

TRANSform Scotland

the campaign for sustainable transport

TACTRAN – Regional Transport Strategy Draft for consultation draft – January 2007 Consultation response – 16th March 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 The strategy contains a useful analysis of the trends seen across the region, and in particular the range of trends away from sustainable transport – increase in private car use, worsening of the competitiveness of public transport, and many others.
- 1.3 The strategy promotes many useful interventions that will help promote sustainable transport. In particular, we welcome the climate change emission reduction target set in the document. We also welcome many of the measures set out in the field of Smarter Choices, walking and cycling, and the development of public transport.
- 1.4 However, in light of current awareness of the need to take urgent action to reduce climate change, it is very disappointing that the strategy has specifically chosen to prioritise economic development over measures aimed at tackling the unsustainable trends that the strategy so clearly identifies.
- 1.5 In particular, the strategy specifically promotes a number of road construction projects that can only be seen as a specific encouragement to private car use.
- 1.6 In summary, while the strategy identifies many positive interventions, the strategy as it stands is deeply unsustainable from the sustainable transport viewpoint.

2. The strategy takes a realistic assessment of transport trends

- 2.1 The strategy contains a thorough description of transport trends in the region that are negative from a sustainable transport perspective, *inter alia*:
 - A large (relative) increase in the price of public transport compared with car use (§4.2.1)
 - Road traffic growth of 81% over the past 25 years (§4.2.2)
 - A decline in the use of public transport over the same period (§4.2.2)
 - The prevalence of single person occupancy car use (§4.2.3, §4.4.5)
 - Modal shift towards car use for commuting trips (§4.2.5)
 - Decision-making in spatial planning are forecast to worsen road congestion (§2.3.6).

3. We welcome the commitment to reducing climate change emissions

- 3.1 We welcome the specific commitment that the strategy attaches to the importance of tackling climate change. We welcome the recognition of the “need to contribute to reducing climate change / global warming” as being ‘Very Important’ (§4.4.6). The *Stern Report* (2006) and the *IPCC Fourth Assessment Report* (February 2007) have demonstrated the need for transport policy to reduce climate change emissions.

- 3.2 In particular, we welcome the proposed target set out in Table 8.1 to achieve a 10% reduction in greenhouse gas emissions by 2011.
- 3.3 Of course, setting a target is different from achieving this target. We recommend that the finalised strategy set out what less of reduction in climate change emissions will be achieved as a result of its implementation.
- 3.4 Given the strategy's support for new road-building and for increase in the use of aviation we find it unlikely that the strategy in its current state would be able to achieve this reduction in climate change emissions.
- 3.5 While we find the strategy to be realistic in *identifying the problems* that the region faces, we do not consider that the strategy sets out a convincing programme of measures to reduce greenhouse gas emissions.

4. The strategy takes an unsustainable approach by prioritising economic development over the environment

- 4.1 The strategy sets out at §6.2.1 its "preference for delivering regional prosperity" over the alternative strategy priorities.
- 4.2 However, the strategy does not set out a convincing case as to why this has been identified as priority.
- 4.3 Given that the Preferred Strategy does most to promote mobility, and least to reduce climate change emissions, it is in deep contradiction with the commitments highlighted above on taking a responsible attitude towards climate change emission reduction.
- 4.4 We would note that a priority for economic development over environmental protection did not reflect the focus of discussion at the two stakeholder consultation events that we attended.
- 4.5 We recommend that this decision be reversed, and the 'Environmental Sustainability and Health and Well-Being' strategy instead be adopted as the Preferred Strategy. Failing this, we cannot regard the TACTRAN RTS as being in the interests of sustainable transport.

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

- 5.1 The strategy acknowledges the Scottish Executive's Road Traffic Stabilisation Target as set out in the National Transport Strategy (§4.2.4).
- 5.2 However, the strategy then fails to set out a clear programme to contribute to meeting this target, and fails to include road traffic stabilisation/reduction as a target.
- 5.3 We recommend that the finalised strategy specifically set out a target for road traffic reduction, and that this be specified in Section 8. 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; and the implementation of demand management measures in the medium-run.

6. The strategy presents no new interventions on road traffic demand management

- 6.1 The strategy fails to promote any new significant road traffic demand management measures. In particular, the strategy presents no measures to internalise the external costs of transport, e.g. road pricing. Given the massive costs that the road traffic sector imposes on the environment, society and the economy, this is deeply negligent.
- 6.2 At the very minimum, the strategy should state that it will *lobby for* a UK-wide road pricing scheme.

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

- 7.1 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
- 7.2 The strategy sets out a number of welcome interventions on walking and cycling. However, we consider that walking, the most sustainable of modes, still receives inadequate attention in the strategy. This might be appropriate if it was an uncommon mode of transport, but it is in fact the second most common mode of transport.
- 7.3 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 little in the way of analysis of travel distances.

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

- 8.1 We note the 'Roads-Based Measures' includes three major road-building projects: (i) A90 Dundee Outer Bypass (IV_I1), (ii) Tay bridge at Scone (IV_I2), (iii) Stirling outer ring road (IV_I3).
- 8.2 Given the strategy's commitments to climate change emission reduction and the promotion of sustainable transport, these schemes are counter-productive, and should be deleted from the strategy. These schemes are unsustainable, and would only act to reinforce the unsustainable trends that the strategy identifies.

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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