

Written Submission to the Infrastructure and Capital Investment Committee on the draft second Report on Proposals and Policies

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Cycling Scotland, Sustrans Scotland and Transform Scotland

Summary

Cycling Scotland, Sustrans Scotland and Transform Scotland call on MSPs to ensure that the second Report on Proposals and Policies (RPP2) is sufficiently robust and ambitious in order to meet Scotland's future climate change targets. We consider that the current RPP2 needs to be strengthened and we recommend the following improvements:

- Proposals which are currently underway and/or are already receiving funding should be upgraded to Policies;
- More action should take place in the short to medium term, rather than waiting until much further down the line;
- The transport section should assume the following hierarchy of travel preference: walk, cycle, public transport, car instead of putting the car at the top of the list;
- The budget lines for the Proposals in RPP1 and RPP2 should remain unchanged to allow for ease of comparison and to increase transparency.

1. Introduction

Cycling Scotland, Sustrans Scotland and Transform Scotland welcome the opportunity to provide joint written evidence to the Infrastructure and Capital Investment Committee on the draft second Report on Proposals and Policies (RPP2). Given our combined knowledge and interest in sustainable and active travel, we focus our comments below specifically on Chapter 7: Transport.

2. Progress of RPP1 Policies and Proposals

It is clear that the policies and proposals set out in RPP1 have not been effectively implemented as Scotland missed its first annual climate change target, as set out in secondary legislation under the Climate Change (Scotland) Act 2009. Transport emissions, particularly from road transport are a primary reason for missing the target. The transport sector (excluding aviation and shipping) accounted for 19% of the total Scottish greenhouse gas (GHG) emissions in 2010¹, and although this is a 1% decrease from 2009, transport's GHG emissions have actually increased by 2% since the 1990 baseline from which the targets are measured. Therefore, it is clear that significant changes are required in relation to transport in order to achieve the required GHG emissions reductions. Action is required now in order to address this situation as opposed to waiting for a 'quick fix' at some point in the future.

3. RPP2 Policies and Proposals

RPP2 significantly reduces the level of ambition in the transport section, particularly in the early years. For example, for 2020, RPP2 almost halves the effort expected from the transport proposals (a 47% reduction):

	Policies (ktCO ₂ e)	Proposals (ktCO ₂ e)	Reference
RPP1	1,386	1,093	RPP1, p143
RPP2	1,243	578	RPP2, p165

Given that transport makes such a significant contribution to total emissions, as highlighted in paragraph 2 above, we consider this lack of ambition to be unacceptable and we outline below our main concerns regarding RPP2:

Distinction between Policies and Proposals

As in RPP1, the Scottish Government remains uncommitted to any transport policies within RPP2, the only emissions savings from policies being as a result of EU Directives. However, the text of the

¹ Scottish Government. (2011). Scottish Greenhouse Gas Emissions 2010. Edinburgh

transport section clearly sets out that the Government is already allocating funds to a number of the transport proposals, such as cycling and walking infrastructure investment, car clubs and eco-driving, so it is perverse for these not to feature as policies². We recommend that those measures that are currently being funded, for example the Cycling Action Plan for Scotland (CAPS), be ‘upgraded’ to policies in the context of RPP2. CAPS is a Government policy document that has been in place since 2010 and there have been actions taken and investment in this policy since RPP1; the 10% of all journeys by bicycle in Scotland by 2020 has also been referenced throughout RPP2. This is just one example and there are many more within the transport section. Therefore, we call for this discrepancy to be rectified and that all proposals which are already underway and/or are already receiving funding should be referred to as policies.

Lack of clarity

The specific policies and proposals have been amalgamated into ‘packages’, which are explained, but not in the same degree of detail as in RPP1. We consider that the narrative describing Package 3: Sustainable Communities is particularly weak and needs to be expanded.

Furthermore, RPP2 features only five budget lines for transport proposals compared to the 13 featured in RPP1³. This significantly reduces the transparency of the document compared to its predecessor. The change in format also makes it impossible to compare the effort expected from different policies and proposals with that expected in RPP1, despite these measures being essentially unchanged.

The document is also extremely vague, for example:

“A range of models used to predict transport emissions **suggests** that it **may be possible** to reduce predicted emissions, **perhaps by as much** as 0.75Mt by 2027” (RPP2, p.132; our emphasis).

Various Committees have called for greater, not reduced, transparency in presentation of data. We call upon the ICI Committee to require the Government to provide a disaggregation of the data in the same format as presented in p.143 of RPP1 so that proper scrutiny can be carried out.

Greater emphasis on “Sustainable Communities” package

In order to successfully reduce GHG emissions from transport, it is essential that significant resources are devoted to behaviour change. Encouraging more people to travel on foot, by bicycle or public transport will result in less GHG emissions and a truly ‘sustainable’ transport network for Scotland. The proposals set out under the “Sustainable Communities” package should encourage this to happen and therefore considerably more emphasis should be placed on this section. Indeed, when focusing on the information contained within the Technical Annexes of both RPP1 and RPP2, it appears that there is a significant decrease in the potential for abatement of proposals in Sustainable Communities. The equivalent proposals (Cycling and Walking Infrastructure, Travel Planning and Car Clubs) in RPP1 provide an average of 192 ktCO₂e per annum, whereas RPP2 provides an average of 141 ktCO₂e per annum for these same proposals. There also appear to be significant differences in terms of ‘annual costs’. For Sustainable Communities, the equivalent proposals (as above) in RPP1 cost on average £127m per annum, whereas RPP2 provides an average of £61m per annum. It is also worth noting that in RPP1, cycling and walking infrastructure alone averaged £110m per annum in costs. We seriously question these figures and consider that more, not less, emphasis should be placed on this package.

Encouraging people to change their travel behaviour, and deliver a modal shift from car usage to walking, cycling or public transport, will require better integration of transport modes. Public transport must be better integrated across public transport modes (bus/rail) and with walking and cycling (cycle storage, cycle hire, walking/cycling networks from stations) in order for people to change their travel behaviour and make their journeys more sustainable. It is essential that these linkages are taken into consideration at the very outset of any project in order that a coherent network can be established. Transport for London often utilises “Complementary Measures” when implementing transport schemes (for example, for the Congestion Charge, Barclays Cycle Hire and some TLRN road schemes). This allows for not only the specific deliverable, but also for the local authority to consider how best to improve the local networks to best utilise the new facilities. While gaps continue to exist between sustainable modes of transport, there will still be an incentive for people to travel by car.

² We note the explanation given in 7.4.6 that “while in most cases they are already being taken forward, they are not yet being implemented at the intensity required for the abatement figures in this document”.

³ Compare the table on p.165 of RPP2 with the table on p.143 of RPP1.

With regards to car clubs, research undertaken for Carplus⁴ shows that a third of car club members in Scotland have sold their vehicle and a third have deferred purchase. The research also shows that car club members walk, cycle and use public transport more often than the general public. This evidence highlights that a package of measures including car clubs, such as electric car clubs, cycling and walking improvements and public transport enhancements could have a profound effect on behaviour. Greater emphasis on this package would deliver a myriad of additional benefits for Scotland, for example it would help to address Scotland's poor health record by encouraging people to be more active and it would also help to address the serious issue of fuel poverty.

Overemphasis on Low Carbon Vehicles and “decarbonising transport”

We have two significant concerns about placing so much emphasis on “decarbonising transport” and, specifically, associated technological and market-led changes, to reduce transport emissions to legally required levels:

1. The carbon reduction and wider environmental benefits of electric and alternatively powered vehicles is uncertain. There is even uncertainty contained within RPP2 itself, as there are references throughout that concede that proposals in “decarbonising transport” will not be viable (or even ready to be implemented) until the 2020s.
2. The policies and proposals as part of RPP2's decarbonising package do not provide the health, environmental, social and myriad of other benefits from increased levels of walking, cycling and public transport use.

There is conflicting evidence as to how much electric vehicles actually do result in reduced GHG emissions. Whilst the Scottish Government has the ambitious policy to generate the equivalent of 100% of Scotland's gross annual electricity consumption from renewable sources by 2020, any GHG savings benefit from electric vehicles must be considered alongside the power-mix that is fuelling the vehicle, **as well as that used in production**. It is also important to consider the environmental impacts of battery manufacture, recycling and disposal. Although there are studies which show the benefit of electric vehicles in reducing GHG emissions, there are others, such as a recent study on life cycle impact of electric vehicles⁵, that highlight the fact that electric vehicles and component production, maintenance, fuelling and disposal all have significant environmental impacts that may even negate the GHG benefit.

A report prepared for the Low Carbon Vehicle Partnership⁶ indicates that a vehicle's GHG from production and disposal is a higher proportion of the vehicle's life cycle emissions now, yet there are currently no regulatory frameworks that recognise this and no automotive targets “specifically aimed at reducing GHG from production of the whole vehicle”. The report highlights a few key areas for investigation, one indicating that there is a need for “better understanding and modelling of the environmental impact of vehicle end of life”.

The WWF, Transport Scotland's key partner in the E-cosse electric vehicle partnership, has stated in written evidence submitted to the House of Commons Transport Committee that they do support electric vehicles, but with the caveat that “A focus on low carbon vehicles must not be at the expense of greater support for public transportation and active modes of travel, such as cycling and walking”⁷. This statement captures the aims that were apparent in RPP1 but unfortunately, as the above evidence shows, the ambition to truly drive forward a step change in travel behaviour is being hindered by hopes that technological fixes may help Scotland achieve its climate change targets.

⁴ Harmer, C. and Cairns, S. (2012). TRL Report PPR613: Carplus Annual Survey of Car Clubs 2011/12 – Scotland. Prepared for Carplus.

⁵ Hawkins, T., Singh, B. Majeau-Bettez, G. and Hammer Stromman, A. (2012). Comparative Environmental Life Cycle Assessment of Conventional and Electric Vehicles. *Journal of Industrial Ecology*. Accessed from: <http://onlinelibrary.wiley.com/doi/10.1111/j.1530-9290.2012.00532.x/full>

⁶ Ricardo. (2011). Preparing for a Life Cycle CO2 Measure. Prepared for Low-Carbon Vehicle Partnership From: http://www.lowcvc.org.uk/assets/reports/RD11_124801_5%20-%20LowCVP%20-%20Life%20Cycle%20CO2%20Measure%20-%20Final%20Report.pdf

⁷ WWF-UK. (2012). Plugged in vehicles, plugged in policy?: Volume II Additional Written Evidence. House of Commons Transport Committee. Accessed 7 February 2013 from: http://www.lowcvc.org.uk/assets/reports/TSC_Plugged_In_Policy_200912.pdf

Concerns surrounding package 2 – Road network efficiencies

Package 2 will essentially make car journeys in Scotland more desirable as it aims to create smoother traffic flows. If Scotland is serious about tackling emissions from transport, it must encourage people out of their cars, not make people more dependent on them. We should be encouraging people to walk or cycle for shorter journeys and to take the train or bus for longer journeys.

4. How these proposals and policies are likely to contribute towards the achievement of the interim target and the 2050 target and, in each target year, the domestic effort target

Assessing whether or not the RPP2 proposals and policies will help Scotland achieve any of these targets is virtually impossible given the lack of transparency in the document. However, in general, we do not consider that they will be adequate. Indeed, abatement comparison between RPP1 and RPP2 policies and proposals shows that ambition has actually decreased. There is a worrying overreliance on expected reductions in GHG emissions post-2020 due to increased market penetration by electric vehicles. If this does not materialise and the Scottish Government fails to take action now to address behaviour change issues, they will almost definitely fail to meet future targets.

5. RPP2 Timescales

We consider that the timescales identified are not appropriate. The first target has already been missed and the fact that there is no sign of a reduction in reliance on road transport means that it is unlikely that GHG emissions from transport will reduce any time soon. The recommendations for investment in policies and proposals in RPP1 have not been met and this has resulted in a further delay to delivery.

In particular, we have concerns that meeting the targets is heavily reliant on the Proposal “Lower emission potential in transport” (7.4.40) despite there being no convincing explanation of what is meant by this or, crucially, why implementation of this measure should be delayed until the final three years. The table on p.165 states that there is a zero abatement potential from “Lower emission potential in transport” in the period from 2013-2024. However, it goes on to assume that in 2025, 250ktCO₂e will be saved, followed by 500ktCO₂e in 2026, and 750 kTCO₂e in 2027⁸.

Furthermore, the emissions savings expected from “Lower emission potential in transport” is expected to come at no extra cost⁹. Therefore, it could be interpreted that the Scottish Government intends to introduce road traffic demand management measures during this period as this is the only measure that has the opportunity to provide the revenue-neutral emissions saving from the transport sector¹⁰. We do not consider the clause in 7.4.40 satisfactory, that further detail will be provided in RPP3. Scottish Ministers have repeatedly stressed the need for early action in reducing GHG emissions. It is unacceptable for Ministers to rely on an unexplained saving, in the final years of the plan, to achieve the required reductions from the transport sector. Action must be taken now and we cannot afford to wait until 2025-2027.

We consider that greater emphasis must be placed on behaviour change and it should be acknowledged that this will not happen overnight. It is imperative that work commences immediately to influence behaviour and that a trajectory of targets are set out to demonstrate progress. Only by adopting this approach will it be possible to influence people’s travel choices effectively and make a significant contribution to reducing GHG emissions from transport. In order to achieve this, 10% of the transport budget should be devoted to active travel, including personal transport planning.

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⁸ The scale of emissions saving in the final year is similar in scale to that expected from all low carbon vehicles improvements (the “Decarbonising vehicles” line).

⁹ The “Total cost of proposals” line increases only from £130m in 2024 to £137m/£132m/£134m in years 2025/2026/2027.

¹⁰ The reference to “scope to manage reductions in use of the road network in favour of public transport” (7.4.40) could be read as confirmation of this interpretation.