

RURAL ECONOMY AND CONNECTIVITY COMMITTEE
SUPPLEMENTARY SUBMISSION FROM CARPLUS BIKEPLUS
THE DRAFT CLIMATE CHANGE PLAN (RPP3)

We are commenting on the transport section of this draft Climate Change Plan.

We are disappointed at the extent to which it focuses on low emission vehicles, which are traffic nonetheless and produce emissions in their manufacture and decommissioning, as well as having negative impacts on the number of people walking and cycling. We believe the transport section of the Climate Change Plan should focus much more on the other, more important, elements of the travel hierarchy, such as reducing demand and facilitating active travel and public transport. Supporting inclusive economic growth should be achieved by improvements to bus and rail services, and creating attractive towns and cities which will benefit citizens of all ages and abilities, not just those who can drive.

The Plan should recognise that road congestion is a tool to be used as a disincentive to private car use and, with electric vehicles and stop-start technology meaning that emissions are not increased in slow-moving traffic, reducing road congestion has no environmental benefits. Nevertheless, there should be an ambition to reduce the number of cars on our roads, in order that this valuable public space can be reallocated to pedestrians, cyclists and buses. Levels of congestion are likely to remain consistent.

We note that the abatement in emissions from market-led technological change is estimated to be 2.5MtCO₂e (19%) by 2032, while the target is 4.2MtCO₂e (32%). This leaves 1.7MtCO₂e (13%) to be achieved by behaviour change alone, and we do not see sufficient policies or proposals in this Plan to support this.

About Carplus Bikeplus

Carplus Bikeplus is a not-for-profit, environmental transport organisation that promotes accessible, affordable and low-carbon options in shared transport, as alternatives to traditional car use in the UK. While recognising the benefits that cars can bring to society, we believe that a new approach to car use and ownership is needed in order to mitigate the financial, environmental, social and health costs of motoring today.

We are the national accreditation body for car clubs, car sharing and shared bike schemes in the UK and co-ordinate annual data collection and research for the sector. In Scotland we provide technical and financial assistance to support the development of car clubs in urban and rural communities across Scotland through the Transport Scotland funded Developing Car Clubs in Scotland (DCCS) programme.

More information can be found on our website: www.carplus.org.uk.

Recommendations

We would recommend the following changes:

9.2.1: After “As historically...people”, add “if significant action is not taken.”

9.2.1: Change “Together with behaviour changes...significantly” to “Together with behaviour changes and demand management, this will reduce emissions significantly.”

9.2.5: Add “Abatement of a further 1.7 MtCO₂e must be achieved by behaviour change actions in order to meet the 32% target reduction.”

9.2.10: Change “suggests that technological change will be transformational, significantly reducing emissions, despite economic and population growth. Supporting such a change remains a key priority” to “suggests that technological change will not be sufficient, and behaviour change interventions are also required.”

9.2.11: We suggest that behaviour change is also significant in aviation, particularly for domestic flights which can be easily substituted for rail travel.

Add an extra paragraph before 9.2.13: “Walking and cycling will be the preferred transport options for urban journeys of under 5 miles. Shared transport will be increasing in popularity: car clubs will be available in the majority of towns with a population of over 20,000, enabling significant reductions in car ownership levels.”

9.2.14: Add “Reallocation of road-space in urban areas will make neighbourhoods safer and more attractive places to live and work.”

9.2.18: We strongly support this paragraph which touches on ways to encourage behaviour change to more sustainable modes of transport. However, the aim of reducing congestion should be removed as, with the implementation of new

technologies, there are no emissions benefits from reducing congestion, and slower traffic speeds make cycling and public transport more attractive options. We suggest rewording to “Other measures such as parking policies, maximum parking standards, workplace parking levies, support for car clubs, bus lanes and core path networks will also incentivise public transport and active travel as well as contributing to improved air quality”.

Add additional paragraph: “Business ‘grey fleet’ use should be discouraged so that commuters do not feel obliged to bring their cars into the workplace. This can be incentivised by working with the UK government to reduce the HMRC rate for mileage claims, and encouraging uptake of car club membership to supplement business pool vehicle fleets. “

9.2.20 If a key goal is to make the population more active, this plan should place a greater focus on active travel and demand management for road transport: increases in road traffic will only act to discourage active travel. Suggest rewording to “By 2050 Scotland will be free from harmful tailpipe emissions from land transport, due to technological improvements and significant behaviour change away from private motor vehicle use, resulting in a healthier, more active population.”

Policy outcomes

Add in an additional policy outcome as Number 1: “Stabilise and then reduce demand for travel, and motorised road transport in particular.” This could be followed by a range of proposals, such as:

- Strengthen the ‘Town Centre First Principle’ to apply to private as well as public sector organisations, to encourage investment in town centres and help communities thrive
- Ensure that the travel hierarchy in Scottish Planning Policy 17 (para.35) is fully implemented in new developments: in order of priority: walking, cycling, public transport, motorised transport
- Promote maximum parking standards in accordance with Scottish Planning Policy 17 (para. 8-17)
- Enable and support Scottish local authorities to easily introduce workplace parking levies to discourage commuting by private car

- Set 20mph as the default speed limit in urban streets

Move Policy Outcome 8 to number 2 (below demand management), to reflect the travel hierarchy.

Under policies which contribute to the delivery this outcome, add:

- Active travel: maintain or increase funding for infrastructure and behaviour change programmes to 2032 (*not 2021*)
- Require new developments to fund locally (as appropriate): a car club, public bike share schemes, public transport, and/or walking and cycling routes.
- Require that public transport, walking and cycling are prioritised over driving within urban areas
- Set 20mph as the default speed limit in urban areas.

Under policies which contribute to policy outcome 2, 6), add at the end, “including by supporting the use of EVs in car clubs, which widens the audience who have access to EVs.”

In Policy Outcome 1, as well as supporting fuel efficient driver training, there should be support for technologies which enforce fuel-efficient driving e.g. in-car speed limiters, average speed cameras, stop-start technology.

Under proposals which contribute to the delivery of Policy Outcome 2, 4), add at the end, “This should include working with local authorities and procurement agencies to introduce a presumption towards public sector fleets being made available to the public wherever viable (e.g. in large town centre locations) through, e.g. car clubs.”

Policy Outcome 4 should include an ambition to increase bus passenger numbers (or can be added as an additional policy outcome). This can be achieved by policies such as support of bus lanes to improve reliability, improving dissemination of bus times, better integration of buses with each other and with trains.

It is disappointing that 9.3.6 suggests that the bus sector is unable to absorb significant new traffic and we suggest that with the right support, e.g. bus lanes and bus priority measures providing faster journey times, the sector would grow more profitable and increase capacity.

9.4.8: delete “congestion and” as reducing congestion should not be an ambition of the climate change plan. Change “Active travel and lift sharing” to “Active travel, lift sharing and bike sharing”.

On P89, please update the figures on car clubs to reflect those most recently collected (in January 2017), as follows:

“There are car clubs in 31 locations within 19 local authority areas. There are over 11,000 members across Scotland, with access to 342 vehicles. 22% of the Scottish car club fleet is electric.”

Carplus Bikeplus

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