

**Strategic Transport Projects Review 2
Case for Change Comments Form**

Overview

This comments form is aimed at capturing your views on the Highlands & Islands Case for Change Report, specifically:

- The extent to which it has captured the problems and opportunities; and
- The proposed Transport Planning Objectives

We recommend that you review the material within the report prior to providing your comments.
The form should take 5-10 minutes to complete and all responses are anonymous.

The deadline for comments is on the **8th April 2020**.

Many thanks for your participation in this study.

Q1: Are you responding as an individual or an organisation?

- Individual
- Organisation

Q2: Age demographics. (if individual)

Q3: organisation name:

Dounreay Stakeholder Group

Q4: Type of organisation:

Unincorporated community body, set up to scrutinise the Nuclear Decommissioning Authority's operations at Dounreay nuclear site. Apart from our role to liaise with Dounreay's operators on environmental performance, safety and decommissioning progress, we have a strong interest in the socio-economic future of our area, chiefly the Dounreay travel to work zone, which covers Caithness and north Sutherland, but obviously has interest in the wider Highland area. See <https://www.dounreaystakeholdergroup.org/>

Strategic Problems and opportunities

Q5: How effectively have the strategic transport problems and opportunities been captured in the report:

Tick one box only

- Very well ✓
- Well
- Poor
- Very Poorly

Q6: Are there any strategic problems which you feel have not been effectively captured in the report?

YES

Q7: Please describe the strategic problems which you feel have not been effectively captured in the report in the space below.

The Scottish Government has set up the Just Transition Commission to advise on climate actions necessary to address Global warming. This clearly will involve transportation and connectivity, yet this report seems to be operating independently from that commission. It is imperative we see a joined-up approach to this by Government with a transparent strategy and associated delivery methodology that the regions and localities around Scotland can engage with and contribute to.

We need to ask what a strategic regional transport policy is for? Is its main purpose economic or for the wellbeing of citizens? Apparently most students of economics get the answer wrong when asked if the economy exists to serve the people or people exist to serve the economy. We believe it's the former. We have seen several iterations of this policy: each time we say what we want, some of it goes in an aspirational plan and nothing happens until the next review. Policy needs to be backed up with action.

AIR

There is no mention of Air Departure Tax (ADT). Scottish government made great show of halving the tax with the objective of removing it altogether, but this was found to be incompatible with Climate Change policy. As a tax, ADT has little effect on greenhouse gas emissions (GHG), since those who can afford or need to fly will do so. Air fares within the Highlands and Islands are already prohibitive even with the Air Discount Scheme, (ADS), so price is not the factor which will reduce GHG. Instead, policy and government investment should focus on greener aircraft, including the possibility of battery powered electric planes. Flights from Wick John o'Groats have been fragile for some time, with only Eastern Airways flying to Aberdeen and Loganair to Edinburgh. The service is vulnerable due to aging aircraft and low passenger numbers leading to cancellations when it's more profitable to use the plane elsewhere. Eastern have recently discontinued the service to Aberdeen. The Caithness Transport Forum has been lobbying for a Public Service Order as is available in similarly disadvantaged Scottish routes. This could take the place of the ADS.

RAIL

There is no mention of the 'Lentran loop' proposal which could segregate the timetabling of the Far North and West Highland lines and lead to shorter journey times. The possibility of an electric shuttle train between Wick and Thurso has been discussed at the Caithness Transport Forum. This has the prospect of being a pilot for longer rail journeys and would help meet Climate Change objectives.

There is the prospect of rail freight from the facility installed at Georgemas by the NDA for nuclear cargoes. If we are serious about climate change, we must do everything we can to facilitate modal shift from road to rail. This means we need more than just 'policy aspiration'; we need some form of subsidy to make it happen.

When Abellio was awarded the franchise for Scotrail, they promised to improve space on trains for bicycles and provide cycle storage/ hire at stations. As a Dutch company, we assumed they would be completely on top of this idea. The only station seen to provide storage is Edinburgh Haymarket. There is no sign of adequate cycle space on trains on the North Highland line – it needs to be pre-booked.

ROAD

The A9 North of Inverness is mentioned only twice in the report, and only under resilience. Apart from the Berriedale improvement, there has been no 'investment' in the road since the construction of the Dunbeath Bridge in the 70s, made necessary by the imminent collapse of the embankment. Parts of the road follow an alignment that can scarcely have changed since the days of the stage coach. The worst sections are north of Brora and north of Berridale. The 2006 Transport Vision for Caithness listed over 100 improvements, many of them safety related. None of these have been implemented. The overall desire was for a rolling programme of minor trunk road improvements. These would be to improve drainage and camber, introduce crawler lanes, carriageway widening in places, alignment in others and also a simple improvement of sight-lines to allow for safer overtaking. In terms of climate change, the section of

A9 just south of Helmsdale, also alongside the railway track, must be a prime candidate for sea level protection. Both have been closed in the past due to landslip.

Q8: Are there any strategic opportunities which you feel have not been effectively captured in the report?

Tick one box only

- Yes – if Yes go to Q9

No

Q9: Please describe the strategic opportunities which you feel have not been effectively captured in the report in the space below.

Solutions to the aforementioned problems in Q7.

The problems are well articulated and in general, comprehensive focussing on all the issues and regional problems of transportation. The opportunities, conversely are not focussed on transportation opportunities, but more on their current problems affecting future economic opportunities, with little on social. We would have thought that future transportation opportunities should be reflected in this document at a more granular level otherwise the opportunities do not readily appear to address the problems and in particular highlight the varied solutions available across, road, rail, air and sea and combinations thereof.

This document deals only with the nationwide strategic transportation issues, but the many problems highlighted in the document are those dealt with by Councils. Therefore, the opportunities and the strategic options seem to only address very high-level discussion addressing a small proportion of the problems highlighted in the rest of the report. Although this is a Transport Scotland document, this seems like a major process omission and would be likely to lead to a disjointed approach to transportation across the country. At what point will this work engage with, presumably council strategic activities so that business, organisations and the general public will be able to see a consistent joined up approach that address their issues on the ground? This is especially poignant when considering the timescales of the Just Transition Commission and necessary actions to address global warming.

Section 5.1 strategic options, second bullet in this section deals with options that may be considered, specifically:

- *Demand management measures, including use of technology and innovation, behavioural change and regulatory control;*
- *Strategic maintenance and safety measures;*
- *Strategic measures to increase travel by active travel modes;*
- *Public transport improvements, including interchanges, road space allocation, technology and ticketing;*

- *Links to/from areas of economic activity of national significance;*
- *Appropriate policy and financial instruments (that are within the responsibility of Scottish Government);*
- *Targeted infrastructure improvements on the transport networks owned, operated and funded directly by Transport Scotland;*
- *Changes to the operation of air and ferry terminals and services; ▪*
- *Infrastructure measures at ports and harbours of national significance; and*
- *Improved access to airports of national significance.*

This approach would seem like a massive error. Without dealing with the items detailed above from your report, how can you possibly address the main strategic options in your previous bullet. That might make it complicated, but that is because it is complicated and why action is urgent and well overdue. Without a holistic review of this sector, the answers arrived at will be incomplete and less effective than might otherwise be the case.

Transport Planning Objectives

Q10: How well do the five transport planning objectives capture what needs to be done to improve strategic transport across the region?

The Transport Planning Objectives are

- *A sustainable strategic transport system that contributes significantly to the Scottish Government's net zero emissions target.*
- *An inclusive strategic transport system that improves the affordability and accessibility of public transport.*
- *A cohesive strategic transport system that enhances communities as places, supporting health and wellbeing.*
- *An integrated strategic transport system that contributes towards sustainable inclusive growth in Scotland.*
- *A reliable and resilient strategic transport system that is safe and secure for users.*

As objectives these are fine, but as mentioned previously, we need to see the actions proposed to attain them.

Q11: Please use the space below to provide any other comments that you wish to make on the Transport Planning Objectives (TPOs) for this study.

Covered above.

Q12: Please use the space below to provide any other comments that you wish to make on the report.

In terms of road and rail links, strategic objectives are meaningless for the vast hinterland that isn't close to the A9 or Far North Line. So transport policy needs to address the feeder road links and (largely absent) bus routes in the northwest of Highland.