CLIMATE CHANGE PLAN UPDATE

Evidence to Scottish Parliament Rural Economy and Connectivity Committee

12 January 2021

transform scotland

[Q1] 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 to date in cutting emissions:

There has also been absolutely no progress in emission reduction from the transport sector over the past 30 years, with the result that transport is now the largest overall source of emissions (36%). Other sectors have had to bear a greater burden in reducing emissions as a direct consequence of the failure to decarbonise the transport sector.

An example we would cite is that of emissions on the trunk road network. Transport Scotland itself reports *"Motorway emissions have increased substantially since 1990, with the 2018 level 81% above that of the 1990 baseline. This increase in motorway emissions since 1990 has coincided with a substantial increase in the length of Scotland's motorway network. Between 1990 and 2017, Scotland's motorway network increased in length from 312km to 645km. Motorway vehicle kilometres rose from 3242 million in 1990 to 8518 million in 2018."*[1] The link between the provision of additional road capacity and increased road traffic levels has been long and comprehensively established. But despite road traffic being our biggest problem in transport, Transport Scotland's priority for new capital expenditure is still overwhelmingly directed to the provision of increased road capacity. This will inevitably further increase road traffic levels, and, in tandem, worsen Scotland's prospects of meeting its climate change obligations. It seems to us that despite the ceaseless policy waffle around transport and climate change that the Scottish Government is no further forward in aligning expenditure priorities with stated policy objectives.

Implementation of proposals and policies in previous Plans:

The first Climate Change Plan ('RPP1'),[2] published in 2011, set out four 'milestones' for transport in 2020:[3] (i) a mature market for low carbon cars, resulting in average efficiencies for new cars of less than 95 gCO2/km; (ii) an electric vehicle charging infrastructure in place in Scottish cities; (iii) personalised travel planning advice provided to all households; (iv) effective travel plans in all workplaces with more than 30 employees; and (v) at least 10% of all journeys made by bicycle. None of these commitments have been met: new cars are still above 120 gCO2/km,[4] there is still only a limited EV charging infrastructure in place, there is no personalised travel

---

1 Transport Scotland (2020) 'Carbon Account for Transport No. 12: 2020 Edition', page 12. Available at <https://www.transport.gov.scot/publication/carbon-account-for-transport-no-12-2020-edition/>.

2 Scottish Government (2011) 'Low Carbon Scotland: Meeting the Emissions Reduction Targets 2010-2022 The Report on Proposals and Policies'. Available at <https://www.gov.scot/binaries/content/documents/govscot/publications/progress-report/2011/03/low-carbon-scotland-meeting-emissions-reduction-targets-2010-2022-report/documents/0115345-pdf/0115345-pdf/govscot%3Adocument/0115345.pdf>.

3 RPP1 had no Policies for transport which were of Scottish competence.

4 Transport Scotland (2020) 'Scottish Transport Statistics 2019', see Figure 13.3. Available at <https://www.transport.gov.scot/media/47300/scottish-transport-statistics-2019.pdf>.

planning at scale, and there has been a complete failure to hit the Cycling Action Plan for Scotland target of 10% of all trips to be made by bike; based on research we have carried out previously, we would be surprised if there is effective travel planning in place in most larger workplaces (but there has also been no monitoring of this of which we are aware).

The second Plan ('RPP2'),[5] published in 2013, retained the same 'milestones' but, as in RPP1, the Scottish Government took responsibility for no transport Policies within RPP2, the only committed emissions savings resulting from Policies based on EU Directives. The document, which we heavily criticised in evidence to the Parliament at the time, was exceptionally vague.

The third Plan ('RPP3'),[6] contained 18 Policies, of which ten were the responsibility of the Scottish Government: (i) Support fuel-efficient driver training; (ii) Enhance the capacity of the electric vehicle charging network; (iii) Provide interest-free loans through the Energy Saving Trust to enable the purchase of EVs; (iv) Consider introducing incentives to promote the uptake of ULEVs in the taxi and private hire sector; (v) Promote the benefits of EVs to individuals and fleet operators; (vi) Deliver the Rail Freight Strategy; (vii) Provide financial support for the purchase and operation of low carbon buses; (viii) Encourage and support Scottish port authorities and airports to adopt low emissions solutions; (ix) Active travel: maintain funding for infrastructure and behaviour change programmes until at least 2021; (x) Support the Smarter Choices Smarter Places (SCSP) programme to encourage travel behaviour change. While we welcomed the addition of transport Policies within Scottish responsibilities, our parliamentary evidence criticised the flawed and unrealistic assumptions regarding traffic levels made in the modelling,[7] the over-reliance on technology measures, and the lack of focus on modal shift and demand management measures. Given that some of the Proposals are not due to be met until 2032, it may be too early to judge progress on all of them; it may indeed not be possible at all: at the time, SPICe commented *"the approach used [in RPP3] does not include details of the specific emission reductions attributable to each policy or proposal or of the expected costs associated with achieving the emission reductions in each sector. This does make it harder to understand the relative significance of each policy or proposal in contributing to the draft plan."*[8]

The conclusions we would draw from the previous Plans are:

1. There has been inadequate progress in decarbonising the vehicle fleet. In 2018, new cars were on average emitting 123.6 gCO2e/km, well above the 107 gCO2e/km target for 2018 in RPP3.[9] As such, it seems unlikely that the RPP1 target of 95 gCO2e/km target for 2020 will be met. Furthermore, even the reduction in emissions from new vehicles has not resulted in equivalent reduction in the total emissions from cars due to the increased size of modern cars and rise in popularity of SUVs, which has in fact led to a 2% increase in emissions from cars between 2011 and 2018.[10]

2. The ambition for comprehensive travel planning shown in RPP1 has been largely abandoned. This is deeply regrettable given the evidence that the Scottish Government commissioned as far back as 2009 which showed that travel planning was one of the most efficient measures of achieving emission abatement.[11]

---

5 Scottish Government (2013) 'Low Carbon Scotland - meeting our emissions reduction targets 2013-2027: second report'. Available at <https://www.gov.scot/publications/low-carbon-scotland-meeting-emissions-reduction-targets-2013-2027-second/>.

6 Scottish Government (2017) 'Draft Climate Change Plan - the draft Third Report on Policies and Proposals 2017-2032'. Available at <http://www.gov.scot/Publications/2017/01/2768>.

7 Transport Scotland had forecasted a 27% increase in private car use by 2035 despite an increase of less then 5% in vehicle use between 2004 and 2014.

8 SPICe Briefing (2017) 'Draft Climate Change Plan and Scotland's Climate Change Targets 30 January 2017 17/07'. Available at <https://www.parliament.scot/parliamentarybusiness/103311.aspx>.

9 'Car Wars: Revenge of the SUV', 7 December 2020'. Available at <https://spice-spotlight.scot/2020/12/07/car-wars-revenge-of-the-suv/>.

10 'Car Wars: Revenge of the SUV', 7 December 2020'. Available at <https://spice-spotlight.scot/2020/12/07/car-wars-revenge-of-the-suv/>.

11 Scottish Government (2009) 'Mitigating Transport's Climate Change Impact in Scotland: Assessment of Policy Options'. No longer published on Scottish Government website; copy available on request.

3. The ambition shown in RPP1 for a large increase in cycle mode share (10%) has been lost. While there has been an increase in cycling from a low level (and particularly the first lockdown in Scotland saw cycle journeys rise at an impressive rate in a very short period), we are still far from reaching that target. This should not be surprising given the low level of investment in active travel, which has only slowly ramped up in the last few years and pales in comparison to the Scottish Government's past and future spending on new road construction.

4. Commitments for action on decarbonising public transport in previous Plans has been extremely timid. As a nation that makes low- and zero-emission buses, and is home to bus companies that operate across the world, the role that bus can play in tackling climate change has been seriously undervalued by the Scottish Government.

5. There has been some progress in electrification in both the bus and rail sector, we have seen the first fully segregated cycle lanes installed in Scottish cities, and low emission vehicles are making up an increasing share of road transport. However, the anticipated emissions reduction has not been brought about; explanatory factors include a lack of strong incentives for modal shift, inadequate priority for investment in sustainable transport, and the failure to anticipate and mitigate trends that would offset sustainability improvements.

6. There has been a general absence in focus on demand reduction and modal shift, with a near-total focus on technological change. All three will be imperative in achieving deep cuts in emissions from the transport sector.

[Q2] 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?

Is the scale of reduction proposed for transport appropriate?

As with previous Plans, the information presented is incomplete, unclear, and, in the case of the TIMES modelling a 'black box'. The emissions projections for transport (p.253) appear unlikely to prove accurate: this shows a steep reduction in transport emissions over the next 5 years (from 11.0 MtCO2e in 2020 to 7.1 MtCO2e in 2025) then no reductions after 2028. Given that the vehicle fossil-fuel phase-out is not intended to commence until 2030, we would expect to see decarbonisation accelerate closer to (and beyond) that date as EVs become more predominant within the fleet.

The same table suggests a 41% reduction in transport emissions from 2020 to 2031 against 56% across all sectors. Given that other sectors have already had to over-achieve in order to bring about emissions reduction, we consider that the transport sector should at least meet its fair share (56%). We consider this not only necessary -- but, for these reasons, fair:

- The lower ambition for transport doesn't account for the decades of historical negligence and injustice on transport emissions.
- Higher ambition should be possible as, firstly, almost all of the necessary technology is available; secondly, it would be economically productive (the costs of transition are modest compared to current spend and the investment would be into industries which create jobs and benefit Scottish manufacturing, skills and development which are at the forefront of a global market).
- Higher ambition would also provide enhanced co-benefits: improved public health; tackling inequalities; reducing the impacts on the NHS; producing good, local jobs; and strengthening the economy.
- Higher ambition in transport would negate the reliance on risky, unproven 'fantasy technologies' such as CCS.

It is clear that when people are asked what they would like to be able to do to tackle climate change, choosing to use active and public transport is often a top priority.[12] Research also shows that when public transport options are safe, accessible, affordable, reliable and good quality - people will choose those modes. Despite this evidence, when compared with the spend on new trunk road construction, the Scottish Government has not yet delivered major investment into active and sustainable transport options.

The government vision as set out in the sustainable travel hierarchy prioritises active and sustainable choices. Yet the budget for new transport capital expenditure is overwhelmingly prioritises high-carbon transport: cars and road freight.

A major issue undermining all government leadership on climate change is that the messaging is inconsistent. This is a lesson learned time and again through the coronavirus pandemic. To achieve behaviour change the messages have to be clear, consistent and followed by government.

On climate, the message is not clear: government asks us to walk, cycle and use the bus. Yet, the government investment is in roads, increasing traffic, and making it cheaper to use one's car. Government leadership is not clear: we are being asked to do one thing while government makes it easier to do another that contradicts the message.

These major issues are all overlooked in the Plan.

---

12 See, for example, the findings of the Big Climate Conversation.

Are the proposals and policies in CCPu sufficient?

There are a number of welcome Policies in the CCPu towards decarbonising public transport and to making conditions better for active travel; however, many of them remain vague and are generally not time-bound:

1. **Traffic reduction target**. The most eye-catching new Policy is the commitment to reduce car kilometres by 20% by 2030 (p121). This is a welcome and long-overdue return to road traffic reduction as a headline policy objective.[13] We have previously been critical of Transport Scotland's forecasts of large continued growth in traffic volumes — despite the evidence of slowing in traffic growth in recent decades — so this is a significant policy change.[14] However, we would note that the 2006 National Transport Strategy set a target to *"stabilise road traffic volumes at 2001 levels by 2021"* yet the Scottish Government then failed to put in place interventions to meet this commitment. Thus given the broken promises in this area in the past, it is imperative that the Scottish Parliament provide greater, and ongoing, scrutiny of the Scottish Government on this matter. Promising traffic reduction is one thing, and the Plan admits that there is as yet no strategy for achieving that ambition; we will return to additional measures required to achieve the target in paragraphs 9 and 10 below.

2. **Digital infrastructure**. We welcome the recognition of the role of digital connectivity in reducing the necessity for travel in the CCPu. This high-level support is welcome but digital infrastructure should be prioritised ahead of new, high-carbon road construction. To enable remote and distributed working we need investment in digital infrastructure to close gaps in mobile and broadband provision in remote areas of Scotland. This includes the expansion of fibre and 5G networks throughout the country. We would like to see more details in the Plan on the actions that will be taken to ensure improved digital connectivity. The Plan should also provide more specific information on the extent to which it expects digital connectivity to reduce the need for travel, as this underpins a number of assumptions made in relation to traffic reduction, 20-minute-neighbourhoods and air travel.

3. **Active Freeways**. We welcome the commitment to 'Active Freeways', a *"strategic active travel network"*, and the commitment of £50m for the delivery of the first of these by 2025 (p122). However, there is no information on the plan on the location of this first Active Freeway, let alone when it will commence construction. This amount is of course entirely inadequate to construct a Scotland-wide, strategic active travel network, and is a trivial amount compared to the £6,000m committed to the A9 & A96 road schemes which are currently under construction.

4. **Bus priority**. We welcome the creation of the Bus Partnership Fund, as announced in the September 2019 Programme for Government, and the commitment to invest £500m for new bus priority measures. However, there has still been zero progress by Transport Scotland in implementing the 'Managed Motorways' programme for the Glasgow motorway network promised in the same Programme for Government.

5. **Zero Emission Buses.** We welcome the commitment to £120 million investment over the next five years for Zero Emission Buses (pp126-7). These buses should be manufactured in Scotland, building skills, supporting good green jobs and apprenticeships, and economic resilience. The Plan's commitment for the majority of new buses from 2024 to be zero-emission is welcome, but may not go far enough: we would note that 35 cities around the world are committed to only buying zero emission buses by 2025.[15] This year's COP26 summit provides an opportunity to showcase Scottish-built green buses.

---

13 The 2006 National Transport Strategy set a target to "stabilise road traffic volumes at 2001 levels by 2021".

14 As noted in the 16/12/20 SPICe briefing 'Back to the future: Reducing car travel in Scotland' (<https://spice-spotlight.scot/2020/12/16/back-to-the-future-reducing-car-travel-in-scotland/>), "Transport Scotland modelling forecast[ed] a 25% increase in car trips and a 37% increase in distance driven … between 2018 and 2037." We expect that this was a deliberate policy of Transport Scotland's officials in order to justify their continued priority for new road infrastructure within its capital expenditure plans.

15 See <https://www.c40.org/other/green-and-healthy-streets>. There may also be merit in the approach announced on 06/01/20 by the UK Government: <https://www.gov.uk/government/news/coventry-and-oxford-set-to-be-uks-first-all-electric-bus-cities>.

6. **Rail decarbonisation**. We welcome the commitments towards rail electrification[16] but consider that these remain insufficiently ambitious. Despite a reference to '2032' in the 'Route Map' (p120), the target date remains 2035 (p226). It is critically important that the programme of electrification be brought forward to 2030, with a commitment to decarbonisation on the whole network with battery on the long rural routes.[17] The majority of Scotland's diesel trains will be retired in or soon after 2030, so an urgent rolling programme of investment is needed in the infrastructure to enable electric trains — so that the Scottish Government is not compelled to buy old rolling stock that will soon become stranded assets.

7. **Fossil-fuel phase-out date for cars & vans**. It is welcome that this has been brought forward from 2032 to 2030, to bring it into line with the existing UK Government commitment. If set in statute, this would provide leadership for other states across Europe and beyond to do the same.

8. **Aviation**. The focus on decarbonising flights within Scotland, whilst itself welcome, is a distraction from two larger issues. Firstly, the volume of short-haul aviation from the Scottish Central Belt to the London airports, much of which should be transferred to rail or avoided by the use of digital connectivity. The Plan completely ignores this issue. The Plan should include a specific instruction that the Scottish Public Bodies should put in place robust travel policies that rule out air travel, except in exceptional circumstances, for travel between the Scottish Central Belt and London. For these trips, rail emits around a quarter of the emissions from equivalent journeys by air; it also offers significant productivity benefits as it offers a high-quality environment for working while on the move. Secondly, the Plan also ignores emissions from international aviation; these have risen by 186.2% since 1990[18] and now comprise 15.1% of Scotland's total transport emissions in 2018,[19] the largest share they have ever accounted for. It is not acceptable to ignore international aviation emissions, as the Plan currently does. At the very minimum, the Scottish Ministers should be instructing Public Bodies to avoid the use of international aviation for business travel purposes except in exceptional circumstances, and putting in place a comprehensive reporting mechanism on this matter.

So while there is merit in many of the policies and proposals included in the CCPu, we are not confident that they will not be sufficient to achieve sufficient emission reductions in the transport sector. As such, we highlight two further topics:

9. **A lack of action on road traffic demand management, and incentives more generally**. The Plan remains extremely weak on road traffic demand management. It makes no further commitments in this area, merely promising consultation on guidance for Local Authorities on the workplace parking levy powers contained in the 2019 Transport Act. It will be difficult to achieve the major shift in road traffic trends that the Plan aspires to in the face of no new action to restrain car traffic levels. The policies that have been put forward to support traffic reduction are overwhelmingly measures that improve the attractiveness of public transport and active travel. While we strongly support these measures in their own right, they are unlikely to be effective, on their own, in shifting the required number of journeys from private car to public transport and active travel. Reversing the trend towards increased traffic will require policies that disincentivise unnecessary private car use through demand management tools. While the Plan does commit to discussing a vehicle excise duty and fuel duty review with the UK Government and promises further consultation on the workplace parking levy, these are not commitments to actual action in this area and remain spectacularly vague. The Scottish Government needs to take responsibility and make commitments to pricing incentives, including a clear commitment to financially supporting those Local Authorities who bring forward local transport strategies which include the implementation of local

---

16 As originally set out in Transport Scotland's Rail Services Decarbonisation Action Plan (July 2020). Available at <https://www.transport.gov.scot/media/47906/rail-services-decarbonisation-action-plan.pdf>.

17 'Action needed now to deliver zero-emission Scottish railway by 2030: Climate Emergency response 'Vision 2030: Clean Rail', 2 September 2019. Available at <https://transform.scot/blog/2019/09/02/action-needed-now-to-deliver-zero-emission-scottish-railway-by-2030-transform-sets-out-climate-emergency-response-vision-2030-clean-rail>.

18 Transport Scotland (2020) 'Carbon Account for Transport No. 12: 2020 Edition', page 19. Available at <https://www.transport.gov.scot/publication/carbon-account-for-transport-no-12-2020-edition/>.

19 Transport Scotland (2020) 'Carbon Account for Transport No. 12: 2020 Edition', page 19. Available at <https://www.transport.gov.scot/publication/carbon-account-for-transport-no-12-2020-edition/>.

road user charging or workplace parking levy schemes.[20] For its own part, the Scottish Government should not shirk its responsibilities in this area by relying on action by the UK Government; it should instead instruct Transport Scotland to develop its own proposals for a national road user charging scheme.[21]

10. **The Plan contains no action to reverse the existing bias towards new high-carbon infrastructure, both in Transport Scotland budgets & in many City-Region Deals**. We consider that the road traffic reduction target will be impossible to achieve while Transport Scotland's transport capital expenditure priorities remain overwhelmingly skewed to high-carbon infrastructure. In 2018, SPICe research found that the Scottish Government's future capital expenditure plans to be heavily skewed towards high-carbon infrastructure (SPICe briefing SB 19-02 'Scottish Government infrastructure investment' January 2019; see Figure 13). The 16/12/20 SPICe briefing referenced above states that the sustainable transport investments set out in the CCPu are *"dwarfed by the investment of: £6bn in dualling the A9 and A96 trunk roads; £120m to upgrade the Sheriffhall roundabout; £31.5m to build the A77 Maybole bypass; other significant investments in trunk roads including the A82 and A83"* and concludes that "[n]ew road building also generates significant greenhouse gas emissions during construction and locks in higher emission travel choices for years to come." While the UK Government is increasingly being brought under scrutiny for its £27 billion road-building programme, there has been no effective scrutiny of the Scottish Government's road spending plans despite these being vastly more expensive per capita than anything seen in England. All of this is while the Government is not fixing the existing road network, which has a £2+ billion maintenance backlog. Fixing local roads would help not only car users, but also pedestrians, cyclists and bus users. Given that 29% of Scottish households do not have access to a car, this spending is not only environmentally disastrous, it also compounding inequalities and undermining the call to shift to active and sustainable options. Advice from a range of expert advisory groups has consistently identified changes to infrastructure investment priorities as a crucial issue for the Scottish Government to address in order to reduce transport emissions. The Infrastructure Commission for Scotland called in January 2020 for *"a presumption in favour of investment to future proof existing road infrastructure and to make it safer, resilient and more reliable rather than increase road capacity."*[22] The UK Committee on Climate Change called in May 2020 for governments to *"avoid locking-in higher emissions or increased vulnerability to climate change in the longer-term"*.[23] The Just Transition Commission recommended in July 2020 that *"[t]he opportunity to re-prioritise any existing transport spend, currently earmarked for increasing road capacity, and redirect it toward investments in low-carbon transport initiatives should be actively pursued."*[24] The Scottish Parliament's Environment, Climate Change and Land Reform Committee recommended in November 2020 that "*transport budgets and fiscal incentives are targeted at reducing demand for travel by car and encouraging the use of active and sustainable modes, e.g. prioritising investment in active and sustainable travel infrastructure rather than additional road capacity."*[25] We ourselves, alongside other national charities, Paths for All, RSPB Scotland, Sustrans Scotland, & WWF Scotland, in November 2020 wrote to Scottish Ministers to express "deep concern" at the transport spending priorities set out in the Scottish Government's draft Infrastructure Investment Plan, and called upon the Ministers to review its capital expenditure priorities.[26] Yet despite this range of advice, we are yet to see any evidence of movement away from high-carbon transport infrastructure from the Scottish

---

20 As provided for in the 2001 and 2019 transport acts, respectively.

21 This is very much within the powers of the Scottish Government to pursue. It should be noted that the initial proposals for what became the 2000 transport bill as introduced to parliament included proposals for powers for trunk road user charging.

22 Infrastructure Commission for Scotland (2020) 'Phase 1: Key findings report', page 108 Available at <https://infrastructurecommission.scot/page/key-findings-report>.

23 'Take urgent action on six key principles for a resilient recovery', 6 May 2020. Available at <https://www.theccc.org.uk/2020/05/06/take-urgent-action-on-six-key-principles-for-a-resilient-recovery/>.

24 Just Transition Commission (2020) 'Just Transition Commission: advice on a green recovery', page 18. Available at <https://www.gov.scot/publications/transition-commission-advice-green-recovery/>.

25 Scottish Parliament Environment, Climate Change and Land Reform Committee (2020) 'Green Recovery Inquiry - Report', page 34. Available at <https://sp-bpr-en-prod-cdnep.azureedge.net/published/ECCLR/2020/11/8/Green-Recovery-Inquiry---Report/ECCLRS0520R12.pdf>.

26 'National charities call for review of government's transport spending plans', 24 November 2020. Available at <https://transform.scot/blog/2020/11/24/national-charities-call-for-review-of-governments-transport-spending-plans/>.

Ministers. With regards to the City-Region Deals, we find these to be generally grossly intransparent in terms of reporting transport capital expenditure; we are not persuaded that this matter has improved since the Parliament's Local Government and Communities Committee considered this matter in its 2017-18 inquiry.[27] Transform Scotland recommends an urgent moratorium and review of all road-building projects in line with the advice from these commissions and advisors to Scottish Government. Separately, but in parallel, we urge the Parliamentary committees to hold an inquiry into the decades of transport spend that has systematically exacerbated poor health, inequalities and the climate emergency.

Finally, we note that the Sector Policy Outcome Indicators (p.247), whilst generally to be supported, are inadequate as they include no information on:

- *Active travel*. We would suggest the following indicators: '% of travel-to-school & travel-to-work journeys made by active travel' and '% of arterial cycle routes in towns & cities which feature segregated cycle paths'.
- *Freight*. The Plan makes a number of welcome references to rail freight but then fails to include it within the indicator set. We would suggest: '% of tonne-kilometres over distances greater than 250 miles that is hauled by rail freight'.
- *Short-haul aviation*. We would suggest an initial focus on Scottish Public Bodies, many of whom still make large volumes of domestic UK flights despite Scottish Government policy to the contrary: '% reduction in flights from the Scottish Central Belt to the London airports'.

[27] Scottish Parliament Local Government and Communities Committee 'City Region Deals 2017-18'. Available at <https://www.parliament.scot/parliamentarybusiness/CurrentCommittees/104236.aspx>.

[Q3] Do you think the timescales over which the proposals and policies are expected to take effect are appropriate?

We made reference under Question 2 where timescales for specific proposals and policies may need to be adjusted, such as bringing forward the electrification of rail from 2035 to 2030. However, given the vague nature of many of the Policies and Proposals and the lack of information on their individual emissions impact, it is difficult to judge whether the timescales are appropriate. However, we would point out that it takes time for the effect of transport policies to be visible and we would therefore recommend that transport investment be frontloaded rather than ramping it up over several years. As discussed above there has been no significant reduction in transport emissions since 1990, so making progress in this sector is extremely urgent.

The table of emissions by sector (p. 253) appears to indicate that the emissions in the transport sector will initially fall between 2020 and 2028 and then remain steady. As discussed in our response to question 2, it is unclear how this stagnation of carbon emission reductions fits with the phasing out of fossil fuel technology which undoubtedly will be continuing throughout those years.

[Q4] 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 proposed improvements in public transport and active travel will undoubtedly attract more people to use these modes of transport. However, the convenience and embeddedness of the private car in people's lives should not be underestimated and needs to be taken seriously as a threat to achieving the goal of reducing car traffic by 20% by 2021. In addition to incentives for public transport use it will be unavoidable to also create disincentives for unnecessary private car use.[28] This will be particularly relevant in the context of increased electric car ownership and the associated lower running cost of these vehicles (due to subsidies and low taxes). We must avoid a situation where the reduced running cost of electric cars leads to an increase in car traffic, as people can afford to drive further and more often. As outlined in our response to question 1, we have already seen this effect in Scotland in the private car sector, where the efficiency increases in the design of modern cars have been offset by the increase in the size of cars and increasing popularity of SUVs.[29] While an increase in traffic from electric vehicles would not necessarily result in increased emissions, it would however undermine the Scottish Government's traffic reduction target and the associated benefits to health, air quality, congestion etc. and would compound the threat to the viability of public transport (compounding the severe cuts to public transport patronage observed during the pandemic). The Plan must ensure that the incentives created through emission reduction policies reflect the sustainable travel hierarchy.

---

28 'Back to the future: Reducing car travel in Scotland',16 December 2020. Available at <https://spice-spotlight.scot/2020/12/16/back-to-the-future-reducing-car-travel-in-scotland/>.

29 'Car Wars: Revenge of the SUV', 7 December 2020'. Available at <https://spice-spotlight.scot/2020/12/07/car-wars-revenge-of-the-suv/>.

[Q5] To what extent do you think the CCPu delivers a green recovery?

A green recovery in transport should be based on two key principles:

1. **All new capital expenditure must be zero emission** - not least to correct the systemic bias towards high-carbon capital expenditure implemented by Transport Scotland over the past decades.[30]

2. **Priority should be given to capital expenditure which has greater potential to be carried out by Scottish companies and Local Authorities** in order to maximise multiplier effects for the Scottish economy. None of the major road construction projects pursued by Transport Scotland are being carried out by companies headquartered in Scotland, as Scotland does not have construction companies large enough to win major roads contracts. Not only would a move to smaller, more local, greener investment be more in line with Green Recovery, this would increase the opportunity for Scottish companies or Local Authorities to be able to win contracts.

The Plan should therefore not exclusively focus on 'green infrastructure' but should also look at the opportunity cost of trunk road spending and commit to redirecting this funding towards sustainable forms of transport. As highlighted in analysis by SPICe, there is *"a clear correlation between the Scottish Government investing significant sums in trunk road [...] infrastructure and growth in [its] use"*.[31] The existing trend towards private car use and reduced bus patronage is now being compounded by government advice to avoid public transport, which while appropriate at the moment, could damage the public transport sector and lead to increased private car use in the long-term. This highlights the necessity for sustained support for public transport and swift implementation of public transport improvements proposed in the Plan alongside a programme of demand management policies for private car use.

However, the coronavirus restrictions have also led to some positive developments for transport. Many more people are working from home now and have reduced their need to commute on a daily basis. In addition there has been a rise in active travel mode share and a number of Local Authorities have installed pop-up infrastructure to facilitate active travel. While the Plan commits to supporting home working and active travel, we would like to see a more specific action plan that sets out how the Scottish Government will ensure that these benefits are locked-in and not lost once the pandemic is over.

---

30 SPICe (2019) 'Scottish Government infrastructure investment'. Available at <https://digitalpublications.parliament.scot/ResearchBriefings/Report/2019/1/15/Scottish-Government-infrastructure-investment#Climate-impact>.

31 'You get what you pay for – 20 years of devolved transport policy', 4 December 2019. Available at <https://spice-spotlight.scot/2019/12/04/you-get-what-you-pay-for-20-years-of-devolved-transport-policy/>.

Overall recommendations:

1. The Plan should be amended so that the transport sector at least meet its proportionate share (56%) of the emissions reduction required during the period 2020-32.

2. The Scottish Parliament should scrutinise the Scottish Government's plans for implementing its 20% road traffic reduction target, as previous commitments in this area were not provided with adequate parliamentary scrutiny.

3. The Plan should be amended to set out the road traffic demand management measures that Transport Scotland will be responsible for implementing (including developing its own proposals for a national road user charging scheme), and its role in financially supporting Local Authorities in implementing their own schemes (e.g. workplace parking levies, local road user charging schemes).

4. The Plan should bring forward an urgent moratorium and review of all road-building projects in line with the advice received from the Infrastructure Commission for Scotland, Just Transition Commission, UK Climate Change Committee and others. Separately, but in parallel, we urge the Parliamentary committees to hold an inquiry into the decades of transport spend that has systematically exacerbated poor health, inequalities and the climate emergency.

5. The Plan should make provision for the Scottish Government to provide a specific instruction that the Scottish Public Bodies (i) put in place robust travel policies that rule out air travel, except in exceptional circumstances, for travel between the Scottish Central Belt and London, and (ii) avoid the use of international aviation for business travel purposes except in exceptional circumstances.

6. The Plan should include a wider range of transport progress indicators, including on active travel, rail freight haulage, and the reduction in short-haul aviation.

•••••

Scotland's alliance for sustainable transport

transform scotland

Transform Scotland
5 Rose Street, Edinburgh, EH2 2PR
t: 0131 243 2690
e: <info@transformscotland.org.uk>
w: <www.transform.scot>

We campaign for walking, cycling and public transport to be the easiest and most affordable options for everyone. Our diverse membership brings together public, private and third sector organisations from across Scotland. We are a registered Scottish charity (SC041516).