercise in our daily lives. An improved transport system in Scotland is needed to create local environments and communities that increase opportunities for physical activity and active everyday lives.

The likelihood of obesity is higher for people living in deprived areas, particularly women and children[2]. 35% of adults living in the most deprived areas are obese, compared to just 20% of those living in the least deprived areas[3]. Tackling inequalities is therefore key to tackling obesity, and action is needed to address the inequalities that drive overweight and obesity. This includes promoting equality of access to the transport system, but more importantly access to well-designed, well-served and well-connected neighbourhoods, towns and cities that reduce the need for car use and promote active daily living and active travel. As such, we believe the priority to promote equality as outlined in the Strategy is therefore also important.

We believe that the priority to take climate action is also important. Actions such as reducing private car use and increasing local greenspace as well as increasing the consumption of local and seasonal fruit and vegetables and reducing meat and dairy to address overweight and obesity also deliver co-benefits for our climate [4].

Transport has a key role to play in protecting and promoting the local economy, and local businesses are key for thriving communities[5]. The Strategy includes a priority on sustainable inclusive growth, however we feel there is a focus on the role of transport in sustaining economic growth. Further emphasis needs to be given to the role of transport in creating healthy environments which include accessibility to local work, enterprise and volunteering opportunities for our communities across Scotland.

[1] The Scottish Government (2018) The Scottish Health Survey, 2018, volume 1 - main report.
https://www.gov.scot/publications/scottish-health-survey-2018-volume-1-main-report/
[2] NHS Health Scotland (2017) ScotPHO: Obesity and health inequalities in Scotland, Summary report.
[3] The Scottish Government (2017) Scottish Health Survey 2016: volume 1: main report. http://www.gov.scot/Publications/2017/10/2970
[4] Swinburn et al (2018) 'The Global Syndemic of Obesity, Undernutrition, and Climate Change: The Lancet Commission report'
https://www.thelancet.com/commissions/global-syndemic
[5] Town and Countryside Planning Association (2017), Creating health-promoting environments.

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

Please explain your answer.:
We are pleased to see the importance of active travel for health, and in tackling overweight and obesity, recognised as a key challenge in this chapter. We

however feel that childhood overweight and obesity should be identified as a separate challenge in this chapter. Currently 29% of children aged 2 to 15 years old are at risk of being overweight including 16% who are at risk of being obese[1]. Obesity in childhood is associated with an increased risk of obesity in adulthood, highlighting the need for early intervention and prevention. More needs to be done to protect our young from ill-health now and later in their adult life. This includes improving nutrition in early life, and changing the environment to enable children to make healthy food and physical activity choices at home, at school and at play. If we are serious about halving childhood obesity however we must understand and seek to address the challenges that face those families living in poverty. With a quarter of Scottish children now live in poverty (many of them in households with a working adult, the challenge of enabling a healthy diet and adequate physical activity for children in low income households is substantial[2].

We are pleased to see poverty highlighted as a challenge in this chapter. People living in poverty are more likely to be exposed to risk factors that lead to poor health, and experience more negative health outcomes than people with a higher socioeconomic status[3]. Some forms of cancer, type 2 diabetes and cardiovascular disease are more prevalent in the most deprived areas[4]. Obesity levels for both adults and children are higher in the most deprived areas of Scotland than the least deprived areas (see Q2B). Improving the conditions in which people live and work by increasing the accessibility and affordability of transport including active travel, public transport and multi-modal journeys can increase access to jobs, education and cultural opportunities, and reduce social isolation and the risk of poor mental health which can all impact on weight[5].

Adherence to the moderate or vigorous physical activity was more common among adults in less deprived areas, declining from 75% in the least deprived areas to 55% in the most deprived areas. Investment in active travel should seek to widen access to active travel modes[6].

The latest figures from the Scottish Health Survey 2018 were published in October 2019 and the final strategy should make reference to the most up-to-date figures.

[1] The Scottish Government (2018) The Scottish Health Survey, 2018, volume 1 - main report.
https://www.gov.scot/publications/scottish-health-survey-2018-volume-1-main-report/
[2] The Scottish Government (2019) Child Poverty Update March 2019 (https://www2.gov.scot/Resource/0054/00546979.pdf
[3] NHS Health Scotland (2016) Health inequalities: what are they and how do we reduce
them.'http://www.healthscotland.scot/media/1086/health-inequalities-what-are-they-how-do-we-reduce-them-mar16.pdf
[4] The Scottish Government al (2018) The Scottish Health Survey. 2017 Edition. Volume 1. Main report.
[5] NHS Health Scotland (2016) Health inequalities: what are they and how do we reduce
them.'http://www.healthscotland.scot/media/1086/health-inequalities-what-are-they-how-do-we-reduce-them-mar16.pdf
[6] The Scottish Government (2018) The Scottish Health Survey, 2018, volume 1 - main report.
https://www.gov.scot/publications/scottish-health-survey-2018-volume-1-main-report/

Section B: The Policies to Deliver the NTS

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

Please explain your answer.:
We broadly support the policies, but an emphasis should be given to policies that align with the priorities we have highlighted in our response in Q2B. These include the priorities to improve our health and wellbeing, promote equality and take climate action.

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

Please provide details.:
We believe that the policies in line with the priorities stated in Q2B and 4A are significant.

The policies are inextricably linked and it is unclear how they inter-relate and impact on each other. The priority to enhance economic prosperity through transport policies should not be at the expense of our health or our climate.

Section C: Transport governance – democracy, decision-making and delivery

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)?

Please explain your answer, by providing examples of where you believe transport related decisions should be taken.:
We do not have sufficient knowledge of existing structures and procedures to comment on this question in detail. We do however believe there should be an integrated system where services work collaboratively to improve Scotland's health and wellbeing. There should be a stronger alignment of transport with health and all other policies including planning, climate change, and anti-poverty. This integration should happen across democracy, decision-making and delivery at the national, regional and local levels.

Furthermore we also believe that there should be an increased focus on active travel for health, equality and the environment.

Finally we believe that while some decisions should be made nationally, regional and local authorities will have a greater awareness of transportation needs and challenges in their areas and be better placed to lead on decision-making and delivery.

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?

Please explain your answer, by providing examples of which transport decisions local communities should be involved in, also suggesting how they should be involved.:

We support the involvement of local communities in decision-making. This should take place at the earliest stage possible of any new design or development to ensure that community views are fully heard, considered and incorporated in ongoing design and development as well as implementation.

Transport should be central to any design and development. It should however not be considered in isolation, it is important to take a wider approach and consider all policy areas such as housing and community planning.

A framework like the Place Standard tool or a Health Impact Assessment checklist can be a useful way to engage communities in planning discussions.

The Place Standard tool provides a framework to have a conversation about all the physical elements (for example its buildings, spaces, and transport links) as well as the social aspects (for example whether people feel they have a say in decision making) in a place[1]. This approach to engagement complements the National Standards for Community Engagement[2]. These good practice principles are designed to support and inform the process of community engagement, and improve what happens as a result. The Place Standard tool also aligns well with the Place Principle.

We welcome the ambition to involve communities in decision-making, but wish to see greater emphasis on support for communities to engage in the process and a greater emphasis to engage with groups of people who are less often heard.

[1] The Scottish Government. (2018) The Place Standard tool, 2018. https://www.placestandard.scot
[2] The National Standards of Community Engagement. (2016) http://www.voicescotland.org.uk/media/resources/NSfCE%20online_October.pdf.

Section D: The Strategy as a whole

6 Does the National Transport Strategy address the needs of transport users across Scotland, including citizens and businesses located in different parts of the country?

No

Please explain your answer.:
We believe the Strategy begins to address the needs of transport users in Scotland, however further emphasis needs to be placed on active travel or multi-modal journeys which has significant benefits for health and tackling inequalities as well as our climate. Transport policy and delivery needs to be framed more in terms of health & wellbeing, social justice and tackling inequalities.

Section E: Looking Ahead

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

Please provide details.:
We are encouraged by the investment for active travel infrastructure projects across Scotland in 2019 .

7b What practical actions would you like to see the National Transport Strategy take to encourage and promote these?

Please provide details.:
We would however like to see further investment in walking and cycling infrastructure projects across Scotland in order to make greater progress. This should be coupled with an investment to support communities to increase walking and cycling activities or programmes such as walk to school or walk to work initiatives, including access to any equipment needed. Investment should also be targeted to reduce health inequalities.

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

Please provide details.:
The maintenance of walking and cycling infrastructure is inconsistent and deter individuals from active travel as a result.

8b What practical actions would you like to see the National Transport Strategy take to improve these?

Please provide details.:
Allocate sufficient resource for the maintenance of active travel infrastructure.

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?

Please provide details.:
We are supportive of the actions outlined in the Strategy, however would recommend completing a Health Impact Assessment to assess and balance the positive and negative impact of proposed strategy on public health, including obesity. This would strengthen the evidence further, and the outcome would be a transport system that enable healthy choices and support health and wellbeing. In developing a HIA, policy-makers should take into account existing tools and duties such as the Place Standard Tool and the Fairer Scotland Duty.

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

Please provide details.:
No comment.

Section F: Strategic Environmental Assessment (SEA)

11 What are your views on the accuracy and scope of the information used to describe the SEA environmental baseline set out in the Environmental Report?

Please give details of additional relevant sources.:

12 What are your views on the predicted environmental effects as set out in the Environmental Report?

What are your views on the predicted environmental effects as set out in the Environmental Report?:

13 What are your views on the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?

What are your views on the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?:

14 Is there anything else you would like to say about the Environmental Report?

Is there anything else you would like to say about the Environmental Report?:

About you

1 What is your name?

Name:
Shruti Jain

2 What is your email address?

Email:
shruti.jain@rcpsg.ac.uk

3 Are you responding as an individual or an organisation?

Organisation

4a What is your organisation?

Organisation:
Scottish Obesity Alliance

4b If responding on behalf of an organisation, please indicate which category best describes your organisation.

Other

If other, please specify.:
Scottish Obesity Alliance is a forum for organisations to collaborate to influence policy and practice on obesity prevention in Scotland. It is composed of leading national health charities, medical royal colleges, campaign groups and professional bodies with an interest in health and public health. We work together to influence the Scottish and UK Governments policy on overweight and obesity.

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

Publish response only (without name)

6 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

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:
Slightly dissatisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:
Slightly dissatisfied

Please enter comments here.: