



# Climate Change Plan

Parliamentary debate, Thursday 16 March 2017

Briefing from Transform Scotland

## Key points

- The Policies and Proposals for transport in the draft Climate Change Plan (CCP) are too dependent on technology and factors outwith the Scottish Government's control.
- There is a lack of focus and specificity on the need for modal shift to active travel and public transport.
- The transport measures in the CCP do little to tackle inequalities, congestion, air pollution, sustainable growth or public health.
- Noting the recommendations of the four Parliamentary Committees, the CCP should be amended in its final form to give greater priority to active travel, bus services and road traffic demand management.

### 1. The CCP is over-dependent on technological changes

- 1.1. Despite a reasonable carbon reduction target, much of the plan for transport in the draft CCP is highly dependent on technology change outwith the control of the Scottish Government.<sup>1</sup> Much of the discussion around technological improvements does not inspire confidence (e.g. "We might expect to see a 15% improvement in the efficiency of new aircraft by 2035...").<sup>2</sup> This creates a high degree of uncertainty over the predicted efficiency improvements in transport and presents a risk to meeting Scotland's carbon reduction targets.

### 2. The CCP is over-dependent on Ultra Low Emission and Electric Vehicles

- 2.1. The Policies set out in relation to electric vehicles and ULEVs are largely underpinned by the premise that consumers will adopt low carbon vehicles in the coming years. This means that meeting the carbon reduction targets is somewhat at risk, and leaves the Scottish Government with limited responsibility to decarbonise vehicles.
- 2.2. Furthermore, we do not believe that the Policies set out go far enough to deliver the scale or rate of decarbonisation needed to reduce transport emissions by 33% by 2032. The target of 40% of new car sales to be electric by 2030 falls well short of the Committee on Climate Change's recommendation of 60%.<sup>3</sup> Many of the Policies on ULEVs and electric vehicles are heavily dependent on factors outwith the control of the Scottish Government.

### 3. The CCP fails to address the need for a sustainable transport system

- 3.1. The CCP fails to go far enough to encourage a modal shift to sustainable modes of transport. It is highly inconsistent to base many of the Policies in the CCP on electrifying private cars, as this will do nothing to achieve the Government's National Indicator to achieve a modal shift to active travel (i.e. walking and cycling) and public transport.<sup>4</sup>
- 3.2. There is little recognition of the need to increase the number of journeys made by active travel to reduce carbon emissions. The two Policies on active travel,<sup>5</sup> both of which are already in operation, do not provide the measures or the levels of funding necessary to encourage a sufficient modal shift to walking and cycling. Continuing with the current levels of investment in active travel will not result in a level of modal shift necessary to reduce carbon emissions and meet other Government targets (e.g. congestion, public health, inequalities).
- 3.3. Buses provide the vast majority of public transport trips in Scotland and represents the third most-common mode of transport. Unfortunately, there is no specific Policy in the CCP which tackles the need to increase

the use of buses as an alternative to private car use. Much more action needs to be taken to focus on modal shift from private cars to public transport. There has been a worrying 10% decline in bus patronage in the past 5 years;<sup>6</sup> without strong Policies backed up with increased funding, it is hard to see how a considerable shift away from private cars can be achieved.

#### **4. The CCP needs to be bolder in introducing demand management measures**

- 4.1. We welcome the recognition given to Low Emission Zones (LEZs) and Workplace Parking Levies (WPLs) in the CCP. Whilst it is a positive sign that road traffic demand management has been discussed in the CCP, there is no Policy to ensure that LEZs or WPLs are implemented in Scotland. This is disappointing, as their inclusion merely as a Proposal means that there is no guarantee of LEZs or WPLs being implemented in Scotland, and makes reaching the Policy Development Milestones relating to demand management uncertain.

#### **5. The CCP fails to deliver the co-benefits of sustainable transport**

- 5.1. The Policies and Proposals in the CCP largely fail to address the Scottish Government's strategic objective to tackle inequalities.<sup>7</sup> The heavy focus on private car use excludes the 31% of Scottish households who do not have access to a car,<sup>8</sup> the majority of whom are low income.<sup>9</sup> People on low incomes are typically more dependent on active travel and public transport, which have both been largely ignored in this Plan.
- 5.2. Promoting sustainable economic growth is a key aim for the Scottish Government.<sup>10</sup> Scotland has three large bus companies, one of which is a world leader in manufacturing and production of buses, and in particular low carbon vehicles (ADL). Despite this, there is little in the CCP to suggest that bus companies and bus manufacturers are being supported to a level necessary to reverse the decline in bus patronage seen in recent years.
- 5.3. The CCP largely fails to give consideration to the need to reduce congestion. Tackling congestion is a National Indicator of the Scottish Government -- one which it is failing to achieve.<sup>11</sup> Active and public transport are instrumental in reducing congestion, yet the lack of specific Policies on these modes in the CCP means that congestion is unlikely to be alleviated in the coming years. It is important to note that the Policies and Proposals for decarbonising private vehicles will have no impact on alleviating congestion.

#### **6. Recommendation for the CCP**

- 6.1. Noting the recommendations of the four Parliamentary Committees, in particular the Rural Economy and Connectivity Committee, the CCP should be amended in its final form to give greater priority to active travel, bus services and road traffic demand management.

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<sup>1</sup> Scottish Government (2017) Draft Climate Change Plan, section 9.2. <http://www.gov.scot/Resource/0051/00513102.pdf>

<sup>2</sup> Scottish Government (2017) Draft Climate Change Plan, page 67. <http://www.gov.scot/Resource/0051/00513102.pdf>

<sup>3</sup> CCC (2014). Going electric. <https://www.theccc.org.uk/2014/11/11/going-electric/>

<sup>4</sup> Scottish Government (2017). National Indicators. <http://www.gov.scot/About/Performance/scotPerforms/indicator/transport>

<sup>5</sup> Scottish Government (2017) Draft Climate Change Plan, Table 9-21 - Active Travel funding and Smarter Choices, Smarter Places. <http://www.gov.scot/Resource/0051/00513102.pdf>

<sup>6</sup> Transport Scotland (2016). Scottish Transport Statistics. <http://www.transport.gov.scot/statistics/scottish-transport-statistics-all-editions>

<sup>7</sup> Scottish Government (2017). Strategic Objectives - Wealthier and Fairer (archived) <http://www.gov.scot/topics/archive/About-Archive/Strategic-Objectives/Wealthier-Fairer>

<sup>8</sup> Transport Scotland (2016). Scottish Transport Statistics - Road Transport Vehicles (2014) <http://www.transport.gov.scot/report/scottish-transport-statistics-no-34-datasets-8914>

<sup>9</sup> Transform Scotland (2012). Warning Signs: Is Scotland Moving Towards Sustainable Transport? Table 1.1a <http://transformscotland.org.uk/wp/wp-content/uploads/2014/12/Warning-Signs-report.pdf>

<sup>10</sup> Scottish Government (2017) Sustainable Development. <http://www.gov.scot/Topics/Environment/SustainableDevelopment>

<sup>11</sup> Scottish Government (2017). National Indicators - Reduce traffic congestion. <http://www.gov.scot/About/Performance/scotPerforms/indicator/congestion>