

**SCOTLAND'S NATIONAL TRANSPORT STRATEGY**

**CONSULTATION RESPONSE**

**FROM SCOTTISH ENVIRONMENT LINK**



## **Scottish Environment LINK**

Scottish Environment LINK is the forum for Scotland's voluntary environment organisations - 36 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Established in 1987 LINK provides a forum and network for its member organisations, enabling informed debate, and assisting co-operation within the voluntary environmental sector. LINK assists communication between member bodies, government and its agencies and other sectors within civic society. Acting at local, national and international levels, LINK aims to ensure that the environment is fully recognised in the development of policy and legislation affecting Scotland.

## **Comment**

Scottish Environment LINK welcomes this opportunity to comment on the National Transport Strategy. We commend the Scottish Executive for producing the strategy, the first ever for Scotland.

## **Summary**

- We are concerned that the National Transport Strategy as it is currently drafted lacks the direction and the dynamism necessary to make Scotland a more active, healthy and less carbon emitting society.
- We urge the Scottish Executive to make environmental protection and tackling climate change, two of its key goals for the strategy
- We implore the Scottish Executive to break the link between economic growth and expenditure on transport.
- We call for a target to reduce road traffic and retain the traffic stabilisation figure.
- We call for a planned programme of road user charging.
- We encourage the Executive to set strict carbon allowances for road traffic.

## **Conclusion**

In its current form this strategy will do little to halt the growth in road traffic and the damaging environmental impacts made by carbon emissions, increased road building and air travel.

We call on the Executive to produce a finished strategy that is a far-sighted and inspiring programme of measures to tackle oil dependency, reduce road traffic, protect the environment and improve the health of the nation and, in so doing, position Scotland at the forefront of eco-friendly transport in Europe.

## Questions

The draft strategy poses sixty-five questions. Where we feel we can usefully add to the debate we do so on the following pages.

**Q1:** The goals listed as bullet points on page 14 are not the right goals for transport in Scotland. They should not be led by economic interests and are lacking in goals for environmental protection and reduction in greenhouse gas emissions.

In addition, while we support the remaining goals, we regard “promote” modal shift as an insubstantial statement; if the Executive is serious about modal shift this strategy should be “facilitating” or “enabling” modal shift.

**Q2** Improving the health of the population should be at the heart of this transport strategy and every transport decision taken in the future.

**Q3** This strategy must set the agenda for all future transport planning and development. The Executive must make clear its aims and objectives for transport through this strategy and ensure that all those tasked with the delivery of transport developments adhere to these criteria.

**Q4** This strategy must require the Strategic Projects Review to address cutting carbon emissions and challenge the link between spending on transport and increasing economic growth.

**Q5** Cycling and walking must be included in all infrastructure projects. Budgets should be dedicated to all aspects of sustainable transport, not just for infrastructure but for training, maintenance and promotion.

**Q6** We wish to see this strategy take forward and enforce the advice on integrated land use given in Scottish Planning Policy 17 *Planning for Transport (SPP17)*. We therefore stress to the Executive the need to use its mandate to ensure that the RTP’s heed this guidance as they draft their regional transport strategies, some of which are already entering consultative stages.

**Q7-9** Scotland should begin planning now for a reduction in flights and should assist the business community to prepare for a Scotland with less oil, less air travel, more business travel by high-speed rail and more use of technology such as video-conferencing by the business community.

**Q10** This strategy must progress the work of the core path planning process which is already underway as a result of the Land Reform (Scotland) Act 2003 to ensure that non-motorised users have path provision that will lead to real, sustainable alternatives for transport, and deliver substantial modal shift.

**Q26** The Executive, through this strategy, must set the agenda and create the environment to allow modal shift. Only the Executive has the influence and power to inspire, lead and compel all the varied transport delivery

agencies to take forward the fundamental change required in altering transport behaviour in Scotland.

**Q28** Every school in Scotland should be a Safe Route to School establishment. Every child should be given free on-road training in Primary 6. Every effort should be made to facilitate walking and cycling to school for Scottish schoolchildren. We would also like to see the Executive commit to delivering a network of offroad routes parallel to trunk roads, which join communities and enable people to walk or cycle safely and choose a non-motorised transport option. These could form part of the core path network.

**Q40** Biofuels should only be promoted where they can be demonstrated to deliver net carbon reductions and meet high environmental standards in their sourcing and production.

**Q46-49** Road user charging should continue to be promoted by the Executive.

**Q55** It is important that the Scottish Executive subjects its final proposed transport policies to Strategic Environmental Assessment and public consultation.

**Q56** The Executive, through this strategy, must break the link between economic growth and transport growth.

**Q60** The Executive, through this strategy, must set a target to cut road traffic levels over the next twenty years, particularly for short journeys, which we argue is achievable through modal shift. In addition, it is vital that the road traffic stabilisation figure is maintained and positioned alongside other targets for increasing cycling and walking and reducing carbon emissions.

**Q64** The level of carbon dioxide reduction for transport should fairly reflect the fact that transport accounts for almost a fifth of emissions and that overall carbon dioxide emissions in Scotland should be reduced by at least 20% by 2010.