

11 January 2021

## Climate Change Plan Update – Spokes response

We are responding only to Chapter 3.3 [Transport] of the *Climate Change Plan Update*<sup>1</sup> CCPu. Our responses are to the five transport-related questions posed by the *Rural Economy and Connectivity Committee*<sup>2</sup>. Tailoring our response into those five headings was not a simple matter and some responses are in fact relevant to more than one question.

### **1. What is your assessment of the progress to date in cutting emissions within the sector/sectors of interest and the implementation of the proposals and policies set out in previous Climate Change Plans (RPP1-3)?**

a. As recognised in CCPu (3.3.1) and in the CCCUK 2020 Progress Report to Parliament<sup>3</sup> (p35, table 2.3), surface transport (along with aviation) has been the poorest performing sector, with emissions if anything rising, compared to greater or lesser reductions in virtually all other sectors. Time is well overdue for transport policy to take climate seriously.

#### **b. Transport Investment**

Scottish Government policy has if anything encouraged the growth in motor traffic, with disproportionate investment over many years as compared to investment in active travel and bus.

The need for drastically increased active travel investment was recognised in year 2011 in RPP1<sup>4</sup>, which proposed investment of £1320m over 10 years [p99, table 10; and p146, table A2] – an average of £132m a year - and assumed this would achieve the then target of 10% of all trips to be by bike in 2020. As we know, subsequent investment was in fact a mere £20m for several years, then £40m, only rising very recently to £100m - still well below the 2011 RPP1 report's proposed annual average! Little wonder, then, that the 2020 cycle use target failed so miserably. Spokes many times raised these concerns over the years, notably in our RPP3 response<sup>5</sup>, consistently pointing out, with evidence, that existing funding levels had no chance of achieving the 2020 cycle use target. RECC and its predecessor ICI Committee consistently agreed that active travel investment was inadequate [example<sup>6</sup>].

The current active travel funding commitment is £500m over 5 years (3.3.22), i.e. £100m annually. We strongly support the new “additional” £50m Active Freeways fund (3.3.22) as a welcome recognition of the crucial need for high quality infrastructure on arterial routes to urban centres and major destinations. It would be useful to know when and how it will be allocated. However, assuming it is over five years it will make little difference to the overall financial picture above and will only make a limited start on the number of arterial roads which merit such treatment.

---

1 <https://www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/>

2 <https://yourviews.parliament.scot/ecclr/ccp-update/>

3 <https://www.theccc.org.uk/publication/reducing-emissions-in-scotland-2020-progress-report-to-parliament/>

4 <https://www.gov.scot/publications/low-carbon-scotland-meeting-emissions-reduction-targets-2010-2022-report/>

5 <http://www.spokes.org.uk/wp-content/uploads/2015/04/1702-Spokes-RPP3-submission-final.pdf>

6 <https://www.parliament.scot/parliamentarybusiness/CurrentCommittees/103262.aspx#>

In contrast to active travel investment, annual trunk road and motorway budgets have been in the £500m-£900m range, including significant sums for increasing traffic capacity. Increased traffic on intercity roads of course impacts on the towns and cities at each end, resulting in growing urban congestion and further emissions. This is discussed further in (2c) below.

c. Part of the policy problem arises from remnants of the discredited 'predict and provide' approach (which tended to be applied only to road travel). Even CCPu (3.3.1) begins its transport chapter by stating that transport is a '*derived* demand,' based on where people live, work etc – whereas in fact it is a 2-way relationship, so that where people live, work, shop, etc is itself in part dependent on what transport opportunities and modes are provided. Trunk road enhancements encourage dispersion of settlements, job opportunities, shopping etc, as longer-distance travel becomes easier, faster and cheaper; and the consequent loss of local opportunities can lead to calls for further road enhancement.

To an extent this is increasingly appreciated by government, for example the welcome new emphasis (3.3.11) on 20-minute neighbourhoods. However, since longer-distance motor travel is at the same time being made easier and cheaper through trunk road expansion, the government is inconsistently thereby encouraging people to work and shop further away, a policy contradiction.

## **2. Do you think the scale of reductions proposed within the sector(s) are appropriate and are the proposals and policies within the CCPu effective for meeting the annual emissions targets and contributing towards the 75% reduction in GHG emissions by 2030 and net-zero by 2045 targets?**

a. Spokes does not have the technical expertise to assess which actions will result in what level of emission changes, and therefore it is difficult to comment on the scale of reductions, other than the general point that transport policy is well overdue in contributing to Scotland's legal emission targets, and that meeting these targets is now more urgent than ever<sup>7</sup>. However, even though we cannot quantify this, we can comment on which policies and proposals are likely to bring about reductions (or increases) in emissions.

**b. We are delighted and, frankly, astonished, by the unexpected commitment (3.3.19) to “reduce car kilometres by 20% by 2030.”**

Whilst some cities have significant traffic reduction ambitions we are not aware of such targets being set across an entire country anywhere in the world. It is an ambition which is truly in keeping with Scotland's hosting of COP26.

Needless to say, we cannot avoid a strong fear that, when it comes to the rub, policies will not be sufficiently ambitious to achieve anything like this goal. The example (1b above) of the Government's utter failure to achieve the 2020 cycle use target, perhaps largely because RPP1 active travel investment proposals were effectively disregarded, gives us serious cause for concern.

Moreover, to achieve 20% reduction in car kilometres, effectively a major reversal of existing trends, will demand exceptional determination and commitment, including tough decisions on demand management and on the allocation of investment. All past experience suggests that it cannot be achieved solely by 'carrot' measures of more cash for active and public transport, although these are essential. The challenges are well laid out in the Scottish Parliament Information Centre's recent paper, *Reducing car travel in Scotland*<sup>8</sup> and we can do no better than refer the Committee to that document.

---

<sup>7</sup> <https://www.bbc.co.uk/news/science-environment-47976184>

<sup>8</sup> <https://spice-spotlight.scot/2020/12/16/back-to-the-future-reducing-car-travel-in-scotland/>

Finally, we are of course aware that Covid19 has shaken up traffic patterns and led to a big rise in home working. However there is also significant evidence of a major shift from public transport to car, with overall car travel therefore rising towards previous levels, a trend which may increase as lockdowns are eased thanks to vaccines and as the level of home working perhaps then falls somewhat. We welcome the promised roadmap in 2021 for how the 20% reduction will be achieved. Policies will have to change rapidly and therefore the roadmap is an urgent requirement. Indeed, even before the roadmap is produced, the Government has a major opportunity to set the ball rolling and give a public message through its investment priorities in the forthcoming 21/22 Scottish budget.

### c. Trunk Road expansion contradicts CCPu aims

Despite the above (2b) hugely ambitious commitment, we are concerned that the recently published NTS2 Delivery Plan<sup>9</sup> clashes with CCPu in respect of trunk road construction. Reading through CCPu (e.g. 3.3.3) who would imagine that the Delivery Plan (*page 26*) continues the entire existing, very costly, programme, ongoing many years into the future, of trunk road expansion and enhancement? This will bring increased traffic, further detract from rail, add to pressures on town and city destinations, detract from 20-minute neighbourhoods, and of course increase emissions, for years to come. If the government genuinely intends to reduce traffic miles substantially, how can this possibly make sense? We also note the very poor justification for some of these schemes (quite apart from the emissions aspect); for example in order to achieve positive cost-benefit for A9 dualling the Scottish Government had to employ consultants to devise an entirely new and additional £430m monetary 'benefit' of reducing driver frustration (additional to the time saving and crash reduction values)<sup>10</sup>.

As Prof Iain Docherty of Stirling University points out<sup>11</sup>, in a paper on NPF4, transport investment in Scotland in recent years has made it *"easier to move between our cities ... but harder to move within them."* He concludes, *"We need to stop spending money to enable some people to travel further to do the same things, and instead invest in interventions that enable everybody to access what they need in a sustainable way."* In particular, *"We need to travel less overall"* and *"the proportion of travel by car needs to reduce significantly, and fast."* This requires *"a fundamental reappraisal of where economic and social activity occurs, so it is accessible, and of how we move between and within these places."*

Unfortunately the contradiction between the intention to reduce car km whilst at the same time investing for increased car km permeates much of the CCPu transport chapter. Many of the proposals in the chapter are excellent but whilst reading them we are continually conscious that at the very same time the government will be investing probably even larger sums in making inter-urban car travel faster, easier and cheaper. This inevitably will impact on the urban and village settlements which are the origins and destinations of these journeys and will detract, to a greater or lesser extent, from the ability of those settlements fully to embrace and benefit from the measures in this chapter.

We can only hope that STPR2, to be published in early 2021, will bring a change of priorities – but given that the above NTS2 Delivery Plan has only just been published, this seems unlikely.

### d. e-bikes / cargobikes / shared transport

We strongly support the intentions (3.3.22) on provision and promotion of e-bikes for individual and household transport (including presumably cargobikes, which are excellent for some forms of family transport). We also support shared transport (3.3.23) such as car clubs, with emphasis on the benefits of using such communal transport in place of private ownership, given that such policies are known to reduce car miles and encourage active and sustainable travel - plus the fact that car clubs are and will continue to be ULEV-based to a far greater extent than private ownership.

---

9 <https://www.transport.gov.scot/publication/national-transport-strategy-nts2-delivery-plan-2020-to-2022/>

10 <https://spice-spotlight.scot/2020/02/18/the-a9-dualling-project-crucial-for-scotland/>

11 <https://www.transformingplanning.scot/media/1282/tp-an-accessible-scotland.pdf>

## **e. ULEV promotion**

However, although certainly the remaining need for motor transport must be ULEV, we have a serious concern over 3.3.25/3.3.26. In the same way that the government is inconsistently pressing forward with road construction at the same time as attempting to encourage transfer away from car (2c above), here also it is keeping ULEV measures (specifically EV) in a separate silo from measures to support the promotion of bike/ebike/cargobike and of car share, with separated schemes and promotion for each.

Active and shared transport is more environmentally sustainable, both for emissions and more widely, than individual motor travel, even when this is ULEV. Thus while the government certainly should promote EVs, this should be done in a more holistic way, such that every advertisement, promotion or incentive for EV should also incorporate information and incentives for alternative more sustainable modes and opportunities. The present 'silo' approach means that householders or small businesses who are considering moving away from fossil fuels may well not be aware that ebikes/cargobikes (together with car club) may be a realistic, cheaper, healthier and equally effective option as compared to a straight swap of fossil fuel motor vehicles for EV motor vehicle. It is not good enough solely to promote this option by separate advertising – it must also be automatically presented, with incentives, to everyone who is at the point of considering a shift away from fossil fuels. Obviously for some people a personally-owned EV will still be the most appropriate choice, but this should not be happening purely by default, without consideration of and incentives for alternatives.

It is the same for vehicles and fleets used by public bodies. Section 3.3.26 talks of “transitioning to EVs” rather than presenting these public bodies with the choice of (and incentives for) ebikes and cargobikes for appropriate purposes. This is all the more disappointing given that some public bodies are already experimenting with such modes - for example, Edinburgh Council's pilot use of cargobikes to assist local businesses during tramworks<sup>12</sup>. The government itself has been involved in ebike provision for use by NHS Forth Valley staff, but only thanks to an initiative by Forth Environment Link<sup>13</sup>. Such options should be standard in government thinking, and in promotional materials, always to be a consideration when transitioning away from fossil fuels, rather than the present silo approach.

There is one recent exception to the above, where a more holistic approach has been taken, namely the LEZ Mobility Fund<sup>14</sup>. Although this is a small and means-tested fund it provides incentives to consider and move to active transport when scrapping a non-compliant fossil vehicle. This is the type of thinking which needs to be the norm and thoroughly embedded in government consciousness.

## **f. Workplace and wider Premises Parking Levies**

Spokes is keen to see the Workplace Parking Levy implemented (3.3.24). We are however disappointed that the government still appears to be at such an early stage in preparing the necessary regulations and guidance when the act received Royal Assent in November 2019.

Furthermore we urge that customer parking spaces (over a certain minimum limit) are included, if possible in the regulations, or, if that is not possible, in early legislation, as was discussed in our submission<sup>15</sup> on the Transport (Scotland) Bill consultation in 2018. As with workplace levies, the wider premises levy would be charged to the parking provider, not the user, although providers could choose to pass it on. The levy would incentivise providers to encourage customer travel by sustainable means. Such a levy would also benefit local centres as against out-of-town car-based provision. Even within-town, any businesses with large car-parking provision would thereby be incentivised to repurpose or sell off plots of this valuable but sterilised urban space for productive purposes.

---

12 <https://www.edinburghchamber.co.uk/cargo-bikes-and-shopping-vouchers-help-support-tram-route-businesses/>

13 <https://nhsforthvalley.com/scotlands-largest-electric-bike-scheme-launched-at-forth-valley-royal-hospital/>

14 <https://www.transport.gov.scot/news/low-emission-zones-to-help-households-travel-better/>

15 <http://www.spokes.org.uk/wp-content/uploads/2018/09/1809-Transport-Bill-Spokes-submission-layout-for-web.pdf>

### 3. Do you think the timescales over which the proposals and policies are expected to take effect are appropriate?

a. Whilst it is hard to predict how long policies will take to achieve full effect, it is clear that the sooner initiatives take place, the sooner will benefits be felt.

#### b. Time lag before transport policies achieve full emissions effect

With most transport policy decisions the impact on emissions will take place over a period, as individual or commercial practice gradually changes as a result of the new policy. The length of this period clearly will depend on factors such as the nature of the policy change, the determination with which it is pursued and the level of investment.

Returning to RPP1 for example (1b above), there appeared to be an assumption (comparing appendix tables A1 and A2) that the emissions benefits from active travel investment could be felt substantially within about 3 years, and felt fully within say 5-6 years. Presumably because of this time lag, RPP1 proposed front-loading the active travel investment, with heavy investment in the first 3 years before settling down to a steady annual figure of somewhat under £100m.

#### c. Immediate Opportunity – making *Spaces for People* schemes permanent

There is one particularly urgent Covid-related issue where the Scottish government needs to act rapidly to avoid the loss of immediate active travel opportunities and the effective waste of a good part of the recent £39m of active travel investment which is referenced in CCPu 3.3.11..

The government, via Sustrans, allocated £39m to local authorities for *Spaces for People*<sup>16</sup> schemes many of which require TTROs (temporary traffic regulation orders) for their legal validity. Their purposes include enabling social distancing when cycling or walking, enabling people to use active travel modes in safety rather than filling up space on buses, for exercise, and such Covid-related purposes. However, these extensive schemes also tie in well with CCPu's aim to reduce emissions through modal shift to active travel.

Many SfP schemes are proving a real boon for active travel – for example Edinburgh City Council<sup>17</sup> is installing over 30km of semi-segregated cycle lanes on main roads, over 70 school schemes, and town centre footway extensions, all using temporary cheap materials funded through its share of the £39m.

Our understanding is that TTROs lose their validity once the temporary cause comes to an end – which could be the case here in a matter of months if there is widespread vaccination. Local authorities such as Edinburgh, along with the Cabinet Secretary, have expressed the hope that successful SfP temporary schemes will be made permanent. However this requires TTROs to be replaced by a full TRO – a process which can easily take well over a year, particularly if there are objections, and therefore could often not be completed before TTRO expiry. This would mean removing successful schemes for 'paper' reasons – a situation incomprehensible to the people using them. A further complication is that making such extensive schemes permanent, using permanent materials and with modifications on the basis of experience, is likely to require considerable staff design and legal time and heavy investment.

The issue, and the variety of possible solutions, is too detailed to discuss here, and is the subject of correspondence between the Cross-Party Group on Cycling, Walking and Buses and the Cabinet Secretary. **We urge the Committee to liaise with the Cabinet Secretary on this matter, in advance of RPP4/CCPu outcomes, to request that the Government takes whatever steps are necessary, whether legal, financial, guidance, advice or other, to ensure that local authorities are able to make all successful SfP schemes permanent.**

<sup>16</sup> <https://www.transport.gov.scot/news/success-for-30-million-pop-up-infrastructure-initiative/>

<sup>17</sup> <https://www.edinburgh.gov.uk/spaces-people-1>



Obviously whatever solutions are adopted must include the opportunity for public comment and objection, at some stage in the process to make a scheme permanent.

**At the start of the pandemic, the Cabinet Secretary acted rapidly to modify TTRO guidance to allow the SfP schemes to go ahead. He must now act to ensure that all schemes that are successful can and will be made permanent, and that they remain in place until the permanent works take place.**

Clearly, making all such successful schemes permanent would be a major and unexpected bonus in the active travel developments needed as part of CCPu, not least because of the time lag between implementation and full emissions benefits discussed in 3b above. In Edinburgh, for example, the Council in 2019 had agreed to look at arterial roads with a view to improvements for cycling. On past experience it would have been a good many years before we saw implementation of a significant number of schemes. But now, in less than 12 months, semi-segregated provision is actually in place on over 30km of such roads. To lose this would be an active travel tragedy not just for Edinburgh and other local authorities – but also for CCPu.

#### **4. To what extent do you think 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?**

a. It is well known that modal shift from car to active or public transport, as the CCPu is meant to deliver, brings about health and environmental benefits, so it is not necessary to go into detail here.

Financial pros and cons vary between households, but generally a more locally-based lifestyle, using active or shared transport, is likely to be more financially advantageous to people than the heavy costs of individual car ownership. Specifically on cycling, the UK Department for Transport commissioned a report “The Value of Cycling”<sup>18</sup> which looked at a wide range of financial impacts, including personal, employer, tourism, logistics, industry and government.

#### **5. To what extent do you think the CCPu delivers a green recovery?**

a. We welcome virtually all the ideas in the New Context and Green Recovery sections, paras 3.3.4-3.3.15, including supporting home and flexible working, supporting public transport, repurposing redundant town centre buildings, freight consolidation centres with local cargobike delivery, freight transfer from road to rail, 20-minute neighbourhoods, access to e-bikes, encouraging of shared transport such as car clubs in place of individual ownership, etc, etc. We also welcome most of the Actions section 3.3.19-3.3.26, though with some reservations mentioned at various points above.

b. The section, Positive Vision for 2032/2045, 3.3.16-3.3.18, goes on to describe a new society where all the above ideas are operating effectively and at scale. However, for the reasons in 2(c) above, we are concerned that the Vision will be less fully achieved than the optimistic picture painted. Not only will there be increased inter-urban car and lorry traffic, impacting on the settlements at either end, but a huge opportunity cost will have been lost, which should have gone to enhancing the many emissions-busting initiatives in this chapter, but instead will have added to emissions. In 2(c) we referred mainly to personal car transport, but it is similar for freight. Para 3.3.10 talks of moving freight from road to rail – yet the A9 is being dualled whilst the parallel railway remains single-track, possibly even resulting in transfer from rail to road.

---

18 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/509587/value-of-cycling.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/509587/value-of-cycling.pdf)