

RURAL ECONOMY AND CONNECTIVITY COMMITTEE
SUBMISSION FROM FRIENDS OF THE EARTH
THE DRAFT CLIMATE CHANGE PLAN (RPP3)

Recommendations

The Transport section of the Climate Change Plan is wholly inadequate, being based on predictions of traffic growth that will never materialise and proposing that little more than technological change will be needed to reduce emissions.

A new version of the Transport section should be produced:

- the Transport sector should be aiming to reduce emissions at least twice as fast as in the draft Plan
- the input of transport figures to the TIMES model should be recalculated with more realistic assumptions about traffic levels instead of on a fantasy 'predict and provide' basis
- the Plan needs to include policies which will help people choose walking and cycling for short journeys, and buses and trains for longer journeys, instead of cars
- workplace parking levies and parking charges at large retail car parks should be included as policies, with a commitment to introduce the necessary enabling legislation in a suitable Bill soon
- other demand management measures should be modelled and included
- Scotland should aim higher on the transition to electric vehicles, as recommended by UKCCC and in line with other leading European nations
- in the long term the original plan to equip the TIMES with its own transport modelling component should be delivered, so that TIMES itself can weigh up technological against demand management options rather than leaving this to people who do not wish to even consider demand management.
- the Plan should include an overall commentary on potential consequences of Brexit, including on the issue of vehicle emissions standards
- the Plan should say how much carbon reduction each proposal and policy is supposed to deliver over time
- growing and improving public transport offers a significant jobs growth opportunity, as well as cutting carbon emissions

Introduction

Friends of the Earth Scotland welcomes the opportunity to make this submission. We are part of the Friends of the Earth International network - the world's largest grassroots environmental network, uniting 74 national member groups, over 2 million members and 5,000 local activist

groups around the world. FoE Scotland is an independent Scottish charity with a network of thousands of supporters, and 10 active local groups across Scotland. Friends of the Earth Scotland's vision is of a world where everyone can enjoy a healthy environment without exceeding their fair share of the planet's resources, now and in the future.

Overall

The Climate Change Plan is the product of a very large amount of work and contains many welcome measures, as well as painting an attractive vision of a future Scotland as a low-carbon country. However, delays caused by the use of the TIMES model and political trade-offs have led to a Plan which sometimes lacks detail, has had limited external input and is, in some sectors, overly reliant on technological progress rather than more fundamental change. In this response we concentrate on the Transport section of the plan.

Overall ambition for Transport of the Climate Change Plan

The Transport sector is the largest sector of carbon emissions for Scotland, producing 28% of all Scottish emissions in 2014 and has seen no significant reduction in emission since 1990. The 2009 Act required Scotland's emissions to reduce by at least 3% every year from 2020. The table below shows that the highest-emissions sectors - transport, agriculture and industry - have been and are proposed to continue to be the sectors which make the least fair contribution to these percentage reductions. It is no coincidence that these are politically 'difficult' sectors. It is in these high-emission sectors that the credibility of the plan is most important.

Sector	2014 emissions	Annual ave change 1990-2014	Annual ave change 2014-2032
Transport	12.9	-0.1%	-1.3%
Agriculture	10.7	-1.0%	-1.4%
Industry	10.4	-2.0%	-0.8%
Electricity	9.8	-1.3%	-4.5%
Residential	5.9	-1.0%	-3.0%
Services	3.4	0.5%	-3.9%
Waste	2.2	-3.1%	-3.1%

Achieved and predicted annual reductions by sector, highest-emissions sectors first; figures in red are less than the 3% overall target required across all sectors

There were several discussions with civil servants about replicating the RPP2 approach of listing the carbon reductions associated with each individual proposal and policy. Whilst these

numbers were often quite approximate in RPP2 the TIMES model will have produced very precise estimates of the impact of each policy in each year - these figures exist; we are just not being told what they are. It is hard to see how progress on the plan will be properly measured when it is not clear how much any given policy is supposed to have delivered by a given date.

It is not possible to tell from the Plan when and how much expenditure is required to deliver policies. So previous Committees' criticisms that it is not possible to work out whether the annual financial budget includes the funding needed to deliver on climate policies has not been addressed.

How the Transport proposals and policies were developed

The complexity of getting the TIMES model up and running meant that the original intention of including a sophisticated transport modelling component was not delivered. This would have been able to choose to substitute car journeys with other more sustainable transport choices. Instead Transport Scotland used their own model, with the starting assumption that there would be 27% more car km driven in 2035 than today, and no increase in the use of buses. TIMES was only able to suggest making these vehicles electric rather than seeking alternatives to the level of traffic envisaged. Transport is the largest-emitting sector of the economy and leaving the choice of policy options almost entirely to Transport Scotland is a key weakness of the CCP process.

The predictions of increased distances driven are justified in the Plan thus: "As historically, so in future we expect economic and population growth to increase the demand for the movement of goods, services and people." Transport Scotland's view of history is clearly rather odd. When the Scottish Executive published its 2006 transport strategy it predicted that traffic levels would grow by 22% between 2005 and 2015, presumably on the same basis and using the previous version of the same model as today.¹ The actual growth in traffic levels was 5% between 2005 and 2014.² A similar prediction of 27% growth between 2001 and 2021 made in 2002 will prove equally wide of the mark.³ The kind of 'predict and provide' approach being used by Transport Scotland was discredited more than 20 years ago in the UK Government's Standing

1 Scottish Executive, 2006, *Scotland's National Transport Strategy*, <http://www.gov.scot/Resource/Doc/157751/0042649.pdf>, p11

2 All vehicles and all roads, latest figures available, Transport Scotland, 2016, *Scottish Transport Statistics 2015* Table 5.1 <http://www.transport.gov.scot/report/j415388-08.htm>

3 Scottish Executive, 2002, *Transport Delivery Report*, <http://www.gov.scot/Resource/Doc/159245/0043337.pdf>

Advisory Committee on Trunk Road Assessment report on generated traffic.⁴ The fundamental assumptions used to create the transport numbers fed into the TIMES model are clearly nonsense. Aiming for large growth in car travel automatically ensures that the Scottish Government will fail to deliver on its National Indicator aims of increasing the proportional of journeys by public transport or active travel, and reducing congestion.

The Element Energy report,⁵ which informed much of the development of proposals and policies for transport is specifically about technological changes in the transport sector. The 70-page report contains one rather trivial page on reducing demand and no mention of trains. No proper research seems to have been commissioned by Transport Scotland into demand management, active travel or modal shift. Work commissioned for RPP1 showed that some demand management options, including workplace parking levies, speed limit reductions and increased public parking charges are, for instance, four or five times more cost effective at reducing carbon emissions than investment in electric vehicles, yet no demand measures are given any serious consideration in the Climate Change Plan.⁶

Over-reliance on technical change

Technological change in transport is important but the Plan is not credible because it almost entirely relies on changing vehicles and fuels, rather than more fundamental demand management options.

The biggest reductions in emissions are supposed to come from policy outcome 1 which relies on tightening vehicle standards from the European Union. Puzzlingly there is no commentary on the implications of Brexit on the imperative to meet current EU standards or for our participation in the negotiations which will agree EU standards beyond 2020. Even if Scotland is still bound by EU vehicle emission standards in future the *Dieselpgate* scandal has shown that emission standards often fail to deliver what is predicted.

The Scottish Government is in continued breach of European air quality legislation and is under a legal obligation to bring itself into compliance with air quality standards as soon as possible. Various court rulings directed against Defra make it clear that a reliance on

4 Standing Advisory Committee on Trunk Roads, 1994, *Trunk Roads and the Generation of Traffic*. <http://webarchive.nationalarchives.gov.uk/+/http://www.dft.gov.uk/pgr/economics/rdg/nataarchivedocs/trunkroadstraffic.pdf>

5 Element Energy, January 2017, *Greenhouse Gas Emissions Reduction Potential in the Scottish Transport Sector From Recent Advances in Transport Fuels and Fuel Technologies* <http://www.transport.gov.scot/system/files/documents/reports/j202258.pdf> and technical annex <http://www.transport.gov.scot/system/files/documents/reports/j202352.pdf>

6 Scottish Government, 2009 *Mitigating Transport's Climate Change Impact in Scotland: Assessment of Policy Options*. <http://www.gov.scot/resource/doc/282791/0085548.pdf>

emissions standards yielding improvements in air quality is not an adequate response to tackling air pollution as quickly as possible.

Electric vehicles

Even where technical fix measures are desirable and necessary the proposals look weak in terms of both delivery and international comparisons. The Plan envisages that 40% of all new cars sold will be ultra-low emissions by 2032, yet the UK Committee on Climate Change recommended that Scotland should aim for 65% by 2030.⁷ Meanwhile, Belgium, the Netherlands, Germany and Norway are all discussing or committed to targets of 100% by 2025 or 2030.

Demand Management

Demand management measures, such as workplace parking levies, increased parking charges, charging for parking at out-of-town shopping centres, reduced top speed limits and congestion charging, have multiple benefits. By stimulating people to make different transport choices these measures can contribute to improved air quality, more active citizens and healthier local economies, as well as reduced climate emissions.

Workplace parking levies get a passing mention in the document but are not even a proposal. They cannot be introduced without primary legislation and this is not proposed in the Plan, so even the vague reference therein is rather pointless.

Public Transport

There is a remarkable statement in the Plan used to summarily dismiss the potential for more people to use public transport: "Any behavioural switch from private to public transport is likely to be limited by capacity of the sector to absorb significant new traffic." The same logic is not applied to car traffic, where demand is expected to automatically lead to more road building. Bus patronage has shown a rapid decline in the last few years so the lack of specific measures to help buses is very disappointing.

A previous SNP transport minister promised that every rail line in Scotland would be electrified; at the rate suggested in this Plan this would take until 2140.

The Plan's focus on helping people drive more is not socially just. Investment in public transport and active travel helps everyone in society, investment in supporting car driving

⁷ UKCCC, 2016 *Reducing emissions in Scotland – 2016 progress report*.
<https://www.theccc.org.uk/publication/reducing-emissions-in-scotland-2016-progress-report/>

helps only those with access to a car. Half of our poorest households do not own a car. Favours cars is also a gender issue since 37% of women of driving age do not hold a licence compared to 27% of men.

Active Travel

The Plan states that the ultimate goal for Transport is that "By 2050, Scotland will be free from harmful tailpipe emissions from land transport, with other transport modes decarbonising at a slower pace, resulting in a healthier, more active population." This is a laudable aim but it is not clear how the population will be more *active* given that more people will drive more distance, albeit in electric vehicles, with no effective measure to help people walk or cycle more. No appraisal of the potential carbon savings that could be made by a switch from car journeys to trips by walking or cycling is presented.

Lord Deben of the UK Committee on Climate Change told the ECCLR Committee last September when presenting the UKCCC's annual progress report for Scotland, "the real problem is the number of small journeys in cars in our big cities". Transport Scotland statistics confirm that over 50% of car journeys in 2015 were for distances under 5km. Many of these short trips could be undertaken by cycling or walking if people had safe, convenient and reliable infrastructure.

Getting more people walking and cycling in our urban centres would have multiple benefits, including improving air quality more quickly, reducing congestion (with 12.5% of all journeys delayed by traffic congestion in 2015 according to Transport Scotland), improving public health and thriving urban centres.

Economic and social considerations

The transformation to a low carbon economy offers the chance to build a fairer, more equal Scotland. In some high carbon sectors jobs will be lost, and new jobs must be created to replace those, with training and funding made available to support redeployment. Growing and improving public transport offers a significant jobs growth opportunity, as well as cutting carbon emissions.

Involving workers and communities currently dependent on jobs in high carbon sectors, as well as broader civil society in planning for this transition, is essential to its success and resilience. Therefore we urge the Scottish Government and Parliament to use the Climate Change Plan as the foundation of an industrial plan which marshals the investment needed for a just

transition to a modern low-carbon economy, in ways which protect workers' livelihoods and tackle disadvantage in the labour market here in Scotland.

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