

TRANSform Scotland

the campaign for sustainable transport

HITRANS – Regional Transport Strategy for the Highlands & Islands

Draft for consultation – November 2006

Consultation response – 31st 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 We regard this Strategy as a very poor document, and one that presents a strategy completely at odds with national objectives towards delivering sustainable development.
- 1.3 The objectives for the Strategy are badly out of step with Scottish Executive policies, in particular with the Climate Change Programme, the National Transport Strategy and the Executive's Guidance on Regional Transport Strategies.
- 1.4 In particular, the Strategy completely fails to recognise the importance of tackling climate change – despite this being one of three core components of the Scottish Executive's National Transport Strategy. While the Highlands and Islands climate emissions may be small on a global scale, it is unacceptable for HITRANS not to make any provision to contribute to the deep cuts in emission levels urgently required. This Strategy transparently takes the attitude that "someone else can deal with climate change" – and this is simply bad governance on the part of HITRANS.
- 1.5 The vision that underlies this Strategy is badly misguided. It is also frankly depressing for anyone with an interest in sustainable development, and sustainable transport.
- 1.6 The Strategy recognises the poor level of public transport services in the region, and recognises the current high levels of car dependency/reliance, yet chooses to advance a strategy based on making transport cheaper (although it is not explained how) and faster (through a large road-building programme).
- 1.7 Such a strategy is doomed to failure. Prioritising subsidy for private transport is certain to lead to more social exclusion for those who, for whatever reason, do not use private cars: a third of all households. It will certainly lead to more damage to the local environment upon which the Strategy recognises is crucial for the region. And it will certainly increase the impact of the region in terms of its global environmental impact – in particular by increasing climate change emissions.
- 1.8 It is all the more appalling that such a Strategy is proposed in the full knowledge that private transport costs are expected to rise (the Strategy notes this in passing in Table 2.4), and can be expected to rise further as energy security issues worsen (whether through global insecurity or the increasing scarcity of fossil fuel reserves) and the impacts of climate change become more severe. Not only is the Strategy environmentally negligent but unsound on economic grounds.

2. The Strategy Objectives are unsustainable

- 2.1 The first Strategy Objective (§3.3) of “a reduction in costs to the users of the transport network and reduced costs in the movement of goods” is totally unsustainable.
- 2.2 It is widely known – but ignored by this Strategy - that the transport sector does not cover its external costs. It is estimated that road taxation covers only one-third to one-half of the costs private car users and haulage companies currently impose on society and the environment.ⁱ Taking as an objective to further reduce the price of transport will mean increased costs for other people and for the environment.
- 2.3 The second strategy objective (§3.3) indicates that “modernising the road network will be a key objective”. This is totally unsustainable given future increase in car use costs (which is recognised), climate change (which is ignored), and oil depletion (which is ignored). Why is this key objective of “modernising” not applied to rail & ferry networks?
- 2.4 The Strategy recognises how rail services have been allowed to fall behind road transport: Figure 2.3 ably describes how rail service speeds (and hence journey times) are substantially below those for parallel road routes. It is incompatible with sustainable development aspirations that this Strategy should then seek to take as its priority the further prioritisation of the road network.
- 2.5 The proposed interventions from the Strategy (Table 5.1 & Appendix A) represents a long wishlist of projects, with no analysis of their affordability or sustainability. We note that the absence of any meaningful analysis had also been identified as a problem with the voluntary RTP’s strategy (§1.8): it is unfortunate then that little has been done to address this.

3. The Strategy studiously ignores climate change

- 3.1 We welcome the recognition in the Strategy does indicate that for “the future prosperity of the region that the region’s environment is protected” (§2.43). However, there is little if any recognition of climate change throughout the document, for example:
 - 3.1.1 The Scottish Executive’s Climate Change Programme is omitted from list of “national and local policies and strategies” listed at §1.12 and §3.5.
 - 3.1.2 The summary of the “analysis of problems, constraints and opportunities” (§2.47) completely omits reference to climate change.
 - 3.1.3 The environmental ‘supporting outcome objective’ of “Manage the impacts of travel on the region’s environmental assets” (Figure 3.1 and §3.14) is inadequate as it doesn’t consider the impact of the region’s activities on those outside its region: this is especially pertinent for climate change emissions. [This objective is itself exceptionally weak and limited in scope: we would recommend replacing it with “Minimise emissions and consumption of resources”.]
 - 3.1.4 Table 2.4 (‘Environment’) does mention “increase in CO2 emissions”, but only as a consequence of “worsening congestion”. This is incoherent: congestion doesn’t cause climate change, the burning of fossil fuel does. Greenhouse gas emissions do not vary by location. Carbon emitted in the Highlands is as polluting as carbon emitted in central Edinburgh.
 - 3.1.5 Table 2.4: The ‘Problems’ of ‘car ownership’ listed does not include the climate change emissions.

- 3.1.6 Table 2.4: The 'Problems' of 'air services' listed does not include the climate change emissions.
- 3.1.7 §5.3 fails to note climate change as a topic upon which interventions should be appraised. This is totally unsatisfactory.
- 3.2 Nowhere in the Strategy is there an indication of its expected impact in terms of climate change emissions: certainly nothing about the absolute amount expected, but not even an attempt at indicating the direction (i.e. up or down) in emissions expected.
- 3.3 The finalised Strategy should indicate what reductions in climate change emissions will be achieved as a result of its implementation. 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 Programme.

3. The Strategy is deeply biased towards long distance transport

- 3.1 Setting the "first level of the network hierarchy" as long-distance routes (i.e. those that connect more 'Regional Centres and National Gateways') is completely at odds with the transport hierarchy set out in the RTS Guidance.ⁱⁱ Section 45 of the RTS Guidance states that RTPs "should take into account the order of priority for personal travel": walking; cycling; public transport; other motorised modes.
- 3.2 This Strategy, completely ignoring RTS Guidance, starts its analysis with long-distance routes (i.e. those used primarily by the modes low on the Executive's transport hierarchy).
- 3.3 Appraising "functionality" on the basis of how many 'Regional Centres and National Gateways' they connect is entirely superficial, as it provides no information about everyday patterns of travel – frequency, load or need.
- 3.4 It is telling that the baseline/scoping analysis (§2.7) provides no analysis of travel distances. Most travel is local – not long-distance: Scottish Executive research published this month shows that over 40% of all travel is less than 2 miles in distance, and 67% less than 5 miles in distance.ⁱⁱⁱ
- 3.5 The Strategy presents no analysis of this type, instead emphasising long-distance travel. §2.31 notes that travel-to-work distances in the region are over 20km for 14% of people, while the Scotland-wide figure is 10%. This is not significantly different from the Scottish figure, and does not suggest that travel distances in the Highlands are significantly different from the wider Scottish experience.
- 3.6 Table 2.1 does set out the modal share for walking for the region for travel-to-work trips as around 20%. However, the Strategy presents no specific interventions to improve the travel experience for those travelling on foot (or cycle), or to encourage more people to use these most sustainable of modes.

4. Inadequate set of interventions for 'Horizontal Themes'

- 4.1 The section on 'Horizontal Themes' (§§4.33-4.40) is extremely general and superficial in nature. While we welcome some of the aspirations set out here ("promote ... active travel", "improving accessibility and the attractiveness of public transport", "reduce car use, especially on short journeys, and increase average car occupancy"), there is no detailed discussion of the measures that could be put in place to deliver upon these high-level objectives.
- 4.2 In comparison with the list of detailed road and rail proposals set out in Table 5.1, there is almost no detail in Table 5.3. For example, what is meant by 'H30b Travel demand management package'?

- 4.3 With regards to bus and rail services, the Strategy (at §§2.13-2.14 and Table 2.4) describes problems with the region’s bus and rail services, and in particular low service frequencies. Table 2.4 describes a future problem of bus network as a “future thinning out of routes” – yet the Strategy presents no detailed interventions to improve the bus network.
- 4.4 §2.18 goes on to state that ferry services have “poor integration, in terms of information, ticketing and timetabling, with public transport” and that “the frequency on some routes remains poor, sometimes less than daily”.
- 4.5 However, the Strategy presents no detailed plan for addressing these issues, with Table 5.3 H33 & H34 giving only very general headings of issues that could be addressed.
- 4.6 We would note that while §2.19 identifies high ferry fares as a problem, there is no action proposed. At the same time, it talks approvingly of new subsidies for air travel (§2.20). This is both inconsistent and environmentally unsustainable.
- 4.7 We note that Table 2.4 fails to note growth in road traffic levels as a ‘problem’ of car ownership/use: this is a serious omission. 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 HITRANS will seek to contribute to this target. We would suggest that a programme of ‘Smarter Choices’ interventions would be the best way in which HITRANS can help deliver on this national target.

5. Consultation on the Strategy has been inadequate

- 5.1 The Foreword describes the importance of consultation in the drawing up of this Strategy. We would note that our organisation has not been consulted at any point by HITRANS.
- 5.2 It would appear to us from the content of this Strategy that HITRANS has not consulted with bodies concerned with sustainable development. If it has, then it is manifest that the advice HITRANS has received must either have been of very poor quality, or that such advice was entirely ignored.
- 5.3 We note “Partnership representatives will be meeting with a number of key stakeholders to gather views on the draft Strategy over the coming months” (§5.12).
- 5.4 We request that the finalised Strategy publish details of meetings held between the HITRANS board and officials and external organisations in the drawing up of the Strategy.

6. Other comments:

Section	Comment
§2.39	<p>Road maintenance costs</p> <p>This section suggests HGVs have limited environmental impacts – but they do have significant road damage costs (and hence impacts on expenditure). This should be acknowledged in the strategy.</p> <p>The Strategy in general has very little on freight, and almost nothing on modal shift from road freight to rail/sea freight.</p>
Table 2.4	<p>Tourism</p> <p>Table 2.4 identifies a problem for tourism as “limited motorway and trunk road access to visitor attractions and so no Executive commitment to maximising the efficiency of said network”</p> <p>Apart from its garbled logic, the statement does not take account of the Scottish</p>

	Executive's, through Transport Scotland, large and expanding expenditure programme on trunk road maintenance, management, and construction. Total expenditure on the Scottish trunk road network has significantly increased over the past decade.
§4.33	<p>Audit of interventions to provide for walking and cycling</p> <p>Paragraph 45 of the RTS Guidance states that the RTS should take into account "the order of priority for personal travel set out in SPP17: walking, cycling, public transport". Furthermore, Paragraph 47 of the Guidance states that RTS's "should look to expand sustainable transport choices wherever possible."</p> <p>We recommend that all projects put forward for each year's capital plan be audited to ensure that they take full account of cycling and walking - both in a positive sense (i.e. incorporating cycle/walk facilities where appropriate) and to avoid negative consequences (i.e. unintentionally making cycling/walking conditions worse).</p>
Table 5.1	<p>Appraisal of railway safety</p> <p>Appraisal for improvements to rail services to Highland Main Line, Inverness-Aberdeen, and others generally indicate a neutral score for safety. At the same time, all proposed road interventions have been appraised to have a positive score for safety. This is incoherent: the greater safety of rail-based transport networks over road-based transport is one of the key benefits of rail.</p>
Table 5.1	<p>Tain-Golspie rail line</p> <p>We are surprised that HITRANS shows no interest in the provision of a Tain-Golspie (Dornoch) rail line, given the potential that this project has for reducing the peripherality of Caithness, and increasing the long-term financial viability of the retention of the Far North Line.</p>

- ⁱ University of Leeds Institute of Transport Studies (2001): *Surface Transport Costs and Charges: Great Britain 1998* - <http://www.its.leeds.ac.uk/projects/STCC/surface_transport.html>
- ⁱⁱ Scottish Executive (2006) *Scotland's Transport Future: Guidance on Regional Transport Strategies* – see <<http://www.scotland.gov.uk/Publications/2006/03/06145237/0>>
- ⁱⁱⁱ Scottish Executive (2007) *Travel by Scottish Residents: some National Travel Survey results for 2004/2005 and earlier years* – see <http://www.scottishexecutive.gov.uk/Publications/2007/01/12092407/10>

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