

## CONSULTATION RESPONSE FORM

**Question 1** - The table in part 5 provides an overview of the proposals under each of the EU 2020 headings – Smart, Sustainable and Inclusive – matched against the relevant thematic objective and investment priorities. Do you think the investment priorities are the most appropriate ones for the activity suggested?

SPT welcomes the changes made by the Scottish Government in light of earlier consultation responses in giving a clearer commitment to supporting sustainable transport through European funding.

Furthermore, we welcome the proposal to create a 'Low Carbon Travel and Transport' strategic intervention, and the sub-headings of Active Travel Hubs, National Smart Ticketing Scheme and Low Carbon Transport Hubs. However, while recognising that it is right that Transport Scotland at national level have the 'Lead Organisation' role, SPT would highlight the significant role Regional Transport Partnerships such as ourselves can and do play in leading or assisting with delivery of these priorities. For example, SPT has invested over £2m in the last 3 years in active travel improvements, and plans to increase that investment over coming years. Similarly, SPT has delivered a fully ITSO-compliant smartcard system on the Subway, and on that basis will be working with partners to roll the system out across other modes in the future. SPT would therefore welcome recognition of this role in helping the Scottish Government to deliver the 'Low Carbon Travel and Transport' strategic intervention, and would be happy to work with Transport Scotland and others to lead or assist on specific projects / initiatives.

SPT welcomes the reference to transport in the 'Low Carbon Infrastructure Transition Development Fund', specifically in relation to accelerated de-carbonisation of transport fuels, and investment in research, innovation and adoption of low carbon technologies. Again, SPT would welcome reference to Regional Transport Partnerships in leading and assisting with delivery of this sector, given the significant role we currently play in these areas.

On a general note, SPT would highlight the role transport can play as an enabler across a range of sectors and themes. For example, transport can play a significant role in assisting regeneration – SPT were successful in securing ERDF funding in the 2007-13 programme for the refurbishment of Dalmarnock station, a key regeneration priority – and therefore SPT would welcome specific reference within the strategic interventions to transport and regeneration, for example, under the Scottish Regeneration Capital Grant Fund.

Similarly, SPT would welcome further references to transport across the strategic interventions in relation to economic development (including freight), social inclusion, job creation and rural access, as transport can and does play a key role in stimulating each of these areas.

**Question 2** – Section 6 sets out the linkages between Structural, Rural and Fisheries Funds as well as linkages to other EU Funding Programmes. We would welcome stakeholder comments on these linkages in order to help us develop this thinking further

In principle, SPT welcomes the Scottish Government's desire to ensure that the approach to Structural Funds is co-ordinated and consistent, removes duplication, with a view to

delivering more collectively than would be achieved separately.

However, with regard to the EAFRD – the Rural Fund – as noted above, SPT would welcome greater acknowledgement and specific reference to transport within the scope of activities for this fund. Effective and efficient transport access to and from rural areas for people and business is vital in delivering economic growth and social inclusion. SPT would welcome the opportunity to help the Scottish Government / Transport Scotland in leading and assisting with the delivery of projects / initiatives in this area – for example, in relation to transport infrastructure in rural areas, bus services, ferries and others.

SPT welcomes the references to passenger and freight transport within the European Territorial Co-operation programmes, and again would be willing to help the Scottish Government / Transport Scotland in leading and assisting with the delivery of projects / initiatives in this area, for example, in relation to sharing of best practice, and opportunities for the more sustainable movement of freight.

**Question 3** - Do you think the new proposals will have a positive or negative impact on the protected characteristics and wider issues of inclusion and participation?

SPT note that an Equality Impact Assessment is being conducted on the European Structural Funds 2014-2020 Programmes and would welcome the opportunity to see the outcomes of this prior to making detailed comment.

However, SPT would highlight that, as acknowledged by the Scottish Government, a key issue for Scotland is an ageing population and the resultant demands this places on sectors such as transport in future. In SPT's experience, demand for such services as our MyBus service from older people is growing and therefore there may be the need to ensure that specific reference to this issue is made within the priorities for the programmes.

**Question 4** - If you think there will be a negative impact on the protected characteristics or inclusion and participation please provide suggestions as to what could be done differently to diminish this impact.

Building on our response to Q3, SPT would welcome the opportunity to discuss with the Scottish Government and Transport Scotland potential interventions which could assist with addressing transport and an ageing population, for example in relation to building on the success of our MyBus service.

**Question 5** - Please provide your views for improving the process for design, procurement, delivery, monitoring and evaluation to strengthen delivery of sustainable development.

SPT welcomes the approach the Scottish Government are taking to strengthening delivery of the EU's Horizontal Theme of sustainable development, specifically:

- Integrating Sustainable Development in programme and project design, implementation and evaluation.
- Building Environmental Sustainability and other Horizontal Themes into each project from the start, and allowing flexibility and innovation in the detailed project and sub-project design.
- The Scottish Government leading the way with a high level commitment toward

achieving multiple benefits through mainstreaming sustainable development through a programme designed around fewer, larger projects where sustainable development can be integrated at the design stage and within project specific targets

Any initiative which streamlines, mainstreams and simplifies the procurement, delivery, monitoring and evaluation of projects while retaining robust governance arrangements is to be welcomed.

**Question 6** – Do you have any further comments on the proposals outlined in this document?

SPT has been successful in securing ERDF funding during the 2007-2013 programmes – for refurbishing Dalarnock station, revitalising Subway stations and Fastlink – and looks forward to working with the Scottish Government and Transport Scotland in future to ensure that future funding is forthcoming for transport in the west of Scotland.

SPT welcomes the greater acknowledgement of the role of sustainable transport in these proposals, but as noted earlier, would welcome a strengthening of support for transport across the wide range of areas it can have significant impact – from social inclusion to rural access to freight and others – and a greater acknowledgment of the role of Regional Transport Partnerships like SPT in leading and assisting in the delivery of projects / initiatives.