

JACOBS/AECOM 'STPR2 UPDATE AND PHASE 1 RECOMMENDATIONS' REPORT

Response from Transform Scotland

31 March 2021

1. General commentary.

We welcome the recognition that:

"Transport's contribution to the climate emergency and net zero targets, means that there is a need to reduce unsustainable travel and deliver modal shift towards walking, cycling and public transport." (page vii)

And that:

"[W]ithout intervention, current issues around higher private vehicle usage, more unreliable journey times, increasing congestion, poor air quality and climate change will continue to increase or deteriorate." (page 26)

We further welcome the statement that:

"STPR2 should prioritise interventions that increase the modal share of shorter everyday trips by walking, wheeling and cycling; short to medium length trips by public transport and longer trips by rail and low emission vehicles." (page vii)

2. 'Challenges and opportunities'.

We agree that one of the main challenges that the transport sector needs to face is reducing carbon emissions and we welcome the target for reducing car mileage by 20% by 2030. The question is rather how this will be achieved. The recent Climate Change Plan Update (CCPu) has not provided a viable route towards reducing transport emissions and the Scottish Government will not be providing this any time soon, given the Ministerial decision that the CCPu will be adopted in its draft form without taking on board the recommendations from four Scottish Parliament committees.

We agree with the assessment that one of the challenges is decline in bus passengers and given the development of passenger numbers in the pandemic this is a serious challenge that needs to be addressed across all forms of public transport.

We note the mention of low carbon technologies for aviation. While there may be appropriate uses for this in the future the focus should primarily be the reduction of air travel.

We support the transition to low emission vehicles but the focus here should be on public transport rather than subsidising private car use.

We note that one of the opportunities that lockdowns have created are the increased active travel rates and it will be important to lock these in, as the report suggests. But the messaging on avoiding public transport has also encouraged more people to make trips by private car. This is a challenge that needs to be addressed quickly and effectively before this behaviour is embedded.

Opportunities to reduce the need to travel compared to pre-pandemic levels of travel should be taken and the Scottish Government should be encouraging employers to continue facilitating remote working.

3. 'National Transport Planning Objectives'

The 'STPR2 Objectives (pp 28-29) are fine, if rather generic and high-level.

Most of the 'Sub-objectives' are supported. However, the sub-objective 'Increase competitiveness of key domestic and international markets...' makes no reference to sustainability, and will presumably be used by vested interests to argue for the prioritisation of high-carbon interventions; this should be changed to make reference to "by sustainable transport modes" or similar. Furthermore, "sustainable access to labour markets" is vague: does this imply access by the sustainable transport modes, or is this a corruption of 'sustainable development' terminology to imply "continued" and/or "unconstrained"?

We do not find the very brief explanation around 'Regional Transport Planning Objectives' to be persuasive. Whose judgement is taken to describe the "unique aspects of each region", and will this actually be used to justify high-carbon interventions in certain parts of the country? Should this prove to be the case, this would represent a major failure as the imperatives of the Climate Emergency demand that all areas of Scotland commit to deep cuts in emissions.

4. 'Recommended interventions'

We support most of the 20 recommended interventions. By our count, we have led advocacy, at various times, in support of interventions which resemble eleven of the 20 set out in this report (numbers 1, 2, 7, 8, 9, 10, 11, 14, 16, 19 & 20). Furthermore, (i) we are currently running a public awareness campaign (#lovelybus) which would certainly fall within the scope of intervention 3, (ii) we have advocated for maintenance of the trunk road asset ahead of new trunk road construction (intervention 17), and (iii) see merit in a number of the remaining six interventions.

However, we have no confidence that either our legally-binding emissions reductions targets or the 20% traffic reduction target will be met with this set of interventions alone. While section 5.2 talks about the use of 'financial instruments', this set of interventions completely fails to set out any measures to tackle the grossly-misaligned transport prices that are faced by transport users. In real prices, motoring is continuing to become cheaper while public transport is continuing to become more expensive.¹ In the absence of action, the transition from ICE vehicles to EVs will further worsen the relative attractiveness by price of public transport vis-a-vis car use.

It is deeply alarming that 'financial instruments' do not feature even within the 80 'Groupings Taken Forward to Appraisal' in Appendix A.² Given that the Scottish Ministers themselves amended the 2019 transport act to provide local authorities with enabling powers to implement Workplace Parking Levy schemes, it appears to us an act of incompetence that the STPR2 process has demonstrably failed to take forward any further consideration of the role of economic instruments. While we accept that Scotland currently does not have powers devolved to it over fiscal instruments such as Fuel Duty or VED, local pricing powers do exist through the 2001 and 2019 Scottish transport acts (local road user charging and workplace parking levy schemes, respectively). Furthermore, as exemplified by the bill introduced to the Parliament which became the 2001 transport act, Scottish Ministers could seek to put in place further powers over such matters without revision to the devolution settlement.³ Generally, we find the analysis set out in this report to be lacking in terms of its command of transport economics: it contains no discussion of the impact of prices and costs on transport demand, let alone any discussion of cost externalities from transport.

5. Phase 2.

We note that "Phase 2 will also take forward a number of additional interventions" (p3), and, while we find the report to be unclear in its drafting, we expect that this will centre on the 80 'Groupings' set out in Appendix 1.

While most of these Groupings sound as if they may be consistent with sustainable transport objectives, we are disturbed to see reference to trunk road dualling (Groupings 52-55) and surface access to airports (Grouping 75). Neither of these have a role in meeting climate emergency and net zero targets; these elements of these Groupings should be deleted prior to appraisal at Phase 2. Transport Scotland's current

capital expenditure programme is already grotesquely skewed towards new trunk road capacity. Proposing to further expand trunk road capacity runs entirely against the overall objectives of STPR2 as stated by yourselves in this report.

6. Recommendations.

In order to achieve policy coherence with climate change emission targets, all recommended interventions should be subject to Marginal Abatement Cost Curve analysis.⁴ Without such an analysis, there is no information presented as to whether the interventions presented have small or large abatement potential, and how cost-effective these interventions will be in reducing emissions.

In order to achieve policy coherence with the 20% traffic reduction target, all recommended interventions should be assessed as to whether they will either (i) reduce, or (ii) increase traffic levels, and the latter group be automatically rejected.



- ¹ See, for example, the ONS data used by RAC Foundation in their 'Transport price index': <https://www.racfoundation.org/data/cost-of-transport-index>
- ² We note the reference to 'Travel Demand Management' on page 84. However, the term which most closely approximates this earlier in the document is the reference to 'Demand management measures' on page 31; this definition does not include financial/economic instruments but rather speaks of "technology, innovation and behaviour change".
- ³ The act as introduced to the Scottish Parliament also included powers for trunk road user charging.
- ⁴ This was carried out as long ago as 2009 in the 'Mitigating Transport's Climate Change Impact in Scotland: Assessment of Policy Options' report by Atkins/University of Aberdeen for the Scottish Government.

Scotland's alliance for sustainable transport

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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).