

TRANSform Scotland

the campaign for sustainable transport

Shetland Transport Strategy Consultation Draft – November 2006

Consultation response

26th January 2007

1. Summary of comments

- 1.1 TRANSform Scotland is the national sustainable transport alliance. We campaign for a more sensible transport system, one less dependent on unsustainable modes such as the car, the plane and road freight, and more reliant on sustainable modes like walking, cycling, public transport, and freight by rail or sea. We are a membership organisation bringing together rail, bus and shipping operators; local authorities; national environment and conservation organisations; and local environment and transport campaign groups. TRANSform Scotland also has individual supporters.
- 1.2 Whilst we welcome certain aspects of the strategy, it does not set out a programme of measures which would assist in delivering reductions in climate change emissions, either to meet Scottish Executive National Transport Strategy and Change Change Strategy objectives, or even to meet the Shetland Transport Partnership's (STP) own environmental objectives. Shetland's climate emissions may be small on a global scale, but it is unacceptable for STP to indicate that it will not contribute to the required cuts in emissions.
- 1.3 The strategy is incoherent in as much as it sets out an objective of reducing emissions, whilst also setting out a programme of expanding subsidies for air travel – well recognised as the mode of transport which is most damaging to the environment.

2. Appraisal of Options

- 2.1 We find the Strategic Options Overview (§4) to be unclear. We certainly find it strange that SPT's 'Aspirational' strategic option fails to perform well against its own vision and objectives. The usefulness of this appraisal is questionable given that options are scored against unquantifiable and often vague objectives. Given this framework, it is unclear as to how a strategy option can be improved to better fit STP's objectives.
- 2.2 In particular, we are disturbed that *all* strategic options modelled result in significant adverse impacts on the environment.
- 2.3 This would suggest that all strategic options considered run in conflict with Principle 1: Sustainability (§3.3), damage chances of meeting some or all of the Environmental Policy Objectives (§3.11), and lead to the damaging of the "unspoilt and unique environment" that is recognised in the strategy as Shetland's "greatest asset" (§2.4). As such, it would suggest that all of the strategic options considered are self-defeating.

3. Climate change

- 3.1 We welcome the strong commitments to environmental protection as set out in §3.11, and the inclusion of 'Sustainability' as Principle 1. However, we are unsure how this objective will be met when all strategic options considered have been acknowledged to damage Shetland's environment (see above).

- 3.2 In particular, we welcome the commitment to reduce greenhouse gas emissions (§2.13, §2.14, ENV 1]. It is imperative that all transport strategies take steps to reduce their reliance on fossil fuels.
- 3.3 We are however disturbed by the dangerous complacency that the strategy demonstrates when it says that:
- “the amount of carbon produced (by Shetland) is relatively insignificant, and the impact of changes in Shetland transport system would be relatively minimal” [§2.14]
- 3.4 We recommend the deletion of §2.14 from the Strategy. This complacency is also apparent in §2.10(f): while it is possible that increases in car use *may* have limited local impacts (e.g. on levels of toxic air pollution), increases in car use *will certainly* lead to increases in climate change emissions. Greenhouse gas emissions do not vary by location. Carbon emitted in Shetland is as polluting as carbon emitted in central Edinburgh. If everyone was to take this attitude then there would be no chance of tackling climate change emissions globally.
- 3.5 Whilst stating a commitment to reducing greenhouse gas emissions (ENV 1), the strategy gives little practical detail on how it will deliver emission reduction. In particular, there is nothing obviously identifiable within the Outline Implementation Plan (Appendix E) specifically aimed at delivering upon the Environmental Protection Objectives.
- 3.6 The finalised strategy should indicate what reductions in climate change emissions will be achieved as a result of implementing the strategy. In the absence of this, we consider the Strategy to be in complete contradiction to the Scottish Executive’s National Transport Strategy and Climate Change Strategy, and against STP’s own Environmental Protection Objectives.
- 3.7 Finally, we note that §8, ‘Environmental Policies and Mitigation’, makes no mention of climate change. This is a glaring omission.

4. Oil depletion

- 4.1 We welcome the clear recognition of fuel prices as a ‘Key Issue’ in the strategy, and that fossil fuel prices are likely to continue to rise (§2.11). We consider this to be part of a global trend, perhaps explained by energy security issues, but certainly also affected by the increasing scarcity of fossil fuel reserves. The UK oil sector is now past ‘Peak Oil’ and will only continue its decline – only the timescales are up for debate. As such, we welcome the recognition of, and commitment to, renewable energy technologies.

5. Walking, cycling and behavioural change

- 5.1 We welcome the recognition, in §7, of the importance of walking, cycling and interventions aimed at behavioural change.
- 5.2 We specifically welcome the commitment to ‘Smarter Choices’ behavioural change interventions identified at §7.9 (TBC 1 & TBC 2). We look forward to seeing the implementation of Travel Plans for STP, Shetland Islands Council (SIC) and other employers.
- 5.3 This section however suffers from a general lack of detail, features no costings, and is almost completely omitted from the Outline Implementation Plan (Appendix E), where the only obviously identifiable intervention appears to be a ‘visitors’ cycle guide’.
- 5.4 The strategy also omits any reference to the Scottish Executive’s Road Traffic Stabilisation Target as set out in the National Transport Strategy. The finalised strategy should set out how STP will seek to contribute to this target. We would suggest that

'Smarter Choices' interventions would be the best way in which STP can help deliver on this national target.

6. Public transport

- 6.1 We welcome the strong commitments made in §7.44 (PTS 1), §7.45 (PTS 2), and elsewhere, to continue the provision of existing public transport services; we also welcome the commitment to maximum fare levels in §7.56 (PTF 1) and further service improvements, such as expansion of real-time information and other service quality issues (§7.59 – §7.64).
- 6.2 We further support the commitment in §7.48 (PTS 5) to identify where demand-responsive transport services could improve on existing scheduled public transport services.
- 6.3 We note the "difficult[ies] in provid[ing] financially sustainable services due to the overall low numbers of service users" (§7.42). However, we would suggest that this should be used as an argument to justify additional revenue support. In as much as external links to/from Shetland (air, ferry) also carry a "low number of service users", this has not deterred the strategy from arguing for more financial support for these services. As such, the strategy is inconsistent.

7. Revenue funding / Fixed links programme

- 7.1 We note that the strategy asserts that "significant savings in revenue expenditure could principally only be achieved by a programme of replacement of ferries with fixed links" (§4.7).
- 7.2 There is however no explanation within the strategy of the level of revenue expenditure that could potentially be saved. As such, it is entirely unclear from the strategy whether the replacement of ferries with fixed links would represent good value.
- 7.3 We note that §6.5 states that if current tunnelling costs are used, "continued ferry operation is the least cost option over 60 years" (§6.5).
- 7.4 The next section, §6.6, goes on to talk about presenting the "favourable outcomes" from research into potential fixed links. This is rather indiscreet. We would hope that STP would present all the outcomes from such research – and not just the results that would tend to support a prejudged favoured outcome!
- 7.5 The strategy makes no reference to the additional revenue costs that would be incurred through the establishment (and eventual replacement) of fixed links.
- 7.6 There is also no discussion of whether a more appropriate response might be to make appeals to external funders (Scottish Executive, Transport Scotland) for increases in revenue support for the maintenance of ferry services. We note that the strategy is happy to make appeal to external funders for additional funding for revenue support for external air services.
- 7.7 In any case, and within the context of a planned 40% reduction in SIC's capital plan over the next four years (§2.24), there must be considerable doubts over the affordability of a significant capital programme for the provision of fixed links within Shetland – unless the assumption is that funding will come from central government.
- 7.8 We note that the strategy asserts, "Effective lobbying by STP and its partners can help to influence national policy directly affecting Shetland" (§2.18). If it is the case that fixed links would be preferable to ferries, then that case is not made effectively in this document.

8. External Links

- 8.1 The proposal to lobby for the 'Air Discount Scheme' to be extended to visitors (§5.9) runs in conflict with the strategy's Environmental Policy Objectives.
- 8.2 The proposal for STP to lobby for retention and expansion of the Executive's Air Route Development Fund (5.8) is simply bizarre, given that the main impact of the RDF has been the expansion of subsidy for low-cost operators. Does STP really think that Ryanair and EasyJet are going to schedule flights to Sumburgh Airport?
- 8.3 The strategy fails to set out how much extra funding should be spend on subsidising air travel, or the expected impact of this additional travel on Shetland's climate change emissions. It now accepted that air travel produces greater climate change emissions than other forms of transport and that in order to address climate change globally we should be seeking to reduce and not increase journeys by air.
- 8.4 We have no confidence that the policy set out at §5.20 (APS11) will have any significant impact in minimising climate change emissions. The draft strategy presents no information that would back up this proposal.
- 8.5 We note that there is no equivalent commitment to lobby for extra subsidy for visitors using ferry services.
- 8.6 Hence we can only conclude that the strategy is completely biased towards air travel – the very mode of transport recognised as having the largest environmental impacts. As such, we regard this section as entirely misguided, and this presumably explains why the strategy runs in conflict with its own Environmental Policy Objectives.

9. Delivery

- 9.1 The decision criteria set out at §9.6 completely omit reference to sustainability / environmental criteria. This is entirely unacceptable, and in direct contradiction to the National Transport Strategy – which places reduction of emissions as one of its three key themes.

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