

Local Government and Regeneration Committee
Scrutiny of the Draft Third National Planning Framework

Scottish National Planning Framework 3

Responses to Scottish Parliament Committees

by Scottish Association for Public Transport FEBRUARY 2014

Responses have been tailored to the particular interests of different committees yet there are common inter-related themes which merit integrated consideration

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Rural Affairs, Climate Change and Environment Committee

1 Sustainable Rural Areas While access to and from rural areas is mainly dependent on cars, developments in other forms of demand response transport (DRT) and retention or improvement of key scheduled bus, ferry and island air services, NPF3 under-estimates the rail role in rural areas and over-estimates the importance of elevating long-distance walk and cycling routes to National Development status.

2 Greater stress should be put on the earlier improvement of rural rail frequencies (as is promised for the Oban line), including options for additional halts, so that most of the mainland rural population is within 5 miles of a rail halt (in the longer-term, this could also justify the reopening or new construction of branch lines in rural areas as well as closer to cities). This would reduce the need for lengthy car trips from rural areas to access the rail network or pick up visitors from distant railheads.

3 An important added benefit is that such action could greatly improve car-free access by day visitors and tourists to Scotland's scenic railways and heritage sites, also linking with outdoor opportunities and bringing extra income to rural economies. A further benefit could be much improved opportunities for short connecting bus/minibus links and for cycle hire with options to return bikes to a station different from where the journey started. Rail lines benefitting from this approach include the often neglected scenic value and outdoor opportunities which could be offered by the Ayr-Stranraer line.

4 These issues merit a higher profile in NPF3 though the detailed delivery of improvements would be a matter for appropriate partnerships with some access to grant aid.

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5 Climate Change Targets At 5.5, NPF3 expresses concern that greenhouse gas emissions from transport are still 25% of the Scottish total and that car travel is continuing to rise. It mentions the target of 10% of regular trips being by cycle by 2020. Progress towards this continues to be modest and, since most cycle trips are shorter than those by car, coach and rail, cycling may still be only some 3% of passenger kilometres in Scotland by 2020. However with respect to travel in cities and some towns, cycling could reach 10% of passenger kilometres in such areas by 2020.

6 It is suggested that **NPF3 should be amended to include an all-Scotland aim of 5% of passenger kilometres being by bike by 2020.** The finalised NPF3 should include 2020 and 2030 targets for increasing passenger kilometres by public transport (including DRT). NPF3 misrepresents reality in stating that car travel in Scotland continues to rise. There has been a slight overall rise in the past decade but the significant change has been a rise in rail passenger totals (and modal share) since 2000 with Scottish rail passenger kilometres now at an all-time high. Edinburgh has also seen impressive gains in bus use. Fuller information on such trend changes and on the range of future forecasts should be included in an ANNEX to the finalised NPF3. At present, rail, bus and DRT use appears to be in the region of 18% of total passenger kilometres in Scotland. As well as a revised cycling target based on share of passenger kilometres, **the finalised NPF3 should include the targets of aiding a continuing stabilisation in car use through measures to raise the public transport modal share to 25% by 2020 and higher by 2030.**

7 Stabilised car use, and other measures to shift from HGVs to rail and water modes would allow road transport carbon to be lowered more quickly while, in the main, shifts to public transport would be to services using electric power from renewable sources. Since progress in expanding electric car use remains slower than first thought, NPF3 should also recognise the importance of an accelerated shift towards **higher road vehicle occupancy and other efficiency measures** reducing oil fuel consumption per passenger kilometre below the present average (already showing some fall but moderated by a failure to increase car occupancy on busy roads at peak commuting times). **Rail electrification** is already expected to see further expansion e.g. northwards to Aberdeen and in the greater use of electrified Metrorail and tram services in Glasgow and Edinburgh. Improved inter-city rail services, including substantial sections of HSR, will also encourage major shifts from mainland UK domestic air services to rail use (see Para 13).

8 Climate Change Adaptation NPF3 should include stronger references to the need to include allowances for higher transport costs, and possible route relocations, as well as more generalised references to drainage, tackling rising sea levels and ensuring reductions in flooding risk.

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Economy, Energy and Tourism Committee

9 Transport, Energy & the Economy NPF3 does refer to the importance of strategic changes in the energy generation, distribution and conservation sector in delivering a successful, sustainable economy plus the new issue of the degree of reliance on 'unconventional' gas. However, there is a need for **explicit recognition in the finalised NPF3 that investment in the energy sector may be more beneficial for the economy than continued high investment across the whole range of transport infrastructure**. Further expansion of the range and quality of broadband may also moderate the demand for business travel and make it easier to expand businesses away from 'city-magnet' areas. On the other hand, demand for non-business travel may show stronger growth (see Paras. 6 & 7 above) – especially for overseas travel to and from Scotland by both 'out' and 'in' tourists (see Para. 13 below).

10 In deciding on National Development projects, the finalised NPF3 should consider the evidence supporting the view that some projects, or packages, are of special value in boosting the economy and well-being while others are only likely to be justifiable due to prior advances in sustainable growth and employment. NPF3 fails to make this distinction yet it is crucial for identifying those transport projects offering high overall benefits.

11 The emphasis on major projects is also suspect and needs modification to place such projects in the context of packages of corridor and area projects, including the important issue (listed in NPF3 but not elaborated) of ensuring better value from existing infrastructure. For example, at 5.27 NPF3 stresses the value of pilot projects for scenic roads while adding that projects for scenic public transport routes could be considered in the longer-term. This approach should be modified to stress the value of early improvements on scenic rail routes and connecting bus links as part of plans to improve access to, and use of, longer distance walking & cycling routes (see Para.3 above).

12 Strategic Airport Enhancements NPF3 gives these National Development status but does not go into details. There is a strong case for such a status since an expansion of direct overseas routes could boost the economy both by offering business benefits and encouraging in-tourism. Air travel, even allowing for large shifts from domestic Anglo-Scottish air travel (and some longer-distance motorway car trips) to HSR and other inter-regional rail, can therefore be expected to grow and strengthen the case for both improved terminals and a greater shift to public transport for access to and from principal airports.

13 There is a need for the finalised NPF3 to be more specific on the timing and nature of airport improvement within an assumption that the majority of funding for such action, apart from the recent public purchase of Prestwick Airport and support for the Highlands and Islands, will come from private sources. The **UK Airports Commission Interim Report** of December 2013 states that targets for greenhouse gas savings may lead to future aviation growth being considerably lower than the present upper range of forecasts yet it also argues for London region airports staying dominant in air travel to and from the UK. The finalised NPF3 should query this view and present the economic evidence in favour of a greater shift of air travel away from London and the south-east to other regions. **NPF3 should**

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recognise the considerable potential for Scottish airport growth, especially if assisted by variations in Air Passenger Duty and other measures encouraging a greater shift from London airports. While the Airports Commission urged improved public transport access to Glasgow Airport, it omitted any reference to Edinburgh Airport even though it is now the fifth most used airport in the UK. In the longer-term, the NPF aim should be to place Edinburgh Airport directly on the national rail network.

Infrastructure and Capital Investment Committee

14 This Committee is concerned with how best to devise, and monitor, programmes for capital investment in which public funding from a mix of direct borrowing and indirect borrowing (as in NPD schemes) underpinned by taxation and other charging can help lever in extra investment from private sources improving prospects for sustainable economic growth and well-being. NPF3 identifies the need for investment in energy generation, distribution and conservation (see Para. 9) and also encourages further broadband development. However, the finalised NPF3 requires further consideration of the level, phasing and structure of transport investment.

15 At 5.2, NPF3 states that the **Strategic Transport Projects Review (STPR)** provides much of the evidence for transport investment but at 5.14 and 5.15 it seeks better connections between cities with ‘rail travel between cities quicker than by car’. In practice, decisions since STPR publication have given priority to major road schemes while programmes for rail electrification and both additional and replacement rolling stock have slowed despite clear evidence of a stabilising of car use and modal shift to rail (see Para. 6)

16 The finalised NPF3 should recognise the economic and wider benefits of further encouragement for ongoing changes in the level and structure of movement. Rather than highlighting particular major projects, it should set phased targets for inter-city rail and road corridor improvements. These should include higher priority for rail electrification and reducing rail trip times relative to car use on principal corridors. Suggested revisions in the NPF timing of inter-city corridor packages are outlined below.

<u>Present NPF</u>	<u>Finalised NPF</u>
2017 Glasgow-Falkirk-Edinburgh elect.	Ditto but with 42 minute trip times
2018	Hourly rail services with reduced trip times between Inverness and Perth & Inverness and Aberdeen
2019 Completion of EGIP Phase 1	Ditto but including half-hourly Edinburgh to Glasgow Central services in 40 minutes with options to extend to Paisley and/or into Ayrshire
2020	Phase 1 of Aberdeen Western Peripheral Road
2024	Phase 1 of Glasgow-Edinburgh HSR cutting trip times to 35 minutes
2025 dualled A9 Perth to Inverness	Dualling of sections of A9 and of A96 from Inverness to east of Nairn plus phased plan for further A9 and A96 works to 2032
	Rail electrification and shorter trip times from Central Belt to Aberdeen (with new construction from Forth Rail Bridge to north-east of Cowdenbeath)
2026	Phase 2 of Aberdeen Western Peripheral Road

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2030 Aberdeen to Central Belt rail improvements	Advanced to 2025 with Edinburgh-Perth-Inverness electrification added by 2030 with overall trip times cut to between 2 hours and 2 hours 15 minutes
2032 completion of new HSR to London	Phase 2 Glasgow-Edinburgh HSR cutting times to 30ms Advanced to 2027 but adjusted to be a package of new and upgraded existing line giving 3 hour trip times from both Glasgow and Edinburgh to London with associated improvements in trip times to other cities in England and Wales and on some services to mainland Europe

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17 NPF3 refers to the importance of improved linkages between land use and transport planning but the finalised NPF should place greater stress on the importance of locating priority new developments in such a way as to aid the better utilisation of existing public transport corridors either with space capacity or relatively low costs in providing extra capacity e.g. though more effective bus priorities at key locations and additional rail or tramtrain rolling stock on shorter distance services into Glasgow, Edinburgh and Aberdeen.

18 The stress on improved and higher-quality city centres is welcome but should be reinforced by the policy aim of increasing the share of public transport and active travel within cities and towns. There should be a clearer policy view supporting a majority of additional housing - and some new business zones e.g. near Edinburgh, Prestwick, Aberdeen and Inverness airports – either in, or on the fringes of, existing cities rather than an emphasis on growth of longer-distance commuting.

19 Project 24 in STPR envisaged major public transport development in greater Glasgow while the about to be completed Edinburgh tram route offers opportunities for further savings and benefits from extensions to the west, north-east and south-east. Other extensions could utilise the tramtrain approach to ease capacity problems on the existing rail approaches to Edinburgh.

20 The finalised NPF3 should make greater provision for improved city-region public transport and a greater role for Regional Transport Partnerships (RTPs). City-region public transport proposals in the present NPF are limited to:-

Modernised Glasgow Subway	Refurbishment and extra capacity
Glasgow Waterfront bus Fastlink	at principal rail stations

21 It is suggested that the finalised **NPF3 should be modified to give National Development status to city-region public transport and active travel development**. Suggested public transport priorities include:-

- EDINBURGH - opening of Edinburgh Gateway station at Gogar by 2015 including an enlarged role as a rail/tram/bus interchange (with segregated bus access from west of the congested Newbridge roundabout)
- extension of electrification into south Fife by 2022
- tram extensions to OceanTerminal, south-east Edinburgh, Newbridge and from Edinburgh Park via Riccarton Campus to Curriehill over the years to 2025 (with the Curriehill extension dependent on approval of additional housing)
- extension of Borders Rail to Newtown St Boswells or Hawick
- GLASGOW - extension of Glasgow area electrification to include the route to East Kilbride/

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- Kilmarnock, the Shields Rd/Bellgrove link and the Possil line in north Glasgow
- development of higher frequency, high capacity Metrotrain services on existing lines within 15 miles of central Glasgow but also including a Glasgow Airport link, co-ordination with bus services and integrated ticketing
 - additional halts on Metro train routes and at some locations in outer commuting zones
- DUNDEE – relocated West Dundee station to better serve surrounding development plus more frequent rail services between Perth and Arbroath
- ABERDEEN Improved rail services to Inverurie and Stonehaven by 2020 plus Metrotrain or tramtrain provision by 2030 including access to Aberdeen Airport and lower Deeside/Ellon and along the development corridor to the proposed Nigg Harbour
- INVERNESS – more frequent rail services from Tain via a modified Inverness bus/rail interchange through to Nairn, Forres and Elgin