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Dear SG Climate Change Adaption Team

Adapting our Ways: Managing Scotland's Climate Change Risk

Thank you for the opportunity to comment on the above. Since our inception in 1977, Spokes has always argued for increased cycle use within a wider context encompassing environmental sustainability and public health. As such we are pleased to respond to this consultation, as we also did to the recent consultation on the Climate Change Bill.

We very much support the concept of this consultation – climate change is already happening, the impacts are certain to grow, and building a culture of awareness, flexibility and adaptation is essential. Furthermore, such a response will also be invaluable in a world of increasingly rapid and unpredictable change – for example rapidly fluctuating and probably substantially rising fuel prices.

In general we support virtually all the principles and proposals in the consultation document, and it is difficult to come up with suggested improvements. That said, we are left with an underlying feeling that the issues of climate change, adaptation to it, and mitigation of it, are not being treated with sufficient seriousness and urgency; and we suggest the tone of the document needs much better to reflect that seriousness and urgency.

Whilst not commenting on the detail of the consultation paper for the above reasons, we highlight below some issues illustrating the lack of seriousness and urgency in current policy, and so showing why a stronger paper is essential. We do appreciate that the `consultation does not go into delivery mechanisms, but nonetheless some of our comments do touch on that, to illustrate the scale of task facing any adaptation strategy seeking to move Scotland to a state of greater resilience.

Underestimating the seriousness of the challenge

Experts are increasingly telling us that the situation is worse than had been supposed, and that urgency is vital.

Sir Nicholas Stern, who assessed for the UK government the economic aspects of climate change, based on 2001 IPCC data, is reported in the Guardian [18 April] as saying, "Emissions are growing much faster than we'd thought, the absorptive capacity of the planet is less than we'd thought, the risks of greenhouse gases are potentially bigger ... and the speed of climate change seems to be faster. ... People who said I was scaremongering were profoundly wrong." Even on the basis of the 2001 IPCC data, Sir Nicholas had estimated that the impacts of climate change could cost up to 20% of the world's GDP in the period covered by his report – let alone subsequent to that.

In terms of adaptation, both Prof Bob Watson (chief scientific adviser to Defra) and Sir David King (former chief scientific adviser to the government) have just warned that we should prepare for a global average temperature rise of 4 degrees [Guardian 7.8.08]. Although the consultation paper does refer to such a figure, it gives little feeling of the impacts this would have on national and international agriculture, food sources, supply chains, and all the intertwined elements of our national and worldwide human life and societal support systems. Prof Neil Adger, an expert on climate change adaptation at the Tyndall Centre for Climate Change Research, said in the same Guardian report, "There is no science on how we are going to adapt to 4 degrees. It is actually pretty alarming."

The current reality of Scottish government spending

Government action on adaptation, mitigation and, regrettably, on *enhancing* emissions, is perhaps best measured by how spending is allocated between different policy areas, and this in no way corresponds to the above warnings and dangers.

It can be clearly seen, for example, in terms of how spending is distributed within the policy area of transport, that climate change mitigation and adaptation are not considered as of any real significance. The Scottish Government's own *Climate Change Programme, 2nd annual report, 2007-8*, states, "It is imperative that overall emissions from this sector are driven down." The report says that levers such as fuel duty are reserved to the UK government – yet Scottish Ministers have called for petrol duty reductions. And in terms of infrastructure, where the Scottish Parliament is in charge, huge sums are going to road and airport expansion. If the warnings on the previous page prove to be valid, then these infrastructure projects will come to be seen as the exact opposite of adaptation; rather, they will increase the costs of adaptation, whilst also having swallowed up huge resources which could have gone to adaptation. Urgent actions on transport by the new government have included abolition of bridge tolls and of hospital parking charges. In the draft 2009/10 budget, headings which support walking and cycling remain static (and investment in these areas is if anything below that under the previous Lab/Lib government), whilst trunk road/motorway spending rises by an astonishing £134m.

In terms of energy, whilst the government is to be congratulated for its considerable initiatives on renewables, the number one objective there is clearly to stimulate conventional economic growth in a new market. Although climate change (and energy security) are also considered to be important objectives, they are clearly not the primary ones – if they were then the government would also be putting massive investment into energy efficiency, which in terms of energy policy is the most cost-effective way to reduce energy use and climate change emissions.

Example – funding for cycle project work

Total Scottish government transport spending is over £2000m per year. Spending on cycle projects by government and local authorities is under £20m. Research by Spokes [Spokes Bulletin 100 and earlier issues] suggests strongly that this figure may even be falling. Whether or not it is marginally falling or static, however, is beside the main point; which is that to devote probably under 1% of total transport funding to developing cycling infrastructure and promotion is an appalling reflection on how seriously the government considers active and non carbon-based transport.

When this matter is raised with Ministers we are informed of current initiatives such as increased cycle training, a plan for an Oban-Inverness long-distance route, a few sustainable travel town experiments, and so on. Welcome as these initiatives may be, they do not alter the fact that if you add up the cycling element of all of them, the total is under £20m a year. What use is it if people are trained to cycle and yet in most towns and cities they do not feel that the infrastructural conditions allow them and their families to do so safely for work, shopping, school and other everyday purposes? Driving with bikes to a rural cycleroute may be a pleasant outing, but what help is that to climate change policy?

This is a clear example of adaptation failure as well as mitigation failure, since we need urgently to be developing an infrastructure where for as many local journeys as possible it is easy and safe to get around by walking and cycling. Settlements need to be more compact, and the public needs to be at home with and happy with getting around by non-carbon means, and meeting as many as possible of their everyday needs by those means. Most importantly in terms of adaptation (and on top of the need to reduce CO2 emissions) society needs to be able to cope with either sudden or consistently growing increases in petrol prices.

Spokes has proposed* as an *immediate* step that the government introduces in the 2009/10 budget a £20m cycle projects fund, to be administered by the existing Sustainable Travel Team, open to bids of over say £1m by local authorities, transport partnerships, or any other relevant bodies (e.g. Sustrans, ScotRail, BWB). This would roughly double existing cycling spend in Scotland, still far below European levels, but would be a means of starting to ramp up planning, staffing and delivery for a future in which carbon-based movement becomes much more expensive.

Yours Sincerely

Dave du Feu Spokes

^{*}For full details see letter from Spokes to Cabinet Secretary for Finance and Sustainable Growth John Swinney. Available as a pdf at www.spokes.org.uk – downloads – campaign submissions – Scottish government.