Transform Scotland
Draft Climate Change Plan: Evidence to the REC Committee
2 February 2017

1. Introduction

Transform Scotland welcomes the opportunity to give evidence to the REC Committee on the Policies and Proposals on transport set out in the draft third Climate Change Plan (CCP). The CCP marks an important point in Scotland's journey to a low carbon economy and sets ambitious targets for carbon reduction over the next 15 years. As the second largest emissions source, tackling transport emissions is vital to meeting our climate change targets. Making transport more sustainable in Scotland is vital to help meet our climate change targets, as well as helping to tackle inequalities and promote sustainable economic growth.

This document sets out our critique of the Policies and Proposals for transport in the CCP. We make a number of recommendations for how the Scottish Government could meet its carbon reduction targets for transport whilst developing a fairer, more sensible transport system.

2. Progress on transport emissions

2.1 Historic transport emissions in Scotland

As acknowledged in the draft CCP, very little progress has been made in tackling emissions from transport.[1] Transport emissions in Scotland have fallen by only 2% since 1990,[2] which, along with agriculture, falls far short of the emission reductions made in other sectors. Transport now accounts for 28% of national emissions[3] and is on course to be the largest source emissions in coming years.

2.2 Transport Policies and Proposals in past Climate Change Plans

RPP2 was disappointing in that it set out no national Policies to reduce emissions from transport, instead relying on EU legislation to reduce emissions.[4,5] A number of Proposals were put forward, mainly targeted on increasing fuel efficiency in vehicles, encouraging the use of sustainable transport, and promoting the uptake of electric cars.[6] Whilst these are positive messages, these Proposals did not go far enough to make the necessary reductions in carbon emissions. The lack of commitment to robust, clear and inclusive Policies in RPP2 meant that little progress has been made in reducing transport emissions over the past four years.

[1] Scottish Government (2017) Draft Climate Change Plan, page 7. Available at http://www.gov.scot/Resource/0051/00513102.pdf
[2] Transport Scotland (2015). Scottish Transport Statistics. Available at http://www.transport.gov.scot/statistics/scottish-transport-statistics-all-editions
[3] Scottish Government (2017) Draft Climate Change Plan. Available at http://www.gov.scot/Resource/0051/00513102.pdf
[4] Scottish Government (2013). RPP2, page 193. Available at http://www.gov.scot/Resource/0042/00426134.pdf
[5] SPICe (2016). Implications of leaving the EU - Climate change. Available at www.parliament.scot/ResearchBriefingsAndFactsheets/S5/SB_16-85_Implications_of_Leaving_the_EU_Climate_Change.pdf
[6] Scottish Government (2013). RPP2, page 193. Available at http://www.gov.scot/Resource/0042/00426134.pdf

3. Proposed emissions reductions in transport

3.1 Emissions reduction target and timescale

We welcome the commitment to a 31% reduction in transport emissions by 2032 set out in the draft CCP. Given the lack of progress to date in reducing transport emissions, this is a realistic target to reach over the next fifteen years. However, we consider that there are serious problems with the process which has led to the selection of the chosen interventions, and the appropriateness of these interventions with respect to other potential measures.

3.2 Failures in transport modelling process

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.[7] Given that vehicle use increased by less than 5% between 2004 and 2014,[8] Transport Scotland's forecast is vastly inconsistent with current traffic trends. Due to the inaccuracy of the traffic forecasts, it seems that the outputs from the TIMES model have become nearly all centred around private cars, with almost no attention given to Policies which address the need for 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. The failure of the Scottish Government to consult stakeholders such as Transform Scotland during the preparation of the CCP could have avoided obvious errors in the modelling such as this.

3.3 Overdependence on technology

Despite a strong carbon reduction target, much of the plans for transport in the draft CCP are highly dependent on technology change outwith the control of the Scottish Government.[9] Much of the discussion around technological improvements does not *inspire confidence (... improvement in the efficiency of new aircraft by 2035* ...).[10] This creates a high degree of uncertainty over the predicted efficiency improvements in transport and presents a risk to meeting Scotland's target reduction targets.

3.4 Ultra Low Emission and Electric Vehicles

We welcome the Scottish Government's aim to decarbonise road vehicles in Scotland. Given that road traffic is responsible for 73% of carbon emissions from transport,[11] there is clearly a need to reduce emissions from cars, lorries and vans. The draft third CCP is more specific than previous CCPs on how the share of ULEVs and electric vehicles can be increased in the coming years.

However, 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%.[12] Furthermore, many of the Policies on ULEVs and electric vehicles are heavily dependent on factors outwith the control of the Scottish Government.

3.4.1 Consumer behaviour change

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

[7] Transport Scotland (2017). Greenhouse Gas Emissions Reduction Potential in the Scottish Transport Sector From Recent Advances in Transport Fuels and Fuel Technologies. Figure 7. www.transport.gov.scot/system/files/documents/reports/j202258.pdf

[8] Transport Scotland (2016). Scottish Transport Statistics 2015. Table 5.1 http://www.transport.gov.scot/report/j415388-08.htm#tb1

[9] Scottish Government (2017) Draft Climate Change Plan, section 9.2. http://www.gov.scot/Resource/0051/00513102.pdf

[10] Scottish Government (2017) Draft Climate Change Plan, page 67. http://www.gov.scot/Resource/0051/00513102.pdf

[11] Scottish Government (2017) Draft Climate Change Plan. http://www.gov.scot/Resource/0051/00513102.pdf

[12] CCC (2014). Going electric. https://www.theccc.org.uk/2014/11/11/going-electric/

the Scottish Government with limited responsibility to decarbonise vehicles. We have previously recommended that, in the short term, the focus should be put on encouraging the uptake of ULEVs as well as electric vehicles. Scotland's Public Bodies should be tasked by the Scottish Government to take a leading role in the uptake of ULEVs and electric vehicles to set an example to the public.

3.4.2 European emissions standards legislation
Given that the UK is set to leave the EU, neither the Scottish or the UK Government will have the same level of negotiating power to encourage greater fuel efficiency. This creates a high degree of uncertainty and risk around the promised improvements to emission standards.

3.5 Lack of consideration of the need for modal shift

3.5.1 Failure to address Government commitment to reducing car journeys
The draft CCP fails to go far enough to encourage a modal shift to sustainable modes of transport. Reducing the number of journeys made by car is a National Indicator of the Scottish Government, albeit one upon which it is currently failing to make progress.[13] Too many of the Policies and Proposals in the draft 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.

3.5.2 Active travel
There is little recognition of the need to increase the number of journeys made by active travel (i.e. walking and cycling) to reduce carbon emissions. As well as reducing carbon emissions, active travel has huge potential to improve public health and keep people active. The two Policies on active travel,[14] 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. For example, only 1% of journeys were made by bike in 2015,[15] well short of the Government's target of 10% of journeys by 2020.[16] 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.

3.5.3 Bus use
Buses provide the vast majority of public transport trips in Scotland and represents the third most-common mode of transport. Buses already play a key role in alleviating congestion, particularly in urban areas, and will be vital in meeting the Government's National Indicator to reduce congestion. 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 in the past 5 years;[17] without strong Policies backed up with increased funding, it is hard to see how a considerable shift away from private cars can be achieved.

3.5.4 UK rail services
We support the commitment to increase electrification of the rail network to 35% by 2032.

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[13] Scottish Government (2017). National Indicator - "Increase the proportion of journeys made by public or active transport" http://www.gov.scot/About/Performance/scotPerforms/indicator/transport
[14] 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
[15] Scottish Government (2017) Draft Climate Change Plan, Page 50, section 9.1.8. http://www.gov.scot/Resource/0051/00513102.pdf
[16] Transport Scotland (2017) Cycling Action Plan for Scotland 2017-2020. http://www.transport.gov.scot/system/files/documents/reports/Transport%20Scotland%20-%20Policy%20-%20Cycling%20Action%20Plan%20for%20Scotland%20-%20January%202017.pdf
[17] Transport Scotland (2016). Scottish Transport Statistics .http://www.transport.gov.scot/statistics/scottish-transport-statistics-all-editions

3.6 Demand management

3.6.1 Low Emission Zones
We welcome the recognition given to Low Emission Zones (LEZs) in the CCP. LEZs are an important tool to improve air quality, reduce congestion and reduce emissions. It must be stressed however that the principal benefit of LEZs is improvements to air quality and reduced congestion, rather than reductions in carbon emissions. Whilst it is a positive sign that LEZs have been discussed in the CCP, there is no Policy to ensure that LEZs are implemented in Scotland. This is disappointing, as their inclusion merely as a Proposal means that there is no guarantee of LEZs being implemented in Scotland, and makes reaching the Policy Development Milestones relating to LEZs uncertain.

3.6.2 Workplace Parking Levy
We also welcome the mention of Workplace Parking Levies (WPLs) in the CCP. WPLs could play a vital role in reducing dependence on private car use in urban areas. However, as with LEZs, WPLs have not been included as a Policy. As such, there is no obligation for the Scottish Government to work with Local Authorities to implement WPLs. It is disappointing that WPLs appear to have been included only as an afterthought, rather than as part of a firm commitment to reduce congestion and emissions in urban areas.

4. The extent to which the CCP reflects considerations about wider benefits

4.1 Equalities
The Policies and Proposals in the CCP largely fail to address the Scottish Government's strategic objective[18] to tackle improve equalities. The heavy focus on private car use excludes the 31% of the Scottish population who do not have access to a car,[19] the majority of whom are on low incomes.[20] People on low incomes are typically more dependent on active travel and public transport, which have both been largely ignored in this Plan.

4.2 Sustainable economic growth
Promoting sustainable economic growth is a key aim for the Scottish Government.[21] The focus of private cars in the CCP however appears to be in contradiction to this aim. Given that Scotland has not manufactured cars for several decades, it is hard to see how the CCP's focus on private car use will help in contributing to sustainable economic growth in Scotland. Conversely Scotland has three large bus companies, one of which is a world leader in manufacturing and production of buses, including 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.

4.3 Congestion
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.[22] Once again, 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. Should the Proposals on LEZs and WPLs be implemented, these will help to reduce congestion. However, the CCP does not commit to these as Policies and so it is hard to say whether these Proposals will ever be implemented at a scale

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[18] Scottish Government (2017). Strategic Objectives - Wealthier and Fairer (archived)
http://www.gov.scot/topics/archive/About-Archive/Strategic-Objectives/Wealthier-Fairer
[19] Transport Scotland (2016). Scottish Transport Statistics - Road Transport Vehicles (2014)
http://www.transport.gov.scot/report/scottish-transport-statistics-no-34-datasets-8914
[20] 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
[21] Scottish Government (2017) Sustainable Development. http://www.gov.scot/Topics/Environment/SustainableDevelopment
[22] Scottish Government (2017). National Indicators - Reduce traffic congestion.
http://www.gov.scot/About/Performance/scotPerforms/indicator/congestion

necessary to make meaningful changes to congestion. It is important to note that the Policies and Proposals for decarbonising private vehicles will have no impact on alleviating congestion.

4.4 Air Pollution

Policies focusing on promoting the uptake of ULEVs & electric cars, if successful, will help to reduce local air pollution. Doing so will help to improve public health and make urban areas more pleasant in which to spend time. Should the Proposals for LEZs and WPLs be implemented, these could make significant contributions to improving air quality. However, whilst these are positive steps, the lack of focus on active and public transport means that one of the simplest and most effective means of reducing air pollution has been largely ignored.

4.5 Public Health

The CCP largely fails to address the significant potential of sustainable transport in improving public health. Increasing the number of journeys made on foot or by bike is one of the simplest ways to improve public health and keep people active. Even using public transport can have health benefits, as most people will typically walk or cycle to get a bus or train. Given the Government's acknowledged need to improve public health, the lack of focus and specific Policies in the CCP on increasing rates of active and public transport is a huge missed opportunity. The heavy focus on decarbonising private vehicles will have no impact on improving public health, as this will do nothing to encourage people to travel actively.

5. Recommendations

5.1 Stronger policies on modal shift to active travel at the local level

In its final form, the CCP needs to give much more focus on utilising active travel, particularly for shorter journeys. Given that 47% of journeys under 2 miles are still taken by car,[23] there is a huge opportunity to reduce emissions from short journeys. Specific Policies need to be put in place to reduce the number of journeys being made by car, and actively encourage people to walk or cycle for shorter journeys and travel by bus or rail for longer journeys. The CCP should include a commitment to have at least one high-quality, fully segregated cycle route in each Scottish city by 2020. Meanwhile, by 2030, all main roads should be provided with cycle facilities of a quality alongside the best in Europe.

5.2 Increased investment in bus priority measures

The CCP also needs to include stronger commitments to increase bus and rail patronage and reduce journeys made by private car. 55% of journeys under 5 miles are taken by car,[24] which represents a huge opportunity to move people onto public transport whilst reducing carbon emissions. This would also improve air quality, reduce congestion, and help to promote sustainable economic growth by supporting Scotland's bus operators and manufacturers. The CCP should include a commitment to increase investment in bus priority measures to incentivise the use of public transport, particularly in urban areas.

5.3 Commit to implementing demand management

In order to make any meaningful progress with demand management, the Proposals for LEZs and WPLs need to be upgraded to Policies. In particular, the Scottish Government needs to commit to introducing new legislation as part of the forthcoming Transport Bill to allow Local Authorities to introduce WPLs. Only by committing to implementing these schemes can the Scottish Government expect to see reductions in carbon emissions, congestion and air pollution in cities and towns. If the

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[23] Transport Scotland (2016). Travel and Transport Statistics, SHS data.
http://www.transport.gov.scot/statistics/transport-and-travel-scotland-all-editions
[24] Transport Scotland (2016). Travel and Transport Statistics, SHS data.
http://www.transport.gov.scot/statistics/transport-and-travel-scotland-all-editions

Scottish Government wish to implement Workplace Parking Levies then Local Authorities need to be granted the powers to do so, as they are not able to do so under current legislation.

5.4 Air-Rail Substitution

More focus needs to be put on promoting rail as the primary choice for long distance journeys within Scotland and the UK. We want to see the Scottish Government commit to ensuring that all Public Bodies commit to using rail instead of aviation for travel to London or the south of England.

6. Summary

The third Climate Change Plan is an improvement on past Climate Change Plans in that there are a number of Policies set out, which was not the case in RPP2. We welcome the target of a 31% reduction in carbon emissions from transport by 2032, which is a realistic target to reach over the next 15 years.

However, there are clearly key areas which the CCP has failed to address. There is a serious need to shift the focus from private car use to using more sustainable modes of transport. In summary, the CCP is:

- Too dependent on technology and factors outwith the Scottish Government's control
- Too reliant on Proposals to reach some of the Policy Development Milestones
- Lacking in focus and specificity on the need for modal shift to active travel and public transport