Road Traffic Reduction Targets (Scotland) Bill proposal:

Analysis of responses to the consultation paper

In January 2005 Chris Ballance MSP launched a consultation on “a Bill to require Ministers to provide transport targets and plans aimed at stabilising road traffic at 2001 levels and which reduce climate change emissions and promote socially and environmentally sustainable transport alternatives.”

The consultation and all previous communications concerning the Bill proposal went out under the working name of “Green Transport Bill”. The use of the word “Green” in this context does not have any party political association, but is used in the same sense as, for example, the Scottish Executive’s own “Green Jobs Strategy” and “Green Travel Plans.” Following advice from the Scottish Parliament’s Non-Executive Bills Unit, however, the title of “Road Traffic Reduction Targets (Scotland) Bill” has been adopted for this paper in order to avoid any party political association. The new working title is to be used completely interchangeably with the previous one. No changes have been made to any aspect of the Bill proposal other than the title, and all reference to and comment on the Green Transport Bill proposal is equally applicable to the “Road Traffic Reduction Targets (Scotland) Bill” proposal.

The consultation ran from 12 January to 12 April 2005. The consultation paper was sent directly to approximately 50 potential consultees from the private, public, voluntary and academic sectors, in addition to being placed on Chris Ballance’s website.

The consultation sought opinions on eight key questions, namely:

- What would be the advantages and disadvantages (if any) of requiring the Executive to publish interim targets and transport strategies?
- If these proposals were adopted, with what frequency should targets be set between now and 2021, and how often should the Minister report to Parliament on strategy and progress?
- How specific should the reporting requirement be?
- Should there be an obligation to report alone, or actually to make progress toward targets?
- What should the targets and strategies address?
- What costs do you think would be incurred were this Bill to become law?
- What savings do you think would be incurred were this Bill to become law?
- Are there any other observations that you have about the Bill proposal?

16 responses were received. These ranged from detailed responses to all of the questions, to more general responses addressing the broader issues. 3 respondents made responses specifically addressing the questions in the consultation. None of those responding elected to keep their responses anonymous. 9 respondents indicated specific support for the proposals, while the rest were non-committal although most indicated sympathy with the intentions of the proposals and none expressed opposition, apart from questioning the mechanisms (this point is returned to further below).

Given the number of responses, it seems most appropriate simply to provide a short précis of each respondent’s comments, followed by a summary of responses. Copies of the original responses are available.

**Asthma Scotland**

We support the aims of the proposed Green Transport Bill to reduce the impact on people's health, particularly those people with asthma, caused by traffic fumes and emissions.

**Barnado's**

Given the impact of road traffic on the lives and wellbeing of children, Barnado’s Scotland welcomes initiatives that will help to manage and contain the untrammeled growth in road traffic. Whilst appreciating that the strength of the Green Transport Bill proposal lies in its simplicity, targets for overall traffic reduction do not allow for the fact that the impact on the ground varies widely. We believe that the targets and strategies should seek to address need and inequality in our society.

**BP Scotland**

Although industry can work on the technology issues and will continue to support the development work in these areas it is not well placed to control the demand side. This is a role which only Government can address with support from industry stakeholders. If we are to have a real impact on the GHG emissions from the transport sector the “demand side” needs to be addressed. This can only be achieved by changing the behaviour of society in its use of transport its broadest sense. A broad range of actions need to be encouraged, namely consideration of alternative transport modes, choice of vehicle and fuel, vehicle maintenance (e.g. correct tyre pressure) and driving behaviour.

**Institute of Logistics and Transport**

The Scottish Region of the Chartered Institute of Logistics and Transport (UK) in principle supports the proposals in the paper. It is acknowledged that The Scottish Executive’s current plans do lack accountability. It is our view that care has to be taken when attempting to set “more stringent traffic reduction targets” since there comes a point at which this can have an adverse effect on industry. We believe that while the paper sets out the issues, it lacks adequate proposals for solving them. We have therefore attempted below to identify some ways in which contributions can be made to achieving the aims and objectives of reducing traffic and emission levels.
a) the school run establishes a car culture mentality in school children from an early age. Rather than being prescriptive, the aim must be to change the culture through influence at an early age, by providing safest possible routes to schools and through innovative pilots.  
b) Youngsters and other travellers should have the perception developed and the reality experienced of public passenger transport which offers much of the convenience of the car. Up to date published travel information, real time information and reliable services providing a high degree of comfort at best cost should be high priorities, so that users will have a good travel experience.  
c) Company Travel Websites should be attractive with easy to follow timetables and news and side issues presented in an eye catching way.  
d) Our increasing reliance on foreign supplied fuel oil and gas is a concern and perhaps our vulnerability to this should be more widely known.  
e) There should be a clear determination by government to ensure that tighter emission targets continue to be set and achieved by reduced car use and by continuously improving technical measures by the car/commercial vehicle manufacturers.  
f) Via Land Use Planning measures, we believe that the siting of commercial development and schools could be improved.

Derek Halden Consultancy Ltd.
Traffic reduction is just as important for the economy as it is for the environment. The consultation paper reflects this very well, but the Bill proposals do not, by suggesting that the interim targets can be separated from wider issues. Traffic reduction targets for environmental benefit cannot be viewed independently of social and economic needs.
A traffic reduction strategy needs to focus on those who don’t think the environment is important and success will depend on the emphasis placed on the social and economic gains from less traffic. However without legislative backing for effective "smart/soft measures" it needs to be recognised that legal and financial pressures point the wrong direction. Traffic reduction targets would not in themselves overcome the major obstacles to change in the way transport is currently administered.

Forward Scotland
In general, Forward Scotland agrees that interim targets will be helpful in ensuring action to stabilise road traffic at 2001 levels. In particular, we believe that the long-term target for stabilisation of traffic levels will be difficult to achieve without targets which ensure continual, year-on-year efforts to tackle road traffic levels. In order to make such targets achievable, we believe that they must be coupled with positive policies which encourage changes in travel behaviour, and that policies from different sectors must work coherently to achieve a reduction in road traffic.

Friends of the Earth Scotland
Friends of the Earth Scotland (FoES) are fully supportive of this Bill proposal. In addition to reporting on progress towards targets and the seven reporting areas outlined in the consultation, all future transport spending decisions should also be climate proofed. The climate proofing process should involve rigorous use of EIA and SEA procedures, be openly accessible to interested
parties, and be undertaken prior to political commitments are made on major transport investments.
FoES would also make the case that the Bill could be more ambitious than current Executive policy by bringing forward the traffic stabilisation target to well before 2021.

Individual Response
I am writing to express my strong support for the Green Transport Bill consultation paper. I believe that it would be a very good idea to oblige the Executive to publish interim targets and transport strategies, and to be help to account if it cannot show it is making satisfactory progress.
On the “greatest threat to world security and biodiversity” ie climate change, so noticeably absent from the election campaigns of the “major” political parties, it is vital that the Executive wakes up to reality, and a transport bill with meaningful targets should form an essential part of Scotland’s response.
(Dr. Guy Johnson)

Individual Response
We urgently need a comprehensive survey of transport needs throughout Scotland. With today’s technology such as the Internet we should be able to ask all households in Scotland where they need and want to go.
All households should have access to public transport routes that are within 5 minutes walk for a toddler/ small child or pensioner. These services should supply access to local schools, shops, recreational facilities as well as the city centre and places of work.
A complete overhaul of bus routes should take place throughout the country: bus services seem to still stick to the old tram routes set up years ago, new housing schemes and places of work never seem to have bus services put in at the planning level by councils.
(Chris McGrath)

Lothian & Borders Police
I wish Mr. Ballance well in his quest to spur Ministers to promote alternative alternatives to road traffic. I fully endorse initiatives that support the Government’s casualty reduction targets for 2010. I do feel however that primary legislation could be strengthened towards the establishment of local authority traffic reduction targets and that accountability for such would be more responsive at that level.

NUS Scotland
At the NUS Scotland Conference a policy to support the principles of the Green Transport Bill and to actively get involved was passed unanimously.

Ramblers’ Association Scotland
As the representative body for walkers in Scotland, the Ramblers’ Association Scotland would like to write in support of the Green Transport Bill. We believe there would be many advantages to requiring the Executive to publish interim targets and transport strategies. While long-term targets to curb road traffic are a useful first step, we are concerned that the time period is too remote and thus targets will not seem as a high priority and will not be met. We hope
that the use of interim targets will act to focus the Executive and local authorities more urgently on the need to reduce traffic levels.

Scottish Enterprise
While I personally support the aspirations of the Bill, as a publicly funded body, Scottish Enterprise cannot take a political stance that is not in line with current government policy.

Scottish Environment Protection Agency
We would agree with the paper’s argument that interim targets, in conjunction with plans for achieving them and monitoring of outcomes, are essential if the goal of bringing traffic back to 2001 levels by 2025 is to be achieved. While SEPA sees the nature and extent of interim targets and reporting as a matter to be determined by Ministers, the proposed Bill could usefully specify a maximum term, at the end of which new targets would need to be set and a new target for reaching them launched. Targets would need to be carefully chosen to reflect best practice, rather than being purely quantitative. As a public body committed to openness and transparency, SEPA feels it is appropriate that this correspondence be placed on the public record.

Scottish Natural Heritage
This consultation paper contributes to an important debate on the best means to achieve the goals of transport policy in Scotland. We agree that it would be helpful to introduce interim targets as a tool to maintain focus on long term targets. However, we question whether legislation to oblige the setting of targets is required. What is needed is Parliamentary commitment to the principle of addressing the issues involved. Our comments stem from the fundamental point that transport is not an end in itself, but a means to an end. If transport is framed in terms of access to goods, services and experiences, then very often there will be alternatives that involve less overall travel.
There are a number of key questions about the way that targets are set and subsequently resourced which we think need close attention. These include: (1) the way that interim targets are linked to the wide range of objectives associated with Scotland’s transport systems; (2) making sure that effort remains balanced across the range of transport objectives; (3) the way that interim targets are set; and (4) the relationship between interim targets for transport and other policy objectives.

SPT
Any targets would require to be set at intervals that are sufficiently frequent to permit any slippage to be noticed timeously whilst also providing a meaningful duration within which planned actions can be developed and measured effectively. This would suggest that between every 3 - 5 years could be an appropriate interval.
It is envisaged that reporting would be reflective of the ongoing monitoring and strategy process which may change over time. It should also provide a summary of key findings and trends. The requirement for reporting should therefore be flexible and responsive enough to accommodate the type of information to be conveyed at each stage.
The setting of targets is a tool to assist with achievement of the objectives. There is an implicit commitment to work towards these targets which should be sufficient. Targets should be directly related to the objective which is to ensure that the Scottish Executive's target regarding stabilisation of road traffic levels by 2021 at 2001 levels is achieved.

**I A Souter Transport Engineering**

Public transport provisions in the UK are too often disjoint, unreliable, and expensive in varying degrees. Past government transport policies have had the effect of worsening these negative aspects. Recognition is also needed of the fear of some users of public transport from the unwanted attentions of anti-social elements of society. This should be seen as a problem for society as a whole, not a public transport problem. As a matter of priority, government must examine the processes which are creating transport demand, both for passengers and for freight. Appropriate responses must then be determined, with due concern for the likelihood that such measures may cause additional costs in transport provision, at least in the short term, and may threaten the viability of some business enterprises which are reliant on the status quo.

The effectiveness and usability of public transport as an alternative to car use must be reconsidered. Fresh thinking is urgently required to consider means of improving access to public transport for society at large, not just those with a physical mobility problem. Education of the public to take an interest in transport issues must be initiated. Such a campaign should focus on schools initially, but police forces must also be encouraged to contribute to the smooth running of public transport operations; both transport operators and users require the support of the police, not the present indifference or even hostility.

**Transform Scotland**

TRANSForm Scotland strongly welcomes the proposals set out in the 'Moving On' consultation paper. The proposed Bill, if passed into law, would put in place an effective mechanism for ensuring Scottish progress towards road traffic reduction. TRANSForm Scotland considers road traffic reduction to be a vitally important objective for Scottish transport policy. With a programme of road traffic reduction in place, the Scottish transport sector could also begin to make a responsible response to our biggest environmental threat: climate change.

It is imperative that government plans for a programmed reduction in road traffic levels. To this end, we need to see the Scottish Executive set out a credible implementation programme for road traffic reduction, with targets and timescales, to reduce the volume of traffic on the roads. This will be a major challenge for the Executive in its forthcoming strategic transport projects review and national transport strategy; for the forthcoming national transport agency; for the forthcoming statutory Regional Transport Partnerships; and will remain a challenge for local authorities, albeit largely currently unaddressed, in their Local Transport Strategies.

We consider it unfortunate that the Executive, in its published Transport (Scotland) Bill 2004, misses an opportunity for strategising the Scottish
transport sector to deliver on targets for road traffic reduction. There is no guarantee, for example, that the Regional Transport Partnerships will take such measures seriously if there is no legal responsibility for them to do so.

**Summary and Conclusion**

It is significant that a large majority of the respondents strongly supported the general principles of the Bill proposal, in terms of tackling traffic growth and climate change emissions, and promoting socially and environmentally sustainable alternatives. Where differences of opinion manifested themselves was more on the details of how the measures should be introduced and managed. In particular, several respondents questioned the need for legislation in this respect. Scottish Natural Heritage, for questioned the need for legislation but acknowledged the need for Parliamentary commitment to the issue, while Lothian and Borders Police felt that the greater need for legislation lay with local authority rather than national targets; Derek Halden Consultancy, on the other hand, were of the opinion that traffic reduction targets would not in themselves overcome the major obstacles to without effective legislative backing for other “soft” or “smart” measures.

A high proportion of respondents echoed the importance of these “soft” or “smart” measures to address traffic growth, including land use planning and the provision of transport information and workplace or other travel planning. Changing attitudes to transport, the “school run” and improved public transport were recurrent themes.

While some respondents questioned whether legislation was necessary or indeed desirable it is worth noting that two respondents felt that the proposals could go further. Friends of the Earth Scotland by suggesting that the 2021 stabilisation could be brought forward, and Transform Scotland by supporting road traffic reduction rather than mere stabilisation.

While respondents differed on the best ways to achieve road traffic stabilisation, a clear picture of consensus emerged concerning the need to address road traffic growth for social, environmental and economic reasons.
Appendix: Full list of organisations and individuals responding to the “Green Transport Bill” consultation

Organisations
Asthma Scotland
Barnado’s Scotland
BP
Chartered Institute of Logistics and Transport
Derek Halden Consultancy
Forward Scotland
Friends of the Earth Scotland
Lothian and Borders Police
Rambler’s Association
Scottish Enterprise
Scottish Natural Heritage
SPT Strathclyde Partnership (formerly Passenger) Transport
TRANSform Scotland

Individuals
Dr. Guy Johnson
Chris McGrath