

Forth Estuary Transport Authority - Local Transport Strategy -

Response from Friends of the Earth Scotland

September 2004

Context

The Draft Local Transport Strategy should be seen within the context of the Scottish Executive's existing transport policy commitments. The Executive, in its June 2004 Transport White Paper, estimates that without action, traffic levels in Scotland will grow by 27% over the next 20 years. The Executive plans to stabilise traffic at 2001 levels by 2021 and to direct 70% of transport spending towards public transport by 2006. Any proposals from the Forth Estuary Transport Authority should be therefore be in accordance with the Scottish Executive's broader commitments to tackle demand and increase investment in public transport.

Comments on specific Package proposals:

1) Packages 1 - 3

The Forthright Alliance support Packages 1 – 3 which focus on improving the operation of the current bridge and development of improved public transport systems. Package 3 is the preferred option as it offers the greatest investment in public transport and is clearly shown to have the greatest impact on demand reduction of 10.5%.

2) Package 4

We oppose Policy 15 which suggests developing proposals for a new 'multi-modal crossing' and as such believe that the Package 4 option should be removed from the final transport strategy on the following grounds:

- **Contrary to Scottish Executive transport policy:**

The proposal for an additional crossing is incompatible with the Executive's commitment to tackle demand and re-orientate transport expenditure away from road building into investing in public transport.

- **Stimulating demand for road use:**

In 1994 the Standing Advisory Committee on Trunk Road Assessment (SACTRA) concluded that development of new road capacity tends to generate new traffic. The Scottish Office itself in 1998 acknowledged that "the 'predict and provide' approach to road building is unaffordable, unsustainable and, ultimately, self defeating. New road capacity can generate more usage and add to congestion." (Transport White Paper 'Travel Choices for Scotland', Scottish Office: 1988).

As the draft FETA transport strategy notes, the impact of building the bridge would actually increase demand, and even when coupled to other public transport options this option offers the least favourable impact on demand management. As set out in the consultation the option of Package 4 which includes a new bridge proposal is clearly shown to have a demand impact of less than one twentieth of that of Package 3 (Package 3 demand reduction –10.5%, Package 4 demand reduction: -0.5%).

Section 3.2.3 notes that annual traffic growth rates have been between 2.0 and 3.4% over the past three years and that traffic growth is continuing unabated. There is now ample evidence to suggest that building new roads simply facilitates increased demand for road use, therefore a new road crossing will go against efforts to manage road traffic demand.

- **Exacerbating climate change**

At the Kyoto conference, the EU agreed to reduce the emissions of the six main

climate change gases by 8% on 1990 figures by 2008-2012. The UK subsequently agreed to a 12.5% cut for these gases and the Labour Party made a commitment to a 20% cut in CO₂ in the 1997 manifesto. The Royal Commission on Environmental Pollution recommends a cut of 60% in emissions by 2050 (RCEP, Energy – The Changing Climate, June 2000).

Scotland is falling behind in tackling climate change. Since 1990 Scotland's carbon dioxide emissions increased by 0.6% while England's fell by 7.1%. Research for the Scottish Executive shows that, even assuming the current UK and Scottish Climate Change Programmes are effective, Scotland cannot reach the Labour Party commitment of a 20% cut in CO₂ from 1990 levels by 2010. In the best case Scotland's emissions might be 16.6% below 1990 levels, in the worst case they would be only 4.7% below.

Road transport is the second fastest growing source of CO₂ and the Scottish Executive's Transport Delivery Report produced in March 2002 acknowledges that "action is required now to prevent rising carbon dioxide emissions from road transport." Indeed the UK Climate Change Strategy requires that the transport sector delivers 40% of the UK's proposed reduction of CO₂ levels by 2010.

Construction of a new Forth bridge would thus accommodate increased traffic demand which would add to climate change emissions and further jeopardise Scotland's ability to make progress in reducing emissions.

- **Premature proposal:**

It is entirely premature to bring forward proposals for a new road bridge when the relevant authorities have failed to deliver the range of sustainable alternatives promised eleven years ago when the last proposal was thrown out. Currently, over 70% of cars crossing the Forth Road Bridge at peak times have a single occupant and 70% of commuter trips are single occupancy. A second road bridge would encourage car use and would further undermine Scotland's ailing public transport network.

- **'Multi-modal' smokescreen:**

The description of the proposal as a "multi-modal crossing" is wholly unconvincing. There are numerous initiatives which would improve public transport without necessitating the provision of a new bridge. Increasing public transport facilities to Edinburgh from Fife is entirely possible using existing rail infrastructure and with comparatively modest investments.

- **Unfavourable frequent user treatment towards public transport**

Unlike cars and trucks, under the current rules, buses are not eligible for frequent user discounts on the Forth Road Bridge. This policy is at odds with commitments to encourage public transport and should be addressed to ensure that public transport is treated at least as favourably as the private car and HGVs.

**Friends of the Earth Scotland
Lamb's House
Burgess Street
EDINBURGH
EH6 6RD**

dbarlow@foe-scotland.org.uk