

TRANSform Scotland

the campaign for sustainable transport

Strathclyde Partnership for Transport – *The Regional Transport Strategy for the West of Scotland 2007-2021* Consultation draft – December 2006

Consultation response – 23rd February 2007

0. Introduction

- 0.1 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.
- 0.2 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 SPT 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 SPT.
- 0.3 We also find the draft strategy to be inadequately ambitious. The last month has seen Greater Manchester, a conurbation similar to Greater Glasgow in many ways, come forward with new regional transport strategy proposals; these have proposed both significant improvements in public transport and the tackling of road traffic growth through the implementation of demand management measures. We see none of this ambition in SPT’s proposed regional transport strategy, and can only conclude that it is a profoundly disappointing document.
- 0.4 Nevertheless, we do find some positive aspects of the interventions outlined, and our comments on these are detailed below.
- 0.5 Our detailed response, below, follows the seven consultation questions set out in the consultative draft.

1. ***“Do the vision, shared goals and objectives identified in this strategy fairly reflect the challenges facing transport in the West of Scotland?”***

- 1.1 The vision is aspirational but outmoded. The addition of the word ‘sustainable’ does not bring the vision into the current context of greenhouse gas emission reduction and concerns about climate change.
- 1.2 The goals also largely fail to address the current agenda. The first of these – to ‘develop the economy’, which in turn prioritises connectivity for business and freight – does not reflect the west of Scotland where there is substantial economic growth, high levels of employment and a growing immigrant community (from the rest of the UK and elsewhere) reflecting the demands of the labour market. The second, to ‘promote social inclusion and equality’ is laudable and a goal we would strongly support. However, the fact that to ‘improve health and protect the environment’ is the third of these goals reflects a lack of priority given to these issues. Environmental concerns (mainly expressed in the desire to reduce greenhouse gas emissions) are the most important for transport at present, while health improvement is

a major priority in the west of Scotland. We feel that the goals do not give either of these areas sufficient importance.

- 1.3 If there are to be both 'goals' and 'objectives', then we would see goals as long-term aspirations with objectives as specific actions that could be undertaken through the strategy. As presented, the objectives merely re-state the goals in a different format.

2. "The strategy contains a series of key interventions. Of these, which best support the strategy in addressing the needs of the West of Scotland?"

- 2.1 The list of interventions is very muddled, and as a result we find it difficult to itemise projects that would support the Strategy as presented. There is a continued addiction to large-scale capital projects, while we would rather see smaller scale interventions to utilise current infrastructure in the most effective way. In general we would support any proposals which promote modal shift for passengers away from cars and in favour of walking for all the most local journeys, safe and easy cycling throughout the region and public transport for longer journeys and those sections of the community unable to walk or cycle. For freight we would support the development of rail and water transport over roads.
- 2.2 We strongly oppose new large-scale road projects that will encourage road transportation and divert potential investment away from more sustainable modes. Specifically, we are dismayed by the continued support for the M74 Northern Extension and East End Regeneration Route. These schemes are disastrous in environmental terms as they represent a massive encouragement to car use within the conurbation. It is also deeply socially unjust that vast amounts of public funds are found to subsidise car use when 59% of households in the City of Glasgow have no access to a car.
- 2.3 The analysis of the interventions listed is inconsistent. Individual projects are judged on three criteria, of which two correspond to the goals of the strategy (Economic Growth, Social Inclusion) while the other, Carbon Reduction, is far more specific than the vague 'Health and Environment' goal – although this is to be welcomed in itself. There are 49 projects listed. 36, the largest number, are judged to meet the Economic Growth criterion, of which 11 achieve Economic Growth only and a further 11 are justified on Economic Growth and one other criterion. 34 projects meet the aim of Carbon Reduction, of which 3 are Carbon Reduction only and 11 are Carbon Reduction and one other; 23 meet the Social Inclusion criterion, of which 2 are Social Inclusion only and 7 Social Inclusion plus one. Only 14 proposed projects are judged to meet all three criteria. This supports our assertion above that Economic Growth is regarded as the most important aim of the strategy.
- 2.4 However, the individual project analyses are also inconsistent. There are numerous examples of this, and we have chosen the following in particular:
 - 2.4.1 The Glasgow Airport Rail Link is judged to meet all three criteria, and rail access to Prestwick Airport - notwithstanding the fact that this already exists - meets Economic Growth and Carbon Reduction aims. By encouraging air travel these links could be argued to worsen carbon emissions; by primarily benefiting more affluent socio-economic groups any social inclusiveness is questionable (the difficulties of use of public transport by airport shift workers have been widely discussed elsewhere).
 - 2.4.2 Airdrie – Bathgate, Cross-Glasgow rail links and Rail Services Improvements are judged to meet all three aims while Fast Rail Routes to England, Edinburgh and elsewhere in Scotland – all of which have a clear potential for modal shift from road and air (with the exception of Edinburgh) to rail – are judged only to facilitate Economic Growth. Moreover, New Rail Stations and Rail Station Improvements are judged to meet all three, while Queen Street Rail Station Improvements only meets Economic Growth.
 - 2.4.3 Of the all-too-numerous road proposals, all except one are judged only to meet the Economic Growth criterion. The exception, bizarrely, is Bypasses and Relief Roads,

which meet the Carbon Reduction criterion *alone*. Presenting a justification for road projects by meeting a Carbon Reduction criterion seems dubious, if not misleading.

2.4.4 Individual interventions themselves are confused: Development of a Mass Transit Network, Fastlink and Investigation of Bus Rapid Transit are listed separately, while elsewhere in the document they are considered together. Developing an Ayrshire Transport Model and Development of Other Transport Studies cannot be considered 'interventions' in the same way as infrastructure proposals.

2.4.5 Categorisation of projects between 'large', 'medium' and 'small' scale also seems unclear. For example, New and Improved Ferries is classified as 'small'; construction of a major new road, the East End Regeneration Route, is 'medium'; and Revitalising the Subway – which is unlikely to involve large scale infrastructure works – is 'large'.

2.5 Finally, the strategy presents no information as to how these analyses have been arrived at.

3. "Do you agree that our approach to produce a "blended" strategy is the best way forward?"

3.1 We accept that a "blended" strategy will be required to meet various objectives - *but the blend chosen is not the right one*. We have already expressed our concern that greater importance is given to Economic Growth over Environmental and Social aims and at some of the specific interventions.

4. "Are there any interventions not listed which could be added to improve the strategy?"

4.1 We are disappointed by the lack of specific interventions to encourage walking and cycling, which need to be treated as bona fide modes of transport in their own right: the Strategy often lumps them in with public transport. Walking and cycling infrastructure is by its nature the least expensive to facilitate and therefore will typically represent good value. Research has shown that measures to encourage walking and cycling (such as travel plans) are some of the most effective means of reducing greenhouse gas emissions. Moreover, they are the only means of transport which can have a direct impact on the health of the community – something which is vital to the west of Scotland. These are the most sustainable modes of all and should be at the heart of a sustainable transport strategy.

4.2 The finalised Strategy needs to present a coherent policy on road traffic demand management. Specifically, we are disappointed at the low priority given to this, when the previous Issues and Options Report stated that demand management measures are key to fulfilling Economic and Environmental goals and, together with targeted improvements to public transport, are important to Social Inclusion objectives as well. The finalised Strategy, as presented, has moved away from this position. We note with interest that congestion charging is being actively pursued in Greater Manchester – a comparable metropolitan area - in conjunction with improvements to public transport, particularly expansion of the Metrolink system. Greater Manchester proposes a more complex scheme than that in London due to the multi-centred nature of the conurbation. However, the Clyde Valley is far more dominated by Glasgow – the city centre in particular - and is likely to continue to be so, given the content of Glasgow's City Plan. It is quite possible, then, that a simpler scheme akin to that implemented in London (or indeed as previously proposed for Edinburgh) would be appropriate. Arguments of a lack of necessary technology can be countered by the fact that we already have a model for charging, in public transport fares, which are varied by time, location and distance.

4.3 The strategy should present a clear position on the development of the rail network in west central Scotland. While SPT has limited powers over the heavy rail network, there needs to be close co-ordination with Transport Scotland over specific developments such as Whifflet electrification and improvements to East Kilbride and Kilmarnock services, in order that the network is developed as a single entity. SPT has a more direct role in promoting light rail

solutions in Greater Glasgow and there should be a specific strand of the Strategy to address this. At present there is only a vague commitment to investigate "rapid transit" for the conurbation without even being clear as to what form this might take or what routes/corridors are under consideration. The map offered as an appendix is only decipherable to those with a truly comprehensive knowledge of the city and its environs.

- 4.4 SPT must demonstrate a clear commitment to integration between modes and the elimination of unwarranted duplication and competition. This extends beyond proposals to create ticketing across modes, such as the "day Zonocard" and Smartcard proposals. There needs to be an active development of integration of road and rail-based networks where this will result in benefits (primarily faster journeys) for the users. Furthermore, given the sunk costs of providing the rail network, every opportunity should be taken to maximise its use and subsidy for competing services should be eliminated.

5. "What additional powers, funding, delivery structures or other measures are needed to make the strategy successful?"

- 5.1 We would like to see SPT put in place delivery mechanisms for introducing road pricing. Congestion charging has already met with success in London; it is now proposed for Greater Manchester. All funds raised from such a scheme should be used for the improvement of sustainable transport alternatives across the region.

- 5.2 There should be a structure in place to eliminate the current wasteful duplication and competition on the bus network. This should include the facilitation of integration between road and rail. At present, there are a number of corridors where significant competition exists. However, the bulk of passengers are carried by the dominant operator (generally First Glasgow) and, to give credit, investment has been made. However, small low-cost operators "cream off" some of the excess demand on these routes and in so doing operate significantly below optimum levels of capacity, with consequences for congestion and the environment. Also, these small operators largely provide low quality services that degrade the overall quality of public transport.

6. "How can SPT best work with the public and other stakeholders to deliver the strategy?"

- 6.1 Clearly, there is a need to work in partnership with the stakeholders within the transport system. This would include operators, local authorities, other statutory bodies such as health boards and Transport Scotland. Consultation with the wider public is a more difficult area. However, input from specific interest groups, such as those with limited mobility, has already resulted in tangible benefits such as the introduction of low-floor buses and step-free access to stations. Likewise, safety concerns of women and social minority groups have been addressed to the benefit of all users of public transport. The gap lies in provision at the most local level, where measures can be taken to improve communities without resorting to grandiose projects. This is reflected in the lack of attention given to walking and cycling measures in the Strategy.

- 6.2 SPT should also involve TRANSform Scotland in delivery of its strategy – as it has so far failed to do this. Our credentials are set out at §0.1 above.

7. "Do you have any other comments on the strategy?"

- 7.1 Two things jump out. Firstly, that the Strategy spends much of its content discussing itself and how it was derived, but notably omits key information such as how projects were selected and how they were allocated objectives. Given that guidance on the preparation of RTSs is publicly available, we feel that this could have been dealt with more summarily, and as it is, gives the document a feeling of having been 'padded out'.

- 7.2 Secondly, that the Strategy has a number of aims, goals, criteria, projects, etc., which are dotted throughout. These often restate one another but with inconsistencies, resulting in a disjointed document. We have already highlighted a lack of clarity over the Fastlink / bus

rapid transit project, but there are others - such as including Crossrail at one point with cross-city rail links, and elsewhere with mass transit for the conurbation. Even the East End Regeneration Route is variously categorised as benefiting the Glasgow City Region and Regional Urban Centres on different pages. This points to a lack of cohesion and thoroughness in the strategy overall.

- 7.3 The lack of content in the sub-strategies - the means by which the Strategy will be delivered - is very disappointing. We would have expected the sub-strategies to be clearly based on the prioritisation of the proposed interventions but this is not the case. The sub-strategies are at best vague.
- 7.4 We would rather have seen a clear set of aims with the bulk of the content devoted to assessing individual projects in terms of those criteria, thereby arriving at a list of priority projects to be progressed, and indeed those projects which have been suggested but not 'made the grade', so as to give the widest possible indication of the sorts of projects to be pursued. The Strategy fails to do this and continues largely to be an arbitrary wish list of major infrastructure projects.
- 7.5 Finally, and crucially, the strategy does not indicate how it will contribute to the Scottish Executive's Road Traffic Stabilisation Target as set out in the National Transport Strategy.

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