



# **NPF3 Proposed Framework**

## **ICI Committee call for evidence<sup>1</sup>**

### **Transform Scotland evidence paper**

28 January 2014

#### **1 Scope of our evidence**

- 1.1 Given the scope of our organisation's interests, our evidence is restricted to those aspects of the NPF3 Proposed Framework that affect transport. We have set out some introductory comments plus responses to the first two of the Committee's questions.

#### **2 Introductory comments**

- 2.1 We regard the choice of transport projects featured as National Developments in the NPF3 Proposed Framework to be quite arbitrary. There appears to us to be no consistency as to which projects feature in NPF3 and which — such as most of the country's principal road and rail projects — are excluded from detailed consideration under the NPF3 process.
- 2.2 We further note the absence of detailed Parliamentary scrutiny of those transport infrastructure projects which feature in the Infrastructure Investment Plan (IIP) and hence are effectively exempt from detailed consideration under the NPF3 process. These include most of the Scottish Government's own major transport infrastructure projects (road and rail). We consider that this makes the NPF3 process a limited, partial, and, ultimately, unsatisfactory process. We recommend that the Committee call for the IIP and NPF3 processes to be brought together under the same Parliamentary scrutiny process.
- 2.3 We would further note that, unlike the extensive consultation process carried out by the Scottish Government's land use planners for NPF3, the process for IIP has been entirely bereft of public consultation. We are further unaware of any Strategic Environmental Assessment (SEA) of the IIP, which is a serious omission given that SEA is meant to be applied to "all public plans, programmes and strategies".<sup>2</sup>

#### **3 Views on whether projects should be considered as National Developments**

- 3.1 We support the retention of the Central Scotland Green Network as a National Development. We expect that Sustrans Scotland will have more detailed views on this project.
- 3.2 We support the inclusion of the new 'National Long Distance Cycling and Walking Network' as a National Development. Again, we expect that Sustrans Scotland will have more detailed views on this project. However, we would note that while this project can be expected to assist with the development of leisure cycle tourism and leisure walking, we do not expect this National Development to lead to significant increases in day-to-day levels of walking and cycling. We would direct the Committee to the Candidate National Development we submitted in December 2012, which suggested, amongst other things, a focus on urban areas and the provision of links in to the National Cycle Network.
- 3.3 We are not opposed to the sea port development proposals listed as National Developments. However, we see a discrepancy between there being three sea freight proposals against the absence of any rail freight proposals. In the section below, we make further comment on the treatment of rail freight in NPF3.
- 3.4 We are not opposed to the inclusion of 'High Speed Rail' as a National Development. However, we consider that greater attention should have been paid in NPF3 to the Scottish inter-city rail network — which, as opposed to HSR, is a topic which is entirely within the powers of the Scottish Government. We expand on the topic of Scottish inter-city rail links in the section below.

3.5 We do not support the inclusion of airport expansion in NPF3. Given the Scottish Government’s failure to meet its first two targets under the climate change act, the promotion of expansion of this most polluting form of transport is deeply counter-productive. Furthermore, as §5.34 expects “digital links” and high-speed rail to contribute to reducing demand, we see no grounds for the inclusion of airport expansion in NPF3.

## 4 Alternative or additional projects or proposals which merit National Development status

### 4.1 Inter-City Express rail network

4.1.1 Scottish rail journey times between our major cities are poor by modern standards. Currently Edinburgh/Glasgow-Inverness and Edinburgh-Perth trains are slower than road travel — *the rail route from Edinburgh to Perth is slower than it was 100 years ago* — and between Edinburgh/Glasgow and Aberdeen/Dundee, trains have no speed advantage over road. As the Scottish Chambers of Commerce have succinctly put it, “Scotland’s railways north of the Central Belt are not fit for purpose.”

4.1.2 We would encourage the inclusion as a National Development the development of a ‘Inter-City Express rail network’ (as in our response to the 2012 consultation on Candidate National Developments). This would include, amongst other things:

- Early investment in electrification of the lines linking Scotland’s seven cities;
- Removal of key bottlenecks (e.g. the single-track section at Usan on the Dundee-Aberdeen line);
- Reinstatement of the direct rail link from Inverkeithing through Kinross to Perth, in order to significantly improve journey times from the Central Belt to Aberdeen & Inverness;
- Further development of city interchanges, with Perth Station being developed as the hub of the Scottish inter-city network following the reinstatement of the direct route north to Perth.

### 4.2 Strategic rail freight connectivity

4.2.1 We believe that a new National Development should be included along the lines of that proposed by the Rail Freight Group, one of our member groups, in its 23rd July 2013 letter to the NPF3 Team. This is especially pertinent given that the NPF3 Proposed Framework contains three sea freight National Developments but fails to give equal treatment to the rail freight sector. In its response, RFG called for enhancement of the ‘strategic freight connectivity of the inter-urban rail network’ through:

- *“Enhancement of route and train capacity and capability to secure cost-effective rail freight operations inter-connecting Scotland’s six mainland regions – in particular the six Areas of Co-ordinated Action – and the three Anglo-Scottish routes (East Coast Main Line, West Coast Main Line and Glasgow-Kilmarnock-Dumfries-Carlisle).*
- *“Identification and development of suitable new terminal sites to complete the strategic inter-urban network, in areas currently inadequately served and in the Areas of Co-ordinated Action.*
- *“Optimisation of rail/road access and handling/storage capability at key rail terminals in Scotland’s six mainland regions (in particular the six Areas of Co-ordinated Action) – and at a potential new Central Scotland hub optimally located for rail and road access, space for storage and ancillary activities etc.”*

4.2.2 We are happy to support the proposal set out by the Rail Freight Group and recommend that further detailed evidence from the RFG be considered as an input to the Committee’s scrutiny of NPF3.

•••••

<sup>1</sup> <[http://www.scottish.parliament.uk/S4\\_InfrastructureandCapitalInvestmentCommittee/14.01.14\\_NPF3\\_Call\\_for\\_Views\\_2.pdf](http://www.scottish.parliament.uk/S4_InfrastructureandCapitalInvestmentCommittee/14.01.14_NPF3_Call_for_Views_2.pdf)>.

<sup>2</sup> <<http://www.scotland.gov.uk/Topics/Environment/environmental-assessment/sea/about>>.