

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SUBMISSION FROM SPOKES

THE DRAFT CLIMATE CHANGE PLAN (RPP3)

1. Introduction

Our comments relate to the place of active travel, and the wider transport context, in the draft RPP3ⁱ. We also endorse the submissionsⁱⁱ from Pedal on Parliament, Transform Scotland and CarPlus-BikePlus.

Our submission responds in sections 3-6 to the four issues raised by the Committees. However we first (section 2) list three main concerns, which are central throughout our submission.

2. Three main concerns relating to draft RPP3

2.1 The aim for 10% of trips to be by bike by 2020 is not taken seriously by government, and hence is not built into RPP3 emissions reduction targets

RPP3 refers several times to the Scottish Government's aim for 10% of all journeys in Scotland to be by bike in 2020. The Transport Minister, in the recent *Cycling Action Plan for Scotland*, CAPS3ⁱⁱⁱ, repeats the government's “*unshakable commitment to the 2020 vision.*” **However, it is clear that RPP3 does not take this commitment seriously** – it does not expect that 10% of all trips will be by bike in 2020, and it does not know when they will be - and hence this is not built into emissions targets. This is a view evidenced in our pre-budget submission^{iv} to RECCC as well as in SPICe Bulletin 16/33^v, which in May 2016 stated, “*it seems clear that the vision of 10% of everyday trips in Scotland being made by bike by 2020 will not be met.*” It is hugely frustrating that government rhetoric does not match reality. How can a document such as RPP3, which has to set realistic emissions targets, cope with such a disconnect?

2.2 Active travel investment is insufficient to raise everyday cycle use by much in the near future

This was recognised by RECCC in its report^{vi} on the draft budget, which states, “*The Committee echoes the recommendations of the previous Infrastructure and Capital Investment Committee and calls on the Scottish Government to set out how it can increase funding for active travel in order to make tangible progress towards meeting its stated targets.*” Our evidence to the Committee suggested that if the government started now to invest consistently at the level of cycle-friendly European countries (around £20 per person annually) it could, with effort, hope to achieve 10% of trips by bike by 2027 – and indeed it could achieve 15% within the period of RPP3.

The fact that investment is currently at “record levels” (RPP3 p89) disguises the more significant fact that this is not an evidence-based amount designed to achieve a specific cycle-use target. Interestingly, the fact that funding for trunk road expansion is also at record (and far far higher) levels is nowhere mentioned in draft RPP3 – and given that this may impact negatively on emissions, surely it should be?

2.3 Government policies encourage more motor traffic, to the detriment of emissions targets

Government policy towards motor traffic does not take demand management seriously [also 4.2 below]. Indeed, the opposite - it is encouraging more use of motor traffic, easier long-distance car and van travel, and hence, in a vicious circle, further dispersion of facilities and jobs. As a result, firstly, the potential impact on total transport emissions of the huge efforts planned to decarbonise private motor traffic will be seriously reduced. Secondly, active travel suffers both because journeys are longer and also because there is little investment potential left after 'big transport' has been satisfied.

3. RECCC issue 1: “Progress to date in cutting emissions within the sector/sectors of interest and implementing the proposals and policies set out in the RPP2”

On overall transport emissions, the CCC 5th Scotland report^{vii}, *Reducing emissions in Scotland, 2016 progress*, states, “Overall transport emissions are largely unchanged from 1990 due to improved vehicle efficiency being offset by increased demand for travel.” Draft RPP3 (p63) confirms that rising overall transport emissions are due to rising road sector emissions. [Relates to 2.3 above]

As regards active travel, whilst RPP3 does not estimate emissions changes from modal shift to/from active travel, distance cycled can perhaps be taken as a proxy figure. The CCC report states, “In 2014, 1% of journeys were by bike, well below the 2020 ambition of 10%. This figure has remained at around 1% since 2003.” RECCC itself concluded in its budget report, “the level of travel by foot and bike has remained relatively stable over the last few years.” Therefore it would appear that the government has achieved zero emissions reduction from cycling, since it has achieved no modal shift in that direction.

There are however considerable variations between authorities. According to the *Bike Life Edinburgh 2015* report^{viii} cycle use in Edinburgh rose by around 50% between 2010 and 2015 (work trips up from 4.8% to 7.3%; all trips up from 2% to 3%-4%), and over 6200 tonnes of CO2 are saved annually by people cycling instead of driving – “equivalent to the annual emissions of over 2400 cars.” Of course, since cycle use is up in some areas, it must be falling in others, as it is static across Scotland as a whole.

Edinburgh's success is due to political commitment, reflected in a specified proportion of capital and revenue transport budgets being allocated to cycling - rising from 5% to 10% during the course of the present council. However it is vital to note that this investment has been almost doubled via the Sustrans 50/50 Community Links scheme. BUT, now that other Councils are also submitting major bids, available funding will be spread much thinner unless government raises cycling investment. For example, there are 10 high-quality shortlisted schemes from around Scotland bidding for the 2017 Sustrans Community Links Plus competition^{ix} – but only enough funding to support one or perhaps two.

Finally, it is worth looking back also to RPP1^x, *Low Carbon Scotland: Meeting the Emissions Reduction Targets 2010-2022*. RPP1 proposed (table 10 and appendix A2) investing £1,320m in cycling and walking infrastructure during the 10 years 2011-2022, weighted towards the start of the period, to achieve the aims of 10% of trips by bike in 2020 and increased walking. **Had that level of investment been made, the government might now be well on its way towards the target.** Sadly, however, actual investment was merely some £20m p.a. 2010-2013, with £40m p.a. promised from 2014 onwards (CAPS3, p7) – a probable total of £320m rather than £1,320m. [Relates to 2.2 above].

Moreover, in RPP1 the aim of 10% cycle use by 2020 was a formal 'milestone' towards achieving statutory emission reductions targets, whereas it is not taken seriously in RPP3 [2.1 above].

4. RECCC issue 2: “The scale of reductions proposed within their sector/s and appropriateness and effectiveness of the proposals and policies in the draft RPP3 for meeting the annual emissions targets and contributing towards 2020 and 2050 targets”

4.1 Scale of reductions proposed

RPP3 does not anticipate any significant emissions reduction from current cycling policy – and implicitly this is because RPP3 does not expect that a substantial increase in cycle use will be achieved.

Firstly, it states (p71) that policy outcome 8 would have little impact on emissions because “most journeys under a mile are already undertaken by walking.” Cycling is not mentioned – and indeed (p65) the average cycling journey length is 4.7km - so RPP3 does not expect emissions savings, as it does not

expect modal shift to cycling. Secondly, in its 'future scenario' (p67) RPP3 does not see modal shift to cycling (or walking) as sufficient to be worth mentioning. Finally, Pedal on Parliament^{xi} has calculated that were the government to achieve 10% cycle use, transport emissions would be cut by 5%. Were RPP3 to believe that cycle use would be thus increased, then the 5% would certainly be in the draft report as a proposed reduction! – but it is not. [Relates to 2.1 and 2.2 above].

4.2 Appropriateness and effectiveness of RPP3 policies and proposals for contributing to targets

As mentioned above PoP has calculated (based on 33% transfer from car) a potential 5% contribution to emissions reductions from achieving 10% cycle usage. However it is clear [2.1, 2.2 above] that current funding levels will not achieve this shift in any reasonable timescale. Thus current policy in terms of investment levels is ineffective. Consistent investment of £20 per person per year could hope to achieve 10% or even 15% cycle use within the timeframe of RPP3 [2.2 above].

Investment in cycling infrastructure is best accompanied by motor traffic **demand management** to achieve maximum effectiveness in raising cycle use. Furthermore demand management will of itself reduce emissions substantially. RPP3 illustrates these advantages, but shies away from proposing them. Failing to propose substantial demand management measures is extremely inappropriate in terms of meeting emissions targets - and even more so given that they are highly cost-effective...

The SPICe RPP3 analysis^{xii} (SB17/07) lists the 12 most cost-effective policy options for mitigating overall transport emissions, according to a Scottish Government Atkins/Aberdeen University report^{xiii}. Of the top 6, three are demand management measures – trunk road speed reduction, tougher public parking charges and workplace parking levies – but RPP3 has no such proposals. [relates to 2.3 above]

In contrast, heavy investment is allocated to measures where emissions reduction per £ is very costly (e.g. high speed rail links) or where it is actually negative (trunk road expansion). The SPICe analysis (p33) concludes *“it is highly likely that the major investment being made by the Scottish Government in the trunk road network will lead to extra miles being driven, with associated increases in emissions.”* We contend that RPP3 should discuss not just policies which reduce emissions, but those that increase them. Yet there is little discussion of policies on trunk road expansion – or indeed APD proposals.

In summary, and without even discussing the planned halving and abolition of APD, existing policies on road and on active travel are inappropriate and of limited, and in some respects negative, effectiveness.

5. RECCC issue 3: “the appropriateness of the timescales over which the proposals and policies within the draft RPP3 are expected to take effect.”

The policies and proposals in draft RPP3 will not lead to significant emissions reductions from modal shift to cycling (or walking) anywhere within its timescale. [2.1, 2.2, 4.1 above].

6. RECCC issue 4: “the extent to which the proposals and policies reflect considerations about behaviour change and opportunities to secure wider benefits (e.g. environmental, financial and health) from specific interventions in particular sectors.”

6.1 Co-benefits and co-disbenefits of the policies and proposals

Potential co-benefits of investment in active travel are described in draft RPP3 (p171). Unfortunately the level of co-benefit actually achieved depends on the level of investment. Given that draft RPP3 does not anticipate significantly increased cycle use [2.1, 2.2, 4.1 above] these co-benefits are likely to remain much more potential than actual.

RPP3 also describes disbenefits (p72). Unfortunately this section wholly omits the co-disbenefits of trunk road expansion. As mentioned earlier [4.2 above], quite apart from emissions implications, this is likely to lead to further dispersion of jobs, facilities and homes, to the detriment of the economies of local towns and villages, and to make active travel less appropriate for many trips, thus deleting potential health benefits.

The SPICe RPP3 analysis (p66) includes a very helpful table showing co-benefits of various transport policies and proposals. Of all interventions, the most robust evidence for positive health outcomes and positive social equity outcomes is investment in active travel. The only other interventions with maximum scores for health co-benefits are demand management and average speed cameras – neither of which are reflected in policies or proposals.

6.2 Behaviour change

We refer to the ISM model (RPP3 p162-164) – Individual, Social, Material. There is considerable evidence that to achieve substantial and ongoing modal shift to cycling, material is the top priority, with social a (fairly distant) second. People as a generality will not be prepared to cycle, and to encourage their children and relations to cycle, unless they feel that conditions are sufficiently safe. Once that is achieved, then behaviour change programs can have a significant role.

Perhaps the seminal paper on increasing cycle use, although now a little dated, is *Making Cycling Irresistible*^{xiv} by Pucher et al, in which the roles of material, social and individual can all be seen. The authors conclude...

“The key to achieving high levels of cycling appears to be the provision of separate cycling facilities along heavily travelled roads and at intersections, combined with traffic calming of most residential neighbourhoods. Extensive cycling rights of way in the Netherlands, Denmark and Germany are complemented by ample bike parking, full integration with public transport, comprehensive traffic education and training of both cyclists and motorists, and a wide range of promotional events intended to generate enthusiasm and wide public support for cycling. In addition to their many pro-bike policies and programmes, the Netherlands, Denmark and Germany make driving expensive as well as inconvenient in central cities through a host of taxes and restrictions on car ownership, use and parking. Moreover, strict land-use policies foster compact, mixed-use developments that generate shorter and thus more bikeable trips. It is the coordinated implementation of this multi-faceted, mutually reinforcing set of policies that best explains the success of these three countries in promoting cycling.”

Spokes
6 February 2017

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- i Draft RPP3 - www.gov.scot/Resource/0051/00513102.pdf
 - ii Other RPP3 submissions - www.parliament.scot/parliamentarybusiness/CurrentCommittees/103306.aspx
 - iii CAPS3 - www.transport.gov.scot/report/cycling-action-plan-scotland-2017-2020-9743
 - iv Spokes pre-budget evidence - www.spokes.org.uk/wp-content/uploads/2015/04/1611-Spokes-short-pre-b-submission.pdf
 - v SPICe Bulletin 16/33 - www.parliament.scot/parliamentarybusiness/99386.aspx
 - vi RECCC report on draft 17/18 budget - www.parliament.scot/parliamentarybusiness/CurrentCommittees/103262.aspx
 - vii CCC 5th report on Scotland - www.theccc.org.uk/publication/reducing-emissions-in-scotland-2016-progress-report/
 - viii Bike Life Edinburgh 2015 - www.sustrans.org.uk/sites/default/files/bike_life_edinburgh_2015.pdf
 - ix Community Links Plus scheme - www.sustrans.org.uk/scotland/communities/community-links-plus-design-competition
 - x RPP1 - www.gov.scot/resource/doc/344868/0114766.pdf
 - xi Pedal on Parliament submission - www.parliament.scot/S5_Rural/Transport_-_Pedal_on_Parliament.pdf
 - xii SPICe Bulletin SB17/07 - www.parliament.scot/parliamentarybusiness/103311.aspx
 - xiii Mitigating Transport's Climate Change Impact in Scotland - www.gov.scot/resource/doc/282791/0085548.pdf
 - xiv Making Cycling Irresistible - www.spokes.org.uk/wp-content/uploads/2010/04/0711-Pucher-Irresistible.pdf