

Transform Scotland response to Transport Scotland 'Consultation on the draft second Strategic Transport Projects Review (STPR2) for Scotland'

15 April 2022

Q13. Comments on the theme Improving Active Travel Infrastructure and the recommendations within it.

Providing safe and comfortable active travel infrastructure is essential to enabling more people to walk, wheel and cycle. Recommendations 1 to 5 will all support the shift towards more sustainable travel. Recommendations 1, 2, 3, and 4, in particular, would provide infrastructure for short to medium distance trips, and provide great potential to allow people to make more of their daily journeys on foot or by bike. Intervention 5, while likely providing some benefit for daily use, would primarily open up opportunities for leisure walking and cycling. However, the lack of detail, in particular regarding Recommendations 3 & 4, is of concern.

We welcome Active Travel featuring prominently in STPR2 and active travel infrastructure being recognised as strategic to the transport network. However, delivery of active travel networks lies primarily with local authorities, where there remains large variation in the ambition and scale of the active travel investment that is being progressed. While it is important that local communities are involved in the planning and decision-making for active travel networks, without a national delivery plan in place it is unlikely that the necessary infrastructure will be delivered at sufficient speed or with a consistent high level of quality. In addition, active travel projects often face significant delays through lack of agreement from landowners and the unnecessarily complex TRO and RSO processes. If active travel is considered a strategic part of the transport system, it should be treated as such. The Scottish Government should take an active role in driving the delivery of active travel networks forward and award them the same level of political support as it provides to rail or road networks.

Q17. Comments on the theme Influencing Travel Choices and Behaviours and the recommendations within it.

We support the proposed recommendations under Influencing Travel Choices and Behaviour. For Recommendations 6 to 10 to be successful in improving vulnerable road users' safety and encourage more people to take up active travel, they must be implemented alongside the Recommendations 1-5. We have also long supported reduced speed limits and expansion of 20mph zones, so we are pleased to see Recommendation 10 included in STPR2.

However, behaviour change interventions to modal shift to public transport will fail if not accompanied by price signals which incentivise public transport use and disincentivise excessive levels of car use. In essence, it is of little use encouraging people to use public transport if it remains unaffordable compared to car use — and decades of price data demonstrate that public transport has become progressively less affordable here. The section on 'Affordable and Accessible Public Transport' (9.8.2) lists a series of public transport interventions. These are all welcome interventions but they will not in themselves clearly impact the affordability of public transport, and will do nothing to affect the relative affordability of public transport with respect to car use.

The failure to set out any road traffic demand management measures is the critical failure within STPR2. Had the scope for STPR2 been narrowly-specified to only include infrastructure investment then we could accept that this would reasonably be addressed elsewhere. However, this section of STPR2 is largely not related to capital expenditure. The failure to address traffic demand management in STPR2 puts the credibility of the Scottish Government's target to reduce car kms by 20% by 2030 in question.

Q21. Comments on the theme Enhancing Access to Affordable Public Transport and the recommendations within it.

We broadly welcome the focus in Recommendations 11,12 and 13 on city-region mass transit systems. However, it remains difficult to provide an informed view given the vagueness of the information that has been presented. It is astonishing that a multi-year, multi-million pound exercise such as this can't even make up its mind as to what public transport technology it is recommending, let alone provide basic levels of information on extent of the networks proposed or expected costs and benefits.

We would recommend light rail (including tram-train) as the additional mass transit technology to be pursued across Glasgow, Edinburgh and Aberdeen. That said, we acknowledge that rail-based systems are more expensive and tend to have longer delivery times than bus-based systems. As such, we also strongly support the implementation of bus priority measures, and, perhaps as importantly, the effective enforcement of bus priority. (This includes bus priority on the motorway network, including the 'Managed Motorways' project for the Glasgow motorway network committed to in the 2019 Programme for Government but now severely delayed.)

It is disappointing that more clarity hasn't been provided regarding the 'Aberdeen Rapid Transit' proposal. If this provides bus lanes separate from general traffic then this may be of merit. However, given the failure of the now-removed guided busway in Edinburgh (i.e. CERT), we would be opposed to the further pursuit of that form of public transport technology in Aberdeen. We recommend that further consideration be given to rail-based options as the city compares most unfavourably with similar and smaller European cities having just one rail route from the north and one from the south – both with single track sections – and being larger than many European cities with successful light rail networks. A similar analysis could be applied to Dundee, and find it surprising that similar commitment is not being made here compared to Scotland's three other major cities.

Recommendations 15,16 and 17 all form part of the Scottish inter-city network and upgrades are essential if the NPF3 objective of 'making the train quicker than the car between Scotland's cities' is to be achieved. Electrification, double-tracking and enhanced passing loops are all required to improve journey times and capacity for both passenger and freight services. Of note are the single track sections in Perth and at Usan on the routes from the Central Belt to Aberdeen plus the largely single track route of the Highland Main Line to Inverness from Perth. In the latter case, the failure to achieve any significant progress since promises made in 2008 is especially notable. The then First Minister's 'Declaration of Inverness' of August 2008 promised that 'journey times between Inverness and Edinburgh would be cut by 35 minutes with an hourly frequency'. There was to be a fastest journey time of 2 hours 45 minutes with an average of 3 hours – all to be achieved by December 2012. STPR1 then placed these improvements and ones to the other inter-city route between Inverness and Aberdeen as 3rd and 4th priorities in Scotland. It is particularly notable that improvements to this latter routes are not even mentioned in STPR2 despite earlier promises of an hourly frequency and 2 hour journey time not being delivered.

Recommendations 18, 19, 21 and 23 are all essential components of an effective and affordable public transport system. Rail cannot exist in isolation and needs to be integrated with other public transport modes both physically at key interchanges and through timetabling that ensures co-ordination and therefore an integrated through journey. This should be accompanied by smart and integrated public transport ticketing.

We remain to be persuaded of the role of Mobility Hubs (Recommendation 22). The integration of transport modes is important and, if well implemented, can make sustainable transport more attractive. However, it remains unclear what level of service a mobility hub has to offer to be considered as such. As long as there is no clear and widely understood standards then we expect that the term will be used to dress up very basic transport infrastructure as some sort of transformational intervention for sustainable transport.

Q25. Comments on the theme Decarbonising Transport and the recommendations within it.

We support the modernisation and decarbonisation of the ferry fleet set out in Recommendation 24. As one of the more challenging modes of transport to decarbonise with long life cycles for individual vessels, the Scottish Government should ensure that investment in new vessels is well planned and low or zero carbon ferries are commissioned where possible in future.

Faster progress is required on electrification of key routes to achieve the decarbonisation target to which Recommendation 25 refers. The majority of the diesel fleet requires replacement by 2030 and a replacement by fully electric trains will be a more efficient and cost effective way forward than reliance on bi-mode trains. By electrifying the routes from the Central Belt to Aberdeen and Inverness alone, 96% of ScotRail's passengers could travel on electric (or zero-emission) trains.

There has been welcome progress in decarbonising bus fleets in recent years and a number of Scottish operators now will soon have substantial fleets of all-electric buses. The Scottish Government should build on this success and ensure that this development keeps pace. However, to deliver the 2021 Programme for Government commitment that the majority of buses will be zero carbon by 2023, decisive action on Recommendation 26 is now required.

As the most efficient and climate friendly form of freight, which we discuss further under Recommendation 44, rail freight should be the primary focus for behaviour change and modal shift for freight, Recommendation 27. Enabling this shift is supported by a number of other recommendations in STPR2 and will primarily require electrification, increasing route capacity and the creation of new rail terminals.

An omission in this theme is the lack of focus on aviation. Aviation has the highest climate impact per passenger but there has been no progress in reducing emissions from the sector given continued increases in flight volumes. While there is progress in developing less carbon intensive fuels and low and zero carbon aircraft, these will not be ready to be deployed at scale within this decade. If we want to achieve our climate targets there will need to be some form of demand management in the aviation sector to reduce emissions.

Q29. Comments on the theme Increasing Safety and Resilience on the Strategic Transport Network and the recommendations within it.

In a climate emergency it is no longer defensible to continue to expand an emissions-generating road network in the uncontrolled fashion that has characterised Scottish Government roads policy in recent decades. As such, we welcome the focus on maintaining and enhancing the existing road network in this section of STPR2, which is a shift away from including capacity-increasing road schemes in STPR1 and other transport policies of the past. This also brings the recommendations in line with the Scottish Government's 20% car km reduction target. We trust that this will set the tone for future budgets and Infrastructure Investment Plans and shift funding for road transport from building new capacity to maintaining the existing infrastructure and improving access for sustainable forms of transport on this network.

However, our scores for Recommendations 29 and 30 reflect the vagueness of these particular recommendations. While we naturally support the retention of a safe and resilient trunk road network, including the A83 access to Argyll, it is unclear to what extent the current list of projects set out in these recommendations includes capacity enhancement which may result in road traffic generation, counter to the Ministers' traffic reduction target.

Q33. Comments on the theme Strengthening Strategic Connections and the recommendations within it.

Recommendation 40 is unclear in its scope. It is unclear to what extent the schemes listed will provide additional road capacity, and as a result what road traffic generation will result. What is clear is that this recommendation is entirely road-based, and that no consideration is given here to the potential of the Ayr-Stranraer railway.

Recommendation 41, to investigate fixed links to Mull and in the Outer Hebrides, is preposterous. These schemes would have vast project costs — we would estimate several billions of pounds — and risibly poor cost-benefit scores. Furthermore, precisely no information is presented on the environmental consequences of such schemes, let alone the climate implications involved in their construction, and as such we are not confident that their environmental impact would not be catastrophic in extent. There are ample other opportunities for investment in the infrastructure in the Islands which would be of greater value; in the area of transport, measures to tackle the negative unintended consequences of the rapid expansion of car-based tourism in these

areas would be of greater value. As such, pursuing tunnels and/or bridges at excessive cost would inevitably entail a vast opportunity cost for more appropriate targets for investment.

Recommendation 44 highlights the need for strategic rail freight terminals and facilities. This needs to be linked to an onward local distribution network by low carbon road vehicles and thus removing the intrusive and highly damaging impact of heavy road lorries in urban areas. Whilst improved terminal facilities are integral to the development of a low-carbon freight network, this must be accompanied by:

- Electrification. Early electrification of the routes from Central Scotland to Aberdeen and Inverness – speeding up transits, improving route capacity and further cutting carbon emissions compared to road haulage. To support electrification there must also be investment in ensuring that the electricity supply will be able to meet the demand placed on it.
- Route capacity. Enhancement of route and train capacity and capability (including loading gauge) to secure cost-effective rail freight operations connecting Central Scotland with key ports and terminals across the country.

We know from the Rail Freight Group (RFG) that "each freight train produces 76% less emissions than HGVs on average". Much of the freight arriving by rail comes via the West Coast Main Line (WCML) and its key spurs. Again the RFG tells us that every 24 hours, 188,000 tonnes of critical supplies move by rail between London, Birmingham, Manchester, Liverpool and Glasgow and each freight train – pulled by one locomotive – takes up to 76 heavy goods vehicles off the road. To allow for the transfer of more freight from road to rail on cross-border routes, enhancements are required to the WCML, East Coast Main Line (ECML) and the Glasgow and South Western Route via Dumfries. This links to Recommendation 45.

Regarding Recommendation 45, construction of HS2 is now proceeding in England and new trains are to be ordered which will allow services to transfer from the new high speed line to the existing 'classic lines'. These trains will serve Scotland by the WCML but will not have the tilt capability currently employed by the Avanti Pendolino trains and so will consequently suffer a longer journey time on the WCML to Scotland. Prior to the pandemic there were over 100 daily flights from Central Scotland to the London airports and the modal share for air was 70% compared to just 30% for rail. A key necessity of decarbonising transport is to achieve modal shift from air to rail: this requires a significant reduction in the rail journey time from Central Scotland to London. A recent report by the High Speed Rail Group estimated that a three hour journey time would achieve a modal share of 75% for rail.

We have been members of Transport Scotland's High Speed Rail Partnership Group from its inception and were party to regular meeting and updates on progress with plans to upgrade both the WCML and ECML to improve both journey times and capacity. We are not aware of any progress for over two years and believe that there is now an urgency to progress plans and start construction on the necessary upgrades to allow HS2 trains to serve Scotland with significantly reduced journey times.

Added capacity is also urgently needed on Anglo-Scottish routes for more freight and local passenger services. The lack of capacity on the ECML was recently highlighted by the LNER timetable consultation on reducing journey times to London to 4 hours. It became clear that this can only be achieved by reducing other trains on the route and reducing stopping patterns at intermediate stations.



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We campaign for walking, cycling and public transport to be the easiest and most affordable options for everyone. Our diverse membership brings together public, private and third sector organisations from across Scotland. We are a registered Scottish charity (SC041516).