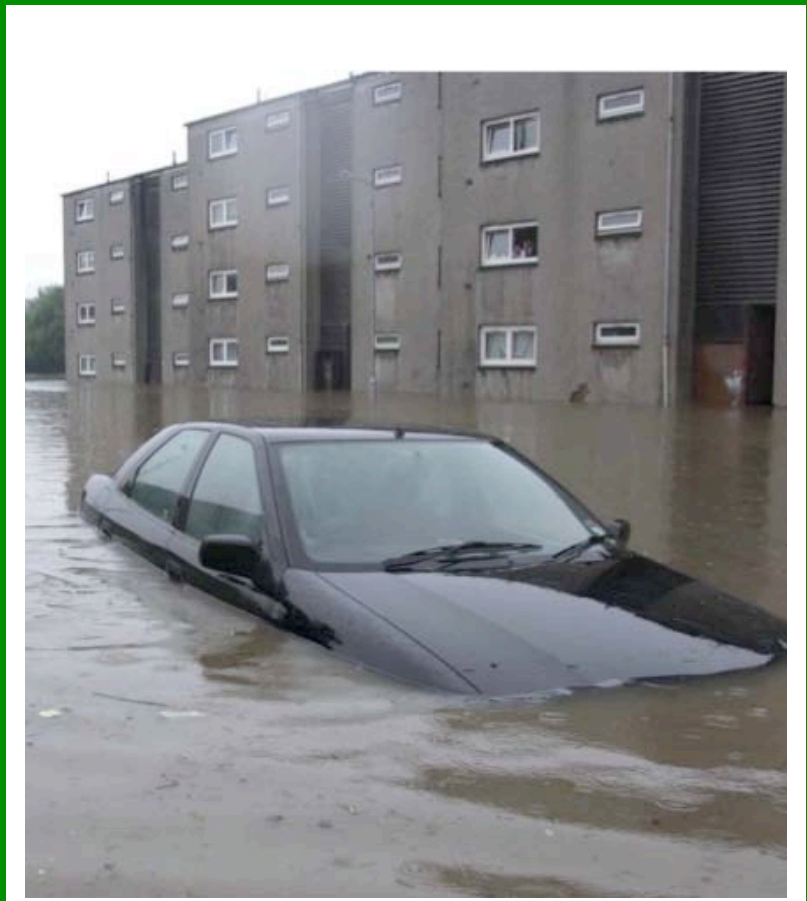


# **SUSTAINABLE TRANSPORT – OR *BUSINESS AS USUAL?***

**TRANSform Scotland response to Scottish Executive  
National Transport Strategy consultation paper (April 2006)**



**TRANSform Scotland**  
the campaign for sustainable transport

**Sustainable Transport – or  
Business as Usual?:  
TRANSform Scotland response  
to Scottish Executive  
National Transport Strategy  
consultation paper (April  
2006)**

Published by TRANSform Scotland,  
July 2006

Lamb's House, Burgess Street, Leith,  
Edinburgh, Scotland

Tel: +44 (0)131 467 7714

Fax: +44 (0)131 554 8656

[info@transformscotland.org.uk](mailto:info@transformscotland.org.uk)

<http://www.transformscotland.org.uk>

**Authors:** Colin Howden & Calum  
McCallum.

Colin Howden is the Director of  
TRANSform Scotland.

Calum McCallum is a researcher with  
TRANSform Scotland.

**Front cover image:**

Reproduced courtesy of The Sunday  
Herald newspaper

## Introduction to this paper

TRANSform Scotland is the national sustainable transport alliance, campaigning for a more sustainable and more socially-just transport system. Our membership includes bus, rail and shipping operators, local authorities, national environment and conservation groups, consultancies and local transport campaigns.

This paper represents TRANSform Scotland's response to the National Transport Strategy consultation paper.<sup>1</sup>

In the final part of the paper, we offer some answers to the 65 questions set out in the consultation paper. We hope these are of some use.

We feel, however, that it would have been of more value for the Scottish Executive to have led a consultation on a proposed strategy, rather than consult on a document that is basically a long and open-ended discussion paper. As a result, we have decided, in the second part of our response, to suggest some specific interventions that we feel that will have to be taken if Scotland is to have a National Transport Strategy founded genuinely in sustainable transport principles, and not just – as we suggest in the title of this paper – business as usual, albeit perhaps one with a superficial gloss claiming sustainability.

Whilst certainly not wishing to hold up progress towards delivering sustainable transport, we would suggest that the Executive may want to consult further once it has set out the foundations of its new sustainable transport strategy. It would certainly be easier to answer questions about specific proposals, rather than framing responses to what is essentially a movable feast. (Most of the interventions we suggest are, however, in terms of their financial cost, either low in price or without cost, and could be carried out even without a finalised National Transport Strategy in place.)

The first part of our response makes some general comments about the benefits of a sustainable transport approach; where current policy is making things worse; and the sorts of principles that will have to underpin a genuinely sustainable transport approach to Scottish transport strategy.

---

<sup>1</sup> We are also party to the joint submission by the 'non-motorised user' groups.

## PART ONE:

### Ensuring the National Transport Strategy is a sustainable transport strategy

#### 1. The benefits of sustainable transport

There are many benefits of sustainable transport, but here are five key benefits:

- A healthier, fitter society - walking and cycling are ideal ways in which exercise can be fitted into everyday activity
- A more inclusive transport system - public transport, by definition, is available to everyone, while a third of Scottish households still have no access to a car
- A more productive workforce: greater use of public transport should deliver economic benefits - e.g. the use of travel time productively rather than having to concentrate whilst driving a vehicle, and the reductions in danger and stress that travellers would experience as a result
- The reclaiming space in residential areas - as exemplified by Home Zones and related concepts - with a major benefit of this will accrue to children, in the form of e.g. greater independence, the ability to travel to school safely
- The reduced dependence on scarce, finite, and depleting, natural resources - in particular oil - and the reduction of climate change emissions, now widely accepted as the greatest environmental threat that the planet faces.

#### 2. Definitions of sustainability and accessibility

A **sustainable** transport strategy will be one that meets the definition of sustainable development set out almost two decades ago in the Brundtland Report:

*"Sustainable development seeks to meet the needs and aspirations of the present without compromising the ability of to meet those of the future."*

What is doesn't mean is eking out the same activity, desirable or undesirable, for a couple more years, or until the next election.

An **accessible** transport strategy is one that provides access to employment, health and education services, and cultural and leisure facilities.

A sustainable and accessible transport strategy implies ensuring that access to these locations is achieved, as far as possible, through the use of public transport, cycling and walking. What is doesn't mean is just providing for more travel to get to further-distant locations. It certainly doesn't mean just providing more mobility for the already highly mobile.

#### 3. Looming environmental and resource threats

Almost every week sees the publication of some report setting out the impacts of **climate change** on the natural and human environment. There is now widespread acceptance that climate change is real, that it is already having damaging impacts across the planet, and that these impacts will worsen.

The transport sector is one of the main culprits in causing climate change. Almost a quarter of Scotland's greenhouse gas emissions come from the transport sector and this figure, unlike in other sectors, is still growing. Yet despite a now high level of awareness of this issue, there is however little evidence that the Scottish transport sector is taking measures to reduce emissions: car use and road freight levels continue to increase, while vehicle efficiency is failing to improve.

The other major threat that has to be dealt with is that of **oil depletion**. The planet is rapidly approaching - or may even have already passed - 'peak oil', when global oil production peaks and thereafter declines for evermore. Yet production is peaking at a time of soaring demand in China, India and other less developed countries. Britain's own oil reserves have peaked in the last few years and are now in terminal decline.

Peak oil has major implications for the transport sector: 67% of all oil used is for transport, while 98% of transport fuel is oil. Even George W. Bush has admitted that the world is "addicted to oil".

#### 4. Current policy responses

None of the above should be new to anyone: climate change has been widely known about since the 1992 Rio Earth Summit, while the phenomenon of peak oil has been being predicted – correctly – since the 1950s.<sup>2</sup> What is surprising is how little action is being taken to address these problems.

Lots of money is spent in Scotland on transport, but is it invested wisely? Has government action helped, or made things worse?

Since 1999, we have seen the Scottish Executive put together a **road-building** programme due to cost over £1.5 billion. This includes driving a second elevated motorway (the urban M74) through our largest city, while supporting the construction of road project that would have the effect of turning the western green belt of Scotland's third city, Aberdeen, into tin shed sprawl. We fail to understand how such measures will help us tackle climate change or peak oil. Even if this money *has* to be spent on the trunk road network, it is bizarre that priority has gone into expanding the network when it is manifestly clear that even the existing network is not maintained or managed properly.

We do accept that the Executive has increased investment in **public transport** from the scandalously low levels seen in the 1980s and 1990s. However, even here, investment has been misdirected towards misguided vanity projects such the Edinburgh Airport Rail Link - £650m to facilitate access to the most unsustainable transport mode of all, air travel.

And what about the most sustainable mode of transport - **walking**? Walking is the second most common mode of transport in Scotland after the car. 25% of car trips are less than two miles in length, and hence ideal for shifting to journeys on foot, yet the Executive remains embarrassed to publish a strategy to prioritise walking as a mode of transport.

It is disappointing that the consultation paper reads as if the unsustainable trends that it reports are somehow independent, exogenous even, to government action – when it has often been government itself that has generated the problems in the first place. Some acknowledgement of this would be welcome.

#### 5. Better policy responses

Firstly, it shouldn't be assumed that a **"strategic" approach** to transport has to mean mega-infrastructure projects. There is a frankly childish assumption current in Scotland that for something to be "strategic" that it must involve a multi-million pound construction project.<sup>3</sup> Major infrastructure projects – whether road or rail – tend to provide most benefit to those who are already the most mobile. More benefit may well be achieved by the widespread application of small-scale local schemes.<sup>4</sup>

Secondly, we need to see a strengthening of measures to **reduce road traffic levels**. Only absolute reductions in road traffic levels will bring about the widespread benefits of sustainable transport: not only reductions of climate emissions, but the reduction of the social impacts of traffic, and the freeing of road space for wider community use.

Thirdly, policies, plans and programmes need to be clearly focussed on delivering **modal shift** away from the more unsustainable modes and towards the sustainable modes, wherever practicable.

Fourthly, we need to **prioritise accessibility over mobility**. We need to challenge the process of centralisation of facilities: the closure of local schools, hospitals and shops. Planning policy needs to be given the clear guidance that it is there to ensure that local provision of key services is paramount. Only through this can we break the reliance on private car use for essential trips.

Fifthly, we need to **reduce transport's chronic overdependence on oil**. For passenger travel, this means implementing rail electrification, funding tram schemes, financially supporting bus industry moves into alternative fuels; for freight, this means more support for the fuel-efficient modes such as rail, sea and canal.

---

<sup>2</sup> The concept of peak oil goes back to the 1950s when the US scientist Hubbert predicted that USA oil production would peak in 1972. He was ridiculed at the time, but his prediction proved correct: US oil production peaked in 1970.

<sup>3</sup> For example, if public health is a problem in Scotland (which it is), and if part of that problem is because people aren't taking enough exercise as part of their everyday activity (which they aren't) then transport policy is probably not going to tackle this by throwing money at multi-million infrastructure projects.

<sup>4</sup> We are not talking here only of walking or cycling projects, but also measures such as implementation and enforcement of bus priority, certain small-scale but high-return rail enhancements, or marketing and information campaigns.

Lastly, we need to **increase the price of private transport so that it pays for its external costs.** This may not be a popular prescription, but it is imperative: we will not move to a more sustainable transport system unless and until private transport starts to pay for its external costs. Private transport prices are too low.<sup>5</sup> The simple fact is that petrol is not expensive: even at £1/litre, its price is a quarter of the retail price of beer. People need to get used to petrol becoming more expensive: fossil fuels are finite, and as they get used up their price is certain to rise. In the context of soaring rates of demand from China and India, and with global oil supplies likely to reach their maximum at some point this decade, it should be of no surprise to see British fuel prices go up. The challenge is to reduce reliance on fossil fuels as soon as possible.

## **6. Conclusion**

We need a new mindset to tackle the global environmental and resource threats that the planet faces. The transport sector is one of the main culprits in generating these impacts, and has to take a major share in reducing them.

The freight industry has got used to the idea of "just in time transport". In future, if we are to meet the really big challenges ahead, we'll have to get used to a new concept for the 21st Century: "just enough transport". It would be helpful if the Scottish Executive started planning for this now.

---

<sup>5</sup> The University of Leeds' Institute for Transport Studies report *Surface Transport Costs & Charges*, in what was probably the most comprehensive report of its kind in the UK, reported that "For the British road sector as a whole, taxes and charges in 1998 covered between one third to a half of their relevant marginal social and environmental costs" - [http://www.its.leeds.ac.uk/projects/STCC/surface\\_transport.html](http://www.its.leeds.ac.uk/projects/STCC/surface_transport.html)

## PART TWO:

### Some key interventions to deliver a sustainable National Transport Strategy

A mix of policy measures can and should be used to achieve sustainable transport policy objectives. These include information and persuasion, infrastructure investment and the use of economic incentives.<sup>6</sup> The Scottish Executive has stressed in its climate change programme that it should focus on the measures that it can take to deliver its 'Scottish Share' of climate emissions. So our recommendations primarily focus on those measures that are devolved to the Scottish Parliament. We do however include some issues where the Scottish Executive could reasonably be felt to take a take in impressing the need for action on other levels of government: locally and regionally, at a UK level, and at European Union level.

### Set out a national programme of road traffic reduction

Road traffic reduction is *the* most vital component of a sustainable transport policy. *A transport strategy that is not founded on reducing road traffic levels is not, nor should claim to be, a sustainable transport strategy.*

Too much traffic divides communities and degrades the environment, in rural as well as urban areas. In simple terms, less traffic will tend to mean fewer air pollution deaths, less congestion costs, less community severance, and less impact on the natural environment. Critically, there appears to be little or no chance of hitting climate change emission reduction targets without reducing road traffic levels.

The Scottish Executive needs to give a clear lead that it wants transport policy to reduce road traffic levels. **The Scottish Executive should strengthen its existing road traffic stabilisation target (returning traffic levels to 2001 levels by 2021) with interim targets and an action plan.** This approach gained the support of the Scottish Parliament in 2005.<sup>7</sup>

It is very welcome that the Scottish Executive has so far had the strength to target reducing traffic levels: this is something where Scotland leads England – down south, government has completely failed to aim at road traffic reduction.

But any weakening of the existing target will give the clear message that the Scottish Executive has no intention of tackling climate change emissions from the road transport sector.<sup>8</sup> Environment Minister Ross Finnie stated in this year's Climate Change Programme that transport is one of the three key sectors where emission reduction must happen. With emissions in transport still on the increase, the weakening of action in the transport sector would fatally damage the integrity of the Executive's Climate Change Programme – and would fatally undermine the claim that the Executive wants to deliver a sustainable transport strategy.

### Lead public information campaigns on the cost of transport, both to the individual and to society

Government has a major role to play in making people aware of the consequences of their travel habits and the need for change. The roads lobby has been successful in publicising and embedding two key myths: that private transport is already too expensive, and that more traffic is good for the economy. Both positions are wrong but, nevertheless, widely held. The strong vested interests that wish to

<sup>6</sup> European Federation for Transport and Environment (2003) *Getting the Prices Right +10: Towards Target Oriented Prices*, p. 18. T&E set out the following five general headings for delivering a sustainable transport policy: information and persuasion; regulations; technical improvements; infrastructure; economic instruments. Some of these measures (especially in the areas of regulations and technical improvements) are not devolved powers.

<sup>7</sup> The report of the Scottish Parliament's 2005 climate change inquiry concluded that not only should the Executive keep the target but also that it should set out interim targets as milestones along the road to the 2021 target.

<sup>8</sup> In 2001, the Scottish Executive made a very welcome decision to set a road traffic stabilisation target - to return traffic levels to 2001 levels by 2021. This was first stated in the 2002 transport delivery report 'Scotland's Transport: Delivering Improvements', and has been repeated in all subsequent major policy statements including the 2004 transport white paper 'Scotland's Transport Future'. However, in its current National Transport Strategy consultation, the Executive has threatened to ditch the target.

maintain the status quo, irrespective of how destructive and unsustainable that course may be, need to be challenged – and central government is well placed to do this.

Government should devise strategies to encourage public acceptability for change. The Scottish Executive must learn from successful campaigns of the recent past, such as drink driving, seat belts and smoking ban, that a major change in society's attitude toward transport is possible. The Executive should **put in place public information campaigns explaining the cost of transport**, both to the individual (e.g. explaining the vast time and money that people expend on purchasing and maintaining cars)<sup>9</sup> and to society (in terms of external social, environmental and economic impacts).<sup>10</sup>

### Implement a Scottish road user charging scheme

It is normal commercial practice to charge transport users based on their time of travel; hence peak-time travel is more expensive on rail, air and many bus and ferry services. It is perverse that the road network has no such mechanism; this results in a very inefficient exploitation of the existing network. We regard the absence of functioning market mechanisms, and transport prices that reflect transport costs, as the primary cause of road congestion. We believe that the delivery of road user charging would assist UK economic competitiveness by deterring inessential road journeys, and give priority to more essential and valuable trips. We consider that the efficient and well-managed elements of the road haulage sector would be a specific benefactor of such an approach.

Road user charging needs to form a key part of the National Transport Strategy. It should be introduced across Scotland's busiest roads to reduce congestion at peak traffic times and help establish the principle of 'polluter pays'.

However, we have no confidence in the UK Department for Transport's proposals for a UK road user charging scheme.<sup>11</sup> The experience with the proposed lorry road user charging scheme, which got to an advanced stage of planning before being dropped, goes a long way to confirm our view that the DfT has no intention of actually implementing a national road charging scheme.

In the absence of action from the Westminster government, the Scottish Executive should set out its own plans, and timescale, for implementation of **a Scottish road user charging scheme**, drawing upon the trials already underway across in England. We recommend that the Executive should take as its initial focus the trunk road network, which is entirely within its own control, and instruct Transport Scotland to take this forward as its priority.

<sup>9</sup> Perhaps best illustrated by the famous Ivan Illich quote: "The model American male devotes more than 1600 hours a year to his car. He sits in it while it goes and while it stands idling. He parks it and searches for it. He earns the money to put down on it and to meet the monthly installments. He works to pay for gasoline, tolls, insurance, taxes, and tickets. He spends four of his sixteen waking hours on the road or gathering his resources for it. And this figure does not take into account the time consumed by other activities dictated by transport: time spent in hospitals, traffic courts, and garages; time spent watching automobile commercials or attending consumer education meetings to improve the quality of the next buy. The model American puts in 1600 hours to get 7500 miles: less than five miles per hour. In countries deprived of a transportation industry, people manage to do the same, walking wherever they want to go, and they allocate only 3 to 8 percent of their society's time budget to traffic instead of 28 percent. What distinguishes the traffic in rich countries from the traffic in poor countries is not more mileage per hour of lifetime for the majority, but more hours of compulsory consumption of high doses of energy, packaged and unequally distributed by the transportation industry." – source: <http://ranprieur.com/readings/illichcars.html>

<sup>10</sup> The Executive should also consider commissioning of research into the 'true costs of transport' in Scotland. What we would currently regard as the state-of-the-art report on this matter – the Institute of Transport Studies report quoted above – is very aggregated, based on UK data, and on a dataset which is now almost a decade old (1998 data). The lack of more current data is not a valid argument against taking action; rather the presence of more recent and local data would be valuable in helping justify the action that needs to be taken.

<sup>11</sup> Of course, given the experience of the past year – with the Executive going missing during the 2005 Edinburgh congestion charge referendum, and deciding to reject outright, in early 2006, the FETA charging proposals for the Forth Road Bridge – we're not sure why we have any more confidence that the Scottish Executive might be any better than the Department for Transport!

## Press the UK Government to take action on fiscal issues

The Scottish Executive also has a role in ensuring that the UK Government delivers action on the parts of public policy that remain outside of the current devolution settlement.

Firstly, the Scottish Executive should press the UK Government to **penalise the use of SUVs**. Gas-guzzlers should pay higher Vehicle Excise Duty to encourage the purchase of fuel-efficient cars, and help establish the principal of 'polluter pays'. The rise in the 2006 budget to £210 VED for the worst polluting vehicles is not enough: a new highest band should be introduced at £2,000 per annum.

Secondly, the Executive should press the UK Government to **introduce aviation fuel tax and/or emissions charge**. The UK aviation industry receives an effective subsidy of £9 billion per annum because it pays no duty on the fuel it consumes or VAT on ticket sales or aircraft purchase.

## Ensure that economic analyses of transport take account of the health benefits of active travel modes

We welcome the Executive's commitment to decoupling economic growth from transport growth.<sup>12</sup> However, economic analyses of transport need to take the widest possible view of economic impacts. Healthy transport modes such as walking and cycling bring significant benefits with them that will lead to a healthier workforce and population at large. But as well as the substantial health and well-being benefits provided by a greater use of walking and cycling, these modes also provide economic benefit in terms of reduced costs to the health sector through avoidance of illness.

The National Transport Strategy should **monetise the public health benefits provided by people walking/cycling** to work/school/etc., and the monetised public health benefits foregone by the use of private cars for making short trips that could be made on foot or by bike.

## Set a sustainable framework for appraising transport expenditure decision-making

The Scottish Executive doesn't have its spending priorities in good order: transport expenditure is heavily skewed towards large capital projects, while a pathetically small amount is devoted to the health-promoting modes of transport. It remains commonplace for sustainable transport projects to be left with funding gaps, while damaging roads projects such as the urban M74 and the Aberdeen western bypass have access to seemingly bottomless pots of money. *We have refrained from providing long wishlists of transport expenditure projects*, but will be more than happy to do so as part of the Strategic Projects Review.

The Scottish Executive's handling of the process for the M74 Northern Extension has severely undermined confidence in its ability to take reasoned decision-making on transport expenditure decisions. As Gray et al. (2005) put it: "it seems that a number of 'strategic' infrastructure schemes have been approved on political rather than technical grounds."<sup>13</sup>

This will not change unless we have a sea-change in how transport expenditure is appraised. It is imperative that the Strategic Projects Review takes as its focus the review of interventions that can deliver on nationally-important objectives such as improving public health, improving social inclusion and reducing climate change emissions – rather than just analysing the pet projects of vested interest groups.

<sup>12</sup> We prefer to refer to "decoupling" rather than talk about "transport intensity". Both are rather forbidding technical terms, and certainly inappropriate as headline indicators, but find the former way an easier way to explain this. Our further views on matters of transport and the economy are set out in our response to the Eddington Study on transport and the economy - available at [http://www.transformscotland.org.uk/info/docs/2006-01-12\\_Eddington\\_Study.pdf](http://www.transformscotland.org.uk/info/docs/2006-01-12_Eddington_Study.pdf)

<sup>13</sup> Gray et al. (2005) *Building better transport? A critical overview of Scottish transport strategy*. TRANSform Scotland would not however agree with the authors' contention that a traffic intensity target is a more "realistic" headline target than a road traffic level target: amongst other things, their analysis has nothing to say on climate change strategy.

Firstly, the **Strategic Projects Review must be conducted using the same objective set as that decided upon for the finalised National Transport Strategy** – and not just whether projects that will be analysed are “effective in growing the economy” (question 4 of consultation paper).

Secondly, there needs to be a **thorough review of the Scottish Transport Appraisal Guidelines (STAG)** such that time savings calculations do not overwhelm other factors (environment, public health and so on), and so that the supposedly headline governmental objective of reducing climate emissions gets treated with more seriousness in transport appraisal. We would suggest that the Executive should consider energy-based appraisal as an alternative to the discredited time savings approach.

Thirdly, the Scottish Executive should **link the availability of funding for local authorities and Regional Transport Partnerships to how realistic their plans are in contributing towards national objectives and targets**. While we accept that there are important regional variations between areas of Scotland, we do not believe that it is good use of public resources to fund branches of local government whose actions specifically oppose national policy objectives.

### Use multi-modal appraisal on all major transport corridors

Multi-modal appraisal is simply the consideration of all transport options when appraising possible interventions (in an area, or along a specified transport corridor). The Scottish Executive successfully applied this methodology when analysing the A8 and A80 corridors in its Central Scotland Transport Corridor Study: this results of this Study have been generally uncontentious because the process carried out was on the whole methodical, fair and open.<sup>14</sup> This contrasts with the atrocious process carried out by the Executive in the case of the M74 and the Aberdeen western bypass, where there has been no attempt to appraise sustainable alternatives to major road-building.

The National Transport Strategy should make it clear that **all analyses of transport investment must use a multi-modal appraisal approach**. To fail to do this would leave itself open to the accusation that it fails to use public finance fairly, and leaves the way open for the various pet projects of vested interest groups to be promoted without being fairly and openly analysed against other potential interventions.

### Introduce social inclusion audits of transport expenditure programmes

Transport policies have major social implications, yet social justice perspectives on transport are too often neglected. This is despite a raft of evidence that those on lower incomes are adversely affected by our unsustainable transport system.<sup>15</sup>

Policies that boost the attractiveness of individual motorised travel at the expense of public and active transport alternatives hold no benefits for the 34% of Scotland’s households that have no access to a car. The share of such households is particularly high in urban areas (55% in Glasgow, 40% in Edinburgh)<sup>16</sup> and the overwhelming majority have low incomes.<sup>17</sup> Even in the Highlands, where social exclusion on economic grounds can be exacerbated by genuine geographic isolation, one household in five has no access to a car.<sup>18</sup>

<sup>14</sup> This doesn’t of course mean that the delivery on the recommendations has been even: TRANSform Scotland remains critical of the lack of progress on some of the Ministerial Decisions of the CSTCS.

<sup>15</sup> Our briefing *Socially-Just Transport*, published at the end of 2005, has much to say on these sorts of issues – this is available at [http://www.transformscotland.org.uk/info/docs/2005-11-23\\_SJT\\_briefing.pdf](http://www.transformscotland.org.uk/info/docs/2005-11-23_SJT_briefing.pdf)

<sup>16</sup> Scottish Executive (2005), *Scotland’s people: Annual Report: Results from the 2003/2004 Scottish Household Survey* - [www.scotland.gov.uk/Publications/2005/08/03155211/52385#61](http://www.scotland.gov.uk/Publications/2005/08/03155211/52385#61)

<sup>17</sup> The Scottish Household Survey reports that 64% of households with average annual incomes of up to £10,000 have no car access, compared to 2% of households with incomes above £40,000 - Scottish Executive (2005), *op cit*.

<sup>18</sup> The different income groups are, as a rule, reliant on different forms of transport. Lower income households tend to be more reliant on buses and walking, while the more affluent are more reliant on cars. So policies that increase travel distances to essential services will impact disproportionately worse on those that are reliant on local modes of transport. Policies that make car users pay for the pollution they create – such as road user charging proposals – tend to be socially progressive by the very fact that poorer households do not tend to own or drive cars. Even where public transport use remains a viable option, the user has lost out in price terms. While the price of motoring has remained static in real terms for the past 25 years, the price of bus travel has increased by 80% above inflation, and the price of rail travel by 60%.

Not only have lower income groups lost out in terms of access to transport, they have often also suffered the negative impacts of others’ increasing mobility. It has been established that children from the lowest socio-economic

We believe that the National Transport Strategy should provide for **social inclusion audits of transport delivery plans (at local, regional and national levels)**.<sup>19</sup> The Scottish Executive should ensure that adequate levels of funding are allocated to transport modes disproportionately used by disadvantaged sections of the population (principally buses and walking).<sup>20</sup>

### **Prioritise active travel modes as a contribution to improving Scottish public health**

Discussions of transport policy should not lose sight of the fact that most travel remains local in nature. Half of all transport trips are of less than two miles, and 70% of all trips are less than five miles; even car trips are mainly local, with a quarter of car trips are less than two miles, and 56% of car trips are less than five miles. Walking remains the second most common mode of transport (after car use) yet receives almost no consideration in most transport policy discussions.

We welcome the recognition in the consultation paper (questions 28-29) that walking and cycling have a role in improving Scottish public health. Scotland has serious public health problems including, but not limited to, obesity; and much research has suggested that this may be more to do with an increase in sedentary lifestyles than calorific consumption. Standard governmental public health advice is that members of the public should take five periods of 30 minutes moderate physical exercise every week: walking and cycling is ideally suited to providing this.

The National Transport Strategy needs to **recognise walking and cycling as modes of transport in their own right, and substantially increase their priority for funding**. As highlighted in recent research by Spokes,<sup>21</sup> Scottish Executive investment in these measures is falling, not rising. According to Spokes, the total spend by the Executive on all Cycling, Walking and Safer Streets (CWSS) initiatives across all 32 local authorities amounts to around £8 million per annum – less than 1% of the Executive's total annual transport spend – yet walking alone accounts for 28% of all transport journeys in Scotland.<sup>22</sup> The National Transport Strategy should ensure that substantially greater amounts of resources are ringfenced for these most sustainable of modes.<sup>23</sup>

### **Provide support for the delivery of Home Zones**

We welcome the consultation paper's acknowledgement (question 54) that action can be taken to make streets safer. We believe that the National Transport Strategy should set the framework for investment in measures that can significantly improve the quality of streets in residential areas. This would entail the prioritisation of measures such as Home Zones, traffic calming and other speed reduction measures, Safe Routes to School and Community Street Audits. The Executive has a role to play in providing the framework for improving the quality of streets in residential areas.

We believe that the area of transport policy that could genuinely transform the quality of life in residential areas would be the widespread application of Home Zone principles. The Executive is well aware of the

group are over four times more likely to be knocked down than those from the highest, and that the injuries they suffer tend to be of greater severity.

<sup>19</sup> It is our contention, albeit not based on anything more than personal experience, that the transport modes used by 'decision-makers' (whether they be national party politicians, media people, business representatives, transport industry professionals, local authority professionals, and or even NGOs) strongly influence their views on which areas should get priority treatment. As most of these 'decision-makers' will tend to be highly-paid, have high levels of transport mobility, and be heavy users of cars, rail and air transport, we would suggest that this is why these areas tend to receive priority, and why others are largely ignored (for example, conditions for pedestrians & bus users). [Decision-makers' are also usually male and wear business suits, although this is possibly not directly related.] We suggest that our 'social inclusion audits' would help as a check against this effect (should it indeed exist!)

<sup>20</sup> Social inclusion audits would help ensure that: (i) adequate amounts are allocated to transport modes disproportionately used by low income parts of the population (principally buses and walking); (ii) efforts are made to make bus travel more competitive on price terms with car travel, reversing the trend of recent decades; (iii) measures that reduce impacts on vulnerable communities (e.g. speed reducing measures, traffic calming, designated road speed hierarchy) are prioritised for expenditure.

<sup>21</sup> See <http://www.spokes.org.uk/modules.php?op=modload&name=DownloadsPlus&file=index&reg=getit&lid=70> and elsewhere on the Spokes website.

<sup>22</sup> Based on figures from Scottish Transport Statistics - <http://www.scotland.gov.uk/Publications/2005/08/25100154/04484>

<sup>23</sup> Our *Healthy Transport* briefing sets out why these measures should be high priority in government transport planning at all levels – this is available at <http://www.transformscotland.org.uk/info/docs/HealthyTransport.pdf>

benefits of Home Zones, having hosted two national conferences on the topic, but has so far failed to provide financial resources for Home Zones – despite the great success of the Home Zones pilot projects south of the border (funded through a challenge fund) and encouraging reports on progress in Scotland. The National Transport Strategy should, firstly, **provide for the creation of a challenge fund for local authorities, and, secondly, provide funding for a coordinating role to support the delivery of Home Zones in Scotland.**

### Put in place an intensive Smart Measures Programme

The reduction of congestion problems may often be better tackled through measures that reduce traffic levels, rather than providing new transport infrastructure. Small-scale, local interventions may often provide better cost-effectiveness than expensive transport infrastructure projects. For example, Safe Routes to School projects and employer Travel Plans are often able to reduce morning peak-hour congestion in a way that new large-scale road and rail projects cannot.

We welcome the positive support that the consultation paper gives towards the development of Travel Plans, and we would certainly welcome their becoming a requirement for larger employers. Employers should clearly be expected to reduce their external impacts, and we would welcome action to make Travel Plans the norm rather than the exception.

However, 'smart measures' (or 'soft measures') also include such measures as:<sup>24</sup>

- School travel plans
- Personalised travel plans
- Public transport information
- Travel awareness campaigns
- Car clubs
- Car sharing schemes
- Teleworking
- Teleconferencing
- Home shopping

The National Transport Strategy should **put in place an intensive Smart Measures Programme**, to be delivered at local and regional levels. Available research suggests that such measures are very cost-effective in delivering change in travel behaviour.<sup>25</sup> The Smart Measures Programme would form a key part of the national programme for road traffic reduction.

### Set out clear guidance on the appropriate use of cars

Cars remain the elephant in the corner of Scottish transport policy. It is remarkable that the National Transport Strategy document discusses a number of, frankly, trivial matters – yet fails to put forward policies directly regarding cars. As the most common mode of transport in Scotland,<sup>26</sup> this is a clear omission.

The National Transport Strategy should **set out clear guidance on the appropriate – and inappropriate – use of cars**. There are many journeys for which cars are the most appropriate mode of transport, and indeed may even be reasonably benign on environmental grounds, but there are also an awful lot of journeys for which car journeys should be specifically discouraged. Making a complex trip to areas ill-served by public transport, perhaps along with others and/or possessions, may be best made by car; driving 100 metres to the shops or the school, or commuting trips to centres along high-quality public transport corridors, are not.

The Scottish Executive's policy on car use could also take in the fledgling attempts at more efficient use of cars: interventions such as car clubs, car pooling, lift sharing, as well as the more established car hire sector (including, but not limited to, as an adjunct to public transport).

<sup>24</sup> Taken from Jillian Anable presentation at TRANSform Scotland 'Facing the Flood' conference, 8th May 2006 – available at <http://www.transformscotland.org.uk/conferences/facingtheflood>

<sup>25</sup> See for example Sally Cairns et al. (2004) *Making Smarter Choices Work* – available at [http://www.dft.gov.uk/stellent/groups/dft\\_sustravel/documents/divisionhomepage/038507.hcsp](http://www.dft.gov.uk/stellent/groups/dft_sustravel/documents/divisionhomepage/038507.hcsp)

<sup>26</sup> At least according to nationally recorded statistics. You still need to walk to your car: see our comments on walking strategy.

The policy would also want to take in the specific discouragement of the Sports Utility Vehicles in urban areas,<sup>27</sup> and the encouragement of low emission vehicles.

The policy would of course also have to take in establishing what is, and what is not, appropriate driver behaviour. We would suggest that the following activities should be specifically discouraged, and measures identified to address them: speeding, dangerous driving, using mobile phones while driving, cutting up cyclists, illegal turning manoeuvres, parking on pavements, and parking at bus stops.

Lastly, the drawing up of the policy on cars should involve a wide range of people and organisations – and not just motoring groups. Those affected by the impact of cars have as much, if not more, right to have their say as those who make the impact in the first place.

---

<sup>27</sup> Far be it from us to recommend that the Executive extend its enthusiasm for ASBOs to include SUV drivers, but something has got to be done to deter the increased use of these offensive vehicles, and those who choose to purchase them.

## **PART THREE: Responses to National Transport Strategy consultation questions**

**Please note: our answers to these questions should be read in conjunction with our comments in the sections above.**

### **CONSULTATION QUESTION 1.**

***Are: facilitate economic growth; promote accessibility; promote choice and raise awareness of the need for change; promote modal shift; promote new technologies and cleaner fuels; manage demand; reduce the need for travel; and promote road safety the right goals for transport in Scotland?***

There are too many levels of objectives etc.: we counted five types: 'vision', 'aim', 'objectives', 'goals', 'principles'. It is not made clear how they are meant relate to each other. Surely some of this could be merged?

An obvious omission from the list of 'goals' is the need to reduce greenhouse gas emissions from the transport sector: we recommend that "reduce climate change emissions" be added as an objective.

We recommend deleting "promote new technologies and cleaner fuels". It may be a useful intervention for the strategy to recommend (e.g. as a response to climate change) but it is not a meaningful goal in and of itself.

The goals also say nothing about social inclusion (or public health). We recommend replacing "promote accessibility" with "deliver a socially-just transport system".

Lastly, "facilitate economic growth" should not be put at the top of this list. There are already far too many organisations in Scotland whose outlook does not go beyond financial considerations: by putting the economy goal at the top of this list will go a long way to ensuring that they read none of the rest of the document.

### **CONSULTATION QUESTION 2.**

***Do consultees consider that the aim, vision and objectives need to be amended, for example to reflect Scottish Ministers' expectation to see Health Improvement at the heart of Scottish Executive policy?***

Yes, and Yes.

In summary, in response to questions 1 and 2, we would suggest five main goals, with sub-goals beneath these:

- **Reduce climate change emissions** (incorporating sub-goals of 'raise awareness of the need for change', 'promote modal shift' and 'promote new technologies')
- **Improve public health** (incorporating sub-goal of 'improving safety' and new sub-goal of 'promote active travel')
- **Promote social inclusion** (incorporating sub-goal of 'improve accessibility')
- **Reduce the need for travel** (incorporating new sub-goal of 'provide local access to services')
- **Facilitate a sustainable economy** (including sub-goal of 'manage demand')

### **CONSULTATION QUESTION 3.**

***Are there areas of work in relation to local/regional transport that would merit the national dissemination of best practice examples? If so, what are they and who would be best placed to lead this?***

Bus operation is one area where there is wide variation across Scotland and a system of 'bench-marking' would be useful. The proposed Public Transport Users Committee would probably be the best placed body to carry this out. There should also be a Scotland-wide review of how best to integrate bus and rail systems, something which again varies widely.

#### **CONSULTATION QUESTION 4.**

**What issues must this NTS address, to ensure that the Strategic Projects Review (SPR) which will follow it is as effective as possible? For example, should the NTS identify key transport corridors, or key types of investment which are most effective at growing the economy, to inform the SPR? If so, which ones?**

Firstly, the remit for the 'Strategic Projects Review' has been set up on a far too narrow base. From everything we have heard, it appears to be founded on the frankly childish assumption that for something to be "strategic" that it must involve a multi-million pound (road or rail) construction project. It is very likely that some of the interventions we suggest in the second part of this paper (e.g. road user charging, the Smart Measures Programme, or substantially increased investment in bus services, walking and cycling, or Home Zones) would be more effective at meeting key national objectives – and cheaper – than throwing away more money on further unaffordable (and generally environmentally-damaging) major infrastructure projects. We recommend that the Executive incorporate the 'Strategic Projects Review' within the NTS and rename it the 'NTS expenditure review'.

Secondly, the review must be conducted using the same objective set as that decided upon for the finalised NTS – and not just whether projects that will be analysed are "effective in growing the economy" (as suggested above).

Thirdly, there needs to be a thorough review of the Scottish Transport Appraisal Guidelines (STAG) such that time savings calculations do not overwhelm other factors (environment, public health and so on), and so that the supposedly headline governmental objective of reducing climate emissions gets treated with more seriousness in transport appraisal. We would suggest that the Executive should consider energy-based appraisal as an alternative to the discredited time savings approach.

Fourthly, the review should focus any available expenditure on urban areas – *where most Scots live*.

#### **CONSULTATION QUESTION 5.**

**Do we have the balance of investment right between spending on new and existing infrastructure and other non-infrastructure activities and between different modes of transport? If not, how should it change over time?**

Scotland currently has a gross imbalance both between expenditure on existing and new infrastructure, and between developments aimed at benefiting private and public transport. This is symbolised by the Executive's blind determination to pursue the construction of the M74 through the south side of Glasgow – a project that will largely be of benefit to those wishing to by-pass the city and of little conceivable use to public transport corridors. While large projects may be politically attractive as signs of 'action', what is really needed is continual audit and maintenance of existing networks – with incremental development where needs be.

#### **CONSULTATION QUESTION 6.**

**To what extent should transport spending be targeted specifically at areas with significant potential for regeneration? How should transport spending be balanced between regeneration areas and other key areas, such as rural Scotland?**

This suggests that regeneration in 'new' areas is a given. Under principles of sustainability, appropriate development should be confined to areas that are already developed, and in general to the central areas of towns and cities, which form the natural hubs of transport systems. In this sense, existing transport systems should guide the programme of regeneration or development rather than the other way around. One of the major problems of large-scale commercial development on brownfield sites on the urban periphery is that these then generate significant new travel needs. When they were industrial sites they would have more likely had their own transport systems (e.g. railway sidings, workers' bus services), but as commercial centres are more likely to be attractive to those with access to private cars given the diffuse nature of their catchment.

The whole question of rural transport development is intimately linked with questions of how we perceive rural development in general. The important issue to be tackled is how we move away from the recent trend to suburbanisation of, and longer distance commuting from more and more distant rural areas. This trend would need to be tackled by coordinated policy regarding transport, planning and demand management certainly at UK, if not EU level, to avoid the phenomenon of areas out-competing each other to be car-friendly or to allow easy commuting from attractive rural environments.

Spending, then, should be concentrated on existing systems (which can include specific and incremental improvements) and should be demand rather than development led.

**CONSULTATION QUESTION 7.**

***What further steps need to be taken in Scotland to facilitate the development of international connectivity both by air and by sea?***

The Executive should get rid of the Air Route Development Fund. In the context of uncontrolled expansion of air travel, and the massive environmental impacts of that mode of travel, the Executive is simply pouring oil on the flames. Action should be focussed on modal shift (as per the Executive's proposed NTS 'goal') from air to rail.

**CONSULTATION QUESTION 8.**

***Do consultees consider that there are issues relating to cross-border connectivity by rail and road, and within devolved competence, that the Strategy should consider?***

The motorway network from Scotland to England – the rural M74 – is open and complete. The Scottish Executive should take action to ensure that traffic is routed on to this route rather than use other routes. This should be specifically the case with road freight because of the massive road damage costs that the industry inflicts. For trips to England, the natural geography of Scotland means that all lorry routing should be via A9/M73/M74 rather than using the Forth Road Bridge and A1/A7/A68 (the exception to this rule is freight trips from Fife/Lothians to north-east England, where are in any case small in number).

We are broadly in favour of the provision of high-speed rail between the Central Belt, London and the Channel Tunnel. However, as there seems little prospect of this being implemented in the near future, further action must be taken to improve line speeds, and reduce journey times, on the East Coast Main Line and West Coast Main Line.

**CONSULTATION QUESTION 9.**

***What view do consultees take on whether there is a need for a faster Scotland to London rail service, to provide an alternative to flying in the long term?***

Yes. See our answer to Question 9 (second paragraph).

However, we would also raise some concern as to the environmental impact of high-speed rail. Some research has found that increasing maximum rail speeds much beyond 200km/h comes at the price of increasing greenhouse gas emissions and diminishes the environmental case for rail (given the current generation mix). Furthermore, business cases for high-speed rail networks elsewhere have been made on far higher traffic – and population – densities than those in Scotland. Therefore, a more sustainable strategy would be to continue incremental increases in the existing rail links, upgrading a greater proportion of track to 200km/h capability and manage air traffic demand through measures to create more realistic pricing structures with regard to environmental impact.

**CONSULTATION QUESTION 10.**

***How do we ensure that all local authorities spend their Grant Aided Expenditure allocation for local roads on local roads? Do consultees think anything more needs to be done to ensure appropriate management, maintenance and operation of the Trunk Road Network?***

We have no views on this matter.

**CONSULTATION QUESTION 11.**

***What are the issues relating to the management and maintenance of the road and rail networks over the long term that the Strategy should address?***

We have no views on this matter.

**CONSULTATION QUESTION 12.**

***What should the NTS say about freight, bearing in mind that a freight strategy is under development? In particular, what should the NTS say about meeting the different needs of freight and passengers on the road and rail network, and how to balance these competing demands?***

Road freight is likely to remain the main freight mode for the foreseeable future, but policy must focus on minimising the need for freight trips (through more local production and distribution networks), and minimising the impact of remaining freight mileage. As a rule, freight should pay for its external costs: the freight industry imposes heavy costs on others, especially in terms of road damage, emissions, and road crashes.

In particular, strategy needs to address 'trunk flows' of freight which are currently carried by road and how these can be transferred to the rail network, which is better suited to large freight flows over long distances.

**CONSULTATION QUESTION 13.**

***What, if anything, should the NTS be saying about skills, bearing in mind the leading role that the Sector Skills Councils have in reducing skills gaps and shortages in the public and private sectors and the role Transport Scotland has in promulgating good practice across the industry? Is it right to integrate skills issues into the NTS?***

Skills are important in the transport sector, not only from a perspective of making public transport more attractive through better customer relations, but also through higher skill levels in the operation of the network, both at the level of better driving leading to lower overall fuel consumption and of management leading to less unnecessary mileage.

**CONSULTATION QUESTION 14.**

***Bearing in mind that investment in new transport infrastructure is not covered in the NTS, as it will be addressed in the forthcoming Strategic Projects Review, what specific steps, if any, does the NTS need to set out to support tourism?***

Tourism needs to be supported so that it does not become entirely dependent on touring by private car. NTS can assist both in contributing to urban areas becoming more attractive and allowing development of tourism in these areas (particularly outside Edinburgh) and in creating a transport system throughout Scotland which is both comprehensive and easy to use and will present an attractive alternative to travelling by private car. There is also the question of demand management in areas of congestion. Charges could be levied in order to discourage bringing cars into the country, but that is beyond the Executive's current responsibility.

**CONSULTATION QUESTION 15.**

***What are the key barriers to developing effective Demand Responsive Transport and how should they be overcome? For example, legislative, regulatory or operational barriers?***

DRT – with the exception of taxi systems – has consistently failed to play any viable role within the 'mainstream' transport system. It has had some success in providing limited transport niche needs, mainly focussed around the needs of the severely mobility impaired – but requires heavy subsidy. This could be improved through better coordination with closely linked transport needs such as community or hospital transport. There are also areas that are dependent on taxis and some support could be given to establishing shared taxi schemes and improving the quality of vehicles used, particularly in rural areas.

**CONSULTATION QUESTION 16.**

***Where are there examples of particularly good practice in demand responsive transport?***

We have no examples to suggest.

**CONSULTATION QUESTION 17.**

***Is accessibility planning something that should be considered for local or regional transport strategies in Scotland? If so, should it be compulsory, or (as at present), one of a suite of possible approaches?***

Yes, and Yes.

**CONSULTATION QUESTION 18.**

***How can we improve the accessibility of public transport to disabled people? For example, how far should concessions be extended for disabled people?***

From the Disability Discrimination legislation enacted by the UK government, accessibility is gradually spreading throughout the mainstream public transport system with low-floor buses and no-step access to stations. This is something that should be pursued alongside efforts to improve public transport in general and bus services in particular. As far as concessions are concerned, we already have Scotland-wide free travel on buses, although some concessions on trains (outside Strathclyde) would be desirable.

**CONSULTATION QUESTION 19.**

***How do we make sure that transport operators and drivers follow best practice in dealing with older people, with disabled people and other groups who may have difficulties with transport? For example, should it be a condition of funding that such best practice is demonstrated?***

This is a question of improving skills and is dealt with under Q13 above. We are unsure how the latter point would be enforceable for the bus industry – where most services are not state-funded.

**CONSULTATION QUESTION 20.*****What more could be done through transport means to tackle social exclusion in rural areas?***

Developing rural transport is closely allied with questions of rural development as a whole (see also Q6 above). The question should not just be of how to best facilitate transport in rural areas, but how to couple that with opportunities which do not involve rural dwellers having to commute long distances and recent trends towards suburbanisation of rural areas.

**CONSULTATION QUESTION 21.*****What do we need to consider in reflecting on the future of the lifeline air and ferry network?***

There needs to be careful consideration given as to how this network operates given the low levels of usage and environmental impact of planes and ships travelling empty. As with very rural areas of the mainland, support could be given to investigating the feasibility of integrating some demand responsiveness into networks to avoid unnecessary mileage.

**CONSULTATION QUESTION 22.*****What more should be done to ensure that there are connections from outlying estates to towns and cities?***

This again relates to how investment should be led. Where there is potential demand, investment should be made, possibly in fixed systems. However, there are examples (such as in Greater Easterhouse) where the population of peripheral housing schemes has collapsed spectacularly and until such times as considerable new development takes place there is no justification for anything more than a bus service, improved to levels that are desirable across the urban area.

**CONSULTATION QUESTION 23.*****Are there any specific areas or events in Scotland where transport particularly well or particularly poorly supports access to cultural opportunities? Are there any specific societal groups disproportionately disadvantaged in accessing cultural activities because of transport issues?***

The main problem with cultural events is that they create large traffic flows, from disparate sources, on a one-off or intermittent basis. For this reason, providing large cultural venues in isolated locations is bad practice from a sustainability perspective. Large cultural events should be, wherever possible, co-located with other economic, social and cultural activities in centres that are likely to already be hubs on the transport network.

**CONSULTATION QUESTION 24.*****Should travel plans be required of all "larger" employers? If so, how should we define "larger" and should Travel Plans be required of all public bodies such as local authorities and Health Boards to show public sector leadership on this issue?***

All employers should be required to produce travel plans showing how their employees will travel for employment purposes: it should be standard practice when taking on a new employee. Travel plans for public sector employers should be a matter of urgency.

**CONSULTATION QUESTION 25.*****What should the relative roles of the Executive, regional transport partnerships and local authorities be in increasing the uptake and how might it be ensured that travel plans required of developers under the planning system are systematically enforced?***

The Executive needs to formulate clear policy: that planning permission will not be granted unless travel plans are formulated both for the development phase and for the users of the completed development. The local authorities, as the planning authorities, need to ensure that this rule is adhered to while the RTPs would assess travel plans and ensure that they are effective. There would also be a need for some policing, which could be carried out by the local authority or the RTP, and punitive measures for non-adherence, which would be within the Executive's remit.

**CONSULTATION QUESTION 26.*****Should we be investing in "smart measures" to promote modal shift? If so, what degree of investment is required; what measures are most effective; and what should be the role of the Scottish Executive (for example, promotion of the concept, sharing best practice, running a scheme or funding others to run a scheme)?***

Yes: research has shown that measures to promote efficient travel at a small scale can have a significant impact on greenhouse gas emissions within a short space of time.

**CONSULTATION QUESTION 27.**

***Is there a need for a single national travel awareness "brand" that the Executive, RTPs and local authorities could all use? If so, what should it be?***

No: in fact, some diversity of regional and urban transport brand identities may improve identification with the (public) transport system as 'ours'. Much of this has been lost in the corporatism that has followed privatisation.

There is also already the 'TravelWise' brand, which could be expanded/refocussed/rebranded as necessary.

**CONSULTATION QUESTION 28.**

***We want to promote walking and cycling as healthy, sustainable ways to travel - what more should be done in this regard?***

Enforce existing legislation and regulations for car use: e.g. speeding, dangerous driving, illegal parking.

More funding: see our comments above (in second part of this paper).

Setting the default speed limit in urban areas as 20mph (and lower, as in the case with Home Zones, for residential areas).

Change design guidance to favour the safety and convenience of travel on foot over travel by car.

**CONSULTATION QUESTION 29.**

***How can the NTS maximise its contribution to improving the health of the nation?***

See our answer to question 28: that is, by treating walking and cycling as serious modes of transport to be incorporated into everyday activity, rather than specific leisure pursuits.

**CONSULTATION QUESTION 30.**

***How do we make buses more attractive for people to use, and therefore allow them to make the choice to take the bus rather than using their car? How do we ensure that the quality of the travelling experience is made a priority by bus operators?***

Bus services need to be reliable: potential passengers need to have confidence that the bus will arrive, even where traffic levels do not justify a 'turn-up-and-go' service and technology has a role to play in providing this information. Moreover, the quality of information needs to be good – something which is variable with current systems (including computerised systems). There also needs to be a perception that bus services are safe, with greater coordination between police and transport operators. In addition, greater pressure needs to be brought to bear on operators to provide a service of a particular standard.

**CONSULTATION QUESTION 31.**

***Is there a need for change in how the bus industry operates, or are the current arrangements working? If so, what should this change be?***

There is certainly a case for overhauling the current regulatory set-up to avoid the perception that routes can be abandoned 'at the drop of a hat', and that bus routes are operated (or not) without regard to social issues.

**CONSULTATION QUESTION 32.**

***How do we make rail more attractive for people, and therefore allow them to make the choice to take the train rather than use their car?***

Again, quality information is important in allowing people to make the choice. This is easier within a railway system, however, and is already more widespread. Otherwise, there needs to be greater integration and coordination between bus, rail, ferry and even air transport in order to allow the traveller to feel that they are able to make a single journey rather than a series of stages.

**CONSULTATION QUESTION 33.**

***What else should be done at a national level to support improvements in travel information? How do we capitalise on the potential opportunities created by new technologies - such as 3G mobile phones - to improve the provision of travel information?***

Developments in information via the internet or mobile phone networks seem to be pressing ahead: there is a greater need to address information for those who do not have access to these facilities.

**CONSULTATION QUESTION 34.**

***Do you consider that we need to change the cost of public transport fares and, if so, what changes should be brought in?***

Priority needs to be given to increase the price of private transport, rather than decreasing the price of public transport. The evidential base shows that the main problem is the decreasing price of private transport use, expenditure on public transport being stable as a component of average household income.

'Average' income is however a rather blunt measure, and many on low incomes have been faced with the double penalty of decreasing availability of public transport services (as people switch to private car use and/or government removing services) and increasing prices relative to the price of car use. This is why we suggest the introduction of 'social inclusion audits' (see our comments in the second part of this paper).

There is also a case for a national fares structure, like that which exists in the Netherlands, so that fares do not vary wildly from one area to another and that the individual has a clear idea of where the cost of their travel comes from.

**CONSULTATION QUESTION 35.**

***If you support lower fares, would such reductions need to be funded by tax revenue, or are there schemes which consultees consider could pay for themselves through modal shift (i.e. because more people would be travelling, albeit paying somewhat lower fares)?***

Lower fares could be funded by revenues raised from road pricing.

There could also be some lowering of fares through elimination of (subsidised) competition between bus and rail.

However, if more people are to be encouraged to use public transport – and there is to be no increase in the price of motoring – then revenue support from taxation will be required.

**CONSULTATION QUESTION 36.**

***How can we promote integrated ticketing between different operators?***

Operators in Scotland already have experience of participating in an extensive multi-modal ticket scheme in SPT's Zonocard. Lessons can be learned from Zonocard with regard to revenue split, but Smartcard technology, which would be used for any nationwide scheme would be able to give a much more accurate picture of travel, without the same surveying and policing to avoid fraud. If there was a system in place to protect operators who run profitable routes, participation in the ticket could be part of the 'quid pro quo'.

**CONSULTATION QUESTION 37.**

***How do we promote additional modal shift from road freight to rail and waterborne freight?***

See Q12 above. There needs to be a complete change to the regulatory environment for freight transport.

**CONSULTATION QUESTION 38.**

***How do we ensure that people are safe, and feel safe, on public transport, at stations and bus stops, and while travelling by foot, bike or car? For example, what needs to be done to tackle anti-social behaviour on public transport and on our roads?***

*For public transport, good lighting at stops and stations, elimination of 'dark corners' and CCTV can all contribute to feelings of safety. Also, investment in technologies that give real-time information and avoid travellers from having to hang around for long periods. Staffing of stations at quiet periods and having linking bus services wait for the train at the station could also help. There needs to be better coordination between police and transport operators to tackle on-board anti-social behaviour.*

For walking and cycling, the best deterrent is to encourage more people to do it. Beyond wider measures to curb anti-social behaviour in public, the best way to make people feel safer is to make sure there are more people around.

People in cars tend to feel safe – it is one of their biggest attractions. This is despite the biggest single danger to all users of the transport system being car drivers.

**CONSULTATION QUESTION 39.**

***Within a UK market, what, if anything, should Scotland specifically do to promote the uptake of biofuels?***

Encouraging businesses based on the production of biofuels is one area where the Executive could have influence. Greater availability of biofuels is one way to get people to use them. See also Q40 below.

We would not however support public investment in biofuels unless there was clear evidence that the overall energy balance was of substantial benefit. We would certainly have concerns over finance available for investment in Scottish transport instead being used to subsidise inefficient production in the agricultural sector.

**CONSULTATION QUESTION 40.**

***Where are the commercial opportunities for biofuels in Scotland? What, if anything, is the role for the public sector in supporting commercial biofuels developments? Are there down-sides of an increased bio-fuel market in Scotland?***

We accept there may be commercial opportunities both for the growing of material and processing of biofuels in Scotland. However, biofuels do not obviate the need to reduce emissions from transport. The growing and processing of biofuels requires energy and the growing alone needs intensive agriculture which may not be beneficial. The public sector could agree to fuel its vehicles (where practicable) and support the industry. However, the use of biofuels could send out the wrong message: that it's OK to burn oil because we're now getting it a different way. Carbon neutrality is an extremely problematic area.

**CONSULTATION QUESTION 41.**

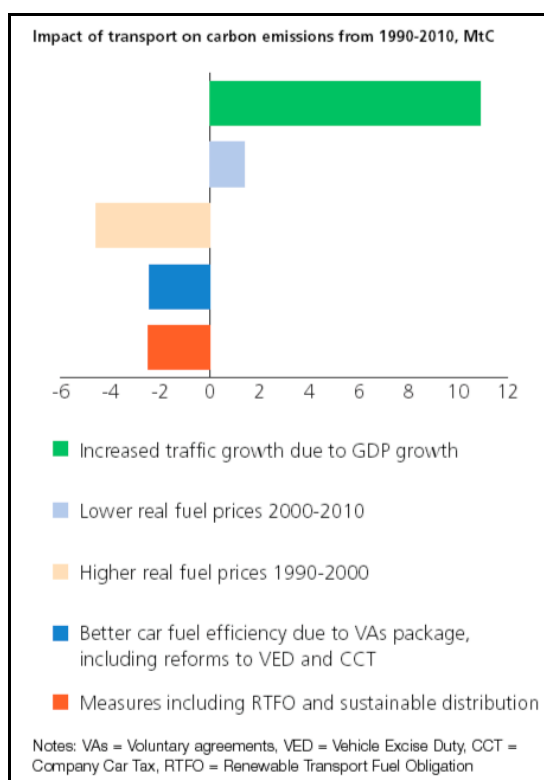
***Within the context of a UK regulatory framework, what more, if anything, should be done to make motor vehicles in Scotland cleaner to run?***

We have no views on this matter.

**CONSULTATION QUESTION 42.**

***Where are the potential gains in terms of new transport technology in Scotland? How do we capture the potential economic benefits of developing them in Scotland? What, if anything, is the role for the public sector in supporting the development of such new technologies?***

Technology has a role to play, but will not provide a solution to climate change emissions in anything but the long-run. As acknowledged in the UK Climate Change Programme (March 2006, p. 63), see graph below, all current technology interventions are outweighed by impacts due to traffic growth:



We would accept that there is longer-term potential for a switch to hydrogen-powered vehicles (although some research indicates that water-vapour emissions at the levels required to sustain current traffic volumes may have a detrimental environmental impact). However, this remains some way off and in the meantime we would be better off pursuing tried technologies such as electrifying public transport (using renewable sources) and moving freight from road to rail. The public sector could actively support these efforts.

**CONSULTATION QUESTION 43.**

***What needs to be done to ensure that parking policy - on-street parking, bus and rail park and ride and so on - is more effective in managing demand and promoting modal shift?***

First of all, parking regulations need to be properly and universally enforced. Cycle lanes, bus lanes, bus stops, even pavements and pedestrian crossings are constantly fouled by illegally parked cars. A persistent lack of enforcement has meant that drivers now believe this to be their right, and will be difficult to turn back. Secondly, there needs to be a widespread system of parking and permit charges in urban areas, bolstered by road charging in specific places. Finally, park and ride needs to be encouraged, but with great care: there is evidence that these schemes (particularly those with dedicated bus routes) substitute all-public-transport journeys for part-car ones.

**CONSULTATION QUESTION 44.**

***How might park and ride schemes best be developed to further encourage modal shift and reduce congestion? How should enhancements be funded and what should pricing policies be?***

See Q43 above. P+R – in the form of special bus services linking outer car parks and town centres - does encourage modal shift: but some of that is from the other public transport routes in the area. The objective should not be to reduce congestion at specific points or on particular routes, but to encourage an overall shift from private to public transport.

**CONSULTATION QUESTION 45.**

***Should we pilot new approaches to improving demand management on the trunk road network? If so, which approaches should we pilot (for example, bus priority measures, multiple occupancy vehicle and heavy goods vehicle preference, metering, more park and ride) and do you have any views about where and when they should be piloted?***

Yes to all. But not just “pilot” – you should *implement* them. Get on with it, don't just discuss it.

In the short-term, it would be helpful if you would instruct Transport Scotland to implement demand management measures on the M8 Baillieston-Newhouse. Transport Scotland has failed to incorporate the demand management measures called for in the CSTCS Ministerial Decisions of January 2003 – see our objection at <http://www.transformscotland.org.uk/info/news/2006/2006-05-13.html>

**CONSULTATION QUESTION 46.**

***Given the difficulties in managing demand for road space by other means, do consultees agree that, in principle, national and/or local road pricing in Scotland could be an effective way to manage demand?***

Yes.

**CONSULTATION QUESTION 47.**

***Does the Executive need to do more to build support for road pricing? Should there be funding made available to local authorities and regional transport partnerships which wish to promote local/regional road pricing schemes. If so, what model should be used to provide such funding?***

Yes and yes.

The Executive needs to give a clear financial incentive to local authorities / RTPs – e.g. the match funding of any revenues raised.

**CONSULTATION QUESTION 48.**

***What should be the objectives of any future national road pricing scheme? For example:***

- ***Should it primarily be concerned with cutting congestion levels?***

No.

- ***Or should it also reflect environmental concerns about CO 2 and other emissions?***

Yes.

- ***Should it be a means by which, in Scotland, we try to achieve our aspiration of stabilising road traffic volumes at 2001 levels by 2021 (see Chapter 4)?***

Yes.

- ***Should it aim to reflect better the true cost of motoring (including the costs to other people, the economy and the environment), or should it cost about the same to drive overall as at the moment?***

Yes: the price of motoring will have to rise in order to encourage habitual drivers to seek alternatives.

**CONSULTATION QUESTION 49.**

***If there were no UK-wide national road pricing scheme, should a Scotland-only scheme be considered?***

Yes: you're a devolved government, act like one!

**CONSULTATION QUESTION 50.**

***Do consultees support the inclusion of surface transport in any future CO2 emissions trading mechanisms? What impact could this have on transport's emissions of CO2?***

We have no confidence in emissions trading as a solution to climate emissions.

**CONSULTATION QUESTION 51.**

***What more, if anything, needs to be done to ensure that transport considerations are taken into account in the location decision, for example of health services and schools?***

Transport should be central to location decisions about all development. Unfortunately, the evidence on the ground does not support that this is presently the case.

**CONSULTATION QUESTION 52.**

***What contribution can broadband and flexible working practices make to reducing individuals' need to travel? What else should be done to reduce the need to travel?***

Electronic networks have promised the end of the need to commute for decades, and yet we now travel more than ever. The potential of this is impossible to calculate. Ensuring that communities are developed along sustainable lines with access to local services without the need of a car would be a more reliable way of reducing the need to travel.

**CONSULTATION QUESTION 53.**

***We are tackling road safety and are on track to meet our targets. But is there more that should be done at the national (rather than local) level?***

Better enforcement of existing traffic speed limits.

**CONSULTATION QUESTION 54.**

***What more can be done to make our streets safer and more pleasant places to be?***

Encourage more people to be on them on foot.

**CONSULTATION QUESTION 55.**

***What issues should be considered in implementing the NTS following its publication later in 2006?***

Ensuring that investment decisions flow from the objectives of the NTS – and not just the short-term priorities of short-termist politicians.

**CONSULTATION QUESTION 56.**

***Do consultees consider that "traffic intensity" is likely to be a useful overall indicator of our success with the forthcoming NTS? If not, what alternative(s) would be preferable?***

No: it is neither meaningful nor readily understandable. (Compare with a road traffic level target – which is easily understood.)

We would agree that the decoupling of economic activity from traffic levels is a welcome aim of transport policy. However, we would not agree that decreasing "traffic intensity" is in itself sufficient, as it only gives information about the rates of growth (/decline) of the two measures (i.e. GDP and traffic levels), and says nothing about their absolute values.

It is possible to construct a scenario where there is high rates of GDP growth as well as high rates of traffic growth - but at a marginally lower rate than the former - and therefore meet the target of reducing traffic intensity - but with continued and worsened social and environmental impacts.

A traffic intensity indicator would only meet the condition that we set - absolute reductions in traffic levels - if the response to GDP growth was a *decrease* in the traffic intensity indicator.

**CONSULTATION QUESTION 57.**

***Are the indicators outlined for each transport goal useful? If not, what alternative(s) would be preferable?***

Indicator 8 is completely unsatisfactory: blindly aiming at reduced journey times could well act to increase the need for travel, and increase 'traffic intensity' (as defined in the strategy).

**CONSULTATION QUESTION 58.**

***Are consultees content that the target of quadrupling cycle use should now be reviewed? What, if anything, might replace it (for example, local authority-level targets on the DfT model)?***

No. The Executive should have clear targets for increasing cycling as a means of transport. There should be local authority input as some LA areas are more suitable than others.

**CONSULTATION QUESTION 59.**

***Are there other measures which should be considered in Scotland which would move us towards the target to stabilise road traffic volumes at 2001 levels by 2021, recognising that significant fiscal measures would have to be agreed by the UK Government?***

Beyond road pricing and parking restrictions, steps should be taken at UK level to move from a 'fixed cost' (i.e. vehicle excise duty) to a 'pay as you go' (fuel duty) model.

**CONSULTATION QUESTION 60.**

***Do consultees agree with the proposals to:***

- ***Continue to have stabilisation of road traffic as a high level aspiration;***

No. It should be a key target of the strategy. "High level aspiration" suggests to us that you have no intention of taking action towards meeting it.

- ***Use indicators measuring modal shift to measure how our modal shift policies are working; and***

This seems pretty much self-evident.

- ***Redirect our efforts more clearly at the environmental and congestion issues which underpin the traffic stabilisation aspiration, by:***
- ***Considering new transport-related target(s) for CO2 (see further below); and***
- ***Continuing to monitor congestion trends on our trunk roads as at present, and considering what further measures might be required.***

Transport-related CO2 targets are important, but so is the need to shift from private to public transport and away from increasingly long-distance commuting. The best way to assess this is through the continuation of road traffic stabilisation (and reduction) targets.

**CONSULTATION QUESTION 61.**

***Do consultees have any views on the idea of a move to regional traffic reduction targets in place of a national target?***

Both should exist, as certain areas, particularly in the Central Belt, have a more acute need for traffic stabilisation and reduction than others. However, it should be within a Scotland-wide framework.

**CONSULTATION QUESTION 62.**

***Given the difficulties with the national traffic stabilisation aspirational target, do consultees agree that realistic, deliverable milestones towards its delivery cannot be put in place at present?***

No, absolutely not.

**CONSULTATION QUESTION 63.**

***Do consultees agree that setting a level of contribution for reductions in Scotland's CO2 emissions which are directly linked to the impact of our policies in areas which are devolved would be the best measure of the Scottish Executive's effectiveness in tackling transport emissions?***

While this might seem reasonable, the Executive (along with all other governmental authorities) should be taking disproportionate action to reduce their emissions profile. To restrict measures to those within the Executive's competence would simply open the door to passing the blame from one authority to another. If targets are exceeded in Scotland – in consort with any measures taken by the UK government – that is no bad thing.

**CONSULTATION QUESTION 64.**

**What specific reduction level(s) for CO2 should be put in place for transport?**

This should be in accordance with UK and Scottish targets in the respective climate change programmes – with the 60% reduction by 2050 as the key long-term target.

**CONSULTATION QUESTION 65.**

***Do consultees have any views about the timing or scope of reviews of the NTS?***

Regular reviews of NTS should take place: at least once in every parliament. It should take place as near to mid-term as possible – maybe even on a fixed schedule - to avoid political scaremongering and expediency.

### **About this report**

This report represents TRANSform Scotland's response to the Scottish Executive consultation on its National Transport Strategy.

### **About TRANSform Scotland**

TRANSform Scotland is the national sustainable transport alliance, campaigning for a more sustainable and more socially-just transport system. Our membership includes bus, rail and shipping operators, local authorities, national environment and conservation groups, consultancies and local transport campaigns.