City of Edinburgh Council Draft 2030 Climate Strategy consultation

Cycling Scotland submission
September 2021

Draft 2030 climate strategy vision, principles and actions

Question 4 – To what extent do you agree or disagree with the following?
The vision – Agree
The principles – Agree
The strategy – Agree

Question 5 – Please provide any comments or suggestions on the above

We welcome the vision outlined in the strategy, in particular that the city will have a "network of safe and attractive active travel routes, and an integrated world-class sustainable public transport system, which is affordable for everyone". Ensuring access to safe, attractive, and affordable active travel and sustainable public transport is essential to address transport's contribution to emissions, tackle the Climate Emergency, and achieve net-zero.

Whilst the principles outlined are welcomed, we note there is no specific mention of transport within the principles. As outlined in the strategy document, transport accounted for 31% of total emissions in Edinburgh in 2020 and remains the single largest source of emissions nationally. Given this significant contribution to total emissions in the city (and across the country as a whole), and the positive commitments to active travel and public transport outlined in the vision, this is an omission which should be addressed. Further, with only 2% of journeys between 1 and 2kms in the city undertaken by bike, versus over half of trips of the same length taken by car, there is a clear need to focus on prioritising active and sustainable modes.

We note on page 63 of the draft Strategy that a measurement of the number of people using active travel as a main mode of travel is listed as a possibility for inclusion in a set of monitoring indicators. This is welcome. Effective monitoring in this regard is important to monitor trends over time, can help to identify what does and doesn't work, and can support the overall case for further investment in active and sustainable modes in helping to deliver on net-zero commitments as part of the Strategy.

Engaging and empowering citizens to tackle climate change

Question 6 – To what extent do you agree or disagree with the following?
The strategic approach – Agree
The outcomes – Agree
The next steps – Agree

Question 7 – What other positive actions could the council or other city partners take to help you make more sustainable choices?

We would like to see actions around supporting access to active and sustainable modes to help citizens make more sustainable choices. Ensuring such modes can be accessed easily

and affordably is key to encouraging people to use them. Key to delivering change is making sustainable choices and actions as easy as possible and the natural default choice.
It is important that any actions taken are done so in a way that is fair and just, to deliver a just transition to net zero. It is welcome that these principles are recognised in the strategy as important in this regard.

Question 9 – What other information about barriers to change should we be aware of?

Specifically, with regards to active travel, the main barriers are well known. These include the speed and volume of motorised traffic on roads, a lack of separated, easily accessible active travel infrastructure, and lack of access to bikes. Priority needs to be given to addressing and overcoming these barriers if the required level of behaviour change is to be achieved to deliver on net zero and other climate targets and commitments.

Net zero, climate resilient development and growth

Question 12 – To what extent do you agree or disagree with the following?
The strategic approach – Agree
The outcomes – Agree
The next steps – Agree

Question 13 – Please provide any comments or suggestions on the above

The outcome *"People can access the support they need in the place they live and work, and local neighbourhoods are resilient to the impacts of climate change"* is welcome and recognises the important role of resilient, vibrant local places in addressing the challenges of the Climate Emergency.

We note a commitment to prioritise re-using land that has already been developed is detailed on page 22 of the Strategy, as is the plan to roll-out 20-minute neighbourhoods to support citizen wellbeing. This is welcome and recognises the importance of effective land-use planning for reaching net-zero targets. This could, however, be taken further, to explicitly recognise the link between transport use and land-use planning.

Land-use planning has a key role to play in facilitating the necessary shift away from cars. It is important that spatial planning and placemaking policies incorporate consideration as to how cycling and walking can be integral to planning decisions to address emissions from transport. Developments which give precedence to cycling and active travel, and connections to public transport, are essential, and should be prioritised. Separated dedicated cycle lanes which separate people cycling from traffic should be prioritised in towns and cities, in this regard. Further, development should be directed to the re-use or re-development of brownfield land and there must be a firm presumption against greenfield site development. This principle should be further extended to commercial and other sites, with a focus to ensure developments have good linkages to existing active travel networks and public transport interchanges. Where new developments are being planned, primary consideration should be given to making connections to these linkages. Where linkages to infrastructure do not exist or are not able to be delivered, the decision to permit development in a particular area should be reconsidered accordingly. Such principles should be embedded in any planning guidance developed and as stated, used as a condition for the decision to permit planning in an area. This could be more strongly emphasised in the Strategy, with regards to transport.

We note reference to delivering a transformed city centre and supporting an economic recovery post-pandemic. In addition to an economic recovery, other important effects of the pandemic should be recognised for their impact on delivering on net-zero commitments and climate resilience. The Covid-19 pandemic has led to fundamental changes in travel patterns and behaviours. The importance of sustainable travel and the possibilities around reducing travel have been highlighted. Positively, there was a significant increase in the number of people cycling in 2020/21; however, there has also been a massive decrease in the number of people using public transport, which has an important role to play in decarbonising transport and delivering the sustainable transport hierarchy. As we move forward in the transition from the pandemic, it is important that the gains in improved air quality, emissions reductions, and increased levels of cycling are not being reversed by a return to pre-pandemic or even higher levels of motorised transport. Ensuring a green and just recovery from the pandemic in this regard should be included as a key focus and outcome of the Strategy.

Net zero emissions transport

Question 18 – To what extent do you agree or disagree with the following?
The strategic approach – Agree
The outcomes – Strongly agree
The next steps - Agree

Question 19 – Please provide any comments or suggestions on the above

We welcome the approach outlined to deliver net zero emissions from transport in the city.

It is welcome that the strategy prioritises reducing the need to travel. The greenest mile is the mile not travelled and actions to reduce the need to travel should be promoted in this regard. We note reference to the creation of 20-minute neighbourhoods in this section of the document as a way to reduce the need to travel. This is welcome. It important in the application of the concept that differences between neighbourhoods across the city are recognised and that a one-size-fits-all approach may not be workable.

The commitment to invest in active travel infrastructure and decarbonising the city's public transport is welcome and needs to be prioritised across all transport activity. As previously outlined, one of the biggest barriers to individuals taking up active travel is a lack of safe and easily accessible infrastructure, separated from traffic. Access to active and sustainable modes of transport is crucial to help reduce greenhouse gas emissions, improve air quality, improve road safety, and address inequality across the city. The present transport system, including through continuing to prioritise road development, currently places an unequal burden on those in the most deprived communities, and there is a risk that growth in car ownership further isolates those without access to a car. Re-focusing on providing integrated active travel infrastructure, including connected networks of safe and easily accessible separated and dedicated cycle lanes, instead of expanding new road capacity is essential in this regard. Increasing access to bikes and storage facilities is key to addressing inequality and reducing transport poverty and should be prioritised across the city. Alongside measures to enable walking, cycling, and wheeling as the most popular modes for short, everyday journeys, and improving the desirability of public transport, measures to reduce demand for cars also need to be prioritised.

We note reference in the strategy to creating sustainable options for the movement of goods and services into and across the city, specifically a commitment to innovative zero emission solutions for 'last mile' deliveries. This is welcome and presents an opportunity for active

modes to be utilised in this regard, to reduce the climate impact of emissions from these deliveries. Recently published research found that emissions from last mile deliveries accounted for 6.6% of all road transport emissions in Scotland[1], demonstrating a significant negative climate impact. In this context, in relation to this commitment, the role of cargo and e-cargo bikes should be explored and emphasised for these last mile deliveries. Cargo and e-cargo bikes, where utilised for such deliveries, have an important role to play in reducing greenhouse emissions from transport and improving air quality, as they can help to reduce the number of freight and delivery vehicles on the road. Going forward, it is important that action is taken to support and promote the use of these bikes for deliveries and that those making deliveries are incentivised to do so, where appropriate.

Further, the commitment to engage with businesses on the benefits of the Workplace Parking Levy is welcome and will be an important step to reducing congestion and emissions from commuter journeys, if implemented. A WPL is an equitable policy across the whole population. Monies raised can be used to fund improvements to public transport and active travel, which is more equitable than other forms of taxation; can be used to fund transport improvements used by the whole population, especially buses; and people living in lower-income communities are disproportionately affected by the health impacts from air pollution caused by vehicles and are more likely to be killed or seriously injured by cars.

We note reference in the strategy to installing EV charging infrastructure across the city. Whilst EVs and accompanying infrastructure have a role to play in helping to decarbonise transport, EVs still contribute to emissions of very harmful particulate matter, from braking and tyre wear, and still represent vehicular traffic on the road, thus contributing to congestion. Further, there are additional safety concerns for vulnerable road users, like people cycling, as these vehicles are often silent/much quieter at low speeds and so are more challenging for vulnerable road users to hear on the road. The focus should be on reducing the number of private cars on the road and the amount of private vehicle kilometres; promoting delivery of the sustainable transport hierarchy; and prioritising active travel (and other sustainable modes). Where EV charging infrastructure is being provided, it is essential that it is also readily accessible by e-bikes. E-bikes have an important role to play in making cycling more accessible to individuals who feel unable to cycle using a traditional bike and make tackling hilly terrain easier. Failure to support e-bike access to charging infrastructure in this regard would be a significant missed opportunity in the city's journey to net-zero.

Equality and diversity

Question 33 - What positive impacts on equality and diversity do you think may result from introducing any of the proposals detailed in the draft 2030 Climate Strategy?

The negative impacts of emissions and other climate factors are more acutely experienced by the most vulnerable populations, thus exacerbating many existing inequalities. As outlined in our response to question 19, people living in lower-income communities are disproportionately affected by the health impacts from air pollution caused by vehicles and are more likely to be killed or seriously injured by cars. The proposals detailed in the draft Strategy are likely to have a range of positive impacts on equality and other outcomes, through improvements to air quality, reduced congestion, and safer roads and communities. This will positively impact on health and wellbeing, both physical and mental, improve

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[1] https://www.climatexchange.org.uk/media/4893/cxc-last-mile-delivery-in-scotland-july-21.pdf

economic outcomes, improve local places and spaces, and deliver improved social cohesion in communities.

To ensure these benefits are experienced by everyone, it is important that activities, such as improving access to active and sustainable modes of transport and more access to greenspace, are delivered in, and can be experienced by, all communities equally across the entire city. Failure to do so is likely to exacerbate existing inequalities and deliver worse outcomes for some groups. Opportunities need to be equally available to all who wish to access them. The focus should remain on delivering a fair and just transition to net zero which supports and empowers everyone in the city to make sustainable choices every day.