

SUBMITTING EVIDENCE TO A SCOTTISH PARLIAMENT COMMITTEE

DATA PROTECTION FORM

Name:	
Date:	23/08/18
Organisation: (if required)	Transform Scotland
Topic of submission:	Climate Change (Emissions Reduction Targets) (Scotland) Bill

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Environment, Climate Change and Land Reform Committee

Climate Change (Emissions Reduction Targets) (Scotland) Bill

SUBMISSION FROM **Transform Scotland**

About Transform Scotland

We are Scotland's alliance for sustainable transport. 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 charity, politically independent and strictly science-based. We are a registered Scottish charity (SC041516).

Scope of our evidence

Our evidence is limited to the Committee's call for "ideas and views on what actions and behaviour change will be required of individuals and organisations if Scotland is to meet more ambitious climate change targets."

In this, we repeat evidence provided to the Parliament regarding its scrutiny of the most recent iteration of the Climate Change Plan (i.e. RPP3). In this, we stress the overall lack of ambition in the Plan, which highlights the ample room for further action on reducing emissions from transport (the largest single source of emissions, yet the sector where there has been almost no progress in reducing emissions).

We do not in this evidence comment on the detailed aspects of the Bill itself, not least as we expect that a number of our member organisations (e.g. Friends of the Earth Scotland, RSPB Scotland and WWF Scotland) will providing evidence on these matters. We would be happy to be associated with the views expressed by these organisations on the Bill, and, in particular, we would be happy to endorse the views of Friends of the Earth Scotland that (i) a target should be set for emissions to be cut by 77% by 2030 (on a 1990 base), and (ii) that there should be net-zero GHG emissions target for 2040.

We would advise the Committee that there is ample expertise within Scotland on reducing emissions from the transport sector, and we would be very pleased to advise the Committee regarding witnesses that it might want to call as part of its scrutiny of the Bill. Indeed, given the almost complete failure of progress in reducing emissions from the Scottish transport sector, the Committee may even want to consider holding a specific inquiry into this matter.

Introduction

As a result of decades of inaction, carbon emissions from transport have barely fallen since 1990. Indeed, transport is now the largest source of greenhouse gas emissions in Scotland, accounting for 28% of national emissions. The Climate Change Plan (hereafter CCP) set out a number of Policies and Proposals to reduce carbon emissions from transport. However, Transform Scotland has serious concerns that the actions set out in the CCP fail in multiple areas and rely too heavily on the use of private cars.

Opportunities for Greater Ambition 1:

Transport in the CCP focused nearly exclusively on private car use

As stated by the Committee in its 2017 report to the Scottish Government,¹ the draft CCP failed to set out Policies to deliver a modal shift to sustainable modes of transport. Reducing the number of journeys made by car is a National Indicator of the Scottish Government -- but one upon which it is currently failing to make progress. Too many of the Policies and Proposals in the CCP are based on the assumption that current modal trends will remain the same in the future. 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 and public transport. The REC Committee, in its report, called on the Scottish Government to set out Policies in the CCP to increase bus use, and to specify how the Government's target of 10% of journeys to be by bike by 2020 will be met.

Opportunities for Greater Ambition 2:

The CCP ignored the multiple co-benefits offered by sustainable transport

As well as reducing carbon emissions, active travel (i.e. walking and cycling) and public transport deliver multiple social, economic and environmental benefits. Increasing rates of walking and cycling has huge potential to improve physical and mental health, as well as reducing congestion and air pollution. Likewise, buses play a key role in alleviating congestion and air pollution, particularly in urban areas. Buses are also a major contributor to sustainable economic growth, with two of the world's large bus operators being based in Scotland (FirstGroup and Stagecoach), as well as a world leader in the manufacturing and production of low-carbon buses (ADL). Furthermore, walking, cycling and public transport are disproportionately used by people on lower incomes, offering a vital means of accessing services and employment. However, the CCP failed to acknowledge these multiple wider benefits delivered through public transport and active travel, and instead

¹ <http://www.parliament.scot/parliamentarybusiness/CurrentCommittees/103917.aspx>

focused nearly exclusively on private cars.

Opportunities for Greater Ambition 3:

Transport 'Policies' were based on flawed and unrealistic assumptions regarding traffic growth

It is clear that the outputs from the TIMES model have been reached through flawed and unrealistic assumptions regarding traffic levels. Almost all of the Policies and Proposals for reducing carbon emissions from transport appear to have been based on Transport Scotland's forecast of a 27% increase in private car use by 2035. Given that vehicle use increased by less than 5% between 2004 and 2014, this forecast is vastly inconsistent with current traffic trends. It appears that the outputs from the TIMES model are nearly all centred around private cars, with almost no attention given to Policies to achieve a modal shift away from private car use. The clear failure of the inputs used for the TIMES model raises serious questions regarding both the forecasting used by Transport Scotland, and the process undertaken by the Scottish Government to set out the Policies and Proposals for transport in the CCP. We were pleased to see that the ECCLR Committee, in its 2017 report, also raised concerns regarding the assumptions made when calculating traffic growth forecasts in the CCP.²

Conclusion and recommendations

The Climate Change Plan (RPP3) failed to set out Policies and Proposals which deliver wider benefits for Scotland, with nearly all actions focused on private car use. It appears that this is the result of serious misjudgements made in traffic forecasting models, with a failure to adequately consult external stakeholders regarding these forecasts. Whilst the draft CCP sets out reasonable carbon reduction targets for transport, it was a missed opportunity to deliver wider benefits through active travel and public transport, such as reduced congestion, improved air quality, improved public health, and equalities.

As such, there is ample opportunity for greater ambition in reducing emissions from the transport sector, by amending RPP3 to include Policies which:

- Focus on traffic demand reduction.
- Achieve a modal shift away from private car use to walking, cycling and public transport.
- Incentivise bus use and reverse the decline in bus patronage.
- Achieve the Government's target for 10% of journeys to be by bike by 2020.

² <http://www.parliament.scot/parliamentarybusiness/CurrentCommittees/103917.aspx>