



Adapting Our Ways: Managing Scotland's Climate Risk - Consultation to inform Scotland's Climate Change Adaptation Framework

Response to Scottish Government consultation paper

Friday 31st October 2008

1. Introduction

- 1.1 Transform Scotland is the national sustainable transport alliance. We campaign for a more sensible transport system, one less dependent on unsustainable modes such as the car, the plane and road freight, and more reliant on sustainable modes like walking, cycling, public transport, and freight by rail or sea. We are a membership organisation bringing together rail, bus and shipping operators; local authorities; national environment and conservation organisations; local environment and transport campaign groups; and individual supporters. We are a member of the Stop Climate Chaos Scotland coalition.
- 1.2 We welcome the opportunity to contribute our views to the Scottish Government's consultation on climate change adaptation.

2. Consultation Question 1: "Do you think what we have outlined in paragraph 4.10 constitutes the correct understanding of climate adaptation?"

- 2.1 Yes, §4.10 seems a reasonable description of climate adaptation.

3. Consultation Question 2: Do you think what we have outlined in paragraph 4.11 constitutes the correct understanding of a well-adapting Scotland?"

- 3.1 Yes, §4.11 seems a reasonable description of the general principles within which climate adaptation could be incorporated in decision-making processes.
- 3.2 We are however not confident that this process is currently being implemented by the Scottish Government in the field of transport policy in any meaningful fashion. We will give three examples:
 - The decisions to abolish bridge tolls and hospital parking charges have increased subsidy to car use and undermined attempts at road traffic demand management.
 - Current transport expenditure proposals favour unsustainable transport. The draft Scottish Budget 2009-10 sets out a £134m increase in spending on new road infrastructure, whilst the spend on the most sustainable modes of transport - walking and cycling - remains pitifully low (at around 1%).
 - Future transport expenditure proposals are deeply skewed towards unsustainable transport. The draft NPF2 plans to legislate for a £4,200m Second Forth Road Bridge and expansion of Edinburgh and Glasgow airports, while it remains to be seen whether the Strategic Transport Projects Review will bring forward further road-building schemes.
- 3.3 Transport policy is widely held to be the basket case of climate policy. In the context of the decisions set out at §3.2 above, it is difficult to treat the Scottish Government's professed intentions on climate change adaptation as being in good faith. All of these decisions, by reinforcing the current unsustainable trends in transport diminish the prospects of Scotland delivering successful climate change adaptation policies.
- 3.4 We note that Box 6.1 states that the Scottish Budget intends to assess the carbon impact of policy proposals. This is welcome, but is not in itself sufficient: investment decisions should be being taken now on the basis of the carbon impacts of proposals. The incorporation of carbon budgeting is long-overdue: we

await the implementation of the transport 'carbon balance sheet' announced in the December 2006 national transport strategy.

4. Consultation Questions 3-8:

4.1 We have no responses to offer to these questions at this point.

5. Annex A, p. 48: 'Transport Infrastructure'

5.1 We consider that this section misunderstands the "critical challenge" for climate change adaptation for the transport sector. A focus on road/rail design and maintenance is unsatisfactorily narrow and technical. (The section itself is misnamed - as transport is about more than infrastructure.)

5.2 We would contend that the critical challenge for climate change adaptation for transport should be on effective planning and land use policies which can deliver sustainable, low carbon, communities (in accordance with the Government's strategic objective for Scots to be able to "live in well-designed, sustainable places where we are able to access the amenities and services we need").

5.3 The reality of climate change is that we will have to adapt the communities in which we live to a more sustainable form of living. In transport terms this will have to mean more active travel, more local services, better public transport etc. - and much less reliance on fossil-fuel powered vehicles.

5.4 The densely-populated cores of the Scottish cities are ideally suited to becoming more sustainable communities. In contrast, the suburban car-based sprawl still being built in areas such as South Fife epitomise a desperate failure to adapt land use planning decision-making to the needs of carbon reduction policies. It will be much easier and cheaper to protect the people and infrastructure when they are in tightly knit communities rather than oil-dependent commuter sprawl: this applies to all services not just transport.

5.5 In the transport sector, we need to see investment turn away from subsidising increased levels of car use, road freight and air transport, and towards delivering sustainable transport and sustainable communities.

5.6 More specifically, and in order to build resilience in climate change adaptation, the Scottish Government should focus on getting Scottish levels of walking and cycling - the most sustainable modes of transport - rise to those seen in other northern European countries. In Denmark and the Netherlands, cycling provides 20-25% of all transport trips whilst in Scotland, cycling makes up only 1% of all transport trips.

6. Conclusions

6.1 We welcome most of the broad principles set out in the consultation document.

6.2 We do not however believe that, in the context of transport priorities and decision-making, the actions of the Scottish Government mirror those principles. We consider the recent decisions of the Government (see §3.2, above) to be exemplar examples of how not to respond to the challenge of climate change.

6.3 We consider the proposed "critical challenge" for transport to be deeply unsatisfactory. The proposed focus on transport infrastructure design and maintenance, while important as a component of climate change adaptation policies, is far too narrowly-drawn. It suggests an over-confidence that a technical, engineering approach will be sufficient as a response to climate change.

Transform Scotland is the national sustainable transport alliance, campaigning for a more sustainable and socially-just transport system. Our membership includes bus, rail and shipping operators; local authorities; national environment and conservation groups; consultancies; and local transport campaigns.

Transform Scotland
5 Rose Street, Edinburgh, EH2 2PR
t: 0131 243 2690

e: <info@transformscotland.org.uk>
w: <www.transformscotland.org.uk>