

SPOKES

WRITTEN SUBMISSION

Low Carbon Scotland: Meeting our Emissions Reduction Targets 2013 - 2027

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Our submission¹ is not intended as a comprehensive one, but highlights a number of issues of particular concern to us with regard to the treatment of cycling (as a form of transport).

Overall we are very concerned that RPP2 is not transparent in terms of transport, and specifically cycling. It is not clear what, if anything, will change as a result of RPP2. It is not clear how it relates to RPP1, with the whole manner of description changed and few comparisons made. If anything it would appear that RPP2 marks a backward shift in terms of sustainable transport and therefore of transport emissions. There is little clarity over intentions on cycling investment.

A. Context

Unstable weather patterns were experienced throughout 2012, bringing fire, flood and storm worldwide, with significant problems even in Scotland and the UK.

These concrete indications were accompanied by grave warnings not just from the scientific community but from institutions concerned with the functioning of world and local economies and societies. Many examples can be found on websites such as ...

<http://climatechange.worldbank.org/> [e.g. World Bank Report: *Turn Down the Heat*]

<http://www.globalchange.gov/> [e.g. the US National Climate Assessment]

<http://climate.nasa.gov/> [data and reports]

Meanwhile in Scotland the government, which has promoted its Climate Change Act and its promises worldwide, failed to meet the relatively easy target of a marginal emissions reduction between 2010 and 2011, with a 1.9% rise instead¹. Transport emissions, which RPP1 said should be 1% lower in 2010 than in 1990 in fact rose 2%.

In this context, RPP2 needs to be stronger and bolder than RPP1, instead of which, at least in our area of transport, it takes a significant step backwards.

¹ <http://www.scotland.gov.uk/Resource/0039/00397478.pdf>

B. The milestone/ target/ vision that 10% of trips are by bicycle in 2020

The 'milestone' that at least 10% of journeys are made by bicycle in 2020 was adopted in RPP1 and is repeated in para 7.2.1. The paragraph is slightly ambiguous – we take it to mean that this remains a milestone, but this should be made explicit in the final document.

Paragraph 7.4.34 refers to what it calls the CAPS 'vision' of 10% of all trips being by bicycle in 2020. Although originally termed a 'vision' this has been increasingly taken as, and referred to by Ministers and others as, a target. Given its important role in climate change policy and in the government's obesity strategy, it must surely be a target – or these policies will need other measures to make up the slack. Most recently the **Deputy First Minister, Nicola Sturgeon MSP**, in evidence to ICI Committee, made crystal clear that this is a target, and indeed a target which the government is tackling with 'determination.' The Deputy First Minister stated²,

“ ... it is worth reflecting on the fact that we are committed to the 10 per cent target ... targets are not easy to meet or there would be no point in setting them, but we have commitment and determination. We have a lot of work to do throughout Scotland in order to deliver...”

The final RPP2 should thus make plain, as the Deputy First Minister clearly stated, that this is a **target**, and one to which the government is committed.

We also support the Pedal on Parliament proposal that the 10% modal share figure should be made a **National Indicator**³. Increased use of cycling for transport helps towards several of the government's National Outcomes, in addition to its above values – doubtless these are reasons for the importance attributed to it by the Deputy First Minister, in her evidence to the Committee.

C. Lower emission potential in transport / traffic growth

Para 7.4.40, and the corresponding row of zeros in the p165 table, are ambiguous, obscure, and deeply worrying.

- ◆ How can there be zero progress to 2024, then a massive improvement over just 3 years? - what is the basis for these figures?
- ◆ Do they include or exclude the abatement potential of the proposals in the earlier rows in the table?
- ◆ Why, despite the abatement potential of the previous rows, is there zero emission potential from 2013 to 2024? Is this because the government is planning for traffic growth which will counterbalance the abatement potential of the other measures?

If indeed the government is planning for traffic growth such that there will be no net emissions reduction until 2024, and even then something highly speculative, this is surely shocking in the context we outlined in A above.

Furthermore planning for, or even enabling, traffic growth surely runs contrary to Scottish Planning Policy⁴ which states, *“Opportunities for personal travel should be prioritised by mode in the following order – walking, cycling, public transport, car and other motorised vehicles.”*

2 <http://www.scottish.parliament.uk/parliamentarybusiness/28862.aspx?r=7505>

3 <http://www.scotland.gov.uk/About/Performance/scotPerforms/indicator>

4 <http://www.scotland.gov.uk/Publications/2010/02/03132605/0>

Although we are concerned here with climate change, the implications of planning for growth in motor traffic impact even more widely, for example on public health, congestion and urban sprawl.

D. Policies and Proposals

The documents are again very confusing. The table on page 165 suggests that cycling (which now, unlike RPP1, falls under 'Sustainable Communities') is entirely in the form of proposals. However clearly CAPS is a policy, albeit its target is grossly underfunded [E below] – and indeed active travel work is already referred to as 'policy' in 4.4.30! RPP2 needs proper clarity on this, with researched, costed and funded policies to meet the 2020 target, to be included both in RPP2 and in the forthcoming CAPS Refresh⁵.

E. Funding for cycling and active travel

RPP1 was moderately clear as to what funding was needed for active travel to meet the cycling milestone/ CAPS target. Albeit with some uncertainty over the split between walking and cycling this corresponded fairly well to the calculations of ourselves and others that 5% of the transport budget was needed for cycling alone – a figure now nearer 10% given the very low level of cycling investment over the last few years (less than 1% of total transport spending). See, for example, section 4.2 of our recent submission⁶ on the CAPS Refresh consultation.

In contrast, the draft RPP2 can only be described as totally obscure on this question, giving no indication of costs for active travel, these being lumped together with other transport measures in the table on page 165.

There is some further detail in the technical appendix (paras 4.4.31, 4.4.32 and table 19), but again the information is very limited and the table is unspecific on active travel, lumping it in with car clubs, travel planning etc.

Para 4.4.32 inadequacy. Although, as above, we are unhappy with the entire RPP2 in terms of its lack of specificity on cycling, we make a particular complaint about this paragraph, and its claim that successful European cycling policies have required investment of merely £5 per person per year. The same claim was made in RPP1, and we challenged it after publication of RPP1, in correspondence with the Scottish Government, given the many other documents, and the evidence from English cycling demonstration towns, that £10-£20 per head per year was a more realistic sum.

The £5 claim, apparently, is based on a report⁷ by Atkins consultancy. After some correspondence it appears that the Atkins £5 figure is very open to debate, being taken from one small section of another paper which in no way pretends to be a comprehensive picture of cycling investment. We also in that correspondence referred to other documents, such as the Dutch Government's *Cycling in the Netherlands*⁸ which gave figures, now quite old, of over 10 euros per head in 7 of the 9 reported towns, ranging up to 27 euros per head – and furthermore it appeared that these were figures for special cycling funds, not necessarily total cycling investment.

5 <http://www.spokes.org.uk/wordpress/2013/02/caps-refresh-spokes-view/>

6 <http://www.spokes.org.uk/wordpress/2013/02/caps-refresh-spokes-view/>

7 <http://www.scotland.gov.uk/Publications/2009/08/26141950/0>

8 <http://www.fietsberaad.nl/index.cfm?lang=en&repository=Cycling+in+the+Netherlands>

Although most of our points were not answered in detail, the final comment from the Scottish Government was that they were aware of the caveats around the Atkins analysis and would bear this in mind in future work – something which appears not to have happened.

Furthermore, the £5 figure came from a paper based on 1990-2006 data, and so should have been significantly updated for inflation even at the time of RPP1. Yet it is still quoted as a current figure in the draft RPP2 of 2012!!

Funding requirements

As stated at the start of this section, the calculations of ourselves and others suggested that 5%-10% of the total £2bn transport budget (i.e. £100m-£200m) is now required in order to give some hope of reaching the 2020 cycling target/ milestone. In contrast, the government currently invests around 1%, £20m a year⁹.

The ICI Committee itself is concerned that current funding levels are quite inappropriate for meeting this target¹⁰, as in para 178 of the Committee's report on the draft 2013/14 budget, "*The Committee remains concerned that funding available to support the implementation of this strategy appears inadequate to meet the 10% target by 2020.*" Evidence on this from Sustrans and Cycling Scotland was also quoted by Jim Eadie MSP when the Deputy First Minister appeared at the Committee¹¹.

It is important also to contrast this inadequate level of funding with that for trunk roads, given that one contributes to climate change objectives whilst the other acts against them, and that there is a target raise cycle use but no target to increase long-distance car use. Whilst funding for cycling (and active travel as a whole) has hovered at or below 1% throughout the government's two periods of office, there has been a 40% rise in government roads spending. This is surely quite incompatible with Climate Change ambitions and legal targets.

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⁹ Table on page 6 of forthcoming Spokes Bulletin 115, which will be at <http://www.spokes.org.uk/wordpress/bulletin/>

¹⁰ ICI committee report on the draft budget 2013/14, para 178.

¹¹ <http://www.scottish.parliament.uk/parliamentarybusiness/28862.aspx?r=7505&i=68411&c=1384992&s=cycling%20target>