

## 1. About Transform Scotland.

We are Scotland's alliance for sustainable transport. We campaign for walking, cycling and public transport to be the easiest and most affordable options for everyone. We are the only organisation in Scotland making the case for sustainable transport across all modes. Our diverse membership brings together 55 public, private and third sector organisations from across Scotland. Our members include public transport operators, local authorities and sustainable transport voluntary organisations.

## 2. Introductory comments.

It is imperative that the Commission takes as the centrepiece of its consideration the provision of infrastructure that:

- Tackles the **Climate Emergency** declared by the First Minister.
- Improves **public health** and reduces **health inequalities**.
- Reduces Scotland's persistent levels of **poverty and inequality**.
- Prioritises the needs of **children & the elderly** — and *not just the wants of the affluent and already highly-mobile*.

The Commission will have failed to make a useful contribution if it takes a narrow focus on the economy.

The Commission must concentrate on infrastructure priorities that can help reverse the long-standing adverse trends on climate, health and inequality.

## 3. Cross-cutting factors to consider.

### 'Strategic'

The Commission must apply a useful definition of the term 'Strategic'. It would be deeply damaging if the Commission was to use 'Strategic' to mean 'Big'. It is this fallacy that has so badly skewed transport infrastructure investment away from local transport provision and instead into transport mega-projects. These projects typically make an adverse contribution to national objectives on climate, health and equalities — yet are perversely considered 'strategic' only because they cover 'trunk' transport corridors. **We recommend that the Commission applies the term 'Strategic' only to mean infrastructure interventions that has the ability to change the adverse trends in transport cited above.**

### 'Local'

Most transport is very local. Given the disproportionate attention given in political debate to aviation, high-speed railways and motorways, someone coming new to the field of transport could be excused for thinking that the typical transport journey was one of hundreds of miles. Yet the simple fact is that most travel is very local: c. 40% of all trips are less than two miles in length and c. two-thirds of all trips are under

five miles in length. Despite comprising *most transport*, this remains the area of investment *most neglected* by Transport Scotland in its infrastructure plans in favour of 'prestige projects' such as new roads and bridges. **We recommend that the Commission gives priority to the infrastructure required for short trips — the majority of transport trips — as this would also help deliver modal shift to the most sustainable modes.**

### 'Low Carbon'

The First Minister has, within the last week, declared a 'Climate Emergency' and announced that the Government's Climate Change Plan will be reviewed in light of the Climate Bill having strengthened targets (including 'Net Zero'). However, a recent Scottish Parliament analysis suggests that the Government's future investment plans are badly skewed towards high-carbon infrastructure.<sup>1</sup> **We recommend that the Commission consider only those infrastructure investments that make an active contribution to tackling the Climate Emergency.**

## 4. Suggestions for focus.

### Streets

This is the most basic, yet most important, level of infrastructure for transport. It is the area immediately outside peoples' front doors. However, the terrible state of disrepair in which much of Scotland's streets are kept is known to be a factor which prevents many elderly people from even leaving their front doors for fear of suffering falls. This is a gross inequality that should not be tolerated in a developed nation. Our experience suggests that other northern European countries maintain their local pedestrian infrastructure much better than is done in the UK. **We recommend that the Commission considers the local street environment as a key infrastructure asset which must be maintained and improved.**

### Local transport

Packages of local investments would have a massive impact in changing the adverse trends cited above. For example, for walking/cycling: pedestrianisation of streets, introduction of 20mph default speed limits, enforcement of pavement parking, creation of segregated path networks, maintenance of pavements and paths, improved mapping and route development. And for buses: integrated ticketing, investment in bus priority and the passenger waiting environment. We would note that walking and buses are the modes of transport disproportionately highly used by those on low incomes — but are the modes of transport most routinely ignored in transport debate. **We recommend that the Commission considers packages of investment in local transport as of national, strategic importance: it would be negligent of the Commission to consider such interventions as of merely local (or regional) importance.**

### Road maintenance

Scotland is estimated to have a road maintenance backlog of over £2 billion. Fixing this should be the first focus for national and local roads policy — not adding additional road capacity. Fixing local roads would help not only car users, but also pedestrians, cyclists and bus users. Local road investment also has a greater likelihood of being carried out by Scottish companies rather than the international companies (English and overseas) that typically win contracts for road mega-projects. The Scottish Government has found £6 billion for two road schemes (A9 & A96 dualling schemes) so why can't £2 billion be found to fix all of Scotland's roads? **We recommend that the Commission considers whether Scottish road spending would not be better focussed on maintaining the existing asset base prior to expanding that asset base.**

### Inter-city and long-distance surface travel

Our existing inter-city rail network is largely uncompetitive with road travel of in terms of journey times. Despite this, the Scottish Government's infrastructure spend is currently focussed on £6bn for dualling of

---

<sup>1</sup> Scottish Parliament Information Centre (2018) 'Capital spend: locking in high or low carbon futures?': <https://spice-spotlight.scot/2018/10/16/capital-spend-locking-in-high-or-low-carbon-futures/>

the A9 and A96. The Government has made, in comparison, very modest capital spend on the parallel rail routes. In combination, this pattern of investment is not only prioritising high-carbon transport, but is actively diminishing the competitiveness of both rail freight and passenger rail services. **We recommend that the Commission rejects demands for further high-carbon road-building proposals and instead considers how the sustainable movement of goods and people can be prioritised in future infrastructure investment plans.**

## Aviation

Air travel is the most high-carbon form of transport. The existing levels of air traffic is incompatible with the Climate Emergency, let alone the expansion of air travel. **We recommend that the Commission give no consideration to the expansion of Scotland's airports.**

.....

# Scotland's alliance for sustainable transport

Transform Scotland  
5 Rose Street, Edinburgh, EH2 2PR  
t: 0131 243 2690  
e: <info@transformscotland.org.uk>  
w: <www.transform.scot>

**transform**  
scotland

We campaign for walking, cycling and public transport to be the easiest and most affordable options for everyone. Our diverse membership brings together public, private and third sector organisations from across Scotland. We are a registered Scottish charity (SC041516).