

Still some way to go

TRANSform Scotland

the campaign for sustainable transport

TRANSform Scotland's response to 'The Integrated Transport Bill: The Executive's proposals'



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TRANSform Scotland is the national sustainable transport campaign, bringing together 66 organisations - including transport operators, local authorities, environment and conservation groups, chambers of commerce and local transport campaigns.

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1. “The Executive’s Strategy for Transport”

1.1 General comments

We welcome the Scottish Executive’s inclusion of a Transport Bill in its first legislative programme. The Bill provides a long-overdue opportunity to tackle some of the problems that our present transport systems exhibit and we broadly welcome the proposals brought forward. In particular, we welcome the commitment to introduce enabling powers for local authorities to introduce road charging schemes, where locally appropriate.

We are however concerned at important omissions from the proposals and an apparent weakening of the Executive’s position on certain issues, moves which we feel are counterproductive to the proposals. We are concerned that the Executive’s proposals understate the urgency and necessity for action on transport and are concerned at inadequate linkage with other important areas of policy. There is still some way to go before the Transport Bill proposals can provide a realistic basis for tackling our transport ills.

1.2 The need for action

The Minister’s introduction to the proposals (page 4) provides a fair summary of why we need change in our current transport systems. In broad terms, we would agree that the Minister is correct to claim that the Executive’s policies seek *“to reverse two decades of neglect in the 1980s and 1990s.”* However, the reality is that in order to produce transport that is both sustainable and equitable it is necessary to challenge longer and more deep-seated trends. It is important that our transport problems must be addressed in a responsible cross-party fashion: private car transport has been expressly favoured over more sustainable modes of transport by politicians of all colours for several decades.¹

When the Minister says that there is a *“growing consensus within Scotland on transport issues”* (page 4 and paragraph 25) we think that this is correct in terms of the vision of what people want transport to be like. This vision is well reflected in the boxes entitled *“What this means...”* on pages 6, 16, 20, 27 and 30. Indeed, there is little in these aspirations that any reasonable party could disagree with.

Despite this agreement on where we need to get to, since the Executive launched the broad thrust of its proposals in the Partnership Agreement of June 1999, it has also become transparent that many vested interest groups are unwilling to take responsibility to help bring about the necessary changes. Fundamentally, however, the Scottish Executive bears the responsibility for ensuring that the requisite changes to our travel habits happen. It is thus imperative that the Scottish Executive’s willingness to *“change our mind where necessary”* (page 4) does not become a general policy of weakening its commitment to bringing about sustainable and accessible transport whenever it is unfairly criticised.

In paragraph 23 and 24, the document lays out the consultation efforts that the Scottish Executive has gone through. This has been an important process and we welcome the Executive’s efforts in this direction. However, we think that there is also a firm consensus that we have had plenty consultation and would now like to see these proposals proceed as quickly as possible. It would be unfortunate if local authorities and transport operators keen to implement the Executive’s proposals were held back by the slowness of the implementation path for the Bill through the Parliament. We recommend that the Transport Bill be introduced to Parliament as swiftly as possible.

¹ The Beeching cuts to rail services carried out in the 1960s (including closure of lines in the Scottish Borders)

² were of course carried out by a Labour administration!

1.3 “Why we must act” section

This section makes welcome recognition of the need for transport policy to provide accessibility but then *completely fails to mention* that we also need to change our transport system so as to reduce its environmental impact. In addition, the section fails to set out the need to reduce fatalities and injuries in road crashes; the need to make the more sustainable modes of transport more competitive with the currently dominant unsustainable modes through the price mechanism; the need to encourage more physical activity through walking and cycling in order that public health targets be met; the need to reduce community severance from road transport; and the need to reduce the impact of transport on biodiversity.

This section correctly recognises that current levels of traffic growth are “unsustainable” (paragraph 6) and then goes on to describe this trend as worsening congestion, reliability, competitiveness and “quality of life” (paragraph 10). One would have hoped that the Executive would at least have remembered its role in reducing greenhouse gas emissions under UK Government commitments to meeting Kyoto Protocol targets, and its role in reducing toxic air pollution under the statutory National Air Quality Strategy.

It is our firm belief that if the Executive is to be successful in articulating the need for change that it will have to make it clear how change can benefit the community, public health and the local and global environment rather than simply take a narrow focus on congestion and competitiveness. The Executive’s focus must be clearly on reducing the need to travel *not* simply on providing for more. Indeed, we would contend that it is the very increases in “travel opportunity” for car owners and “competitiveness” of road haulage heralded in paragraph 6 that is the cause of the pollution and injury suffered by others.

1.4 “Delivering the vision” section

While this section sets out a long list of financial investments, it is not quite what we’d call a “vision.”

In particular, we feel that it is important that the Executive stress accessibility, by sustainable modes of transport, rather than transport *per se*. Indeed, much of the document retains a seeming confusion between the terms ‘integrated’, ‘sustainable’ and ‘accessible.’

1.5 Local Transport Strategies

Much of the Executive’s “vision” will have to be delivered at the local level and it is important that local authorities also have a clear strategy on how to move to sustainable and accessible transport.

We welcomed the (then) Scottish Office’s promotion of Local Transport Strategies for local authorities and are heartened to see that all Scottish local authorities are in the process of drawing them up. However, to ensure their continued applicability, we recommend that these become a statutory requirement of local authorities, with an appropriate consultative framework instituted.

We have yet to see a convincing explanation of why Local Transport Plans are to be made statutory for English and Welsh local authorities in the UK Transport Bill while Local Transport Strategies remain non-statutory in Scotland. Given that English & Welsh local authorities have until now had to produce annual transport plans under the Transport Policies and Programmes and/or ‘Package Bid’ framework, it could well be argued that it is rather the Scottish local authorities who need to be instilled with the need for local transport planning!

1.6 The funding framework for local transport provision

Irrespective of the quality of Local Transport Strategies drawn up by local authorities, it is important that they are adequately resourced to enable their plans to be put into operation.

We feel it important to note widespread local authority frustration at budgetary constraints in implementing the national transport agenda at the local level. It is vital that funding be made available so that the measures that the Bill would bring about can be implemented: the lack of appropriate funding will damage the credibility of the proposals. While the new charging instruments that the Bill will legislate for will provide a vital source of revenue for some local authorities, there is a genuine concern that support for the Executive's agenda will be lost because of existing spending constraints.

Local authorities have welcomed the Executive's Public Transport Fund and Rural Transport Fund as a worthwhile contribution to kick-starting sustainable transport investment at the local level. However, there is concern that the availability of funds is not of a magnitude to allow local authorities to accomplish the extra responsibilities given to them under the Executive's Strategy for Transport. This is of especial concern in the context of current annual decreases in local authority spending on transport. It is unfortunate that there is no clear mechanism to ensure that Local Transport Strategies that promote sustainable transport can be rewarded by the allocation of appropriate funding. It is worth noting that this has been less of a problem in England where the statutory Local Transport Plans are accompanied by the annual Local Transport Settlement distributed by the DETR.

We restate our concern that the Public Transport Fund and Rural Transport Fund are ill suited to meet other necessary local sustainable transport investment (e.g. towards the meeting of new national road safety targets) so necessary to achieve traffic reduction aims. In order that initial moves towards sustainable and accessible transport be buttressed, we restate our recommendation that the Public Transport Fund be continued, and increased in size, but re-specified as the 'Sustainable Transport Fund' so that investment in generally low-cost measures such as walking, cycling and traffic management projects can also be supported financially.

We would note the further concern about how revenue streams for sustainable transport will be provided in local authority areas where the new charging instruments are less likely to be implemented i.e. areas with no cities or large towns.

1.7 Rail services

Some of our member organisations have expressed concern at the paucity of reference to rail services in the Bill. It is fully understood that rail service issues are being considered in the Westminster Transport Bill and not in the Scottish Bill but more clarity on what powers the Scottish Parliament and Scottish Executive will have with regard to services in Scotland would have been welcome.

We welcome the re-statement that the Scottish Executive be empowered to direct the Strategic Rail Authority in terms of rail service development in Scotland. However, there is also a concern that the Strategic Rail Authority, to be set up by the Westminster Transport Bill, will retain an overtly London-centric focus. Given the role that rail services will have to play in providing an alternative to journeys currently made by car and heavy lorry, we recommend that the Executive provide more clarity on how this London-based body will provide for rail service development in Scotland.

2. The need for targets

We recognise that the Transport Bill proposals are part of a broader package of measures and initiatives, as set out in paragraph 21 of the paper. However we are concerned that these many initiatives may not add up to a truly integrated approach as there is a failure to set out what these measures will achieve against various targets. While there are many potential ways of measuring progress,² we would suggest that there are two key targets that these measures must match up against.

Firstly, we feel that the proposals must spell out what contribution they will make to meeting binding UK climate change emission reduction targets under the Kyoto Protocol and, secondly, what contribution the measures will make towards traffic reduction in the context of the Road Traffic Reduction (National Targets) Act 1998.

2.1 Climate change targets

The recently launched greenhouse gas emissions inventory showed that Scotland was falling behind in tackling climate change. The figures revealed that Scotland's emissions of CO₂ rose by 0.7% between 1990 and 1995, while England's fell by over 10%. Transport emissions rose by 2% in Scotland but only 1% for the UK. The inventory also showed that Scotland produced more than its fair share of emissions, with 9% of the UK population producing 13% of the emissions.

The 'Draft UK Programme on Climate Change' launched in March 2000 aims to reduce greenhouse gas emissions by 21.5% by 2010 on a 1990 base, and to reduce CO₂ emissions by 17.5% by the same date. The UK Government was elected on a manifesto commitment to cut in CO₂ emissions by 20% by this date. Nevertheless, the strategy has been broadly welcomed.

Unfortunately, the parallel 'Scottish Climate Change Programme Consultation' contains no targets for Scotland. We think it is unacceptable that the Scottish Executive has failed to set out targets for emission reduction. The Executive's failure to do so not only fails to give Scotland a lead as to the task required but also undermines the UK Programme. In the transport sector this is particularly problematic as the UK Programme sets out emission reduction targets for England only. For the UK Programme, it is estimated that transport would have to contribute 40% of the total emission reduction required, with a reduction of 17% within the sector.

Firstly, we need to know what contribution to meeting the Kyoto targets and the Labour Party manifesto commitment that the Executive predicts will be achieved by the strategies implemented, between now and 2010, as a result of the measures proposed in the Transport Bill.

Secondly, if and when the Scottish Executive catches up with the UK Government and designates Scottish targets, we also require to know what contribution the Bill measures will make to said Scottish climate change targets.

2.2 Traffic reduction targets

We welcome the Executive's recognition that "*current levels of traffic growth are unsustainable*" (paragraph 6). But it is not only current levels of traffic growth that are unsustainable but the level

² Three other targets come immediately to mind: for air quality, for which there is now a clear National Air Quality Strategy; for modal shift to sustainable modes; and for accessibility to transport. We would note the deliberations of the National Transport Forum for Scotland's Sub-Group on Progress Indicators, which has come up with very many potentially useful indicators. However, we would contend that many of these targets are subsets of that for traffic reduction and that the Westminster legislation on the issue makes this a priority subject.

of traffic current *now*. We think that the Executive's position reflects an unfortunate complacency in this area.³ With two Road Traffic Reduction Acts on the UK statute book, we think it necessary that the Scottish Transport Bill should be framed in the context of traffic reduction.

Firstly, we recommend that the Executive should quantify the impact of the proposals in the Transport Bill on traffic levels and towards traffic reduction, through a series of scenario.

Secondly, we recommend that the Bill include a commitment for the Executive to report annually to the Scottish Parliament on a Scottish traffic reduction target, on measures required to cut traffic levels, and on an implementation plan to ensure that targets for traffic reduction are met.

Our recommendation, in line with that of the Road Traffic Reduction Campaign, is that the Executive should seek to reduce traffic levels by 10% by 2010 on a 1990 base. This figure was predicated on estimates of levels of traffic reduction necessary to meet greenhouse gas emission reduction from transport. However, road traffic reduction would also deliver a wider range of benefits: less road crashes, less congestion, less toxic air pollution, less wildlife damage and so on.

Our concern that the Executive should take action to implement traffic reduction is backed up by the apparent failure of Scottish local authorities so far to implement strategies to do so.⁴ We feel that it is now a responsibility of the Executive to take its share of the responsibility in this area.

³ We would note that Ministerial statements from the UK Government have repeatedly made commitment to traffic reduction *not* the reduction in traffic growth: (1) the Labour Party's 1997 General Election website and policy handbook said it would "reduce and then reverse traffic growth"; (2) Deputy Prime Minister John Prescott said, in 1997, that his Government would have "failed if in five years time there are not many more people using public transport and far fewer journeys by car"; (3) Glenda Jackson, the Minister responsible in 1998 when the Road Traffic Reduction (National Targets) Bill was being passed, said seven times that there should be a reduction in road traffic levels rather than a reduction in traffic growth. Source: Friends of the Earth (England, Wales and Northern Ireland). We would also note the overwhelming support by MPs for national traffic reduction targets.

⁴ The 'Audit of Preliminary Local Transport Strategies and Road Traffic Reduction Reports' reported that "A small number of authorities have set targets, mainly relating to journeys to work in urban areas. Most authorities have given only preliminary consideration to this issue, for example describing traffic monitoring arrangements being put in place or presenting traffic monitoring data which will be used to inform target setting in the future" (Scottish Executive, February 2000: section 6.1).

3. Legislative proposals for Regional Partnerships

3.1 General comments

We welcome the promotion of (essentially) voluntary partnerships to consider cross-boundary transport issues. We are in broad agreement with the Executive that it would *“in general be counterproductive to impose a new layer of government between the local authorities and the Executive and Parliament”* (paragraph 29) in the delivery of transport services.

While we are in agreement with the Executive’s decision not to promote new statutory “regional transport bodies” at this time (paragraph 31) we trust that the Executive will monitor the development of voluntary partnerships on an ongoing basis. We trust that the Executive will not hesitate to bring forward proposals for the relevant public bodies to produce ‘Joint Plans’ where necessary (paragraph 33).

3.2 Joint plans

We welcome the Executive’s retention of powers to compel local authorities to prepare a ‘Joint Plan’ to address specific transport issues, where appropriate (paragraphs 33-34). While we recognise that in most cases local authorities will choose to work cooperatively and in an even-handed fashion to tackle such problems, we believe that the proposal provides a framework to ensure that cross-boundary issues are considered where local authority cooperation breaks down. We think that the flexibility built in to the proposal for Joint Plans is welcome.

We recommend that the Scottish Executive bring forward a requirement for a Joint Plan either when a “named transport issue” *physically crosses local authority boundaries* (e.g. a new piece of road infrastructure or a public transport service) or when the impact of a development *has cross-boundary impact* although physically contained within one local authority area (e.g. a new large traffic-generating development). Joint Plans should be carried out in the framework of national transport, environment and planning policies.

We recommend that preparation of any Joint Plan should made provision for full public consultation and not just *“private sector and other interests”* as suggested in paragraph 36. It is also disappointing that specific reference is not made to environmental, public health and social interest groups, and statutory bodies such as SEPA and SNH, as groups to be consulted in preparation of Joint Plans.

We also recommend that the provision for Joint Plan be applicable to planned and ongoing developments and will not simply provide an opt-out for such developments.

3.3 Linkages between transport planning and land use planning

We are not satisfied that the proposals being brought forward in general provide adequate linkage between transport planning and land use planning. We think that this is an unacceptable flaw in the proposals in light of the ongoing review of the planning system.

In 1999, the (then) Scottish Office carried out consultation exercises on the future of the land use planning system (‘Land Use Planning under a Scottish Parliament’) and on regional transport planning arrangements (‘Regional Transport Partnerships and the National Transport Forum for Scotland’). Unfortunately, although running concurrently, neither document made reference to the other. This suggests a failure of integrated policy-making when it comes to development of transport policy and planning policy. We see little evidence of improvement in the draft Transport

Bill proposals.

It was our view that the former proposal for 4-6 'Regional Transport Bodies' (irrespective of the merits or otherwise of this proposal *per se*) did not fit well with land use planning integration (i.e. with the 17 Structure Plan areas) nor did it respect the relative locality of most non-trunk cross-boundary travel. We expressed an opinion that the land use planning boundaries currently used might provide a better basis as they better reflected these principles.

While there is a wide range of opinion on the effectiveness of the Structure Plan system itself, it is our opinion that the Structure Plan areas in general provide a better geographical basis to plan for cross-border transport movements. Until such time as land use planning boundaries are redrawn – or perhaps replaced by sub-national spatial planning frameworks? – it is our consideration that the Executive must promote close working between local authorities represented in Structure Plan groupings in consideration of cross-boundary transport issues. Such activity should help to reinforce the necessary integration between transport planning and land use planning - and in particular the need to plan to reduce the need for people to travel.

It was clear from the published findings from the 1999 consultation that few organisations had raised concerns in this important area of policy integration. We recommend that cross-boundary transport planning requirements be a major part of the Executive's review of the land use planning system.

3.4 Proposals for revision to the Forth Estuary Joint Board

We welcome the proposals with regard to the Forth Road Bridge Joint Board. We feel that the revised body will be better able to consider cross-modal traffic issues across the Forth estuary. Such a body should be entrusted to ensure that cross-Forth trips are at a sustainable level: it is clear that it is not acceptable to try and cater for a 33% increase in cross-Forth road trips (as suggested in paragraph 41). The Joint Board should rather focus on reducing the volume and impact of cross-Forth trips while improving the quality of transport services that continue to use these services. We recommend that the revised Forth Estuary Joint Board should consider as a priority how the number of cross-Forth trips could be reduced by appropriate planning policies of the surrounding local authorities.

We also welcome the Executive's proposal because it demonstrates a willingness to be flexible when considering transport planning requirements. We think that it makes sense that south and west Fife transport issues are considered in the context of the Lothians' transport systems as commuting from the Fife area is responsible for transport pressures on the Lothians and in particular the Edinburgh area. This raises an issue to be considered in the review of the existing Structure Plan framework and suggests that land use planning boundaries require flexibility in order to handle – and tackle – unsustainable cross-boundary transport demands.

3.5 Proposal for a Highlands and Island transport authority

We welcome the Executive's promotion of further examination of this proposal. We welcome the range of issues to be considered (paragraph 47). We will be keen to see the study examine how local sustainable transport interests would be provided for by a new transport authority as there is concern that there would be disproportionate focus on long-distance environmentally-damaging forms of transport such as air travel. We recommend that the study into a possible Highlands and Islands transport authority will consider how appropriate interest group representation would be handled in such a body as a number of our member organisations have raised concern about the treatment of this issue.

4. Legislative proposals for Bus Services

4.1 General comments

Better bus services will provide a key element in the move to a more sustainable transport system. We welcome the Executive's attempts to improve bus services across Scotland: the first two Public Transport Fund allocations have been well targeted in the enhancement of bus provision across the country.

In this context, we welcome the Executive's attempts to provide a legislative basis for bus service organisation. We broadly welcome the emphasis on Quality Partnerships as providing a basis for bus service organisation. We also welcome the introduction of proposals for Quality Contracts as a fallback position where Quality Partnership arrangements do not function well.

In general we support the Executive's view that *"debates about the structure of the industry are a distraction from the real issue, which is how to best reverse current trends and grow the bus market"* (paragraph 51). However we would introduce the caveat that growth in bus passenger numbers should in general seek to provide for modal shift from less sustainable modes, and seek neither to abstract from other sustainable modes nor simply generate unnecessary trips.

We also support the Executive's objective that buses be made *"a real and attractive choice"* but think it rather insulting to bus users to regard bus use as a mode of transport of the *"last resort for those with no alternatives"* (paragraph 54). Bus use is already a favoured mode of transport for many people in the areas where service levels are adequate.

4.2 Quality Partnerships

We welcome the statutory basis proposed for Quality Partnerships between local authorities and bus operators.

We also welcome the proposal for locally set *"minimum standards"* in Quality Partnerships (paragraph 55, bullet 2). Concern has been raised in the context of the UK Transport Bill that the specific exclusion of certain elements from Quality Partnership agreements (e.g. key fares and frequency elements) could make Quality Partnerships more vulnerable and instead create pressure for Quality Contracts.⁵ This provision will allow more flexibility in the setting of necessary Quality Partnership elements.

We welcome the commitment to making publicly available information on Quality Partnership arrangements. Not only will this information be useful for the Scottish Executive in monitoring success of the Partnerships but will also be useful in building public confidence in the arrangements (note that this is an argument made regarding the transparency requirements of charging schemes).

4.3 Quality Contracts

We welcome the provision for Quality Contracts to be introduced where the Quality Partnership approach *"has failed, or is inappropriate"* (paragraph 62). We are broadly in favour of the proposals as specified.

Advocates of the Quality Contract set-up have drawn succour from the experience in London where the 'area franchising' arrangement is held to resemble Quality Contracts. Some of our

⁵ See e.g. Local Government Association 'LGA rough guide to the Transport Bill', available on the LGA website at <http://www.lga.gov.uk/lga/parliament/guidetransport.htm>

member organisations have expressed an opinion that a better comparison could be made between the efficacy of Quality Partnership and Quality Contract arrangements if a formal comparison project could be set up. While we do not specifically recommend this, we trust that the Scottish Executive will be monitoring the relative success of both frameworks as implemented across Scotland.

4.4 Consultation with bus users

We welcome the Executive's commitment to introducing statutory consultation procedures for bus users (paragraph 54). It is thus strange that this is then not mentioned elsewhere in the section, although it is possible that the reference in paragraph 56 to "local representative bodies" would include bus user groups (if they exist). We recommend clarification on proposals for statutory consultation with bus users.

4.5 Joint Ticketing arrangements

We are appreciative of the Executive's efforts to encourage Joint Ticketing and Through Ticketing arrangements. In this context, we welcome the provision to give local authorities power to require setting up of joint ticketing arrangements where inadequate progress has been made by bus operators to implement joint ticketing voluntarily (paragraph 68).

5. Legislative proposals for Concessionary Fares

5.1 General comments

We welcome the Executive's commitment to provide concessionary travel for groups with special needs. The Executive's free travel scheme for blind people was a welcome development in this area.

In this context, we welcome the introduction of a national minimum level of concessionary fare for pensioners and those with disabilities. We feel that this proposal will help contribute to the Executive's objectives of tackling social exclusion.

We welcome the commitment that local authorities will retain the discretion to promote concessionary arrangements better than the minimum proposed (paragraph 74). Indeed, it would be unfortunate if the minimum scheme becomes in effect the maximum scheme.

It is disappointing that the proposals do not include more detail about groups covered, modes of travel covered, suggested rate of concession, and so on, and we await the publication of the Executive's research into the matter with interest. We recommend that research into a national concessionary fare scheme look into options for modes of transport other than bus services.

We also recommend that the research should consider options for concessionary fare schemes for other vulnerable groups, for example children, the unemployed and those on low incomes. This would seem to fit well with the Executive's ongoing research into social exclusion and transport and fit well with its broader social inclusion agenda.

5.2 Proposal for a Taxi Concession scheme

We recommend that the Executive's research into concessionary travel will also consider the prospect of a national taxi concession scheme.

Scotland has a good record in providing mobility for people with disabilities through taxis, through schemes that are popular and typically have unit costs much lower than other door-to-door schemes such as "dial-a-rides." Taxi concession schemes are already in operation by many Scottish local authorities.⁶ The Transport Bill provides an opportunity for the Executive to capitalise on the leadership shown by local authorities in this area.

People with the most restricted access to transport would benefit as Taxicard schemes are used by those who are most reliant on door-to-door transport. It is our opinion that provision for a national Taxicard scheme would make a significant contribution to the Executive's social inclusion objectives.

The Disability Discrimination Act will in the near future require taxis to be wheelchair accessible but there is concern that without the means to pay for them that many people who rely on taxis will be unable to use them. Taxi owners and drivers who need to acquire new accessible vehicles would also see the benefit of attracting new disabled customers.

A national scheme could be delivered through a variety of mechanisms such as vouchers, smartcards, etc. and could be designed to fit in with schemes already in place. We recommend that consultation take place on this issue with the Scottish Accessible Transport Alliance as to how a national scheme could best be implemented.

⁶ Scottish local authorities that run taxi concession schemes include Dumfries and Galloway, Dundee, East Lothian, Edinburgh, Falkirk, Fife, Midlothian, Stirling and West Lothian.

6. Legislative proposals for Road Charging

6.1 General comments

TRANSform Scotland welcomes the Executive's proposals to introduce enabling powers for local authorities to implement schemes for urban road user charging and workplace parking levies.

We welcome the Executive's acknowledgement that "*Congestion and workplace parking charges confront drivers and employers with the wider costs of their actions*" (paragraph 77). TRANSform Scotland believes that pricing measures must play an integral role in making the price paid by car and heavy lorry use better reflect its cost to the environment, society and the economy.⁷

We accept that the proposals may not be appropriate in all local authority areas but would recommend that the proposals do not specifically exclude certain areas geographically.

We recommend that the drafting on page 6, "*to address a pressing congestion and/or air quality problem*" be used in preference to that in paragraph 81, "*pressing congestion and air quality problems*" (our emphasis). We would remind the Executive that local authorities have statutory requirements to tackle air quality problems but not those of congestion, and as such the drafting should reflect the possibility that a road charging scheme could be implemented primarily in an attempt to comply with National Air Quality Strategy requirements.

6.2 "Consultation" section

We feel that we must point out a misleading statement in this section. The right-hand box on page 29 claims that "*Members of the public ... were generally against all three proposals.*" This sweeping statement could be taken to suggest that there is evident public opposition to road charging. As we were represented on the National Transport Forum for Scotland Sub-Group on Road User Charging, we are in the privileged position of knowing that "Members of the public" comprised about 30 responses – and this despite a tabloid newspaper campaign asking people to write in to complain! (Our recent 'slowdownscotland' campaign - via a newspaper with a much smaller circulation - received around 1000 responses: however, we would not seek to portray this as meaning that everyone in Scotland wanted slower speeds!)

We would suggest that a much more useful example to have presented in this document would have been that of the recent City of Edinburgh Council consultation on transport policy. In this case, over 200,000 consultation documents were circulated, and from the approximately 10% return, approximately two-thirds of responses were in favour of road charging in the city. This demonstrates considerable public support for road charging. It would be helpful if the Executive could help in presenting the public taste for road charging rather than the blank opposition!

6.3 "Our contract with the motorist" section

We are very concerned at the concept of a "contract with the motorist" (paragraphs 79-80) and suggest that the Executive would be better served in promoting a "contract with the traveller." The Scottish Executive is well aware of the unacceptable impact of the over-use of the car on society, the environment and the economy and so it is objectionable that car users should be given undue guarantees about their already privileged use of the roads.

⁷ A more detailed response to the Scottish Executive's proposals for urban road user charging and workplace parking levies is contained in our response to the 'Tackling Congestion' consultation paper of July 1999. Our response is available on our website at <http://www.transformscotland.org.uk>

We are concerned that the 'contract with the motorist' clause suggests that the Scottish Executive is more concerned with its image to the motor lobby than it is to protect the interests of *everyone* by bringing about a more integrated, sustainable transport system.

We recommend that the Executive ceases to refer to charters for car users and instead concentrates on ensuring accessibility *for everyone* by concentrating on better provision for public transport and the other truly sustainable modes.

6.4 "The Executive's Pledges" section

We welcome the firm commitment to *hypothecation* of net revenues from charging to local transport.

We welcome the firm commitment to *additionality* of net revenues. However, there will have to be a robust methodology to demonstrate this in order to ensure confidence that revenues raised are genuinely additional.

We welcome the commitment to *transparency* through annual reporting and accounting arrangements. This transparency is however too narrowly specified. The transparency of charging schemes should not only be specific to those charged (car users and/or businesses) but for those benefiting i.e. the improvements accruing to local residents from lower traffic levels (and thus lower pollution levels, less community severance and so on) and enhanced investment in sustainable transport.

We are not clear what the commitment to "*fair treatment*" means and what this adds to the proposals. We suggest that the Executive begins its "*fair treatment*" of car users by internalising all external costs from car use⁸ in the price paid for use of road space. At that point, it would be more appropriate to use the language of "*fair treatment*" for car users as we would no longer have a market for transport distorted in favour of the unsustainable modes.

Neither are we clear what the commitment to "*public transport improvements before charging with further improvements to follow*" means in practice. We would have to ask what constitutes improvements to public transport provision and who determines whether the improvements made are significant. The fundamental point of road charging is to make users contribute to the costs they impose *not* for improving public transport provision *per se* - although the proposals make welcome provision for this through the reinvestment of net revenues.

The Executive needs to justify further the caveat towards upfront investment in public transport. We recommend clarification on what safeguards will be put in place locally to stop reactionary campaigns seeking to stop the implementation of a charging scheme once local authorities and/or transport companies have made additional investments in public transport services predicated on the future implementation of a charging scheme.

6.5 "Our proposals for road charging" section

In general, we welcome the enabling powers to be given to local authorities (paragraphs 81-83). We welcome the proposal that no national limit be set on the duration of a charging scheme (paragraph 83).

The legislative proposals set out in paragraph 87 seem to us to provide a sound basis for initiating road charging schemes. We welcome the flexible basis upon which local authorities could decide to

⁸ For example, costs arising from air pollution, noise pollution, climate change impacts, road damage, road crashes, congestion, and from health impacts and community severance.

promote a scheme (that is, that arbitrary “trigger” points are not specified) and the local flexibility in determining exemptions.

However, we strongly oppose the presumption that road charging is only appropriate for use by “major urban authorities” (paragraph 81). Independent research has suggested that road charging could be an appropriate instrument for use at, for example, vulnerable landscape and biodiversity areas (see e.g. the proposals for the Peak National Park) or on roads around major out-of-town developments. We recommend that the legislation is framed broadly and flexibly so that charging proposals at locations such as these could be considered. As the Scottish Ministers are to retain an effective veto on proposals, we fail to see why the legislative proposals should be framed to exclude such possibilities.

As discussed above, we are concerned at the requirements placed towards providing public transport improvements up-front (see paragraph 86). We recommend further guidance on what this might mean in practice.

6.6 Absence of trunk road user charging proposals

We do not accept the excuses presented in paragraph 78 that *“In light of the concern expressed in the consultation exercise”* that the Executive will not legislate to allow trunk road user charging.⁹ We feel that the Executive’s retreat from this proposal is more a reflection of its failure to present the benefits resulting from the implementation of road user charges on major trunk roads.

The deletion from the legislative proposals of the option of trunk road user charges removes one of the possibilities that could emerge from the Multi-Modal Studies that the Executive is to set up for the Glasgow-Edinburgh (M8) and Glasgow-Stirling (A80) corridors and as such limits the possible findings of these studies.

We think that the exclusion of proposals for trunk road user charging damages the proposals as they stand and recommend that the legislation is framed in a fashion that will not preclude the introduction of trunk road user charges at some point in the future.

We also recommend that local authorities be given the power to request charges on trunk roads that are complementary to a road charging scheme set up by a local authority. This would be necessary, for instance, where a trunk road passed through a built-up area for which a road charging scheme was being considered.

6.7 Proposals for levies on workplace parking

In general, we welcome these proposals. Although we accept that there are valid concerns about possible dispersal and displacement impacts, we are confident that parking levies could be an effective aid in encouraging modal shift from car commuting towards sustainable transport modes.

We are however perplexed by the statement that *“The Executive recognises the concerns expressed by business and others that workplace parking levies will do little to relieve congestion”* (paragraph 89). The further statement that schemes *“whose main purpose appears to be concerned with raising revenue will not secure the approval of Scottish Ministers”* is equally perplexing. If workplace parking levies are unlikely to reduce congestion and are not just a local parking charge to pay for better transport provision then this does raise the question of just what purpose the Scottish Executive actually sees for the measure?!

We are similarly perplexed at the statement that *“Ministers will pay particular attention to the level*

⁹ We also note the interesting phraseology used in paragraph 78. After months of, correctly, deeming road user charges on trunk roads “trunk road user charges” (viz: “urban road user charging”) we now see the Executive refer to them as “tolls.”

of support from the local business community” (paragraph 89). We request clarification as to why business community interests are to be given “particular attention” above that of local residents and other road users impacted upon by commuter traffic. The current drafting could easily be read to mean that business community interests have an effective blanket veto over workplace parking levy proposals. The level of support from the business community is a spurious basis on which to decide on whether to implement a workplace parking levy as they represent the tax base. Schemes should rather be judged on their impact on tackling transport problems – congestion, air pollution, climate change emissions, road safety, traffic levels, and so on.

6.8 Parking levies for other private non-residential parking.

We are disappointed that the Bill proposals do not provide for all private non-residential parking to be included in local parking levy schemes.

We note that the ‘Tackling Congestion’ consultation paper said that the legislation would not preclude secondary legislation to allow non-workplace parking levies¹⁰ but we think it preferable that the initial legislation should include enabling powers in this area.¹¹ While we accept the Executive’s statement in the ‘Tackling Congestion’ paper that it *“is not yet persuaded”*¹² of the measure, we similarly are not persuaded by the Executive’s argument that NPPG17 and voluntary agreements between local authorities and retail/leisure facilities will tackle this problem adequately. We have yet to see any convincing arguments presented why retail and leisure facilities should be excluded from the coverage of the levy.

We urge that the legislation be made flexible in this area. We recommend that the Bill provide for a discretionary extension of parking charges to retail and leisure premises to produce a more ‘level playing field’ between town centres, where parking charges already apply, and out of town facilities, where they do not.

We certainly require the Executive to set out why it is providing for an exclusion from parking levies for retail and leisure developments. To do otherwise would continue the suspicion, articulated by many over the past two years, that the exclusion from the levy results from the lobby power of the supermarket industry.

¹⁰ ‘Tackling Congestion’, July 1999, section 3.4.8, said: *“The primary legislation will allow the Scottish Executive to extend the scope of the levy to apply to types of non-residential parking other than workplace parking, through secondary legislation.”*

¹¹ We would note the view of the House of Commons Environment, Transport and Regional Affairs Committee which, in its April 1999 report on the UK Transport White Paper, concluded that:

“Road user charging should be designed, where possible, to include out-of-town and edge-of-town retail and leisure facilities and other major generators of traffic.” [recommendation nnn, para. 258]

and:

“Local authorities should be allowed to introduce customer parking charges, where they think it is appropriate. We recommend that schemes for customer parking charges be included in the pilot projects that have already been proposed to evaluate road user and workplace parking charges or are the subject of separate trials” [recommendation ooo, para. 259].

In its recent report ‘Environmental Impact of Supermarket Competition’, the same Committee concluded that *“the large amount of free parking offered by out-of-town developments gives them a massive advantage over town-centre retailers, as well as generating extra traffic”* (as quoted in Local Transport Today, 20/01/00). The Committee asked the UK Government to tackle the issue *“as a matter of urgency.”*

¹² ‘Tackling Congestion’, July 1999, section 3.2.8.

7. “Our other proposals” section

7.1 General comments

We are broadly in favour of the three sets of proposals on page 35.

7.2 Local sustainable transport for healthy communities

We are very concerned that the Transport Bill proposals as they exist does insufficient to provide for improvement in non-motorised travel and for making better use of our streets by reducing the dominance of the car and the heavy lorry.

The Bill appears to make provision for such improvement here only through knock-on effects from road charging schemes (see e.g. box after paragraph 80: *“return the streets to the people – making the urban environment a safer and more pleasant place to live, work and shop”*). Even here, we are told that this will be limited to *“our cities and larger towns.”*

The last few years has provided ample demonstration of the ability of low impact and generally low cost sustainable transport and access policies in contributing to a more balanced and civilised use of our road space. Initiatives such as Safe Routes to School, Home Zones, 20mph zones, traffic calming and speed reducing measures, secure and safe cycle facilities and improved pedestrian environments all have invaluable roles in providing for sustainable transport.

It is of concern that these initiatives merit no mention at all in the legislative proposals. This reinforces our suspicion that these measures are still regarded as peripheral in providing for better transport and access. It is our contention that a focus on local accessibility is central to providing for reducing the impact of transport and providing for better access to the facilities that people need to get to. The omission of legislative proposals in this area will certainly help reinforce the prejudice of those wedded to expensive infrastructure provision as a solution to transport problems

7.3 Home Zones

We have welcomed the Executive’s creation of a project to monitor Home Zones set up by Scottish local authorities and are happy to continue to play a role in promoting Home Zones. However, we are concerned that local authorities’ development of Home Zones proposals will be held back by the failure of the Scottish Executive to provide a suitable legal framework.¹³

Legislation required to bolster the status of the zones will require a change in the law to hold drivers responsible for crashes within the zone. In health and safety legislation those who create hazards must take primary responsibility for safety and we see no logical reason why this should not apply in the framework of road policy.

While the pilot programme will provide a useful opportunity to test Home Zones in Scotland, we believe that policy on Home Zones can be modelled on successful continental experience. We recommend that legislation be framed to allow enabling power to be given to the Executive to make regulations in future that would give priority to pedestrians and cyclists in Home Zones.

¹³ Our view would appear to be supported by recent research by the Improvement and Development Agency: ‘Making Connections: A Survey of Local Authority Plans for Integrated Transport.’ This research suggested that *“a fifth of local authorities would like to introduce transport projects but cannot do so without changes to the law”* (see report ‘New safe play zones face legal set-back’ in Planning, 11/02/00).

7.4 Green Transport Plans

We have welcomed the Executive's work in encouraging businesses to set up Green Transport Plans (GTPs) and the Executive's lead in making provision for their implementation at central and local government office locations.

However, local authorities have no powers to ensure that a GTP is implemented for existing sites. As such local authority efforts towards effective traffic management can be blocked by existing developments with large traffic impacts. We feel that there is unlikely to be sufficient take-up of GTPs unless they become a requirement of businesses. We recommend that the Executive legislate to give local authorities power to call for mandatory GTPs for developments over a certain size – perhaps initially those with a minimum number of parking spaces. The Executive should set out specific guidance on the size of development that would trigger the need for a GTP.

7.5 Parking restrictions

We recommend that the Executive legislate for a complete and total ban on parking on bus stops and on zigzag markings outside schools, with appropriate penalties for offenders.

On-street cycle lanes provide a safer environment for cyclists and so encourage the use of this sustainable mode of transport. However, the blockage of such lanes by parked motor vehicles hinders the usefulness of such lanes. The provision of advisory cycle lanes that allows parking simply provides a message that cycle use takes lower priority than the provision of car parking. We recommend that the Executive legislate to make it easier for local authorities to introduce cycle lanes in which parking is prohibited.

7.6 Speed wardens

We recommend that local authorities be permitted to employ speed wardens as they currently employ parking wardens, and that they should be able to retain the revenue for use for traffic calming or other similar purposes.

8. Recommendations

Much of our comments have been supportive of the Executive's proposals (see section 1 above for our general comments on the Bill). However, we have picked out a number of specific comments and recommendations that we would like the Executive to consider. The numbers in square brackets refer to the sections above:

It is imperative that the Scottish Executive's willingness to "*change our mind where necessary*" (page 4) does not become a general policy of weakening its commitment to bringing about sustainable and accessible transport whenever it is unfairly criticised. [1.2]

We recommend that the Transport Bill be introduced to Parliament as swiftly as possible. [1.2]

We recommend that Local Transport Strategies become a statutory requirement of local authorities, with an appropriate consultative framework instituted. [1.5]

We restate our recommendation that the Public Transport Fund be continued, but re-specified as the 'Sustainable Transport Fund' so that investment in generally low-cost measures such as walking, cycling and traffic management projects can also be supported financially. [1.6]

We recommend that the Executive provide more clarity on how the Strategic Rail Authority will provide for rail service development in Scotland. [1.7]

We need to know what contribution to meeting the Kyoto targets and the Labour Party manifesto commitment that the Executive predicts will be achieved by the strategies implemented, between now and 2010, as a result of the measures proposed in the Transport Bill. [2.1]

If and when the Scottish Executive catches up with the UK Government and designates Scottish targets, we also require to know what contribution the Bill measures will make to said Scottish climate change targets. [2.1]

We recommend that the Executive should quantify the impact of the proposals in the Transport Bill on traffic levels and towards traffic reduction. [2.2]

We recommend that the Bill should include a commitment for the Executive to report annually to the Scottish Parliament on a Scottish traffic reduction target, on measures required to cut traffic levels, and on an implementation plan to ensure that targets for traffic reduction are met. [2.2]

We recommend that the Scottish Executive bring forward a requirement for a Joint Plan either when a "*named transport issue*" *physically crosses local authority boundaries* or when the impact of a development *has cross-boundary impact* although physically contained within one local authority area. [3.2]

We recommend that preparation of any Joint Plan should made provision for full public consultation and not just "*private sector and other interests*" as suggested in paragraph 36. [3.2]

We also recommend that the provision for Joint Plan be applicable to planned and ongoing developments and will not simply provide an opt-out for such developments. [3.2]

We recommend that cross-boundary transport planning requirements be a major part of the Executive's review of the land use planning system. [3.3]

We recommend that the revised Forth Estuary Joint Board should consider as a priority how the number of cross-Forth trips could be reduced by appropriate planning policies of the surrounding local authorities. [3.4]

We recommend that the study into a possible Highlands and Islands transport authority will consider appropriate interest group representation. [3.5]

We recommend clarification on proposals for statutory consultation with bus users. [4.4]

We recommend that research into a national concessionary fare scheme will look into options for modes of transport other than bus services. [5.1]

We also recommend that the research should consider options for concessionary fare schemes for other vulnerable groups, for example children, the unemployed and those on low incomes. [5.1]

We recommend that the Executive's research into concessionary travel will also consider the prospect of a national taxi concession scheme. We recommend that consultation take place on this issue with the Scottish Accessible Transport Alliance as to how a national scheme could best be implemented. [5.2]

We recommend that the drafting on page 6, "*to address a pressing congestion and/or air quality problem*" be used in preference to that in paragraph 81, "*pressing congestion and air quality problems*" (our emphasis). [6.1]

We recommend that the Executive ceases to refer to charters for car users (the "contract with the motorist") and instead concentrates on ensuring accessibility *for everyone* by concentrating on better provision for public transport and the other truly sustainable modes. [6.3]

We would suggest that the Executive begins its "*fair treatment*" of car users by internalising all external costs from car use in the price paid for use of road space. [6.4]

We recommend clarification on what safeguards will be put in place locally to stop reactionary campaigns seeking to stop the implementation of a charging scheme once local authorities and/or transport companies have made additional investments in public transport services predicated on the future implementation of a charging scheme. [6.4]

We strongly oppose the presumption that road charging is only appropriate for use by "major urban authorities" (paragraph 81). [6.5]

We recommend that the legislation for road charging is framed broadly and flexibly so that charging proposals at a range of locations broader than that indicated in the paper could be considered. [6.5]

We think that the exclusion of proposals for trunk road user charging damages the proposals as they stand and recommend that the legislation is framed in a fashion that will not preclude the introduction of trunk road user charges at some point in the future. [6.6]

We recommend that local authorities be given the power to request charges on trunk roads that are complementary to a road charging scheme set up by a local authority. [6.6]

We request clarification as to why business community interests are to be given "*particular attention*" above that of local residents and other road users impacted upon by commuter traffic. [6.7]

We recommend that the Bill provide for a discretionary extension of parking charges to retail and leisure premises to produce a more 'level playing field' between town centres, where parking charges already apply, and out of town facilities, where they do not. [6.8]

We recommend that legislation be framed to allow enabling power to be given to the Executive to make regulations in future that would give priority to pedestrians and cyclists in Home Zones. [7.3]

We recommend that the Executive legislate to give local authorities power to call for mandatory Green Transport Plans for developments over a certain size – perhaps initially those with a minimum number of parking spaces. [7.4]

We recommend that the Executive legislate for a complete and total ban on parking on bus stops and on zigzag markings outside schools, with appropriate penalties for offenders. [7.5]

We recommend that the Executive legislate to make it easier for local authorities to introduce cycle lanes in which parking is prohibited. [7.5]

We recommend that local authorities be permitted to employ speed wardens as they currently employ parking wardens, and that they should be able to retain the revenue for use for traffic calming or other similar purposes. [7.6]

9. Acknowledgements

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TRANSform Scotland was launched in November 1997. Our sixty-six member organisations - including transport operators, local authorities, national environment campaigns and local transport groups - support the development of sustainable transport policies and structures for Scotland.

TRANSform Scotland seeks to reduce the need for intrusive movement by transforming the way:

- ◆ people travel
- ◆ goods are moved
- ◆ we plan, develop and use our cities, towns and countryside
- ◆ our economy operates, by improving access while reducing the need for transport.

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Our membership currently comprises the following sixty-six organisations:

Aberdeen City Council
Aberdeen Friends of the Earth
Caledonian MacBrayne
Campaign for Borders Rail
Capital Rail Action Group
CARE80
City of Edinburgh Council
Clydesdale Rail Action Group
The Cockburn Association
Colin Buchanan & Partners
ctc Scotland
Dumfries and Galloway Council
Edinburgh Chamber of Commerce & Enterprise
English, Welsh & Scottish Railway
Fife Friends of the Earth
FirstGroup plc
Forward Scotland
Friends of the Earth (Edinburgh)
Friends of the Earth Scotland
Glasgow for People
Glasgow Healthy City Partnership
Go Bike! Strathclyde Cycle Campaign
Great North Eastern Railway
Highland Cycle Campaign
Joint Action Against M74
Light Rail Transit Association (Edinburgh)
Light Rail Transit Association (Glasgow)
Lothian Community Transport Services
Lothian Buses plc
Lothian Safe Routes
Mid Argyll Chamber of Commerce
Motorcycle Action Group (Scotland)
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Pedal Power, the Scottish Borders Cycle Campaign
Perth and Kinross Cycle Campaign
Public Health Association Scotland
Rail Action Group, East of Scotland
Rail Users' Consultative Committee for Scotland
Railtrack Scotland
Railway Development Society (Scotland)
Railway Engineering Associates Ltd.
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RSPB Scotland
ScotRail Railways Ltd.
Scottish Accessible Transport Alliance
Scottish Association for Public Transport
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Scottish Citylink Coaches Ltd.
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Transport 2000
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Transportation Management Solutions
Virgin Trains
West Lothian Council
WWF Scotland