

National Planning Framework 2: Discussion Draft

Response from TRANSform Scotland

Tuesday 15th April 2008

1. Introduction

- 1.1 As the national sustainable transport alliance, our response focuses on sustainable transport priorities and how this can deliver sustainable development in Scotland.
- 1.2 Transport is the fastest growing source of climate change emissions, and as such we consider it essential that NPF2 is guided by and linked to climate change priorities.
- 1.3 While there is much to welcome within the draft, we regard the existing set of 'national developments' as being inappropriate for challenges of climate change and peak oil (which are well described in the document). Instead, we suggest a set of 'national developments' that are substantially more in keeping with sustainable development requirements than that currently set out.

2. The role of sustainable transport in providing for sustainable land use planning and in delivering the Government Economic Strategy

- 2.1 The sustainable transport modes (walking, cycling, public transport, and rail and sea freight) are crucial to delivering both sustainable development and the Government's Economic Strategy.
- 2.2 The 'active travel' modes (walking & cycling) have a crucial role in delivering not only increased public health, but also in reducing costs on the Scottish health sector – principally in terms of dealing with illnesses associated with obesity and increasingly sedentary lifestyles.
- 2.3 The local public transport modes (buses, rail, ferries) has an important role to play in terms of reducing costs associated with traffic congestion. Without the existence of this sector, costs due to congestion on Scotland's roads would be significantly higher.
- 2.4 The longer-distance sustainable transport modes (principally Anglo-Scottish rail, but also to some degree coaches and ferries) provides productivity benefits that are not present in its competitor mode: short-haul aviation.¹
- 2.5 The sustainable transport sector also provides a range of economy-wide benefits. These include regeneration benefits (e.g. better communities, crime reduction benefits, support for local retail), social inclusion benefits (e.g. access to job opportunities for those without access to private travel), and safety benefits (the greater levels of safety provided by passenger transport over private car use).
- 2.6 It is our strong view that it is not desirable on economic grounds (let alone environmental or social grounds) to continue to deliver dispersed, car-based, patterns of development expensive to serve in terms of utilities, facilities, transport, etc. It is certainly not efficient to base development around single-occupant car trips, which unfortunately remains the norm in Scotland. And it is neither environmentally-sustainable nor economically-productive to plan for ever-increasing levels of air transport when this continues to deliver a net drain on the Scottish economy.

¹ See our report *The Railways Mean Business* (2007) for details - http://www.transformscotland.org.uk/info/docs/2007-11-21_The_Railways_Mean_Business.pdf.

3. Some welcome aspects of NPF2

- 3.1 We welcome the identification of climate change and peak oil as key challenges for Scotland (§§81-85, §123).²
- 3.2 We consider that there is a generally fair analysis of the links between transport & land use planning (e.g. §§115-118, §145).
- 3.3 The paper says a number of welcome things on transport policy³ including, but not limited to:
- The need for modal shift to sustainable transport (§199, §§219-221)
 - Making good use of the existing transport asset base (§196)
 - The desire for a decoupling between traffic growth and economic growth (§192)
 - Priorities for investment in the rail network, including:
 - Making good use of the existing infrastructure (§212)
 - The role of Edinburgh Waverley & Glasgow Central as “national gateways” (§67)
 - The Edinburgh-Glasgow Improvement Programme (§250)
 - The overall benefits of electrification (§224)
 - A focus on improving the Scottish inter-city rail network (§213, §215, Map 19)
 - Improvements to Edinburgh Waverley (§214)
 - Consideration of an Inverkeithing-Halbeath cut-off (§215)
 - Improvements to services on the East Coast to Newcastle (§114)
 - Improvements to Anglo-Scottish rail links (§120, §204), including the consideration given to Anglo-Scottish high-speed rail (§205).
- 3.4 Finally, we welcome the repeated recognition of the importance of the major cities to Scotland’s future (§15, §23, §79, §154, §196). The paper also highlights the threats to the future well-being of Edinburgh due to, *inter alia*, traffic congestion and land use conflicts (§41), and the opportunities provided by the spare land and people resources available in Glasgow (§42).

4. Unwelcome aspects of NPF2

- 4.1 The list of ‘national developments’ projects promote unsustainable transport *not* sustainable transport**
- 4.1.1 The national priority projects *do not* reflect the need for modal shift to sustainable transport modes. This is in conflict with what is set out in the National Transport Strategy and a host of other government policies. *None* of the nine national priorities focus on public transport, let alone walking or cycling, or ways to reduce road traffic levels – instead, the first three listed are for new road-building and airport expansion, the very things that will fuel greater dependence on unsustainable transport.
- 4.2 The expansion of Edinburgh and Glasgow airports is not compatible with Scottish climate change policy – *nor with Scottish economic policy***
- 4.2.1 NPF2 uses deeply flawed logic on the topic of air travel. The paper supports airport expansion (§§201-203, §120) despite the clear incompatibility of this with priorities on climate change and peak oil. It is

² Although the suggestion that that climate change could in some ways be good for tourism (§164) is just daft. Map 6 is also unhelpful – of course there is more emissions in urban areas, as there are more people living there! A more useful map would be of emissions *per capita*. We would suggest that this would provide more useful information.

³ However, some of the analysis presented is either partial or misleading. Map 5, for example, considers only long-distance (or trunk) transport movements – when more than 50% of all transport trips are less than 2 miles in distance, and 70% less than 5 miles in distance. Similarly, §57 (personal travel) and §61 (freight) underplay the significance of, respectively, walking & bus use (when expressed by number of trips rather than total trip distance) and rail freight (when expressed as tonne-kilometres rather than total trip distance). The latter, for example, would lead to a white van delivery be accorded as much importance in freight terms as a coal-laden freight train.

well known that the aviation sector is a net economic drain on the country. Hence, even setting aside its climate change implications, we find it strange that the discussion draft is so overtly enthusiastic for airport expansion. We note that the discussion draft makes it clear (§36) that the Scottish tourist sector is fundamentally *not* dependent on air travel. We recommend that the drafters of this document think more fundamentally about the implications of airport expansion – both in terms of its climate change impact, but also in terms of its impact on the Scottish balance of payments.

- 4.2.2 Airport expansion at Edinburgh and Glasgow Airports would simply not be necessary if the vast majority of internal flights between the central Scotland airports to London (in the order of 100 flights per day) were switched to rail. A programme of air-rail substitution would in itself remove much of the necessity for expansion of these airports in the short- to medium-term. In the longer-term, even the current levels of aviation are deeply incompatible with requirements to reduce all carbon emissions by 80% by 2050, let alone planning for increases in the numbers of flights.

4.3 It is unsustainable and unaffordable for the top 'national development' to be a Second Forth Road Bridge

- 4.3.1 Construction of a Second Forth Road Bridge (named misleadingly in this document as a "Forth Replacement Crossing" when it has become clear that the proposal is for a second, *additional*, bridge) would conflict with a series of key priorities set out in the paper (e.g. best use of existing infrastructure, sustainable land use planning, the reduction of long-distance commuting, the reduction of climate change emissions).

- 4.3.2 We note that the recent FETA report on cable augmentation which showed that, in the event of dehumidification failing to correct corrosion in the Forth Road Bridge's cables, cable replacement (augmentation) could be carried out at a cost of £91-122m - a fraction of the £4200 million cost of an additional bridge. At that price, we can be fairly sure that giving top priority to a Second Forth Road Bridge will lead to sustainable transport being systematically deprived of investment.

4.4 The list of 9 'national developments' is not compatible with sustainable development

- 4.4.1 We note that 8 out of 9 of the projects are evaluated as *not* helping to meet climate change strategy objectives. Furthermore, we note that there is no explanation regarding why the list of proposed 'national developments' is so skewed towards development that does not assist in meeting climate change priorities.
- 4.4.2 We further note that none of the 9 are on passenger sustainable transport (walking, cycling, public transport) – while one (the Second Forth Road Bridge) is specifically about expanding road capacity.
- 4.4.3 Finally, whilst we are normally in favour of encouraging modal shift from road freight to sea freight, we raise concerns over the sustainability of the port developments given the document's evaluation that they do not assist in meeting climate change targets, and that international shipping remains outside of international climate change agreements. (There is also no analysis of the impact on rail freight of a transfer to sea freight – as for some freight movements, sea will be a competitor to rail *not* road.)

5. Some sustainable 'national developments'

5.1 Anglo-Scottish rail links

- 5.1.1 We recommend deletion of 'national developments' 2 & 3 (expansion of Edinburgh & Glasgow airports) and its replacement with a programme of investment in Anglo-Scottish rail links. We take the view that this can be accomplished through a programme of incremental improvements,⁴ but that there should also be consideration of the merits of a stand-alone high-speed line from London northwards, providing journey time improvements for trips from Scotland to the south of England and onwards to the continent.

5.2 Scottish inter-city rail investment programme

- 5.2.1 A genuinely sustainable 'national development' would be a programme of journey times improvements and capacity enhancements (coupled with electrification) to link all Scottish cities by a modern, efficient rail system. Amongst other things, this would include a new cut-off line from the Forth (Rail) Bridge

⁴ For some preliminary views on how this would be carried out we would refer you to section 10 of the discussion paper *Are High-Speed Railways Good for the Environment?* – see http://www.transformscotland.org.uk/info/docs/2006-10-16_HSR.pdf.

through Fife in order to significantly improve journey times from the Central Belt to Aberdeen & Inverness.

- 5.2.2 This programme would also include a focus on the strategic transport nodes, with Glasgow Central, Glasgow Queen Street, Edinburgh Waverley, Edinburgh Haymarket, Dundee, Aberdeen, Stirling, Perth, & Inverness stations being developed as high-quality transport interchanges. This is essential for connectivity within Scotland & for links to the south. Specifically as a gateway to Scotland's capital, Waverley requires significant enhancement of its passenger environment and capacity upgrades on its eastern side.

5.3 Zero carbon transport

- 5.3.1 Finally, and most fundamentally, we recommend the inclusion of a strategic programme of investment in the most sustainable forms of transport: walking and cycling. These "zero carbon transport" modes have the potential to provide for significant congestion alleviation (given that the majority of all transport trips being less than 2 miles in length) as well as providing a major contribution towards meeting physical exercise and public health targets. Crucially, as these modes emit zero carbon, they are the very modes that a forward-thinking and sustainable National Planning Framework should prioritise.
- 5.3.2 Specifically, we suggest that NPF2 includes a strategic programme to create walking and cycling networks in all towns & cities in Scotland with a target to have 20% of all journeys by bike by 2020.

6. Summary and Recommendations

- 6.1 To ensure shift to a low carbon economy, and prepare for the inevitable increases in fossil fuel prices (due to the depletion of oil supplies), we consider that the National Planning Framework needs to set out a range of *sustainable* transport interventions – not a series of 'business-as-usual' priorities for road-building and airport expansion. The former would provide substantial economic benefits (as summarised in section 2, above), while the latter course will simply ensure further worsening of economic and environmental conditions.
- 6.2 In short, we recommend the following:
- 6.2.1 Delete 'national development 1' (Second Forth Road Bridge) and replace this with refurbishment of the existing Forth Road Bridge and associated measures (specifically sustainable transport investment & demand management interventions) aimed at controlling and reversing patterns of increasing long-distance car commuting across the Forth.
- 6.2.2 Delete 'national developments' 2 & 3 (expansion of Edinburgh and Glasgow airports) and replace this with a programme of investment in Anglo-Scottish rail links aimed at air-rail substitution for short-haul trips.
- 6.2.3 Add new 'national development' on Scottish inter-city rail development programme. The current administration has made a good start on this programme with the outlining of the 'Edinburgh-Glasgow Improvement Programme', which sets out a programme of investment (including electrification) in the Central Scotland rail network aimed at journey time improvements. However, in the context of the currently uncompetitive journey times on Scottish rail network for journeys from the Central Belt to Aberdeen, Dundee & Inverness (and between these locations), it is our view that this needs to be significantly expanded to set out the aspirations for journey times between *all* Scottish cities.
- 6.2.4 Most fundamentally, we recommend the addition of a final 'national development' setting out a national programme of investment in zero carbon transport (walking & cycling). Such an intervention would give Scotland a realistic chance of both reducing climate change emissions from transport whilst delivering on national public health targets. *Without such a focus, we can see no prospect of the National Planning Framework helping to deliver sustainable development in Scotland.*

TRANSform Scotland is the national sustainable transport alliance, campaigning for a more sustainable and socially-just transport system. Our membership includes bus, rail and shipping operators; local authorities; national environment and conservation groups; consultancies; and local transport campaigns.

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