



‘Low Carbon Scotland: The Draft Report on Proposals and Policies’ Scottish Parliament Transport, Infrastructure and Climate Change Committee call for views¹

Evidence paper from Transform Scotland

Friday 3rd December 2010

1 About Transform Scotland

1.1 Transform Scotland is the national sustainable transport alliance. We campaign for a more sensible transport system, one less dependent on 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.

2 Introduction

2.1 We welcome the opportunity to present our evidence for the Committee’s attention.

2.2 As our organisation’s interest is in the promotion of sustainable transport, our comments are primarily limited to matters pertaining to transport. As such, our evidence pertains only to the transport section of the RPP plus the overall contextual material. We are a member of the Stop Climate Chaos Scotland (SCCS) coalition and are happy to support the more general points made by SCCS in its evidence paper of 18/11/10.²

2.3 The first section of our evidence presents our principal comments on the RPP; the second a series of additional comments; the third section provides responses to the Committee’s questions highlighted in its call for evidence; while a concluding section summarises our views.

3 Our principal points

3.1 The RPP shows that the 42% target for emissions reduction can be met

3.1.1 We welcome the finding that the Scottish Government can meet the 42% emissions reduction target for 2020 as set out in the *Climate Change (Scotland) Act 2009*.

3.2 The RPP is potentially transformational in certain areas of transport policy, and specifically on ‘Smarter Choices’ measures

3.2.1 We welcome the RPP’s strong focus on ‘Smarter Choices’ measures: in particular, Travel Planning, Car Clubs, and Community Hubs.³ In as much as Smarter Choices measures do not, as a rule, entail large infrastructure costs, they tend to provide some of the best value-for-money in carbon abatement, and in the case of Travel Planning, provide some of the largest single carbon abatement opportunities across all potential transport interventions. In 2020, these three Proposals are estimated to produce 36% of all emissions savings. We welcome the greater emphasis on Smarter Choices measures in the RPP than seen in similar UK DfT policies.⁴

3.2.2 However, we consider the workplace travel plan proposals (RPP §§6.28-29) somewhat unambitious in aspiration.⁵

3.3 The RPP is flawed in that it includes no road traffic demand management measures

3.3.1 The RPP fails to include any road traffic demand management measures; for example, measures such as:

- Parking management
- Workplace parking levy
- Road user charging
- Low Emission Zones.

3.3.2 We note that the final draft version showed two additional transport Proposals: ‘Parking Management – Public & Residential’ and ‘Workplace parking levies’. Between them they would have saved an additional 219 ktCO₂e. Both were deleted from published version (although were present in the version initially published on the Scottish Government website on 17/11/10).⁶

3.3.3 The RPP states (at §6.29) the importance of demand management measures, *inter alia*, in delivering emissions reduction from travel planning, while page 96 of the version initially published on 17/11/10 (see above) stated that “*Modelling shows that anticipated abatement levels [from Travel Planning] would be halved or more if this policy is not supported by Parking Management.*” This text was excised from the revised, final, version.

3.3.4 Furthermore, earlier drafts of the RPP, and indeed the research upon which the transport component was based,⁷ included discussion of road user charging (of which there is no mention in the final version). In the simplest terms, road user charging has clear benefits as a policy as, firstly, it is based on the polluter pays principle, and secondly, it is a revenue-raising measure.⁸ Local authorities should be actively investigating the implementation of road user charging as a means not only to deliver sustainable transport but also as a revenue-raising measure focused on the ‘user pays’ principle.⁹ On this topic, we note the recommendation from the Independent Budget Review:¹⁰

“The Panel suggests that the Scottish Government should consider the feasibility of adopting road user charging as a means to both better managing the use of existing transport networks and financing improvements to those networks.”

3.3.5 For a recent review of the importance of economic instruments as a key policy measures in delivering GHG emission reduction from the transport sector, we would refer the Committee to the study prepared for the European Commission, *Towards the decarbonisation of the EU’s transport sector by 2050*, which concluded that a 90% decarbonisation of the European transport sector was possible.¹¹

3.4 The reliance on biofuels is unacceptable given emerging evidence which suggests that this intervention has a net emissions-generating impact

3.4.1 We are concerned by the heavy reliance on biofuels as a Policy (640 ktCO₂e) given recent findings regarding the wider sustainability of these as a fuel source. We note the recent research from Institute for European Environmental Policy (IEEP) which concludes that meeting the EU Renewable Energy Directive “would lead to between 80.5% and 167% more GHG emissions than meeting the same need through fossil fuel use” due to Indirect Land Use Change (ILUC) effects.¹²

3.4.2 Should further evidence confirm the unsustainability of biofuels (i.e. that it generates more GHG emissions than it saves), we would expect it to be struck out as a Policy. It may be that the Renewable Energy Directive targets could be met by a greater use of other alternative fuels (e.g. electricity or hydrogen); however we are sceptical as to whether these energy sources would be able to provide for 10% of all fuel use by 2020.

3.5 There is a serious mismatch in funding terms between the RPP and the Draft Budget

3.5.1 There is a serious mismatch between the Draft Budget 2011-12 and the RPP Proposals highlighted for 2011.

- 3.5.2 Firstly, the RPP sets out ‘Proposals’ which have emissions savings estimated for 2011, and yet do not obviously have spending committed to them in the Draft Budget:¹³
- Freight - HGV efficiency improvements
 - Buses and Taxis.
- 3.5.3 Secondly, the Draft Budget does not appear to provide budget for a further ten transport RPP Proposals which, on the other hand, have costs allocated against them for 2011 in the RPP (RPP p.143):
- Eco-driving (£3m)
 - Speed limit enforcement (£25m)
 - LCV infrastructure etc. (£7m)
 - ITS (£29m)
 - Travel planning (£7m)
 - Car clubs (£2m)
 - Cycling & walking (£207m)
 - Freight - HGV modal shift (£15m)
 - Community hubs (£2m)
 - Maritime transport (£2m).
- 3.5.4 The RPP is not transparent in as much as it provides no methodology for the calculation of these figures.¹⁴ The Draft Budget is, however, also lacking in detail and so we are unable to provide a definitive judgement on this credibility of these figures. However, it is difficult to see how the 'Cycling & walking' figure, for example, can be reached (the best estimate suggests a spend of £21.8 million p.a.¹⁵) while the 'Freight - HGV modal shift' looks very dubious given that the Budget cancels the Freight Facilities Grants (£7 million p.a.).
- 3.5.5 In particular, we consider the proposed savings from ‘Cycling and walking infrastructure investment’ (§§6.30-6.31) to be threatened by the omission of the ‘Cycling, Walking and Safer Streets’ (CWSS) budget from the Draft Budget (and despite the CWSS fund being specifically highlighted in §6.31).¹⁶ Additionally, we consider the ‘Freight Modal Shift’ measures outlined at §6.36 to be under threat by the decision, as part of Draft Budget, to cancel the Freight Facilities Grant scheme.

4 Our additional views

4.1 The RPP represents reduced ambition for emissions reduction from the transport sector

4.1.1 In June 2009 (in the *Climate Change Delivery Plan*) the Scottish Government indicated that the transport sector would show a 27% reduction in emissions by 2020,¹⁷ while in November 2010 (in the RPP) it said that transport emissions would reduce by only 13% by 2020. This is a halving of effort in less than 18 months.

4.2 The RPP makes unsupportable claims regarding impact of devolved action vs. EU/UK action

4.2.1 Section 6.4 of the RPP states “the policies that will have the biggest impact on emissions reductions lie with the EU and the UK Government”. However, at 2020, the transport Proposals provide 45% of all transport emission savings; this number would have been above 50% had the Government not deleted the road traffic demand management measures that the RPP contained until its final draft.

4.3 The RPP presents an unsatisfactory ordering of the hierarchy of transport interventions

4.3.1 The measures are listed in wrong order (§6.12, Table 9). The correct order should be:

- Reducing the Need to Travel
- Widening Transport Choices
- Driving More Efficiently

4.3.2 Demand reduction measures should come before efficiency measures. Our usual categorisation would be: (i) Reducing the need to travel; (ii) Modal shift to sustainable modes; (iii) Improved efficiency in the remaining transport. This hierarchy of transport interventions is comparable to the the long-established ‘waste hierarchy’ of: Reduce > Re-use > Recycle.

4.4 The RPP has an over-emphasis on technology measures in the transport ‘Milestones’

4.4.1 We are content with the focus on low-emission vehicles (i.e. those that meet EU emissions standards) as a transport ‘milestone’.

4.4.2 However, in as much as the second transport milestone is regarding infrastructure for Electric Vehicles (§6.3), we consider the transport milestones to be unfairly skewed towards technology measures. This skew is further manifest in the emissions savings attributed to the ‘LCV infrastructure provision and procurement’ Proposal which is minor in scale compared to some of the other Proposals.

4.4.3 As such, we recommend that the second transport milestone should be a behaviour change measure. As Travel Planning has the single largest emissions impact of any of the transport Proposals, and Smarter Choices measures are one of the more welcome element of the RPP’s Proposals, it would be appropriate for this to form the second transport milestone. For example, the milestone could be the percentage of workplaces and schools at which effective Travel Plans are in operation.

4.5 The aviation multiplier should be set at ‘2’ rather than ‘1’

4.5.1 We would contend that the aviation multiplier (p.19) should be set at ‘2’ rather than ‘1’. As such, the impact of emissions from aviation are understated in emissions inventories.

5 The Committee’s questions

5.1 “Are there any proposals or policies that are not included which should be?”

5.1.1 Please see our views at §3.3, above, regarding the omission of road traffic demand management measures.

5.2 “Does the draft report include proposals or policies that you would like to see removed or changed?”

5.2.1 Please see our views at §3.4, above, regarding biofuels.

5.3 “What are the barriers to delivery of the plans and proposals in the report and does the report give enough clarity as to how these will be overcome?”

5.3.1 Please see the answer we provide at §3.5, above, regarding the mismatch in funding terms between the RPP and Draft Budget 2011-12.

5.3.2 A further potential barrier is the skills sets held by key government agencies that will be responsible for delivering the transport RPP Proposals. It may well be that the skills possessed by the current staffs of Transport Scotland and the 32 Local Authorities may not be easily transferrable to implementing the RPP Proposals, much of which would be new ground to many of those employed by these organisations.

5.4 “Does the RPP instil confidence that Scotland can hit its ambitious emissions reduction targets?”

- 5.4.1 We are pleased that the Scottish Government has been able to construct a set of measures which, should they be implemented, would allow it to meet all of the targets set under the climate change act.
- 5.4.2 However, as pointed out by SCCS in its evidence paper of 18/11/10: “Over a third of total effort described to meet the 2012 target comes from proposals, not policies.” In terms of the 2020 target, around 45% of all transport emissions reductions are expected to come from Proposals rather than Policies.
- 5.4.3 Also as pointed out by SCCS: “The draft RPP relies heavily on voluntary measures to deliver emissions reduction.” In the transport section, most of the Proposals appear to be voluntary measures.¹⁸ We have grave concerns about relying on voluntary measures in the transport sector given the adverse trends already in existence (e.g. on traffic growth, modal shares for the sustainable transport modes) and the limited evidence that these trends are being reversed.

5.5 “What are your views on the costings elements of the draft report?”

- 5.5.1 The overall price of all transport Proposals comes to £3,828 million between 2010 and 2022. We do not consider this as excessive given (i) the size of the Transport Scotland annual budget (£2,084 million in 2008-09),¹⁹ (ii) the size of funding made available for single transport projects (see e.g. the £2.3 billion allocated to the Second Forth Road Bridge project).
- 5.5.2 However, we do not understand the figures given for ‘cycling and walking infrastructure investment’ in Table A2. This suggests a total spend of £1.202 billion between 2010 and 2022. As stated above, our understanding is that current spending by government on walking and cycling is around £21.8 million p.a. – so we do not recognise the £207 million quoted for 2011. We suspect that this row is massively in error. If it is correct, we would not then understand why the figure would decline over the decade given, amongst other things, the commitment to delivering a 10% national cycle modal share through the Cycling Action Plan for Scotland.

6 Summary

- 6.1 In order to meet the emissions reductions required from the transport sector, the most effective interventions in financial terms will be those which require least in the way of expensive infrastructure – for example, the widespread introduction of travel planning, the introduction or increase in parking charges, reductions in road speeds, and introduction of measures to improve the quality of bus services (such as quality contracts or statutory partnerships).
- 6.2 Notwithstanding our concerns, the RPP presents a generally welcome set of Policies and Proposals for the transport sector which would allow the sector to make a contribution to Scotland’s emissions targets. In particular, the RPP has a welcome emphasis on ‘Smarter Choices’ (behaviour change) measures.
- 6.3 However, and as articulated more fully in our evidence to the TICC Committee on the Draft Budget 2011-12, that there is little evidence of a change in spending priorities required to implement the RPP’s Proposals. Our concern is that they remain “proposals” – unfunded, and with the Second Forth Road Bridge scheduled to gobble up increasing shares of the Scottish capital budget over the next five years, arguably unfundable.
- 6.4 In summary:
- The RPP shows that the 42% target for emissions reduction can be met
 - However, there is too great a reliance on voluntary measures in the transport section of the RPP
 - And there is too great a reliance on Proposals to achieve emissions reduction from the transport sector
 - The RPP is potentially transformational in certain areas of transport policy, and specifically on ‘Smarter Choices’ measures

- The RPP is however flawed in that it includes no road traffic demand management measures
- The reliance on biofuels is unacceptable given that emerging evidence suggests that this intervention has a net emissions-*generating* impact
- There is a serious mismatch in funding terms between the RPP and the Draft Budget 2011-12.

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1 <<http://www.scottish.parliament.uk/s3/committees/ticc/inquiries/RPPcallforviews.htm>>.

2 See <<http://www.stopclimatechaos.org/files/sccs-rpp-reaction.pdf>>.

3 See the Transform Scotland Trust report *Smarter Ways Forward* (2009) for a recent review of the benefits of Smarter Choices measures and their level of uptake in Scotland. See <<http://www.transformscotland.org.uk/smarter-ways-forward.aspx>>.

4 For example, in the DfT's *Low Carbon Transport: A Greener Future*. Available at <<http://www.official-documents.gov.uk/document/cm76/7682/7682.pdf>>.

5 While private sector take-up of workplace travel plans is currently low, we consider that it would be possible for the target to be met within, say, 5 years (rather than by 2022). With personalised travel plans, it would provide better value to focus on the first instance on (i) urban areas, and (ii) short trips. In this instance, 2022 is perhaps a reasonable objective.

6 We note that the final draft version stated that for Travel Planning that "Modelling shows that anticipated abatement would be halved or more if this policy is not supported by Parking Management" – yet the expected abatement for Travel Planning remains unaltered in the published version (242 ktCO₂e).

7 Scottish Government (2009) *Mitigating Transport's Climate Change Impact in Scotland: Assessment of Policy Options* – <<http://www.scotland.gov.uk/Publications/2009/08/26141950/0>>

8 We would be happy to supply the Committee with further evidence on road user charging upon request.

9 We know that the one "fully quantified" Scottish proposal (Edinburgh, 2005, approved by PLI) was that even that scheme, which took congestion alleviation rather than emissions reduction as its focus, would have delivered significant GHG emissions reduction (approx. 10% of City Centre emissions in year one) whilst delivering large amounts of revenue to the public sector over and above its operational cost.

10 See p.135 of <<http://www.scotland.gov.uk/Resource/Doc/919/0102410.pdf>>.

11 Skinner I, van Essen H, Smokers R and Hill N (2010) *Towards the decarbonisation of EU's transport sector by 2050* Final report produced under the contract ENV.C.3/SER/2008/0053 between European Commission Directorate-General Environment and AEA Technology plc; see www.eutransportghg2050.eu

12 See <http://www.foeeurope.org/agrofuels/ILUC_report_November2010.pdf> or <<http://www.transportenvironment.org/News/2010/11/Member-state-biofuel-plans-will-cause-higher-emissions-than-fossil-fuels/>> for a summary.

13 The RPP estimates (p.140) GHG reductions in 2011 from: (i) 'Freight - HGV efficiency improvements', and (ii) 'Buses and Taxis'. However, neither is funded in the Draft Budget: (i) the total budget for freight is £2.9m (see Budget Table 7.12)), while (ii) the most the Government could reasonably claim was being spent on buses was the £61m in Budget Table 7.05 (and these payments are only in part about reducing emissions). These figures could only be explained should others (e.g. HGV, bus & taxi operators) be assumed to be responsible for the remainder of the spending (£4m and £110m, respectively) (RPP p.143).

14 It is possible, for example, that the RPP assumes that most/all of these costs should be borne by local authorities and/or the private sector.

15 See p.7 of Spokes Bulletin 108 – <http://www.spokes.org.uk/wordpress/wp-content/uploads/2009/09/p.all_.pdf>.

16 We have addressed this matter more fully in our evidence paper on the Draft Budget 2011-12: <<http://www.transformscotland.org.uk/GetFile.aspx?Itemid=320>>.

17 See p.12, Table 1, of <<http://www.scotland.gov.uk/Publications/2009/06/18103720/0>>.

18 Almost certainly some or all of (i) Eco-driving, (ii) LCVs (unless targets were made mandatory), (iii) Freight Efficiencies, (iv) Van Efficiencies, (v) Maritime, (vi) Travel Planning, (vii) Car Clubs, (viii) Bus and Taxis, (ix) Freight Modal Shift, (x) Community Hubs.

19 Transport Scotland (2009) *Annual Report and Accounts 08/09* – <<http://www.transportscotland.gov.uk/files/documents/reports/j11465/j11465.pdf>>.

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 Limited is a registered Scottish charity (SC041516).

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

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