

Scottish Government Draft Infrastructure Investment Plan (IIP) for Scotland 2021-22 to 2025-26 consultation

Cycling Scotland submission November 2020

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

Yes

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

Yes

Question 1c) – If you do not agree, please provide your suggested changes and additional material to support your answer (200 words limit).

N/A

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

No, please see comments in response to question 2b.

Question 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.

The hierarchy needs to explicitly recognise the need to reduce climate change emissions and would benefit from outlining examples at each stage to illustrate what real-world investment will look like.

While the aim to ‘Determine future need’ is logical, it should be made clear that this is not a return to the failed ‘predict and provide’ of the past. Predicting traffic growth and building new road capacity to meet that growth does not tackle congestion, address inequalities or take into account the impact of air pollution, community severance or the Climate Emergency we face.

We note that new building is at the bottom of the hierarchy. Specifically, with regards to new trunk road building, this is welcome. There should be a presumption in favour of future proofing existing road infrastructure, as recommended by the Scottish Infrastructure Commission. This includes reallocating existing road space to cycle lanes, separate from traffic and also improving maintenance, given the impact of road conditions on vulnerable road users in particular.

The plan to double investment in bridge and roads maintenance reflects the need to adapt to climate change. However, maintenance spend is equally significant on the local roads network. The investment hierarchy needs to ensure that footways, cycle tracks and local

roads are also included in investment plans with local infrastructure investment plans delivering key priorities, including a network of cycle infrastructure.

Question 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 reasons for your response.

A dashboard of indicators might be an effective way to enable informed decisions to be taken. Where indicators exist, they should be measurable and able to be tracked over time, to enable the effectiveness of infrastructure investments to be calculated. It'll be essential that the budget implications are clarified - spending 75% of a budget on infrastructure which will drastically increase climate change emissions undermines the positive impact that the remaining 25% could have.

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

It is important that infrastructure investment decisions complement and align with other areas of Scottish Government focus and commitment.

Outcomes and indicators to prioritise:

- Investment which helps deliver the long-term vision for Active Travel in Scotland and Active Travel Framework
- Investment which delivers on Net-Zero and interim climate targets for greenhouse gas emission reductions
- Investment which reduces inequality and improves access to sustainable transport
- Investment which contributes to achieving the Road Safety Vision Zero by 2050

Question 3c) – Are there existing tools or methodologies which you think the Scottish Government could draw on or adopt in developing its framework? You may wish to draw on examples from other countries in your response.

The Scottish Transport Appraisal Guidance (Scot-TAG)¹ is the transport appraisal mechanism currently used in Scotland. We note that cycling and walking improvements are listed in Scot-TAG as possible transport options to address identified or perceived problems and opportunities. Further, the guidance includes environment, safety, integration, and accessibility and social inclusion as factors considered in the appraisal process. It is important to stress that given this appraisal framework, that cycling and active travel need to be duly and properly prioritised as transport infrastructure options in decision making processes.

Question 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?

N/A

¹ <https://www.transport.gov.scot/our-approach/industry-guidance/scottish-transport-analysis-guide-scot-tag/>

Question 4b) – Please explain and support your response with evidence (500-word limit).

The current taxonomy approach, using a RAG system to categorise projects as low, medium, and high carbon, is user-friendly and easy to understand. The new systems proposed appear more complex, each with positives and negatives. As outlined in the draft document, it is likely that a combination of methods will be required to deliver a comprehensive assessment approach.

Any approach used must ensure that it properly accounts for a proposed project's contribution to emissions, at all stages of the process, and ensure that investment is prioritised to low and zero emission projects and infrastructure, that will help to deliver on emissions targets.

Question 5a) – What are your views on the accuracy and scope of the environmental baseline set out in the Environment Report? Please give details of additional relevant sources alongside your response.

The baseline outlined acknowledges the importance of high-quality environments for health and wellbeing and the broader societal benefits of creating a sense of place, as well as recognising the role of transport in this.

The baseline acknowledges the importance and significance of the climate emergency, which is welcome, and accurately reflects the central role the climate emergency will play across a range of policy areas over the coming years.

While acknowledging technology has a role to play, it is welcome that the baseline recognises that adoption of technology is an increasing area of energy consumption, which can result in increased emissions and greater use of resources. One possible addition to the baseline report in this regard could be greater recognition of the significant negative environmental impact from the manufacture and operation of new technology, such as electric vehicles, which are associated with significant greenhouse gas emissions during manufacture and also create particulate matter emissions through braking and tyre wear. Recognition of 'embodied energy' within the baseline does recognise this to some extent but could go further. There are also significant safety concerns with emerging technology, particularly in the road environment for vulnerable road users, that negatively impact on many environmental factors which are not acknowledged in the baseline.

Construction of infrastructure and the negative impact this can have on the environment is outlined in the baseline, which is welcome. This could be strengthened by directly linking it with the proposal in Scottish Planning Policy² for the right development in the right place, rather than development at any cost. It is vital that the planning system enables and directs development to the right location, and this should include the planning and development of infrastructure. The right location for development includes where there are good links and connections to public transport and active travel, and where it is easy to reach local amenities without the need for a private car. This could also help to mitigate some of the negative consequences of increased competition for land and pressure on land use.

² <https://www.gov.scot/publications/scottish-planning-policy/>

Question 5b) – What are your views on the predicted environmental effects of the IIP as set out in the Environmental Report?

We welcome the acknowledgement of the importance of place and the positive environmental impacts of designing places which reduce dependency on private cars, and which prioritise and facilitate active travel. Recognition of the broader societal and economic benefits of such decisions is also welcome.

The environmental report outlines that significant benefits for the environment and climate are likely where the draft IIP supports continued decarbonisation across the sectors, particularly where a focus is given to (heat and) transport, due to contribution to greenhouse gas emissions. This is welcome as it acknowledges and highlights the significant negative contribution of transport to greenhouse gas emissions.

Despite this, the draft IIP outlines a number of large-scale road building projects which appear to remain a priority. This is problematic and could undermine many of the positive predicted environmental effects outlined in the environmental report. There are also no costings of these projects outlined which is again problematic for ascertaining what proportion of total infrastructure spend these projects will take up. It is unclear whether a full cost and impact assessment of such projects has been undertaken, and that there may be presumption in favour of delivery at any cost, with little or no alignment to broader environmental (and other) targets and objectives within the draft IIP.

Systems for transport infrastructure investment need to prioritise active travel infrastructure. Prioritising cycling, walking, and wheeling infrastructure can help to deliver strategic drivers outlined by the draft IIP, specifically those of prioritising investment to deliver inclusive economic growth and low carbon objectives, and placemaking.

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

Monitoring is an important stage in the process and is essential to ensure that environmental effects are being recorded and tracked, in particular, to identify any areas which require further action. We welcome that the environmental report outlines and acknowledges existing sources of reporting and how this can be utilised as part of the draft IIP. This is important to ensure consistency in reporting practices.

We welcome the recognition and recommendation in the environmental report that the focus of investment should be on maintenance and use of existing assets. This is particularly relevant for trunk road building and closely aligns to the recommendations of the Infrastructure Commission for Scotland in their key findings report in this regard³. We also welcome the recommendation in the report of placed based approaches and the role they play in helping to mitigate negative climate effects and enhance positive outcomes.

³ https://infrastructurecommission.scot/storage/281/Phase1_FullReport.pdf