

TRANSform Scotland

the campaign for sustainable transport

NESTRANS – Regional Transport Strategy 2021

Consultation draft – December 2006

Consultation response – 7th February 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 inadequate in as much as it fails to set out a convincing programme for reducing climate change emissions from the region. We find the strategy is complacent in this regard, and relies far too heavily upon action at national government level – none of which is certain to happen. We find it unacceptable for NESTRANS not to plan 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”. This is simply bad governance on the part of NESTRANS.
- 1.3 The strategy is fundamentally unsustainable in as much as it is founded upon the deeply misguided, and grossly unsustainable, “Modern Transport Strategy” proposals. We recommend that appraisal instead be carried out upon the set of proposals contained in this strategy – independent of those included in the “Modern Transport Strategy”. The Foreword to the strategy ably demonstrates the unsustainability of the “Modern Transport Strategy” proposals when it explains how funding has been obtained for road-building (AWPR) but has provided only funding for a *feasibility study* for the public transport scheme referred to (Aberdeen Crossrail).
- 1.4 It is all the more appalling that this strategy is proposed in the full knowledge that energy costs are expected to rise (the strategy notes this in passing on page 20), 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.
- 1.5 Nevertheless, we do find some positive aspects of the interventions outlined, and our comments on these are detailed below.

2. The strategy takes a realistic assessment of transport trends

- 2.1 The strategy makes a decent fist at describing transport trends in the region that are negative from a sustainable transport perspective, *inter alia*:

- High levels of car use (p.13, para. 3)
- Increasing modal share for cars (p.13, para. 5)
- High levels of free car parking (p.13, para. 6)
- Increases in the price of public transport compared with car use (p.16, para. 5)
- Low, and falling, levels of public transport use (p.13, para. 7)
- A very low modal share for cycling (p.14, para. 1).

2.2 The strategy also describes some of the forecast negative trends:

- Upwards pressure on levels of car use (p.16, para. 3)
- Continued increase in price in public transport use (p.16, para. 5)
- Increased energy costs (p.20, para. 2).

2.3 Furthermore, the strategy describes the importance of tackling climate change. We welcome the recognition of the "imperative of emissions reduction" (p.16, para. 2), and that the *Stern Report* (and presumably now also the *IPCC Fourth Assessment Report*, published in February 2007) has demonstrated the "need for future transport to be more sustainable and to contribute much lower greenhouse gas emissions" (p.16, para. 2; also p. 20, para. 4).

3. The strategy fails to set out a programme of measures designed to reduce climate change emissions

3.1 While we find the strategy to be realistic in *identifying the problems* that the region faces, we find the strategy to be negligent in its approach to *taking action* to reduce greenhouse gas emissions.

3.2 The strategy makes a number of vague aspirations, for example that "there is a need to ensure that [these trends do] not lead to a consequent increase in road traffic." (p.16, para. 5). What we do not find in the strategy is a programme of action for reducing climate emissions.

3.3 In particular, we cannot support contentions such as "It will be necessary to balance measures to reduce carbon emissions against their impact on connectivity and economic growth" (p. 17, para. 4). What the strategy here in effect says is that climate change is negotiable, but that mobility and economic growth are not. This is nonsense - ultimately, it is the environment that is non-negotiable: try expanding your economy within a destroyed ecosystem!

3.4 The section on aviation growth is particularly worrying. The strategy acknowledges the environmental impact of the aviation sector (p.37, para. 3), and in particular its excessive and growing impacts in terms of climate change emissions.

3.5 However, the strategy sets out no measures to tackle this, other than stating that impacts "need to be mitigated through more efficient aircraft technology and utilisation" (p. 19, para. 1).

3.6 This is a completely inadequate and unsustainable approach. Growth rates in aircraft movements (in recent years approaching 5% per annum) far outstrip what is reasonable to expect from efficiency measures (1-2% per annum at most).

3.7 While we accept that there is a role for efficiency measures in tackling greenhouse gas emissions from aviation, there is *no prospect* of their being able to reduce absolute levels of emissions from the aviation sector, given the current growth rates in aircraft movements.

- 3.8 By proposing no action, NESTRANS is effectively washing its hands of this problem. This is totally unacceptable.
- 3.9 Nowhere in the strategy is there an indication of its expected impact of the strategy 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.
- 3.10 We recommend that the finalised strategy 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.

4. The strategy fails to set out action to reduce road traffic levels

- 4.1 The strategy omits any reference to the Scottish Executive's Road Traffic Stabilisation Target as set out in the National Transport Strategy.
- 4.2 The finalised strategy should set out how NESTRANS will contribute to this target. We would suggest that 'Smarter Choices' interventions would be the best way in which NESTRANS can help deliver on this national target in the short- to medium-run.

5. The strategy is over-reliant on national action on transport, much of which can be put down to wishful thinking on the behalf of NESTRANS

- 5.1 The strategy talks positively about the role of technology (p. 16, paras. 1-3) and economic instruments (p. 16, paras. 4-5) in tackling the negative transport trends identified.
- 5.2 While we strongly support the use of both sets of intervention, in as much as *the strategy presents no action on these issues*, we can consider this as being simply wishful thinking on behalf of NESTRANS. This is especially pertinent given the *decline* in fuel efficiency (i.e. a technological decline) seen in the UK fleet over the past decade, and the complete absence in progress (outside London) in implementing road user charging.
- 5.3 At the very minimum, the strategy should state that it will *lobby for* a UK-wide road user charging scheme.

6. The strategy has an inadequate treatment of the transport hierarchy

- 6.1 Section 45 of the Scottish Executive's guidance on Regional Transport Strategy states that RTPs "should take into account the order of priority for personal travel": walking; cycling; public transport; other motorised modes.ⁱ
- 6.2 In contrast, this strategy takes until page 46 to consider pedestrians and cyclists – we consider that this reflects the priority that NESTRANS affords these most sustainable modes of transport.
- 6.3 The treatment of issues related to walking and cycling is considered only after the strategy has gone through its 'External Connections Strategy' section (long-distance transport), and at the tail-end of the 'Internal Connections Strategy' (which commences with a treatment of the major road network – i.e. mainly for longer-distance trips).

- 6.4 We note that walking, the most sustainable of modes, receives a total of one paragraph in the whole document (page 47, para. 1). This might be appropriate if it was an uncommon mode of transport, but it is in fact the second most common mode of transport.
- 6.5 Most travel is local – not long-distance: Scottish Executive research published in January this year shows that over 40% of all travel is less than 2 miles in distance, and 67% less than 5 miles in distance.ⁱⁱ However, the strategy's analysis of trends provides no analysis of travel distances.
- 6.6 Finally, and most importantly, 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.

7. The section on option generation and appraisal is unclear

- 7.1 This section (p.25-29) appears to present modelling of interventions included in the 'Preferred Package', which is itself in addition to the 'Reference Case' (which appears to the "Modern Transport System" – i.e. including the AWPR). If this is the case, we consider it misleading to present only the results of this additional 'Preferred Package'.
- 7.2 We note that the 'Reference Case' is listed as costing £450-560 million, and that the Preferred Package would cost another £500 million (page 32, para. 3). The strategy is misleading in failing to present the expected impacts of this first strategy, equal and probably larger in scale in terms of financial cost.
- 7.3 We recommend that the finalised strategy (either in the body of the strategy or as an annex) presents modelling of the results of implementing the 'Reference Case' and also the other Packages studied (presumably those listed on p.25).

8. The 'lock-in measures' associated with the proposed AWPR are vague and inspecific

- 8.1 We have no confidence that AWPR will alleviate congestion or journey time unreliability in anything but the short-term (p.11, para. 3).
- 8.2 We note the tacit recognition that the AWPR, in the absence of sustainable spatial planning decision-making, will lead to sprawl: "Land use policy will need to ensure that the increased connectivity provided by the AWPR does not encourage further dispersal of homes and business which would increase car travel" (p. 16, para. 6; also p. 19, para. 4).
- 8.3 Unfortunately, given, for example, the car-dependent sprawl *currently* being constructed on the A90 at Portlethen, we have no confidence that Aberdeen City Council and Aberdeenshire Council are competent at such decision-making.
- 8.4 We note the discussion on page 31 (para. 2), and elsewhere in the document, about 'lock-in measures' to follow the proposed construction of the AWPR.
- 8.5 While we consider that the AWPR will do more damage than create benefit, we are intrigued that the strategy has at least considered this matter.
- 8.6 However, we find no clarity in the document as to what these 'lock-in measures' actually are, and when and how the strategy will implement them. The only concrete proposal we could identify was bus 'Selective Vehicle Detection' which,

whilst welcome, seems a somewhat minor “benefit” of the AWPR (and something that could and should be implemented in any case).

9. The strategy sets out a further expansion of road-building, despite what would be the expected impact of this on meeting environmental targets

- 9.1 We note the “priorities for action” set out in the ‘Internal Connections Strategy’ includes a further list of road construction schemes (p. 39).
- 9.2 Given the overwhelming bias in the “Modern Transport Strategy” (/ ‘Reference Case’) towards road-building, and this strategy’s recognition of the need to tackle climate change emissions, we would have expected that this strategy would have taken a different approach. Instead, we see the same “wish list of pet projects” (p.2, para. 5) trotted out. This is unsustainable: it will reinforce the unsustainable trends that the strategy identifies.

10. The strategy fails to make clear what are its aspirations for railways

- 10.1 We welcome the recognition that “a significant reduction in journey times between Aberdeen and Edinburgh / Glasgow would improve connectivity between Scotland’s three main cities and enable rail to compete more effectively with the car” (p.17, para. 6; also p.35, para. 1).
- 10.2 It is certainly the case that the political establishment has over the last few decades failed to take action to ensure that rail journey times remain competitive with road journey times. This has come about because for a number of reasons, including but not limited to a failure to secure investment in the rail infrastructure, a large programme of road-building, and failings in law enforcement (principally, but not solely, limited to failings in road speed enforcement).
- 10.3 We recommend that the strategy sets out specific aspirations regarding rail journey times on these corridors. The strategy should certainly promote revisions to the Aberdeen-Edinburgh rail timetable that would allow fast services Aberdeen-Dundee-Edinburgh, with limited/no stops in Fife. We would suggest that NESTRANS should aspire to the provision of an Aberdeen-Edinburgh rail service with a best journey time approaching 2 hours (rather than 2 hrs 25 mins at present).

11. The strategy fails to set out a convincing vision for the development of the region’s public transport services

- 11.1 We have no faith in the provision of guided buses (p.42-43), and are yet to be convinced of the merits of “Super Buses”.
- 11.2 The one guided bus route in operation in Scotland (Edinburgh’s Lothian Buses number 22 bus service) has been widely judged to provide little extra benefit over the provision of a segregated bus road. This guided bus route will be removed when the Edinburgh Tram Scheme takes over its alignment.
- 11.3 We note that the strategy describes tram schemes as “prohibitively expensive” and not providing “sufficient return for investment”. On the latter point we would refer you to the final Business Case for the Edinburgh Tram Scheme, approved in December 2006 by The City of Edinburgh Council and due for final agreement by the Scottish Ministers in the near future.
- 11.4 On the former point, we would note that tram schemes have not proved “prohibitively expensive” for the hundreds of towns and cities across Europe that feature them. We would like to see the evidence base upon which this prejudice is

based. Many of the best recent modern tram systems in Europe have been provided in cities with population sizes similar or below that seen in Aberdeen, and have proven successful in transforming the public transport experience found there.

- 11.5 We would have thought that Aberdeen would have aspired to matching the best public transport systems across Europe. This strategy fails to even consider that aspiration.

12. Other detailed comments:

P13, para 1	"Settlements ... are relatively dispersed". What is evidence base for this? Our understanding is the majority of population in the North East is located within urban areas. We recommend the final strategy include statistics on rural/urban location (as seen e.g. in the SESTRAN draft RTS).
P13, para 1	This section talks about car "dependency". We would contend that much car use is actually "reliance" – i.e. choice of other modes is open. This is acknowledged elsewhere in the document, and we suggest the usage of terminology on this matter is reviewed throughout the document.
p.14, para. 2	Here comparison is drawn with Scottish average, where previously (p.13) comparison is drawn with average for urban areas. Why is this changed here?
p.14, final paragraph, second sentence	What is evidence base for this claim? Please state references here.
Ditto	A comparison with Edinburgh Airport is unhelpful: it is a larger airport, serving a larger city and a much larger hinterland in population terms.
p. 20, para. 1	We welcome this – however, specific mention should be made of 'Smarter Choices'.
p. 24 Strategic Objective 2: Environment	This should state "reductions in greenhouse gas emissions".
p. 24 Strategic Objective 2: Environment	This should state "stabilise levels" not "reduce growth". The former is in line with the Scottish Executive's Road Traffic Stabilisation Target contained in the National Transport Strategy, the latter is not. The latter formulation provides for continued traffic growth – which is simply unsustainable, and totally suitable as an 'environmental' objective.
p. 30, Figure 8.1	We consider it somewhat dishonest to include Aberdeen Crossrail within the 'Reference Case' given that no funding has been identified for the project, nor Scottish Executive support been granted.
p.35, para. 4	"North East companies are already disadvantaged by limits on

	<p>drivers' hours":</p> <p>In fact, "North East companies" are only having to obey the law, which we would have thought that the strategy would endorse. We suggest that this section be changed, lest it be taken as an encouragement to law-breaking.</p>
p. 35, para. 5	<p>"River Forth crossing points":</p> <p>An analysis of lorry movement origin and destination statistics, and a basic understanding of the geography of the UK road network, would have shown you that relatively few road freight movements require, for purposes of lorry routeing, to use the Forth Road Bridge.</p> <p>The main road network southwards to markets is principally via the M74, and the strategy should "press for" (same section) North East road freight companies to properly utilise the existing road network, including the provision of the second Kincardine Bridge currently under construction.</p>
p.38, para. 1	<p>We also frankly bamboozled by what the strategy means by "the relaxation of constraints offered by the implementation of the [AWPR]". We recommend that this be deleted.</p> <p>This phrase could be read as being in direct conflict with the various references to controlled spatial planning and the provision of 'lock-in measures' (whatever they may be).</p>
p.38, para. 2	<p>The claim that the AWPR will "reduce traffic levels and emissions" is ludicrous.</p> <p>Is the strategy seriously claiming that the AWPR will reduce greenhouse gas emissions across the region?</p> <p>Is the strategy seriously claiming that the AWPR will reduce traffic levels across the region?</p> <p>If not, then such claims should be deleted from the strategy.</p>
p. 38, para. 7	<p>We note the reference to a multi-modal study of the Aberdeen-Inverness corridor.</p> <p>We note that you style this as a study of the "A96 corridor", which immediately suggests a bias towards roads-based interventions.</p> <p>We also note that the document almost completely fails to address the Aberdeen-Inverness rail line – which we would have thought have formed an important part of any multi-modal story of the Aberdeen-Inverness transport corridor.</p>
p. 39, final para.	<p>HOV lanes: Why not just implement one rather than "triallying"?</p>
pp. 43-44 & pp.49-50	<p>We welcome the proposals on park+ride, real-time information, transport interchanges (including the City Centre Shuttle), travel plans and travel awareness, and demand-responsive transport.</p>

	<p>It is however a shame that these measures are so far buried in the strategy.</p> <p>We would also welcome seeing more specific proposals being brought forward.</p>
p. 46	<p>We welcome the acknowledgement that “pedestrian and cyclist facilities are increasingly incorporated into the design of all transport improvements and news developments.”</p> <p>We recommend that the strategy go further than this and propose an audit of interventions to provide for walking and cycling.</p> <p>Paragraph 45 of the RTS Guidance states that RTSs should take into account “<i>the order of priority for personal travel set out in SPP17: walking, cycling, public transport</i>”. Furthermore, Paragraph 47 of the Guidance states that RTSs “<i>should look to expand sustainable transport choices wherever possible.</i>”</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>
p. 50	<p>We welcome the consideration given to “incentivising bus use through lessening the impact of fares” and look forward to seeing the details of the proposals.</p>

ⁱ Scottish Executive (2006) *Scotland's Transport Future: Guidance on Regional Transport Strategies* – see <<http://www.scotland.gov.uk/Publications/2006/03/06145237/0>>

ⁱⁱ 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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