

CONSULTATION

Response Document



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National Transport Strategy (Scottish Government)

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Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme, and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network

Comments from CIEEM

Introduction

We welcome the opportunity to participate in this consultation. We have set out a high-level response rather than responding to individual questions. We would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at JasonReeves@cieem.net with any queries.

1. Is the Vision that is set out for the National Transport Strategy the right Vision for transport policy over the next 20 years?

We are supportive of the elements laid out in the Vision, but it is missing a clear link to how transport can help address the biodiversity crisis as well as the climate emergency. Although biodiversity is mentioned in the accompanying Environmental Report, it is treated in isolation from other topics, with only a brief mention of the interdependencies between various environmental receptors. For example, access to active travel for health and well-being reasons could be linked to access to nature through inclusion of an appropriate section on how biodiversity will be protected or enhanced in the development of active travel programmes and projects.

Similarly, taking climate action should include the use of nature-based solutions for both climate adaptation and mitigation. This could include the consideration of integrating biodiversity net gains¹ into the design of transport infrastructure which would help deliver both the net-zero carbon target and address biodiversity loss. Habitat creation actions linked to green infrastructure (which is mentioned in the Environmental Report but not reflected in the Strategy) could also provide resilience to climate change effects, such as flooding.

2.

(a) Are the Priorities and Outcomes that the Strategy is trying to achieve the right Priorities and Outcomes for transport policy over the next 20 years?

The Priorities and Outcomes, whilst mentioning rail and other forms of transport (notably to the islands where aviation and ferries are key) seem largely to focus on challenges around road use – be it cars, buses or cycling.

A focus on improving resilience in the rail network and on improving accessibility beyond the central belt could aid in delivering the Vision around taking climate action, and would aid further in breaking the cycle of congestion that has contributed to declines in bus use.

(b) Are some of these Priorities and Outcomes more important than others or are they equally important?

The priorities and outcomes are all equally important, but see question 3 response.

3. Are the Challenges the Strategy highlights in Chapter 3 the key Challenges for transport, or are there others the Strategy should focus on?

¹ CIEEM (2019) Biodiversity Net Gain in Scotland, Winchester: CIEEM. Available at: <https://cieem.net/resource/biodiversity-net-gain-in-scotland-briefing/>

A shift towards inter-regional travel and transport of goods via rail rather than by road, and a focus on maintaining climate resilience on the rail network, would be beneficial. Whilst it is true that some improvements in the national rail network have been made (e.g. Borders railway), the focus is still largely on the central belt and significant investment would be needed in the Highlands to truly shift traffic in many of Scotland's wild places away from the road network, and hence reduce the well-documented effects of roads (construction, operation and maintenance) on air quality, biodiversity and other environmental receptors. For example, journey times by rail between Inverness and the central belt can be close to four hours, with service frequency being much poorer than connections within the central belt; or connections between the central belt and cities south of the border.

This shift would require significant investment, however, in the longer term it could facilitate a decline in road usage whilst also creating opportunities for biodiversity, for example through habitat creation along railway embankments. To ensure that this development does provide these opportunities for biodiversity, a biodiversity net gain approach should be incorporated. Efficient, carbon-neutral long-distance travel by rail, coupled with appropriate local-level investment in bus and car-sharing infrastructure, would reduce the need for large scale development, construction and maintenance of major trunk road networks.

Section B

Through the process to develop the National Transport Strategy, 14 policies have been identified that will deliver its Vision and Outcomes and address the Challenges. These are listed below:

- **Plan our transport system to cope with the effects of climate change**
- **Continue to improve the reliability, safety and resilience of our transport system**
- **Embed the implications for transport in spatial planning and land-use decision making**
- **Integrate policies and infrastructure investment across the transport, energy and digital system**
- **Provide a transport system which enables businesses to be competitive domestically, within the UK and internationally**
- **Provide a high-quality transport system that integrates Scotland and recognises our different geographic needs**
- **Improve the quality and availability of information to enable better transport choices**
- **Embrace transport innovation that positively impacts on our society, environment and economy**
- **Improve and enable the efficient movement of people and goods on our transport system**
- **Provide a transport system that is equally accessible for all**
- **Improve access to healthcare, employment, education and training opportunities to generate inclusive sustainable economic growth**
- **Support the transport industry in meeting current and future employment and skills needs**

- Provide a transport system which promotes and facilitates travel choices which help to improve people's health and wellbeing
- Reduce the transport sector's emissions to support our national objectives on air quality and climate change

4.

(a) Are these the right policies to deliver Priorities and Outcomes of the National Transport Strategy?

The first policy should include the use of nature-based solutions, for example it should read: "Plan our transport system to cope with the effects of climate change and combat biodiversity decline using nature-based solutions".

These crises are inextricably linked and must be addressed in tandem.

(b) Are some of these policies more important than others or are they equally important?

N/A

5.

(a) Are there specific decisions about transport in Scotland that are best taken at the national level (e.g. by Transport Scotland or the Scottish Government), at a regional (e.g. by Regional Transport Partnerships), or at a local level (e.g. by Local Authorities)? Please explain your answer, by providing examples of where you believe transport related decisions should be taken.

N/A

(b) Should local communities be involved in making decisions about transport in Scotland? If so, how should they be involved, and on which specific issues should they be involved in making decisions on? Please explain your answer, by providing examples of which transport decisions local communities should be involved in, also suggesting how they should be involved.

N/A

6. Does the National Transport Strategy address the needs of transport users across Scotland, including citizens and businesses located in different parts of the country?

Yes/No

Please explain your answer

N/A

7.

(a) What aspects of the transport system work well at the moment?

(b) What practical actions would you like to see the National Transport Strategy take to encourage and promote these?

N/A

8.

(a) What aspects of the transport system do not work well at the moment?

(b) What practical actions would you like to see the National Transport Strategy take to improve these?

N/A

9. Chapter 6 of the Strategy sets out immediate actions the Scottish Government will take in three key areas: Increasing Accountability; Strengthening Evidence; and Managing Demand. Is there anything you would like to say about these actions?

N/A

10. Is there anything else you would like to say about the National Transport Strategy?

N/A

11. What are your views on the accuracy and scope of the information used to describe the SEA environmental baseline set out in the Environmental Report? Please give details of additional relevant sources.

N/A

12. What are your views on the predicted environmental effects as set out in the Environmental Report?

As with any Environmental Report at strategy level, these are high level and would require revisiting at later stages of the development of the Strategy. However, whilst there are policies on integration of policies and investment, and on innovation, the discussion of predicted environmental effects at times struggles to do this, notably on addressing the biodiversity crisis that is linked inextricably with the climate emergency and is strongly linked to well-being and access to greenspace (although green infrastructure is mentioned).

Policy objectives should not aim to only protect biodiversity within sites (page 70 of the Environmental Report), but at a landscape level, focusing on protection of ecosystem services rather than strictly focusing on licensing and consenting for effects on sites and species.

13. What are your views on the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?

There is an overwhelming focus on greenhouse gases (GHGs) as a key environmental indicator in monitoring. Whilst it is right that GHGs must be a focus, especially in monitoring progress towards net-zero carbon by 2045 under the terms of the draft Climate (Scotland) Bill, there is only a vague allusion to other indicators such as energy and air quality.

The earlier mention of biodiversity as an indicator of ecosystem health, which has well-established links to some of the key challenges around well-being and flood risks to transport infrastructure, could be developed further in the mitigation and monitoring proposals.

14. Is there anything else you would like to say about the Environmental Report?

N/A