



**Friends of
the Earth
Scotland**

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Dear Ms Gidney

National Transport Strategy Consultation Response

Friends of the Earth Scotland has been concerned about the direction of Scottish transport policy for some time in relation to compatibility with pressing environmental problems and is therefore pleased to contribute to the current review. In this regard we hope the following issues will be addressed to ensure that transport policies support rather than undermine the Executive's strategy for sustainable development.

Context and Trends

We welcome the analysis of current drivers and factors influencing transport policy and the implications of current trends for Scotland's people, environment and economy (p.3-8). Based on the picture presented it is clear that current policy is failing, for instance traffic growth, rising emissions and high levels of ill health related to non-active travel. At best existing policies have made little impact on these negative trends and at worst they have exacerbated them.

Vision, Aims and goals (Questions 1 & 2)

The NTS needs to be much clearer about the high level outcomes it is trying to secure; in this respect we question why the goals on p.10 come before the vision p.13. The number of objectives also leads to confusion throughout the document. We argue that a tighter framing of the strategy would be helpful, for instance delivering a transport system that:

- Is socially inclusive being affordable and accessible to everyone, especially low income groups
- Is compatible with environmental goals especially obligations to tackle climate change
- Meets the needs of industry and commerce and supports a strong economy

Any policies promoted by the NTS should be measured against overarching goals of this nature, which should be given equal weight. In this respect we believe the approach taken in the current proposal is problematic given the breadth of the eight goals, not all of which are mutually compatible or of the same apparent weight.

We are concerned that the goal of facilitating economic growth is given undue prominence, albeit with a caveat that this should be on a socially and environmentally sustainable basis. We note however that the

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reference to environmental and social sustainability is hastily dropped by p.13 paragraph 4 and p14 paragraph 5, concerning the NTS's objectives. This reinforces the impression that the strategy will repeat previous failures to deliver sustainable development due to the singular pursuit of economic growth.

As currently framed the strategy is incompatible with the Scottish Executive's overarching Sustainable Development Strategy. For instance we believe there must be a much greater recognition of the role of transport in the production of climate change emissions, the fact that this is not a key objective is deeply disappointing. We also note the apparent absence of reference to health objectives in relation to active travel, which again puts transport out of sync with wider government priorities and policies.

In the context of (Questions 1 & 2) we recommend:

- **Fewer higher level aims and outcomes based around the principles of sustainability**
- **The key aims and objectives reflect the Scottish Executive's wider policies on climate change and health**

Measures to facilitate economic growth

The strategy fails to make the required change from the failed "predict and provide" approach towards demand management and efficiency. We are deeply concerned that the section of the consultation on the Strategic Projects Review (SPR) is framed solely in the context of growing the economy; ignoring the multiplicity of objectives set out in the first part of the document. The consultation also fails to test or explore assumptions concerning investment decisions and economic growth (Question 4).

We note that P.22 para.9 is factually incorrect in claiming, "STAG does not take as its starting point any one preferred infrastructure solution", given that the Scottish Executive has committed substantial funding to projects such as the Dalkeith Bypass, M74 Northern Extension and Aberdeen Western Peripheral Route, without applying the model in this way. We therefore have no confidence in the Scottish Executive's application of this tool and believe an urgent review is necessary. This should take into account the Executive's climate change and sustainability strategies.

There is an assumption that transport infrastructure spending leads to the regeneration of deprived areas, but there is limited academic evidence that this is the case. Nor is it appropriate or sensible to develop new roads in areas of low car ownership, which are also likely to be candidate locations for regeneration. It should also be noted that as an employment generator it is almost always more cost-effective to invest in public transport.

The existing 70% public transport spending commitment is welcome, but it should be clarified in terms of capital versus revenue spending and take account of PPP funded roads projects. It should be noted that the figure is affected by a small number of capital-intensive projects such as the Edinburgh airport rail link and trams. The 70% figure is therefore not applicable in most Regional Transport Authority, including WESTRANS and NESTRANS areas. Nor is the figure replicated at a local authority level in terms of the proportion of resources devoted to public transport.

We also strongly suspect that investment in cycling and walking makes up a minimal proportion of the 70% accounting for perhaps 1% of the overall transport budget. Worse still funding fluctuates from year to year and is only now recovering from a sharp decline. Evidence shows that where investment in facilities such as dedicated infrastructure is put in place, cycle use rises. Edinburgh is just one area where this can be seen in practice. We argue that given the low baseline any additional funding will deliver greater added value than a similar investment in other modes. When making investment decisions the health benefits delivered by active travel should be given added weight in the appraisal process.

Rail investment should be prioritised in areas where the greatest modal shift can be achieved, especially routes parallel to trunk roads such as the A9. Rail upgrades should be prioritised ahead of road improvements to make train journeys more competitive and achieve modal shift on key corridors between major urban centres. This applies to rail freight as well as passengers, especially on long distance routes e.g. Aberdeen and the Highlands and routes to England.

We note that planned projects such as the M74 Northern Extension and Aberdeen Western Peripheral Route that are incompatible with the Scottish Executives wider environmental goals and do little if anything to help achieve the other objectives set out in the consultation, such as promoting accessibility, modal shift, demand management or reducing the need to travel. In fact if they proceed, the strategy could be undermined from the outset. Given that these projects will account for much of the investment in the early years of the strategy, it is vital that they are reviewed in the context of the Strategic Projects Review (Question 4).

Any policies with regard to international air links should be compatible with policies on climate change and emissions. The economic benefits stemming from the air route development fund should be re-evaluated as a matter of urgency, given the unavoidable environmental impacts of air travel. We also believe that by using time-savings as the basis for calculations the value of new routes may be over estimated.

In the context of questions 4, 5 and 6 we recommend:

- **Adopting a rigorous methodology for assessing the actual impact of transport spending on the economy, before considering corridors or types of infrastructure.**
- **Correcting the fact that the SPR is being set up solely to deliver economic objectives in isolation rather than the full set of objectives.**
- **Providing reassurances that the SPR will focus on the full spectrum of infrastructure and strategic non-infrastructure options e.g. demand management or national programmes to support green modes or soft measures.**
- **A complete reappraisal of the STAG methodology both in its application and the weighting given to time-savings compared with environmental factors.**
- **At the project and strategy appraisal stage greater weight should be given to the unique health benefits delivered from green modes.**
- **The Scottish Executive should maintain and clarify its 70% commitment and in addition set a target date for achieving a minimum 3-4% budget allocation to cycling.**

In the context of question 7 we recommend:

- **A more in-depth analysis of the actual economic benefits derived from the air route development fund and more realistic assessment of the environmental impacts.**

Questions 8 & 9

- **The critical issue with regard to cross-border rail services relates to the provision of rail capacity which delivers services of the appropriate frequency, price and journey time to deliver air-rail substitution**

Measures to promote accessibility

In the future policies should do more to identify the key facilities and destinations that people are seeking to access and the areas where issues of exclusion are most pronounced. The needs of groups that have most difficulty accessing facilities should be assessed and prioritised. This is largely people who don't drive, but in developing new access opportunities for public transport and green modes, opportunities to shift people from cars will also be created.

The key priority is reviewing the public sector estate in Scotland firstly in terms of location of particular facilities in relation to provision for public transport cycling and walking. Issues in relation to design must be addressed such as pedestrian access and facilities for cyclists. Accessibility planning (Q7) will be an essential component of this process. A particular priority should be given to reviewing developments funded through the public private partnership mechanism many of which are large-scale and built away from traditional centres and public transport hubs e.g. the Edinburgh Royal infirmary.

In the context of question 17 we recommend:

- **The rigorous application of accessibility planning in relation to the public sector estate. Scottish Executive Departments, Agencies and local government should see this as a requirement and be expected to meet minimum standards within a reasonable timescale.**

Measures to promote travel awareness and reduce demand

Outside the public sector, commercial organisations also have an obligation to promote sustainable travel. For instance, it would be a refreshing change if the business community spent more time considering how it could use the existing road network more efficiently, by assisting employees with their travel choices, rather than calling for more road capacity.

Whilst, it would be good if all employers produced travel plans voluntarily, many businesses won't see this as a priority and will require a legislative push, financial incentive or penalty.

In the context of (Question 24 & 25) we recommend

- **That travel plan requirements should apply to all businesses providing parking for employees and customers based on specific number of spaces threshold, shifting the emphasis towards staff who don't drive to work.**
- **The role of the Scottish Executive should be to provide councils or regional transport partnerships with the powers to compel businesses to adopt and report on plans, and to ensure they are enforced.**
- **The NTS should assess the need for financial incentives to reward progressive organisations and also actively consider financial penalties such as a parking space levy for businesses that fail to support sustainable travel choices.**

Promoting modal shift

The critical issues are availability of alternatives and whether they are comparable in terms of flexibility, journey times, cost, as well as awareness and public perception. Only by tackling each dimension will policies succeed. In relation to meeting the objective it may be insufficient to simply provide new services where levels of awareness are low or perceptions are poor. In some cases it may also be necessary to reduce the relative competitiveness of the car for instance reducing availability of parking. For all short journeys (2.5 miles or less), walking should be actively promoted and prioritised in the first instance whilst cycling should be promoted for medium to longer journeys, especially in and around urban areas. We therefore welcome the intention expressed in para. 87 p.44.

In relation to question 26 we recommend:

- **That funding is made available to regional transport partnerships specifically for delivering targeted smart measures, where opportunities exist to build on existing facilities and networks.**
- **The delivery of smart measures should be rolled out and integrated into the delivery of new infrastructure.**

We believe that the delivery and prioritisation of cycling and walking policies needs to be much better promoted, by the Scottish Executive, in addition to the commendable efforts of Sustrans and Cycling Scotland. For instance the Walking and Cycling Strategy and 'Cycling by Design', the Scottish Executive's design manual, were only ever published in consultative draft form.

In relation to question 28 we recommend:

- **That Transport Scotland should have a team dedicated to cycling and walking, headed by a sufficiently senior member of staff to champion investment in these modes.**
- **Building on recent funding allocated to Sustrans via a longer-term funding agreement.**
- **Setting a target date for achieving 3-4% of total transport spending on green modes.**
- **Finalising a national strategy for walking and cycling, in the context of increased investment levels as set out above.**
- **Finalising, re-launching and actively promoting design guidance, and ensuring that all local authorities comply with it when they deliver projects.**

In relation to question 29

The answer is simply to maximise the number of journeys made by green modes, which entails ambitious targets and the resources to deliver them.

In relation to questions 30 & 31 we believe that there is sufficient evidence stemming from London to reconsider how bus services are organised and regulated in Scotland. This could be part of a wider review of how services are supported and subsidised. Among the issues that must be addressed are

whether social inclusion and environmental benefits are being delivered from existing support such as fuel duty rebates.

New Technologies and Cleaner Fuels

Emission reduction via fuels and technology in the absence of traffic reduction, or at least traffic stabilisation, will fail to meet environmental goals – especially those related to climate change. We also believe that the Scottish Executive has limited powers in relation to this area in terms of regulation. One area that would be worth exploring is the utilisation of cleaner fuels and more efficient vehicles by public transport operators (Question 41), especially in areas where air quality standards are not being met. However, steps must be taken to ensure this does not lead to a rise in fares.

In relation to question 41 we recommend that priority be given to promoting the use of low emission and fuel-efficient public transport vehicles in urban areas.

We are gravely concerned that a rush to promote bio-fuels, rather than traffic reduction, will have undesirable side-effects, for instance in the importation of fuel oils from developing countries where the production has serious negative impacts on both biodiversity and the carbon balance. For example production of palm oil in countries like Indonesia has resulted in the clearance of rainforest. To minimise such impacts and to maximise support for sustainable domestic production the Executive should advocate and develop a labelling scheme for bio-fuels (Question 42), if necessary on its own initiative as part of the Fair Trade Country policy stance.

In relation to question 42 we believe that action should be taken to verify that all bio-fuels in Scotland come from certifiable sustainable sources.

Demand management

Action should be taken with regard to work place parking, in the context of travel plans, as previously discussed – for instance through a work place parking levy (Question 43). Residential parking should be reviewed in the context of local government finance, for instance by considering council tax discounts for non-car-owning households. In this respect locations in urban centres are likely to have a higher council tax band creating a barrier and disincentive to living in an area with good public transport links, compared to suburban locations where residents are more reliant on cars to access services.

In relation to question 43: we recommend

- **A detailed study into the benefits and options for a work place parking levy.**
- **Consider incentives or discounts for non-car-owning families as part of the review of local government finance and council tax.**

We are disappointed that action such as bus priority measures and multiple occupancy lanes will only be piloted, when there is considerable evidence that these measures are effective (Question 45). Bus priority measures have already been rolled out for instance on A90 South Queensferry and Barnton. The priority is to get on and deliver further schemes, especially on congested commuter routes, targeting single occupancy vehicles.

It has been demonstrated in theory and in practice (London) that road pricing is the only effective mechanism for managing demand (Question 46).

In relation to question 47 the Scottish Executive must provide greater incentives for authorities that are prepared to develop road-pricing schemes in terms of giving preferential treatment to funding bids. This would increase the additional benefits arising from any scheme and also maximise the benefit gained from Executive funding. The Executive must also drop the unrealistic barriers to local authorities proceeding with road pricing schemes, such as the need to demonstrate clear public support, which should be an entirely political decision. Evidence from London suggests that, once in place, such schemes quickly gain acceptance. In addition any new road capacity should be tolled to lock in the benefits from the investment, by reducing demand and traffic growth, as well as freeing up money for public transport investment. In this respect removing tolls on the Forth Bridge would send inappropriate price signals to commuters and undermine any attempt to meet environmental goals for transport in South East Scotland.

It is clear that 'predict and provide' policies fail to tackle traffic growth and the current lack of price signals mean that the Scottish road network is not used efficiently resulting in congestion and unnecessary journeys. Road pricing is the only mechanism that can address these issues and influence choices. Charging should seek to change travel behaviour by making sure that motorists pay more of the negative external costs, including those related to congestion and CO₂ emissions (Question 47). The intention should be to lower taxes in other areas of the economy, not to introduce the policy so it is cost neutral to motorists (question 48). A policy that is cost neutral to the user is entirely self-defeating, although a fiscally neutral policy could be designed to deliver redistributive benefits within the economy e.g. lowering the tax burden on low-income groups.

Yes, Scotland should if necessary consider a road-pricing scheme aimed at areas of high car use and congestion, if this is needed to deliver critical environmental goals e.g. CO₂ emissions reductions (Question 49). Building more road capacity at best delays the day when this decision will have to be taken, wasting resources and time in the process.

We believe congestion charging and road pricing are more likely to induce behaviour change than emission trading, which could prove difficult to design and operate and is as yet unproven as a mechanism for addressing climate change.

Reducing the need to travel

Firstly this section needs to be reframed, giving more emphasis to reducing the need to travel by motorised modes and improving accessibility for non-green modes. It also needs to specifically discuss how to eliminate unnecessary journeys many of which will relate to the work place. This area of the NTS relates closely to the section on accessibility. In this regard we would reiterate our calls for a review of the entire public sector estate in Scotland. We also wish to emphasise the need to adopt a robust approach in terms of compelling larger employers to implement travel plans. In addition we also wish to see more basic and definitive advice to planning authorities such as requiring that any large or medium sized housing or commercial development must have good pedestrian access to shops and other basic facilities, as well as public transport links. Developments should not proceed until the developer puts such facilities in place. Otherwise new developments will go on creating new car journeys.

In response to question 51 we reiterate the need for greater action by the public sector as set out in question 17.

We also believe a ban on new supermarkets and large-scale retailing developments over a certain size should also be seriously considered, given their well-documented impact on local shops (Question 51).

In response to question 52 we re-emphasise the need for mandatory employers' travel plans (see our reply to question 24, 25)

Measures to promote road safety

Traditionally, road safety has been promoted by segregating vehicles and pedestrians but this has in many cases lowered the environmental quality of our towns and cities e.g. barriers and underpasses. It has also led to lower levels of cycling and walking than on the continent. Given lower levels of cycling, international comparisons on Scotland's safety record may be somewhat deceptive: a more useful comparison would be the number of casualties per kilometre cycled, where Scotland's record does not compare well with other European countries. The continued roll out of the safe routes to school programme should be maintained as a priority (Question 53). Friends of the Earth wishes to see stricter planning guidance in terms of design, for instance making Home Zones the norm in all residential areas (question 54). We are concerned that the Scottish Executive has been overly timid in its approach so far.

It should also be noted that cycling in particular benefits from reaching a 'critical mass' where drivers encounter cyclists more often and are therefore more aware of how to drive safely in their presence (see reply to questions 28 & 29). Achieving this critical mass requires promotion of cycling through infrastructure investment as well as public information campaigns and through other means, which all must be fully funded on a long-term secure basis.

The cost effectiveness of speed enforcement as a safety enhancement measure should be considered before investment in new infrastructure (Question 53). The environmental benefits of enforcing existing speed limits should also be considered at a national level.

Implementation and monitoring

The critical issue is ensuring that decisions on transport investment and priorities complement and do not undermine environmental goals (Question 55). We reiterate the point that current trends in car use and rising traffic levels are incompatible with the Scottish Executive's climate change objectives.

Traffic intensity is not a useful overall indicator for measuring the success of the NTS and compares unfavourably with a road traffic level target – which is already established and easily understood (question 56). Decoupling of economic activity from traffic levels is a welcome aim of transport policy but this does not mean that decreasing “traffic intensity” is an appropriate indicator, as absolute levels of traffic could still increase dramatically. Transport intensity also has no direct connection to CO₂ emissions as we could see people driving less but doing so in less efficient or lower average occupancy vehicles.

In relation to question 57 we note that an indicator based purely on journey times is simplistic and fails to take account of whether any time saving are economically useful. For instance there is no point delivering a 45-minute journey time saving to ferry port only for driver and vehicle to sit idly. A more useful measure relates to the reliability and dependability of journey times, allowing for better and more efficient planning and logistics.

Accessibility should be measured in relation to actual facilities (e.g. hospitals) that can be reached by public transport or provide facilities and access for cyclists (question 57).

The target of quadrupling cycle use should not be reviewed, (question 58) but action will be needed to consider what additional measures need to be put in place to meet it. The target is based on a modest baseline and must be retained. Local authorities should be strongly encouraged to set targets, which reflect continental levels of cycling and areas where ambitious targets have already been achieved in other parts of the UK (question 58).

We are alarmed and disappointed that the road traffic stabilisation target has been dropped and has become an aspiration, and is therefore seen as non-essential (Question 60). The fundamental problem with transport in Scotland has been the continued growth in car use and the associated problems this causes. A meaningful strategy should seek to reverse these negative trends; in this regard the 2021 target is just the starting point. Whilst, CO₂ targets are useful they will not be met by technological means alone, hence a net reduction in vehicle use is vital. A strategy based on trunk road congestion will simply consider the efficient management of the network, something that will be impossible once the overall volume of traffic reaches critical levels. Whilst CO₂ is the most pressing problem issues of local air pollution, noise etc must also be reflected in targets based around halting traffic growth.

Regional traffic reduction targets should be established along with target dates for road traffic stabilisation and must support and not be seen as a substitute for the national target (question 61). Regional Transport Authorities need a clear steer from the Scottish Executive – something that won't happen if the 2021 target is abandoned. It is also vital that interim milestones in the run up to 2021 (Question 62) are put in place if the effectiveness of policies is to be monitored. We are deeply disappointed that the Scottish Executive believes that slowing traffic growth is neither deliverable nor realistic at the present time and is seen as little more than a pipe dream. Investment decisions should clearly be measured against traffic levels. Without such indicators we will have no confidence in the strategy. Ultimately it is not the target that is the problem but the failure to develop and deliver a coherent strategy to realise it. In this respect the 2021 target has already proven useful in demonstrating that the Scottish Executive's current policies are failing.

We warmly welcome the commitment to develop a sector target for CO₂ emissions (question 63). However we note the inconsistency in the proposition of a target for CO₂ targets, without first setting a reduction in climate change emissions as a principle objective for the strategy. The reduction from transport should be proportionate to other sectors of the economy and relate to achieving the 2021 target. Scotland should be put on course to meet the 60% reduction in emissions by 2050 (question 64).

Specific savings should be identified for different parts of the strategy – for instance smart measures, better land use planning and infrastructure investment to promote modal shift.

Finally the NTS should be a long-term strategy, which is constantly monitored. Ministers should be required to report regularly on traffic levels and CO₂ emissions from the sector and review and amend the strategy if it transpires targets are not being met.

We hope the above is useful and will be considered when a final draft of the NPF is produced.

Yours sincerely

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