

Response ID ANON-FAT5-GHH5-V

Submitted to **Draft Infrastructure Investment Plan – 2021-22 to 2025-26**

Submitted on **2020-11-19 15:38:28**

Questions

1a Do you support the inclusion of natural infrastructure in our definition of infrastructure?

Not Answered

1b Do you agree with the wording proposed for the revised definition?

Not Answered

1c. If you do not agree with the proposed wording of the definition of infrastructure, please provide your suggested changes and additional material to support your answers [200 word limit].:

2a Do you agree that the steps proposed in the common investment hierarchy are the right ones?

Yes

2b. If you think any adjustments are needed to the proposed investment hierarchy, please provide suggested changes (and evidence, where appropriate) to support your answers.:

We support the proposed aim of the new investment hierarchy, particularly to place the determination of future need of infrastructure in light of population and climate change forecasts at the forefront of decision-making. This commitment should be strengthened by including the Scottish Government's commitment to net-zero by 2045. Additionally, this hierarchy must be reflected in the projects that are put forward and prioritised in the IIP. Currently the plan contains a multi-billion pound road-building programme and no new investment in sustainable transport, which runs counter to the investment hierarchy and would further lock Scotland into a high-emission transport system for the foreseeable future. The investment programme contained within the draft plan must be reassessed and realigned in accordance with the investment hierarchy; failing this, we consider the investment hierarchy to represent little more than an act of greenwashing.

3a Do you agree that a dashboard of indicators is the best approach to enable informed decisions to be taken about the long-term trade-offs and choices in our infrastructure investments? Please provide the reasons for your response.

Please provide the reasons for your response.:

The use of a dashboard of indicators can be a useful tool for making assessments that are comparable between projects. However, the dashboard of indicators put forward in this plan is extraordinarily vague. The dashboard sets out a number of categories but gives no information on their relative weight or how they would be measured. It also does not align or reflect the investment hierarchy, calling into question how and whether the investment hierarchy would be part of the decision-making process for prioritising investment. The dashboard of indicators should set clear and specific policy outcomes against which projects are measured and compared to enable a robust analysis that is accountable to previously set policy priorities.

3b What outcomes (and/or indicators) do you think should be included in developing a common assessment framework for prioritising infrastructure investment?

Please explain your answer:

As mentioned above the indicators and outcomes used for assessing infrastructure investment must reflect both the investment hierarchy and existing policy commitments made by the Scottish Government.

3c Are there existing tools or methodologies you are aware of which you think the Scottish Government could draw on or adopt in developing its framework?

Please explain your answer:

4a Do you support the planned approach to developing a new approach to assessing the contribution made by infrastructure investment to Scotland's emissions targets?

Yes

4b. Please explain your response and support your response with evidence [500 word limit].:

The current methodology used for measuring the impact of infrastructure investment on Scotland's emissions targets is very simplistic, as noted in the draft plan. In particular, the lack of a quantitative assessment of the carbon impact of projects under the current methodology is problematic and we would welcome the development of a methodology that measures the carbon impact of infrastructure projects more accurately. However, the development of such a methodology must not be used as an excuse to prevaricate and delay decision-making in shifting transport investment from projects that support an unsustainable transport system to a zero emission transport network. We know which projects will lead to further emissions (i.e. investment in new road and airport capacity), and which projects will allow us to reduce carbon emissions (i.e. investment in public transport and active travel). The development of a new methodology must therefore not be used to further delay the shift to investment for a sustainable transport system.

5a What are your views on the accuracy and scope of the environmental baseline set out in the Environmental Report?

Please explain your answer:

The Environmental report, as it has been published, in no way accurately assesses the impact of the IIP. The report bases its evaluation exclusively on the investment hierarchy and key themes contained in the first chapters of the report. As discussed in response to previous questions, the projects contained in the plan have not been reprioritised in line with the new investment hierarchy and the policy priorities, which therefore cannot be used as a stand-in for the impact of the plan as a whole. Failing to include the infrastructure projects in the environmental report undermines the purpose of the assessment and results in an inaccurate representation of the plan's impact. A comprehensive environmental report, must include the assessment of the impacts of the projects prioritised in the plan.

5b What are your views on the predicted environmental effects of the Infrastructure Investment Plan as set out in the Environmental Report?

Please explain your answer:

The environmental effects predicted in the report are entirely misleading, as they do not take account of the projects prioritised in the plan. We reject the spurious claim made in the report that "significant benefits are considered likely to arise for climatic factors, air quality, water, population and human health, biodiversity, cultural heritage and material assets." The report neglects to mention that the IIP continues to contain a multi-billion pound road building programme that will negatively impact all of the factors mentioned here. Transport remains the largest contributor to Scotland's emissions, accounting for 37% of all emissions and the draft plan does not reflect the shift in investment priorities that would be required to reduce emissions in the transport sector.

5c What are your views on the proposals for mitigating, enhancing and monitoring the environmental effects set out in the Environmental Report?

Please explain your answer:

The environmental report considers how environmental effects of implementation of the IIP can be "managed, mitigated or enhanced". This approach is predicated on the assumption that these impacts are unavoidable. Instead, the first consideration in this process should be whether an environmental harm can be avoided before creating the necessity to manage or mitigate that harm.

About you

What is your name?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Transform Scotland

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Please enter comments here.: