

TRANSform Scotland

the campaign for sustainable transport

Scotland's Transport:

Proposals for a new approach to transport in Scotland

Consultation response from TRANSform Scotland

17th December 2003

General comments

We see a role for better coordination of transport services across local authority boundaries and would welcome the replacement of the voluntary regional transport partnerships with some form of statutory arrangement (provided that there is clear public accountability of such bodies).

We have, however, genuine concerns as to whether the creation of a new national transport agency will aid the delivery of sustainable and socially-just transport. Delivery in transport is already complex yet the consultation document does not make a compelling case as to why a new government agency will make things any simpler. When the jury is out over the effectiveness of the most high-profile of the UK's new executive transport agencies, the Strategic Rail Authority, a better case needs to be made to explain why a new national transport agency is required in Scotland.

While we would certainly agree, as the consultation paper sets out, that road-building has - and indeed continues to dominate - Scottish Executive transport expenditure (§2) and that political horizons may mitigate against a more forward-looking and sustainable approach (§3), the contention that "We need a [new] organisation" (§3) doesn't immediately follow.

Section 16 gives one possible justification for the creation of a new organisation, namely the creation of a "core of experts" in order to deliver transport projects. While facilitation of such expertise may indeed be necessary, the consultation paper does not explain why such expertise cannot be held in-house within the Executive's own transport divisions. (If there are genuine reasons for this then they are not presented in the consultation paper.) While we continue to question the Scottish Executive decision to prioritise road-building expenditure over sustainable transport expenditure, we have few grounds to question the technical competence of the Scottish Executive's civil service in delivering these road projects. If the Executive's civil service can deliver road projects, we do not understand why this civil service cannot be tasked to deliver in accordance with sustainable transport and social justice objectives.

It has often been observed that one of the reasons why delivery on road-building appears to be easier to achieve than delivery on sustainable transport is because of the disproportionate amount of Scottish Executive civil servants employed in the roads divisions at Victoria Quay compared to those employed in areas charged with delivering sustainable transport. Wendy Alexander, the then Transport Minister, acknowledged as much at the March 2002 launch of the Transport Delivery Report that delivering public transport in Scotland was difficult because the existing Scottish Executive officials' skill set was "entirely based around road-building." It is hardly surprising that Scotland has such low levels of cycling and declining levels of walking when the Executive chooses, as it did in early 2002, to abolish the Branch (never mind a Division!) devoted to promoting

these most sustainable forms of transport. If 70% of Scottish Executive transport expenditure is, as is currently claimed, due to be on sustainable transport then we would suggest that it would also be appropriate that 70% of the Executive's civil service staffing levels should also be tasked with delivering sustainable transport.

Therefore, we suggest that a first step before any new such body is considered is that the Scottish Executive itself initiate a fundamental review of the Executive civil service's own staffing levels on transport.

Fundamentally, any new transport authority must not repeat the Scottish Executive's skewing of staffing levels towards major infrastructure projects; its staffing levels must reflect the need also to deliver local transport projects that can deliver on environmental, public health and social justice objectives - as is acknowledged in the consultation paper.

Q.1 We seek views on the overall aims for a new national transport body.

Should the Scottish Executive decide to continue with its proposals to create a new transport agency, we offer these comments:

We welcome the statements (§8, 23-24) that sustainable development, sustainable transport and social justice should underpin the philosophy of any new national transport agency.

However, we are surprised that the document appears to start from the premise that "very large infrastructure projects" (§1) are the most likely way in which shifts to sustainable and socially-just transport can be achieved. We cannot support this contention and would welcome the presentation of any evidence that could support this contention.

In accordance with the objective-led approach that underlies the Executive's own Scottish Transport Appraisal Guidance, more clarity is indeed required on the specific aims of any new such body. We would suggest that any new agency be charged with delivering against these key progress indicators:

- Traffic stabilisation/reduction targets (and hence, in the context of transport, on UK climate change strategy greenhouse gas emission reduction targets)
- Modal shift to the sustainable transport modes (walking, cycling, public transport, rail- and water-based freight), in aggregate and for specific journey types (e.g. journeys to work/school, short trips, freight trips)
- Accessibility planning standards

In order to achieve these aims, and in particular to meet the Executive's own target of road traffic stabilisation for Scotland as a whole, it is demonstrably the case that significant new road traffic demand management measures will have to be taken. Whatever the merits of the Transport Initiatives Edinburgh special purpose vehicle, it has at least been charged with the task of developing such a measure (an urban congestion charge for Edinburgh). We see nothing in these proposals which indicate that the new national transport agency would be charged with delivering any new road traffic demand management measures. We find this a rather bizarre omission given the UK Government's ongoing Road Pricing Feasibility Study (upon which the Scottish Executive is represented). We seek clarification that any new national transport agency would have responsibility for delivering any future road traffic demand management measures - either brought forward from the UK Government or by the Scottish Executive separately.

Lastly, we think that 'Transport Scotland' is a very poor choice of name. We suggest that the original suggestion of 'Scottish Transport Agency' be pursued as it would be a much clearer description of the task such a body.

Q.2 We would welcome comments on the best way of widening public involvement in the planning of transport services in Scotland.

We suggest the Executive considers the creation of bodies akin to the Rail Passengers Committee Scotland for the following transport modes: walking, cycling, buses, roads. It is our view that the Rail Passenger Committee structure gives rail users an independent body to which they can appeal should service quality fail.

We note that the Scottish Executive has recently created a Bus Users Complaints Tribunal. We are however concerned that the very name of this body may act as a deterrent to public input, being somewhat legalistic in tone.

Q.3(c) Would it be helpful for Transport Scotland to have powers to promote new railways or tramways in Scotland at its own hand?

We have always considered it a significant anomaly that new roads project can be procured through Road Orders while rail projects need to acquire Parliamentary legislation. While the latter process may give some extra benefit to the promoters of any such rail project, we do feel that the process for procuring roads schemes is substantially simpler.

Should the national transport agency be pursued, we would welcome it being given powers to promote new rail projects. However, and presuming that such a move would in itself require primary legislation, we see no reason why the Scottish Executive shouldn't seek to acquire such powers for itself irrespective of whether a national transport agency is created.

Q.4 We welcome views on the management framework options for regional partnerships.

1. Voluntary regional transport partnerships

The consultation takes an over-sympathetic view of the voluntary regional transport partnerships. There is little evidence that the voluntary partnership approach to transport planning has worked: a lack of budgetary responsibility and reliance on voluntary agreements have limited the effectiveness of these arrangements. Their unstable nature has tended to lead to controversial issues being avoided, with the lowest common denominator becoming the norm in decision-making.

The sole achievement of SESTRAN appears to have been delivery of a public transport cross-ticketing scheme (One-Ticket) that is, from our experience, incomplete and poorly used. More importantly, SESTRAN has entirely failed to achieve any political consensus across South-East of Scotland local authorities that action needs to be taken to implement road traffic demand management measures in order to control rising levels of congestion and pollution. The very public, and ongoing, spat between Fife, Midlothian and West Lothian Councils on one side, and the City of Edinburgh Council on the other, should be evidence enough of that.

The only significant activity of NESTRANS appears to have been the coordination of political lobbying for the Scottish Executive to divert national transport expenditure to its roads-dominated policies.

Furthermore, and in the case of NESTRANS and HITRANS, the involvement of business lobby organisations in policy-setting has, in our view, entirely discredited the political accountability of these bodies. We regard this as unacceptably bad practice in terms of local public accountability.

2. Passenger Transport Authorities and Executives

Whatever the merits of SPT, we do not think that the PTA/E model is appropriate for extension across the rest of Scotland if the aim is to deliver integrated transport services. The narrow focus of the PTA/E model on public transport service provision:

- do not provide a clear framework for delivery of high-level national policy objectives (such as traffic reduction or modal shift)
- provides no linkage to local transport modes (such as walking and cycling)
- would not be an appropriate structure within which to deliver road traffic demand management measures (given that PTA/Es, by definition, have no roads powers).

3. Special purpose vehicles

We have, in principle, no problems with such bodies being created. We do however have concerns about the accountability of such organisations. When Transport Initiatives Edinburgh was created, we raised concerns over an organisation which nominally is in the power of the City of Edinburgh Council but is run by a board which has a majority of private sector representatives. We continue to regard this as unacceptably bad practice in terms of local public accountability.

4. Joint Committees & Joint Boards

We are not supportive of the invention of Joint Committees or Joint Boards should such bodies contain non-elected members. Any such bodies would be democratically unaccountable.

In theory, we would welcome the replacement of the voluntary regional transport partnerships with some form of statutory regional transport authorities, charged with jointly coordinating regional transport and land use planning functions:

- Structure Plan formation
- Regional Transport Strategy formation
- Integration with Local Plans, Community Planning, Local Transport Strategies
- Management of regionally-coordinated transport services (e.g. integrated ticketing)
- Delivery of regionally-significant transport projects (e.g. new public transport and cycle infrastructure projects, road traffic demand management projects)

Local service provision (e.g. local roads, walking/cycling provision, local traffic management, local bus services) should, in general, remain with Local Authorities.

We do not see any case for all transport provision (as suggested in §60) being exercised by organisations that would exist on a geographical scale that would not reflect the essentially local nature of the vast majority of journeys. Half of all journeys are less than 2 miles in length, and 70% less than 5 miles. As such, transport provision must focus, and be seen to focus, on local transport provision. Reducing the need to travel is an

essential element of the Government's transport and planning policies: as such, transport planning structures that reflect locality rather than long-distance are, and will continue to be, most appropriate.

Q.5 We welcome comments on the future of SPT and the challenge of delivering integrated transport in the west of Scotland, particularly if new regional partnerships are established across Scotland.

We would have no difficulty with SPT being incorporated as the public transport section of a West of Scotland regional transport authority.

Q.6 We invite views on the appropriate number and geographical extent of regional partnerships.

These should mirror land use planning boundaries as far as possible in order to facilitate integrated regional transport and land use planning.

We feel that the consultation paper misses one of the more obvious frameworks on which to address the need for regional transport planning: Structure Plan areas. While there is a statutory requirement for local authorities to deliver land use plans in association with neighbouring local authorities, there may well be a rationale for transport planning to be delivered at a similar geographical scale.

There may well be a case for transport planning to follow the strategic land use planning framework used for Structure Plan formation. This approach would encourage better integration with land use planning, and would assist transport and land use planning in becoming mutually reinforcing. We feel that a regional approach to transport planning on this scale would also reflect the mass of non-trunk travel. It is our contention that Structure Plan areas better reflects the reality of journey length in Scotland as being local rather than being over longer distances. Such longer-distance trips will, as a rule, be carried out on the trunk road or trunk rail networks, the responsibility for which is well established as being the Scottish Executive itself.

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