

Scottish Association for Public Transport

Response to Environmental Assessment of Strategic Transport Projects Review

February 2009

Introduction

While the Association accepts the principle of Strategic Environmental Assessment (SEA), it has serious reservations about the merits of the current approach and the unreality of separating environmental assessment from economic and social assessments. In theory, the latter are covered in STAG but there is a risk that both SEA and STAG procedures are perceived as little more than box-ticking exercises poorly connected to budget appraisal in the context of action being developed under the **UK and Scottish Climate Change Bills** and the recommendations of the **UK Independent Committee on Climate Change**

In its first report published in December 2008, the above Committee made strong recommendations for steepened cuts in greenhouse gas emissions between 2005 and 2020. These would be part of concerted action to meet the aim of 80% cuts on 1990 levels by 2050. The Committee makes it clear that such action will not only meet environmental objectives but can make the economy stronger than it would otherwise be. New and intensified measures are recommended to promote energy efficiency and conservation and to accelerate shifts to alternative fuels. The aim is meaningful integration of environmental, economic and social objectives in a series of Five Year Action Programmes, including both fiscal and regulatory measures and reviewed in the light of emerging evidence and future intermediate targets to 2050.

Any adoption and revision of STPR must take account of this context. Climatic factors, and their inter-linkage with the economy, cannot therefore be confined to the seven line reference on page 7 of STPR Environmental Report summary.

Movement Forecasts

Another factor neglected in the Environmental Report is the impact of changes in policy and in fossil fuel prices on future forecasts of movement and modal share both within Scotland and on external links. The STPR does recognise a substantial slowing of rates of growth in road vehicle kilometres but needs to take account of the importance of including a revision of forecasts for external aviation in the context of the Independent Committee view that recent rates of growth (now much affected by cyclical downturn) are not sustainable over the years to 2050. In particular, both the UK and Scottish Governments have recognised that there are increasing prospects for rail, not only to handle more freight (with much lower emissions and less disturbance for local environments than movement by HGV), but also to attract a substantial share of short-haul (250 to 500 mile) passenger trips presently made by air.

The STPR as adopted needs to give more attention to this issue with explicit recognition that a continuation of the near stabilisation of road vehicle kilometres (already evident for car use as shown in Scottish Transport Statistics, December 2008) and a substantial slowing of aviation growth offers joint benefits for the economy, the environment and society. Conversely, the new policy and forecasting context is likely to maintain recent high levels of rail growth and add momentum to increases in walking, cycling and in tram, bus and demand responsive transport for many of the shorter trips which, if by car, contribute to emissions, traffic delays and other adverse

impacts on local environments. The Environmental Report also needs to take account of the advocacy in the National Planning Framework of land use and pricing policies which can reduce the need for movement and encourage both shorter trips and working and shopping from home.

Transport Technology, Regulation and Investment

Both the UK Climate Change Committee and the STPR assume, pending further evaluation (notably in relation to aviation), that transport technology and related regulatory/fiscal measures to encourage investment in more energy efficient vehicles and alternative fuels will take time to have a substantial impact and will do little more than counteract the tendency for continued growth in aviation and in road use at least until 2020. Yet the need for more investigation of this area is admitted with the Climate Change Committee urging faster moves towards the use of electric power in transport if steepened 2020 targets are to be met. What also requires examination in the adopted STPR (and in SEA) are the increasing prospects that overall road vehicle kilometres can be stabilised (reduced in some areas) and domestic air travel in Britain (and to the nearer continent) reduced over the period to 2022 with joint benefits for the economy, the environment and society. Environmental assessment must be revised to take account of these probabilities. Given limitations in public finance and current problems with private sector investment, it is of special importance that both STAG and SEA assessments should take integrated account of the need to compare the costs and benefits of major transport projects with the costs and benefits of alternative uses for similar, or reduced, levels of funding. On the evidence of the Eddington Report and of the Climate Change Committee, there is a distinct possibility that structural change in funding (backed by regulatory and fiscal change) could offer higher and earlier benefits than the programme outlined in STPR.

Finalised STPR and related Environmental Report

The Association would urge adoption of the following changes:-

- a diversion of funding from major trunk road projects to lesser road, rail and other public transport schemes offering greater corridor and area benefits in phased packages
- a shift of funding towards the promotion of energy efficiency, energy conservation and shifts to alternative fuels
- enlarged funding for rail electrification within Scotland and Anglo-Scottish route development in the periods both to, and after, 2016
- enlarged funding for Regional Transport Partnerships (RTPs) and local councils earmarked for local public transport, travel plans, access and active travel
- introduction of borrowing for major transport projects against specified income streams (allowing investment in sustainable transport to be higher than it would otherwise be)

The APPENDIX contains more detailed points on the Environmental Report but the key issue is seen as one of integrating economic and environmental assessments to reflect the realities of the new agenda for the economy, energy, climate change and social progress.

Alastair Reid, Secretary
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APPENDIX : Selected Comments on Environmental Report Summary

Strategic Corridor Diagram p 3 Though this is indicative, it gives a misleading impression that freight movement within Scotland (and to England) relies heavily on the present Forth Road and Rail Bridges. In fact, neither have a substantial use for freight and the principal north-south

freight corridor is, and will continue to be, the corridor via the M80, M73, M74, M6/A66 and the West Coast Main Line rail route from Perth via Gartsherrie/Eurocentral to Gretna. Maps of Freight (and Passenger) Flows in 2007 and expected Flows by 2017 and 2022 would be preferable. An outline of forecasting methodology and assumptions should be included.

Stages of Assessment p 4 Environmental assessment should be integrated with economic assessment, including the **opportunity costs and benefits** of using funding for proposed major projects in other ways. Changes in the level and structure of funding from that proposed in STPR could offer better outcomes for the economy and the environment

Climatic Factors p 7 Reference to impacts arising from rising sea levels should be included.

Assessment Methods p 9 & p10-13 Pages 10 to 13 deal only with broad findings of positive or adverse environmental impacts. The weighting given to the different factors in environmental assessment is unclear and, since no information is given on economic assessments, it is not possible to evaluate the reasoning behind the 29 projects favoured in STPR. A more appropriate method would be to rank projects in 4 categories from say +10 to -10. The categories would be economic impact, environmental impact (exclusive of climate change and energy issues) and separate categories for rating the economic impacts and more localised environmental impacts of transport changes related to climate change and energy issues. This would allow an explicit weighting for the particular importance of the climate change/energy agenda to 2020 and 2050, including allowance for the positive economic impacts of the emerging climate change/energy agenda as outlined in Scottish Government priorities and by the UK Climate Change Committee.

Project Comments

D14 Part 1 p12 Should this not read as A9 upgrade Dunblane to Blair Atholl?

E2 p12 Co-locate Bus and Rail Station in Dundee – query basis for view that this would have adverse environmental impact

E8 & D31 Query view that E8 (new railway Inverkeithing-Perth) would have positive regional environmental impacts while D31 (new railway Inverkeithing-Halbeath) would have neutral impact. In view of higher cost of Perth line (and ability to use these funds in other ways), it is likely that Inverkeithing-Perth would be neutral and Inverkeithing-Halbeath positive

D25 p13 West of Scotland Strategic Rail Enhancement – query conclusion of an uncertain environmental impact. Would expect strong environmental benefits (as well as economic gains), especially if decisions are taken to give priority to electrification of the Shields Rd-Bellgrove Glasgow Crossrail link and related early conversion of inner south side suburban lines to higher frequency light rail penetrating the city centre

Forth Crossing Why was this major project omitted from list of environmental assessments? An assessment should be part of the adopted STPR. Given the engineering evidence that the existing bridge can handle present levels of traffic (apart from the 5% in HGVs) for the foreseeable future and the commitment to encourage both peak car-sharing and shifts to rail, bus and ferry, early priority for a £2.3bn additional crossing would have large economic and environmental disbenefits (including allowance for the assessed benefits of using £2.3bn in other ways over the period to 2016, especially if funds came from the annual funding for the Scottish Government rather than from acceptable arrangements to spread the costs of a new bridge). It is expected that the present road bridge will be able to handle HGVs at least until 2020 but, if this is not feasible, the disbenefits involved in HGV diversions would be low compared to the economic and environmental benefits of allocating £2.3bn for other purposes in the years to 2016. This suggests that any final decision on an additional Forth crossing should be delayed until 2014. This would give time to examine the gains from stronger efforts to encourage peak car-sharing and modal shift to public transport and to consider the benefits of a Dunfermline Northern Bypass encouraging more HGVs to travel to and from the west and to England via Kincardine rather than Queensferry. Such a delay would also permit evaluation of the integration of any future crossing in a tidal barrage (also able to

generate electricity) cutting flood risks from rising sea levels on the Forth west from Rosyth.

National Transport Strategy (NTS)

This is referred to on p17 but there should be an indication that the NTS retained the aim of stabilising road vehicle kilometres over the years to 2021. Substantial progress on this aim is evident in recent traffic data, showing stable or falling car use despite a rise in car ownership (principally in the number of households with 2 or more cars).

Cumulative Effects Assessment (p17-19)

Environmental Impacts in Inverness, Perth, Aberdeen, Edinburgh, Fife, Dundee & Glasgow

In the Environmental Report, STPR schemes are seen as positive with accessibility, air quality, health &, road safety gains and added benefits from modal shift from cars. The Association suggests that there should be a direct indication of the expected scale of modal shift from cars (the greater the shift, the greater are environmental and economic benefits) with added mention of the benefits of the NPF objectives of encouraging shorter trips, better interchange planning and higher densities promoting greater use of public transport and of walking and cycling. However, there is a puzzling reference to greater use of public transport encouraging walking and cycling. This is true as people have to walk to and from public transport but it is less evident that plans for integrating cycling with public transport are well developed. The statement needs to be altered to reflect the importance of greater use of both walking and cycling for the full length of shorter trips made in urban areas – a topic neglected in STPR as it is a local authority and RTP issue. Nevertheless, it is a topic affected by national funding policies for transport, access and health.

Scotland-wide Cumulative Effects

There is a need to review the conclusion that STPR would reduce Scottish road transport CO2 emissions by only 1% a year on the 9.7Mt of carbon emissions attributable to road transport in Scotland in 2005. Is this an absolute cut of 1% a year or a cut of 1% on a rising level of road transport emissions? Assuming that the former applies, a 1% cut is still less than the UK Climate Change Committee stress on a 31% cut in internal UK emissions between 2005 and 2020. A cut in road transport emissions of only 1% a year will be more than cancelled out if aviation growth continued at the high rate applying to 2006. The STPR requires to be extended to include aviation issues with more flesh being put on the acceptance by the UK and Scottish governments of a substantial shift of Anglo-Scottish travel from air to rail. There is clear scope for shifting the present 80/20 air/rail split of Scottish Central Belt - London travel to 30/70 within 20 years.

The Environmental Report does conclude that the **rail electrification** proposed in STPR could reduce levels of rail-based carbon emissions. Firm data on the scale of this saving is needed, including allowance for savings arising from mode shift from car, HGVs and plane to rail. Explicit reference to electricity pricing, fiscal policy (such as a fossil fuel tax) is required. Rail electrification and the rising use of electricity for trams (and possibly some buses) and cars will tend to raise **demand for generating capacity** (in addition to replacement capacity). Rising demand for energy via electricity may make it harder to meet existing targets to generate 50% of electricity from renewable sources by 2020 yet, if the gap is met by new coal-fired power stations (as now proposed in the NPF at Hunterston and possibly on other sites), this will lead to rising CO2 emissions unless viable means are found for applying carbon capture and storage at such power stations. The STPR and Climate Change/Energy Strategy needs to address these concerns.