



in Scotland

Scottish Government's updated Climate Change Plan (CCPu)

Submission from Cycling UK in Scotland to the Scottish Parliament's Rural Affairs and Connectivity Committee (CCPu)

Submitted on 12/01/2021

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)?

Progress in cutting emissions from the transport sector in Scotland has been inadequate. Emissions from transport have remained virtually static since the 1990 baseline and is currently the highest-emitting sector in Scotland with a 36% share of emissions

<https://www.gov.scot/publications/scottish-greenhouse-gas-emissions-2018/pages/3/> .

In previous Climate Change Plans Government has chosen policies which encourage rather than compel people to change behaviour. With a headline commitment to reducing car kilometres by 20% the CCPu shows a change in emphasis by Government although how this will be achieved is uncertain until the publication of the 'route map' in 2021. We therefore urge Government to include ambitious and urgent measures in the route map in order to drive emission reductions at pace.

Previous Climate Change Plans have included funding and provision for cycling but not at the scale required to provide a transformational change. The CCPu does include the 2020 Programme for Government commitment of long-term funding (5-year) for active travel, however, the funding remains static over this period at £100m per year. This amounts to 3.3% of the current transport budget, whereas we and other organisations have long called for at least 10% of the transport budget be spent on active travel provision.

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?

The Scottish Government is projecting a reduction in transport emissions of approximately 40% by 2028. After this date the emission reduction pathway graph on page 119 of the CCPu appears to show no further reductions to 2032. We welcome this contribution to the nation's emission reduction effort, however, we believe that that greater reductions could be achieved from the transport sector. We urge the Committee to investigate why the projected emission reduction levels off in 2028. With a continued shift to electric vehicles in Scotland, we would expect that emission reductions would continue after 2028.

The Scottish Government has used the TIMES model to balance emissions reductions from each sector to achieve the overall 75% reduction target. However, with no emission reduction attributed to each policy in the CCPu we cannot judge whether the policies and proposals will be effective in providing sufficient emission reductions to meet the target. Cycling UK in Scotland can however, provide an opinion on whether any particular policy would help to reduce emissions and whether policies can be more ambitious.

Car journey reduction target

Cycling UK in Scotland strongly welcomes the inclusion of the aim for a 20% reduction in car kilometres by 2030. This target is needed to drive measures which will move people out of their cars and onto sustainable and active travel – thus reducing emissions from everyday journeys and transport. Achieving this target will make streets less busy and make cycling and walking safer and more enjoyable. The Scottish Household Survey showed that in 2019 over half (54%) of journeys in Scotland were under 5km and a quarter of journeys under 1km were done by car, there is huge scope for people to take more everyday short journeys on foot or by pedal cycle.

Decarbonising transport is important but simply replacing petrol and diesel vehicles with electric versions would be a failure. Instead, the new target to cut car traffic has the potential to start reducing levels of road congestion and encourage people to be more physically active and healthy, as well as helping to meet the 2030 climate target.

Although the target is in line with what Transport for Quality of Life called for (in a report for Friends of the Earth) as the minimum needed for transport to be on course for its share of the reductions needed to reach net zero by 2045.

<http://www.transportforqualityoflife.com/u/files/1%20More%20than%20electric%20cars%20briefing.pdf>. We urge the Committee to investigate why this 20% figure was chosen and not a greater reduction by 2030. We also request that the Committee seeks clarity on the types of policies that Government will introduce through the 'route map'. For example, as hinted at in paragraph 3.3.36, we want to see Government develop a potential framework for road user charging that could complement the workplace parking levy (WPL) and any changes to fuel duty and Vehicle Excise Duty. This could not only help reduce demand for motorised road travel, but also provide an additional funding stream to support investment in active and sustainable travel measures.

Cycling investment and promotion

The CCPu provides little extra in terms of policy measures to invest in and promote cycling despite journeys by pedal cycle in 2019 standing at only 1.2% of all journeys, and cycling being a recognised way of cutting emissions for short journeys. A five-year investment of £500 million was a commitment in the Programme for Government in 2020. Whilst this long-term investment was welcome, £100m per year will actually see a real term cut in investment year on year, and with match funding rules changing the overall amount spent on active travel will reduce. See the Cycling UK comment for more information <https://www.cyclinguk.org/blog/ps500m-cycling-and-walking-scotland-enough>

We believe that considerably more investment is needed on active travel to create the safe and attractive space needed to encourage a growth in cycling in Scotland. We have long called for at least 10% of Scotland's transport budget to be spent on active travel – based on the 2020/21 budget this would be approximately £300m per year rather than the current £100m per year.

Active Freeways is a new policy in the CCPu but lacks detail on what this £50m investment will mean in reality. We urge the Committee to scrutinise this policy in the CCPu, and ask the following questions:

- What are Active Freeways? Are these new routes between towns or within towns and cities?
- Is the £50m to be spent on design and development of the active travel network or on creation of segregated active travel routes?
- Is this £50m a one-off amount or an annual addition to the active travel budget?
- If the £50m will be spent on infrastructure how many miles of segregated active travel route will be created with £50m.
- If the £50 is to be spent on design and development will the cost of creating the Active Freeways come from within the £500m AT budget and Local Authority budgets?

We welcome further support for public bike and e-bike sharing schemes, the provision of child and adult cycle training, and the commitment to grant-fund CoMoUK to promote shared mobility in all its forms. We urge Government to give greater emphasis to engaging businesses in promoting shared transport. We would like the Scottish Government, local government and public bodies to show leadership in sustainable and active travel by becoming Cycle Friendly Employers through Cycling Scotland's scheme.

Bike, bus integration

We believe that Government needs to do more to enable cycling in rural areas through specific policy measures aimed at rural communities. These are needed in order to provide alternatives to the car in rural areas, which are often less well connected by public transport. We want to see bus companies incentivised to allow the carriage of pedal cycles on buses, particularly on rural and island services. The X62 Borders Bus service has buses which can accommodate 4 bikes and has proven popular. We believe that bikes on buses gives people living in rural communities the option to travel one way by bike and return by bus, or ride at either end of a bus journey. With a CCPu commitment to rolling out new ultra-low or zero emission buses we urge that these buses in rural areas have bike spaces as standard.

Public bike share schemes would also benefit from the introduction of integrated ticketing and for this to include public bike share within whole journeys.

Freight delivery

We would like to see Government show stronger leadership on decarbonising road freight and establishing freight consolidation centres (CCPu para 3.3.27), taking lorries away from residential areas and promoting rail freight. Reducing road freight doesn't just reduce carbon emissions, it also reduces the danger that lorries pose to cyclists and other vulnerable road users, and encourages people to cycle.

We urge greater emphasis on the role of cargo bikes (including electrically-assisted cargo bikes) in decarbonising 'last mile' deliveries, as included in paragraph 3.3.9 of the CCPu. We believe that establishing large zero emission zones in our cities and promoting cargo bike delivery within these can transform communities and make them more attractive places to live.

Road spending

We welcome the overall focus in the CCPu to promote sustainable transport options, and meet the vision set out in the National Transport Strategy 2 (NTS2), and particularly its Sustainable Travel and

Investment hierarchies. However, we remain concerned that the balance of Scottish Government transport spending remains heavily weighted towards motorway and trunk road spending. This is despite a commitment in NTS2 that the Scottish Government “will not build infrastructure to cater for forecast unconstrained increases in traffic volumes.”

The CCPu does not reflect the current high carbon investments that the Scottish Government has and continues to commit to. We are pleased at the commitment in CCPu paragraph 3.3.20 that phase 1 of the second Strategic Transport Project Review – to be published in early 2021 – will “begin the process of reviewing the best use of existing assets and consider what new infrastructure may or may not need to be built”. We strongly urge that the Committee seeks clarification from Government about how the existing road spending commitments fit with the CCPu and the aim of achieving climate targets.

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

We welcome the 2030 timescale for reducing car mileage by 20%, however, we are not in a position to know if this is achievable. This is because Government has not yet produced its ‘road map’ for achieving this target. We urge that the promised ‘road map’ for achieving this target is developed as a priority and published as early as possible in 2021. It must set out ambitious policies, and a reallocation of transport funding to achieve a more rapid pace of change.

We also welcome the CCPu commitment to bring forward to 2030 the policy of phasing out the need for fossil fuel vehicles.

As already outlined in answer to Q2 we ask the Committee to scrutinise why transport emission reductions are not expected to continue after 2028.

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?

The CCPu transport section is notable for the target to cut car journeys by 20% by 2030, essentially through influencing drivers to choose more sustainable forms of transport. Taking cars off the road in this way will cut road congestion, improve air quality, and if people adopt cycling and walking as a regular means of transport for short journeys would improve the health and wellbeing of the nation.

Cycling UK in Scotland recognises that commitments in the CCPu to invest and promote cycling have potential to improve health, air quality and local economies. The following briefings provide more information:

- health <https://www.cyclinguk.org/campaigning/views-and-briefings/health-and-cycling>
- air quality <https://www.cyclinguk.org/campaigning/views-and-briefings/air-quality>
- economy <https://www.cyclinguk.org/campaigning/views-and-briefings/cycling-and-economy>

We are pleased to note that the CCPu supports the 20 Minute Neighbourhood principle. We believe that this policy has the potential to make neighbourhoods more attractive, accessible, sustainable, and help communities to thrive. Planning policy is a crucial to make this a reality, in addition to

reducing the need for car journeys, by requiring that new developments and redevelopments have good access to public transport, and safe and convenient cycling and walking access to key destinations within the development or the surrounding area. We are concerned, however, that the onus of responsibility, as described in the CCPu, is primarily on Scottish local authorities. We urge the SG to create an appropriate policy framework for to enable local authorities achieve this admirable goal and CCPu commitments on parking and local transport strategies (paragraph 3.3.24).

Cycling UK welcomes the inclusion of the Road Safety Framework (RSF) in the CCPu as achieving the ambitious 'vision zero' aim (zero deaths or serious injuries on Scotland's roads by 2050) will be transformational in terms of health. Fewer deaths and injuries will, of course, be positive but more significant will be the effect of reducing inactivity-related ill health as people's perception that streets are safer encourages them to cycle.

Whilst the draft RSF identifies climate change as one of its 12 priority issues, it fails to recognise the positive contribution that improved road safety could make to tackling climate change (and indeed congestion, pollution and inactivity-related ill-health), by enabling more people to walk and cycle in safety. We therefore strongly urge that the RSF adopts the 'road danger reduction' approach advocated in a report by the Parliamentary Advisory Council for Transport Safety <https://www.pacts.org.uk/wp-content/uploads/PACTS-What-kills-most-on-the-roads-Report-13.0.pdf>, focusing on reducing the danger posed by the fastest and heaviest vehicles to those travelling in ways that are healthier and more sustainable, but also more vulnerable. More information on our position can be found here <https://www.cyclinguk.org/blog/road-safety-must-target-most-dangerous-not-least-safe>

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

There are strong synergies between decarbonising transport and creating a more equitable and fairer society, as well as creating 'green jobs'.

Cycling infrastructure is highly cost-effective in terms of jobs created per pound invested. STUC analysis showed 'Construction of cycle lanes & pedestrianisation' to be the most effective transport related measure in terms of job creation, and 78% better than road building http://www.stuc.org.uk/files/Scotland_Report.pdf. This strengthens the justification for Government investing more than the current £100m per year on active travel infrastructure.

Investment in active travel infrastructure helps local economies as people are more likely to spend time and money in their communities. 84% of traders on Union Street in Dundee expressed the opinion that the pedestrianisation through the Spaces for People initiative has positive for the street, and 62% saying it has been good for business https://www.dundee.gov.uk/news/article?article_ref=3746.

We believe that making cycling easier, safer and more attractive in Scotland through policies in the CCPu is likely to create 'green jobs' in cycle retail, cycle training, and cycle logistics.

Lower income groups are most likely to face (a) greater road danger, (b) worse air quality, (c) greater transport poverty (e.g. they often live in locations which are poorly served by public transport, making it harder for them to reach education, training and employment opportunities); and (d) greater inactivity-related ill-health (which may in turn undermine their ability to gain employment that might lift them out of poverty).

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/784685/future_of_mobility_access.pdf

Investment in high-speed interurban roads disproportionately benefits higher income groups, who travel further and more often than lower income groups. Conversely, lower income groups spend a disproportionate share of their household income on transport. Enabling more people to travel by walking and cycling would reduce these inequalities.

https://www.sustrans.org.uk/media/2880/transport_poverty_in_scotland_2016.pdf

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