



STRATEGIC TRANSPORT PROJECTS REVIEW: ENVIRONMENTAL REPORT

Consultation response from Transform Scotland

Friday 13th February 2009

1. Introduction

- 1.2 Transform Scotland is the national sustainable transport alliance. We are a membership organisation bringing together rail, bus and shipping operators; local authorities; national environment and conservation organisations; local environment and transport campaign groups; and individual supporters.
- 1.3 We welcome the opportunity to comment on the Strategic Environmental Assessment (SEA) of the Strategic Transport Projects Review (STPR). We are, however, greatly concerned, about the direction in which STPR as a whole takes the future of transport infrastructure investment in Scotland. Secondly, it also appears to us that that the SEA process appears to have had no overall impact on the content of STPR.
- 1.4 In particular, we find it worrying that, while the SEA states that it will reduce levels of transport-related carbon emissions in line with the Scottish Climate Change Bill, the STPR does not propose interventions which will contribute to that reduction. Additionally, on consideration of Human Health, the SEA states that walking and cycling should be promoted – but these interventions have been specifically excluded from STPR. Finally, in spite of giving certain interventions an ‘adverse’ rating, the SEA does not appear to have had any influence on STPR.

2. Climate Change

- 2.1 The introduction to the Non-Technical Summary states that STPR “will deliver a strategic transport network which will...deliver on the priorities set out in the ... Scottish Climate Change Bill”¹ “Climatic Factors” – with specific reference to greenhouse gas emissions – are also listed as one of the 11 environmental characteristics, the impact on which forms the core of the SEA² and one of the strategic environmental objectives of STPR is to “Reduce national levels of carbon emissions from transport to contribute towards climate change targets”³ Reduced emissions, again with specific reference to expected targets from the Climate Change Bill, are also one of the three key strategic outcomes of the National Transport Strategy – from which STPR is derived.⁴ These objectives are re-iterated throughout the remainder of the document.
- 2.2 STPR itself, however, clearly tries to absolve responsibility for reductions in climate change emissions from transport. Transport is “widely regarded as being one of the most difficult areas in which to achieve long term reductions in emissions levels”⁵ while “[m]any of the policy levers that are most likely to reduce transport emissions are outside the current competence of the Scottish Government”⁶ It appears that actively seeking the changes in behaviour necessary to reduce greenhouse gas emissions from transport are put in the ‘too difficult’ box.

1 STPR SEA p4
2 ibid p9
3 ibid p10
4 ibid p38
5 STPR Report 4, § 2.16
6 ibid, § 2.24

- 2.3 The SEA document states that 17% of greenhouse gas emissions come from road transport,⁷ but the UK Air Quality Archive (itself supported by the Scottish Government) reports a total of 24.4% of greenhouse gases as arising from the transport sector as a whole.⁸
- 2.4 Even if we accept the optimistic claim that the STPR projects will cut emissions (a 1% cut by 2022 on business-as-usual is asserted⁹), the STPR programme is not compatible with the climate change trajectories set out in the Scottish Climate Change Bill. Current forecasts for the year 2022 indicate that, in the absence of significant technological or behavioural change, total road transport carbon emissions will increase from 2005 levels by some 10%. This is fundamentally at odds with the Government’s climate change ambitions: a 10% increase in emissions from the transport sector (at 2022) is patently not compatible with the acknowledged requirements for deep cuts in total emissions (by 2020).
- 2.5 The only conclusion that we can draw from the above is that the SEA (as well as STPR in general) utterly fails to address the problem of climate change emissions arising from transport.

3. Human Health

- 3.1 In the 11 environmental characteristics which form the core of the SEA, ‘Human Health’ states that “the promotion of travel by methods such as walking and cycling can contribute towards a healthier lifestyle”¹⁰. The SEA document also states that the strategic environmental objectives for STPR include “encouraging healthier forms of travel such as cycling”¹¹
- 3.2 However, STPR specifically excludes this kind of intervention. Schemes to improve provision for walking and cycling are regarded as being “outside the scope of the review”¹² and are regarded as “not strategic in their scope or funding requirements”¹³. We do not accept that investment in walking and cycling is “not strategic”: if the transport sector is going to make *any* contribution to the Government’s Strategic Objective of a ‘Healthier Scotland’¹⁴ then it is these very interventions that will have to be prioritised.
- 3.3 In the Environmental Assessment, the appraisal of Human Health takes a narrow concentration on accident reduction as a result of road upgrading rather than the encouragement of healthier lifestyles through walking or cycling or modal shift.¹⁵ There are established economic benefits in encouraging people to travel by active means,¹⁶ but this matter is not addressed in the SEA. There are also clear safety benefits from modal shift from road to rail, with rail being some 23 times safer, on average, than road;¹⁷ but again, the SEA fails to take account of this factor.
- 3.4 This too indicates a failure of the SEA to reach one of its key stated objectives.

7 STPR SEA p9

8 UK Air Quality Archive (2008) - <http://www.airquality.co.uk/archive/reports/cat07/0809180941_DA_GHG1_1990-2006_v1r.xls> and <http://www.airquality.co.uk/archive/reports/cat07/0811180855_International_aviation_and_shipping1990-2006_final_v5.xls>. This figure is for all transport emissions (including, e.g., aviation and shipping). It is calculated as 15001 tCO₂e (transport emissions) divided by 61359 tCO₂e (total emissions including international emissions).

9 STPR SEA p20

10 *ibid* p8

11 *ibid* p10

12 STPR Report 4, § 1.14

13 *ibid* §1.15

14 As set out in the Scottish Government’s National Performance Framework.

15 See SPTR SEA Appendix 5

16 See for example Transform Scotland Trust report “Towards a Healthier Economy” available at: <http://www.transformscotland.org.uk/GetFile.aspx?ItemId=108>

17 http://www.rssb.co.uk/pdf/reports/strategic_safety_plan.pdf

4. Environmental Assessment of Interventions

- 4.1 It is notable that of the interventions which are assessed as having an adverse effect, the only ones which are being pursued through STPR are the A96 upgrade between Inverness and Nairn and (more particularly) the A9 upgrade to dual-carriageway as far as Inverness, of which all phases are judged to be “Moderate to Major, short and long term, Local and Regional, Adverse”¹⁸ The document considers alternatives which focus on improvements to public transport, modal shift from road to rail and use of speed cameras,¹⁹ but only the improvements to the Highland Mainline between Perth and Inverness is pursued.
- 4.2 The A9 upgrade is only seen as being acceptable in conjunction with the parallel rail upgrade: “any increase in CO₂e through decreased journey time would be offset through a modal shift to rail as result of rail service enhancements”²⁰ This scheme is pushed through despite its adverse environmental effects and once again, the SEA demonstrates that it has no teeth.

5. Conclusions

- 5.1 The SEA states that transport-related emissions have to be reduced in line with the targets in the Scottish Climate Change Bill. However, the SEA has patently failed to influence the content of STPR as the STPR schemes do not represent a programme of investment which would make significant cuts in greenhouse gas emissions (and make almost no contribution to meeting the ambitious targets set out in the Scottish Government’s own Scottish Climate Change Bill).
- 5.2 The SEA also introduces encouragement of walking and cycling as a key element of its Human Health assessment, but does not follow through on this objective. STPR does nothing specifically to encourage walking and cycling, and so makes no contribution to meeting Scottish Government objectives to improve public health and reduce obesity.
- 5.3 Finally, even where there is an adverse environmental assessment, the SEA has had little influence on the content of STPR. This is perhaps most manifest in the case of the considerations of the A9 scheme where the scheme is promoted despite a negative environmental appraisal.
- 5.4 Given that SEA is a legal requirement, there is a danger that it could be seen as no more than a ‘box-ticking’ exercise rather than a genuine environmental assessment of government proposals.

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¹⁸ STPR SEA p14

¹⁹ ibid p166

²⁰ ibid p169