

# **TRANSform Scotland**

*the campaign for sustainable transport*

## **Loch Lomond & The Trossachs National Park – National Park Plan consultative draft 2005**

31st August 2005

### **1. Introductory comments**

- 1.1 TRANSform Scotland is the national sustainable transport alliance, campaigning for a more sustainable and more socially-just transport system. Our membership includes local authorities, public transport companies, national environmental groups, local transport and environment interest groups, and individuals.
- 1.2 We welcome the opportunity to comment on the National Park Plan, and hope that our views are of assistance in finalising the Plan.
- 1.3 In general, we found the Plan to be clearly presented and uses what appears to us to be a thorough approach. We have some concern about the degree of repetition apparent, and the somewhat fragmentary treatment of topics (e.g. transport receiving detailed treatment in sections 4.7, 5.2, 5.3, 6.2 and 6.3), but we accept that this may be due to a desire to adopt a “cross-cutting” treatment of issues.
- 1.4 Our specific comments, which follow, are restricted to topics relating to transport, accessibility, tourism, and strategic environmental issues (such as climate change).

### **2. ‘Guiding Principles’**

- 2.1 We welcome the commitment in Guiding Principle 1 to sustainable development and the precautionary principle.
- 2.2 We welcome the recognition in Guiding Principle 4 that the National Park Authority has a role in addressing unsustainable consumption patterns, and in particular taking action on development patterns, transport and climate change.
- 2.3 However, we consider that “developing management responses” to climate change is an inadequate Guiding Principle: the Plan should commit to contributing to emission reductions. The UK Government and the Scottish Executive has a range of policy commitments to emission reduction and we consider it appropriate that the Park Authority adopt a similar commitment.
- 2.4 Likewise, “achieving more sustainable transport options”, whilst a welcome aspiration, is too weak to be particularly useful. Key guiding principles in sustainable transport are that of ‘reducing the need to travel’ and of reducing travel volumes generally – and we recommend that these be made the Plan’s headline Guiding Principles for transport. Reducing the need to travel is established within the Scottish Executive’s recently-published ‘Scottish Planning Policy 17: Planning for Transport’ (August 2005) as a key objective of planning policies, while the Executive has a long-standing policy commitment to stabilising road traffic volumes (see e.g. Scottish transport white paper ‘Scotland’s Transport Future’ (June 2004), section 1.21): that is, to stabilise road traffic levels between 2001 and 2021; this is in the context of a forecast 27% increase Scotland-wide over the same period.

### **3. 'Special Qualities'**

- 3.1 We welcome the recognition in the Plan that transport can, in certain instances, represent a positive contribution to the Park's 'Special Qualities' (pp. 24-43), for example, its long-distance cycle routes and the West Highland Line.

### **4. 'Managing Natural and Cultural Resources'**

- 4.1 We welcome the recognition of sustainable transport as one of the five aspects of 'Using Resources Widely' (p. 46), and to the 'long-term aim' of "reducing the environmental impacts of travel and increasing the use of sustainable modes of transport" (p.157), but subject to our comments on Guiding Principle 4, set out at para. 2.4, above.
- 4.2 The statement that "[r]oad upgrading is an inevitable consequence of modern life" (§4.2.54) should be deleted. (We imagine that you wouldn't blithely state that environmental destruction is an "inevitable consequence" of modern life!) We do however welcome the consideration given to non-standard approaches to roads planning (Policy LS16): we agree that over-engineered roads projects can in themselves often be a source of environmental damage.
- 4.3 We welcome the commitment to prioritising timber freight movement by rail or water (Policy LM11, p.127). However, we consider that this may be duplicative of the later policy on freight (Policy INF5, p.262, with the linked proposed action CL32, p.267), and suggest merging them.
- 4.4 We welcome the Park Authority's own commitment to environmental practices (Policies NPA1-5). We would imagine that a useful first step would be the adoption of a Green Transport Plan reflecting the various policies set out in the Plan.
- 4.5 The 'Strategic Objective for Sustainable Transport' set out on page 170 is somewhat better than that set out on page 157 as it has the merit of highlighting the need to reduce the need to travel (see, again, our comments at para. 2.4, above). As before, however, we believe that the 'Strategic Objective' should seek to reduce transport volumes – not simply the environmental impacts thereof.
- 4.6 The car ownership figures set out in §4.7.27 are a non-standard way of presenting such data. While car ownership per household may be 142% this will overstate household accessibility to a car (which is approximately 65% Scotland-wide), the disparity representing multiple car ownership in some households. We suggest that the Plan present a household car accessibility figure: this is substantially more meaningful when considering social aspects of transport accessibility. (This issue is later recognised within §6.3.13.)
- 4.7 We welcome the Policies on promotion of sustainable transport (TR1), promotion of Green Travel Plans (TR3), and modal shift of freight to sustainable modes (TR4). We are however unclear what is meant by Policy TR2 and would welcome more clarity on this matter.
- 4.8 We welcome the proposed action to develop promotional materials on sustainable transport (NC200) but question whether this is not duplicative of Policy TR12 Travel Awareness (p.227) and its associated proposed actions (p.228). Likewise, Policy TR4 Sustainable Movement of Freight: see our comments at section 4.2, above.
- 4.9 This section of the Plan is however flawed in as much as it gives no basis for reducing traffic levels, and hence climate change emissions from transport. Prioritising modal shift to sustainable modes (Policies TR1, TR3 and TR4), whilst

very welcome, does not in itself guarantee reduction in traffic volumes when the context (recognised at §6.2.33) is one of nationally increasing road traffic levels. The Plan should state traffic volumes within the Park Authority area, aggregately and for specific corridors/areas, and set out targets for stabilisation and/or reduction of such volumes. A legal framework for road traffic reduction policies is provided by the Road Traffic Reduction Act 1997 and the Scottish Executive has provided guidance to local authorities on Local Transport Strategies, incorporating guidance on traffic reduction. The failure to include even basic traffic level data within the Plan is a major flaw in the document. We note that the State of the Park Report 2005 suggests that traffic and car park counts are being considered as a “potential indicator change” and we urge the early adoption of this indicator.

## **5. 'National Park Experience'**

- 5.1 We welcome the recognition that increasing visitor numbers can have detrimental impacts on the Park (§5.2.6) and that traffic management measures are an appropriate response in the most highly-affected areas (e.g. East Loch Lomond). However, we consider that the reference in Policy VM1 Visitor Numbers to “introduc[ing] appropriate management measures” is very weak. We would suggest that if you are prepared to acknowledge that you have a problem in certain areas then you should be prepared to make commitment to implementing traffic demand management measures to tackle these problems. Policy INF4 Traffic Management (p.262) again makes encouraging noises but fails to present anything concrete.
- 5.2 Furthermore, we are unclear how the 'Priorities' listed for the East Loch Lomond area (p.185) can be judged to be consistent with taking forward traffic demand management – given that these 'Priorities' include “coping with peak volumes”. This is the very antithesis of demand management. We recommend that the Park Authority urgently look at best practice examples on traffic demand management in sensitive mountain areas, from the UK and overseas, before finalising its Plan. This should include investigation of strategies for selective car bans at peak times, a policy commonly implemented across the Alps (e.g. Zermatt), Dolomites (e.g. Misurina) and the Pyrenees (e.g. Ordesa).
- 5.3 We note that §5.2.21 states that pressure on car parking capacity at some locations may be such that expansion of car parking “may have to coupled with some form of demand management”. However, the Plan then fails to present any specific measures to take forward demand management other than developing a strategy on car parking (proposed action NPEX9, p.210). We would expect the finalised Plan to bring forward proposals on demand management.
- 5.4 We note that the finalised Park Plan will include provisions on seaplanes (textbox under §5.2.14). Irrespective of localised impacts (e.g. upon other recreational users, or upon biodiversity), we would note that air transport is in general the most environmentally-damaging form of transport – especially in terms of climate change impacts. We hope that the Park will also take account of this factor when finalising its policies on seaplane use.
- 5.5 We would suggest that the section 'Transport Serving Visitor Needs' (p.203 onwards) needs to specifically address the issue of managing visitor numbers associated with one-off events held within the Park (e.g. large concerts at Balloch Country Park). It may be appropriate that consent for such events only be granted should the promoters be able to present an acceptable plan providing for public transport access.
- 5.6 We welcome the Policies on public transport links (TR5), cycling and walking (TR6), transport interchanges (TR7) and water transport (TR10). The sequential approach

to parking provision outlines in Policy TR8 is a welcome approach to adopt. Unless we misunderstand, Policy TR9 appears to duplicate Policy TR2.

- 5.7 The commitment to developing demand-responsive transport projects (proposed action NPEX5, p.210) is welcome – but doesn't appear to be referred to within the text. (This proposed action is also repeated as CL48 on page 285.)
- 5.8 In general, there seems to be little cross-reference between Policies TR5-10 and the proposed action set out on pages 210-211. There is, for example, no proposed actions relating to walking and cycling (TR6) while there are only two proposed actions to develop Policies TR5 Public Transport Links and TR7 Transport Interchange: a public transport link to Glasgow Airport (NPEX7) and a transport interchange at Balloch (NPEX8), respectively.
- 5.9 We question whether the term "integrated transport" used in Policy TR11 Integrated Transport Network is now meaningful. We suggest use of the term "sustainable transport" - and hence "Sustainable Transport Network" - as used elsewhere through the Plan.
- 5.10 We welcome the Plan's commitment to environmental education and, in particular, the Policies on travel awareness (TR12) and travel information (TR13), both on page 227. (However, see our comments at section 4.7, above.) We would welcome the opportunity to be involved in drawing up the proposed National Park travel awareness campaign (NPEX39).

## **6. 'Communities and Livelihoods'**

- 6.1 We welcome the Plan's recognition that tourism requirements should be viewed in the context of the environmental consequences that often arise (§6.1.16 and elsewhere). The tourism section of the Plan is however remarkably light on information on the transport impacts associated with tourism. We recommend that the Plan makes specific commitment that tourist visitor numbers, and/or income, be decoupled from increasing car trips to the Park area. Most material on green tourism / eco-tourism that we have seen fails to make adequate account of the transport implications of such tourism, and especially air transport and car use associated with such activities.
- 6.2 As such, we regard Policy SED6 Sustainable Tourism as being too weak. It should specifically recommend decoupling tourism growth from traffic growth. Section (e) of that policy, whilst welcome, does not adequately pick up the wider environmental transport implications of tourism trips.
- 6.3 Whilst we accept that there may be some truth in the link between a "deteriorating roads infrastructure" and the tourism economy (§6.2.35), we question whether this impact is over-stated. As such, the Plan is correct to ensure that the A82 Route Action Plan does not lead to undue damage being done to the Park: uncontrolled road-building could have the impact of damaging the tourism value of the Park.
- 6.4 Policies INF2 to INF5 should be renumbered as transport policies (i.e. with TR prefixes). We see no reason why roads issues should be indicated separately. As indicated previously, Policy INF4, while welcome in itself, is unduly weak (and does not appear to be followed up with any proposed actions, pp.262-267). As indicated previously, Policy INF5 could be merged with Policy LM11.
- 6.5 The 'Sustaining Community Facilities and Promoting Inclusion' section (pp.271-274) is very welcome. We would recommend, however, that this section makes more specific connection with 'reducing the need to travel' (see section 2.4, above) as it is

the loss of such local facilities (in urban as well as in rural or remote locations) that has, and still does, necessitate increasing numbers, and lengths, of journeys.

- 6.6 We welcome Policies on access to service centres (TR15), public transport provision (TR16) and community-based transport (TR17). We question, however, whether there may be opportunities to merge some of the Policies with earlier ones.

## **7. Conclusions and summary of key recommendations**

- 7.1 We broadly welcome the policies and range of proposed actions set out in the National Park Plan consultative draft.
- 7.2 We recommend that the wording in Guiding Principle 4 makes specific commitment to contributing to climate change emission reduction (para. 2.3).
- 7.3 We recommend that the wording in Guiding Principle 4 makes specific commitment to reducing the need to travel and to reducing traffic volumes (in order to make a practical contribution to climate change emission reduction from transport). These aims are standard in Scottish Executive planning and transport guidance and policy (para. 2.4).
- 7.4 We recommend that the Park Authority carry forward its welcome commitment to improving its own environmental performance by designing and implementing a Green Transport Plan covering all transport modes (para. 4.4).
- 7.5 We consider the absence of traffic level data a major flaw in the Plan's analysis on transport. We recommend that this material be incorporated within the Plan to provide a baseline figure. We further recommend that the Plan make specific commitment to traffic stabilisation or traffic reduction, in keeping with current Scottish Executive policies (para. 4.9). We consider that this is the only practical way in which transport policy can reduce climate change emissions from the sector.
- 7.6 We consider that the sections on traffic management are too weak. We recommend that the finalised Plan bring forward specific proposals (paras. 5.1-5.3). We recommend that the Park Authority look at best practice examples on traffic demand management in sensitive mountain areas, from the UK and overseas, before finalising its Plan.
- 7.7 We recommend that the policy on Sustainable Tourism should specifically seek to decouple tourism growth from traffic growth (para 6.2).
- 7.8 We welcome the critique presented on rural accessibility to services (para. 6.5). This material is a good example of policies that back up the policy aim of 'reducing the need to travel'. As such, we recommend that the finalised Plan make specific attempt to connect these issues.
- 7.9 Lastly, we welcome the Park's commitment to creating a travel awareness campaign and would welcome the opportunity to be involved in drawing this up (para. 5.10).

## **TRANSform Scotland**

*the campaign for sustainable transport*

Lamb's House, Burgess Street, Leith, Edinburgh, EH6 6RD

Tel: 0131 467 7714 Fax: 0131 554 8656  
Email: [info@transformscotland.org.uk](mailto:info@transformscotland.org.uk)  
Web: [www.transformscotland.org.uk](http://www.transformscotland.org.uk)