

## RURAL ECONOMY AND CONNECTIVITY COMMITTEE

### SUBMISSION FROM SESTRAN

#### THE DRAFT CLIMATE CHANGE PLAN (RPP3)

1. Thank you for the opportunity to provide evidence to the Rural Economy and Connectivity Committee on your scrutiny of the Scottish Government's Draft Climate Change Plan: the draft third report on policies and proposals 2017-2032 (RPP3).
2. The South East of Scotland Transport Partnership (SEStran) is a Regional Transport Partnership under the Transport (Scotland) Act 2005. Our vision is:  
  
*"South East Scotland is a dynamic and growing area which aspires to become one of northern Europe's leading economic regions. Essential to this is the development of a transport system which enables businesses to function effectively, allows all groups in society to share in the region's success through high quality access to services and opportunities, respects the environment, and contributes to better health."*
3. Given the timescales for submission of evidence, we have been unable to table a report for agreement by the Board of SEStran and therefore this response is the initial views of the Partnership Director.
4. The ambition of the RPP3 is welcomed, as is the recognition of the role of RTPs. I feel there is a clear potential role in taking a new wider regional approach to tackling the challenges for the transport sector to deliver sustainable aggregated responses to certain transport-related climate change challenges.
5. An initial view of officers is that the draft RPP3 focuses predominantly on emissions reduction via supply side interventions. It would be welcomed going forward to also consider in greater detail a wider range of potential demand side interventions and the impact these could have on potential latent demand for transportation generated by the long-term achievement of inclusive growth in Scotland which may continue for the near future to generate unsustainable travel practices prior to the impact of supply side policies and proposals outlined in RPP3 being able to generate the emissions reductions planned for them. It may also generate externalities in terms of congestion with economic albeit much reduced environmental externalities in future years, which could impact on economic performance and the resultant ability to resource further emissions reduction proposals and policies.
6. While it is welcome to see within the draft RPP3 a focused policy on ULEVs, SEStran would encourage a greater discussion of workplace parking charges for all vehicles. Further, in terms of LEZs moving forward it would be useful to understand if councils will be able to charge, in order to cost recover, for LEZs given the potential magnitude of resources involved and as a further measure to alter behaviour alongside any access restrictions. It may also be appropriate to renew and revise strategic regional approaches to parking and demand restraint policies in order to strategically plan for the reduced boundary effects and therefore it would seem appropriate to reference RTPs as delivery partners. If LEZs are focussed on air quality and modal shift outcomes then it will be important to take a whole system approach to their implementation.

7. Within the Plan many actions require preventative spend and it is good that the co benefits section recognises this resourcing issue and observes it will bring benefits to healthcare budget. It also perhaps highlights the need to develop a strategic model of co-production of such transport policies and proposals to enable benefits to be realised and enable commitment to policies such as interest-free loans and active travel beyond 2020/21.
8. The draft RPP3 makes welcome references to the need for further engagement with public sector run partnerships such as SEStran freight quality partnerships. It would be welcome in the final document if greater reference could be made to Freight Quality Partnerships<sup>1</sup> run by RTPs and the potential for them to be involved in delivery of the outcomes required by various policies and proposals. Especially given the previous and future research ambitions of SEStran on green logistics and distribution centres<sup>2</sup>.
9. We welcome the recognition of Intelligent Transport Systems within the document and would be keen to see any ITS strategy also cover the wider aspects of ITS. We currently run a Real-Time Passenger Information system<sup>3</sup> to seek to enable passenger confidence in using public transport. If future policies and proposals seek to encourage and enable a modal shift, it will be vital to cover maintenance and long term resilience of those systems as part of an ITS response to future travel demands. It will also be welcome if such a strategy could consider the costs of such maintenance and resilience of such systems.
10. On the proposals within the Transport Chapter, we would comment that RTPs could deliver greater efficiency and reach if we had greater access to funding such as Smarter Choices, Smarter Places alongside our constituent councils. In recent months for example we have just concluded a report entitled X-Route<sup>4</sup> with YoungScot investigating young people's attitudes to active travel and potential barriers to its uptake. Given the timescale of RPP3 many of the respondents to this report will be established commuters by the end of 2032 and many of the report recommendations highlight the need to engage and embed confidence to enable travel behaviour change for the long term. Certainly, an eye-catching result of the survey was that 75% of respondents hadn't heard of the term "active travel", which highlighted the need to manage our messages to young people better when seeking to initiate behaviour change.
11. In the context of our work on X-Route and other sustainable travel initiatives, we recognise clearly the significance of 3 of the 10 key behaviour areas outlined in RPP3 relate to transport behaviours. Furthermore, that 30% of consumption emissions associated with individuals and households relate to transport. Therefore, whilst current progress is welcome on active travel and low carbon transport, we need to continue to make significant progress within the transport sector going forward and we recognise that RTPs must play our part in delivering these outcomes.
12. The draft Climate Change Plan also makes welcome reference to the availability of trip-sharing. We would invite further promotion of trip sharing in the final RPP3.

---

<sup>1</sup> <http://www.sestran.gov.uk/news/30/minister-launches-sestran-freight-quality-partnership/>

<sup>2</sup> <http://www.instituteforsustainability.co.uk/lopinod.html>

<sup>3</sup> <http://www.bustrackersestran.co.uk/>

<sup>4</sup> <http://www.youngscot.net/getting-active-with-xroute/>

Given the predicted increase in population we will have to balance supply side measures with demand restraint to achieve emissions goals. SEStran has a successful and ever-growing Liftshare scheme<sup>5</sup> and it would be welcome if further proposals and policies could be considered in the final RPP3 alongside a recognition of the role of RTPs in promoting it. The increase in lift-sharing opportunities could have a related co-benefit in terms of potential inclusion and accessibility impacts across urban-rural geographies.

13. We welcome the ambition for Scotland to have reduced transport emissions by over a third by 2032 and with almost complete decarbonisation of the Scottish economy by 2050. This will be a challenge for all sectors but especially in our view transportation given long-standing behavioural habits, current fuelling technologies and long lead-in times for consumer purchasing habits to change in terms of asset renewal if targets, such as 40% of ULEVs by 2032, are to be realised. It is highly possible to achieve, given current rates of fleet renewal, however it requires significant and quick consumer buy-in and ability to purchase such ULEVs. There will need to be a clear focus on financing routes for households and SMEs.
14. In terms of the companion draft Scottish Energy Strategy it is recognised that there is a clear pick up in terms of ULEVs registered in Scotland but there is still a significant gap between that figure and other conveniently fuelled vehicles. There is a requirement for clear public leadership on this matter to drive behavioural change and instil in all consumers that they can confidently buy and drive ULEVs over the next 10-15 years. This will be critical if transport is to meet its share of the 2030 “all-Energy” target outlined in the draft Strategy. We welcome the balance outlined in the Strategy between Hydrogen, Electricity and Fuel Cells, as across the SEStran region, transport in the future may be fuelled in different manners dependent upon the urban or rural geography in question.
15. Further, we would comment that a lot of consumer confidence could be engendered by proposals for a Government Owned Energy Company (GOEC) working with regional or local stakeholders to equalise current short-term fluctuations in the pricing of transport fuelling due to global market conditions and also any price differentials as the outcome of geography e.g. current enhanced price of oil-based products due to transportation costs.
16. However, the draft Strategy and RPP3 focus on reducing the emissions impact of individualised modes of transport must not implicitly or inadvertently be allowed to strategically promote greater use of individual motorised modes over collective or active modes and so potentially contribute to the further decline of bus or rail modes of transport. There is a potential equity impact on those who in the future, despite interest-free loans, can't afford or access for other reasons individualised ULEVs. Alongside any equality impact, these ULEVs could still have externalities around economic and social impact e.g. congestion, albeit the environmental externalities of their carbon emissions would have been greatly reduced.
17. The Draft Energy Strategy also ends with a commitment to work with Local Authorities moving forward which is welcomed in terms of co-design principles. However, in terms of transport we would suggest that RTPs would offer a clear

---

<sup>5</sup> <https://liftshare.com/uk/community/sestran>

route for delivery of regional low-carbon outcomes and would be grateful if the final strategy made a similar commitment to work with RTPs on the issues of transport energy moving forward.

18. In conclusion we would welcome further discussion, in co-design terms, on policies that look at hypothecation of revenues back to further transport projects to deliver improvements to collective modes of transport and also resource the maintenance and adaptation of our existing networks to climate change and increased demand. At present it would appear that the RPP3 strategic approach is very much focussed on a supply-side revolution of fuelling of vehicles but if the incentives outlined in the document are not sufficient to change certain long-standing behaviour patterns, it may also be prudent to ensure that RPP3 also have policies and proposals to restrain demand in terms of equitable and re-distributive schemes.
19. That comment notwithstanding SEStran welcome proposals for access limitation policies for certain vehicles e.g. Low Emission Zones and would welcome further discussions with Scottish Government over how these can be resourced and rolled out over the period of 2017-2032. We also recognise the co-benefits such policies could have for air quality and healthier outcomes for Scotland, as well as their demand management impact on transport choices towards potentially greener and more sustainable modes of transport and distribution
20. We would be happy to provide further information to your Committee if required on any of the points raised and plan to submit a further response to the draft RPP3 itself after consideration by SEStran's Board on 2 March to Scottish Ministers.

SEStran  
1 February 2017