

**RURAL ECONOMY AND CONNECTIVITY COMMITTEE****TRANSPORT (SCOTLAND) BILL****SUBMISSION FROM CLACKMANNANSHIRE COUNCIL****Transport Bill****Roads and Transportation Response****Clackmannanshire Council****Low Emission Zones (LEZ)**

Clackmannanshire Council recognises that transport emissions have a significant impact on local air quality issues. In principle a LEZ which enhances local air quality issues, without creating any unintended consequences in adjacent local areas is welcomed. However there are concerns that the full impact of implementing a LEZ has not been fully considered, especially the impact on adjacent areas and for the travelling public from areas well outwith the LEZ and its surrounding communities.

Our main concerns relate to the following:

- Increased traffic volumes on adjacent areas as traffic diverts from the LEZ and how this is managed or minimised.
- The cost and availability to retrofit or upgrade to a compliant vehicle, especially for those who do not drive in the LEZ on a regular basis
- Impact on those facing transport poverty and fare inequalities
- Road safety issues on the surrounding areas due to increased traffic volume or by increasing speeds in the LEZ itself as a result of decreasing traffic volumes.
- Cost of implementing a LEZ in light of the Government's objective to move towards all new vehicles being electric or plug in hybrids by 2032. As more vehicles become compliant or cleaner, more vehicles will be eligible to enter the LEZ. After 2040 there may be very few non-compliant vehicles, resulting in the removal of the LEZ entirely. Could more value be found in investing now in public transport, active travel, car clubs and electric charging infrastructure?
- Movement of compliant fleet vehicles, especially buses, from other areas to serve the LEZ.
- Impact on marginal bus services, could see smaller operators forced out of the market. It should be borne in mind that buses are very expensive, built to last and depreciate over many years. The availability and cost of retrofitting technology will be a key consideration for the bus market. However this could lead operators to retrofit rather than replace, leading to lower quality and less safe buses on the road for longer.
- Reassurances are required that the retrofitting technology is fit for purpose and has tight quality control in place, perhaps even regulated.
- Clarification is needed on whether the LEZ will be a financial charge to drive a non-compliant vehicle in the LEZ or a ban and financial penalty. A fine could cause financial hardship to people who may need to drive in the LEZ on an infrequent basis, where they cannot afford to retrofit or upgrade.

- Even clean vehicles will continue to have a negative impact on a LEZ as a result of congestion and road safety. It may be better to consider other solutions such a park and ride, improved public transport services, active travel links and parking constraint.

### **Bus Services**

The ability for local authorities to have more control and influence over the bus market is welcomed. However the new legislation is limited in its scope for a small local authority and Clackmannanshire Council is continually facing reduction of commercial network coverage and frequency. The new powers will be of limited benefit to us and more control and funding is needed to meet the basic needs of our travelling public.

The ability of a council to provide its own bus services may improve how we can deliver local transport in a decreasingly competitive market where there is often very little interest from operators to tender for supported services. However we have concerns on how difficult this will be in practice in an area such as Clackmannanshire, where a council operated service would likely to come into competition with commercial operators, due to a lack of viable alternative routes. The costs involved in setting up a council operated service may also limit the ability of a council to use this new legislation. There is perhaps more opportunity for joint council owner companies being set up. The Regional Transport Partnerships could have a significant role to play in operating these bus services, however the current boundaries would not be suitable for all councils. Clackmannanshire would only find opportunities on a smaller regional basis like the old Central Region of Falkirk, Stirling and Clackmannanshire, due to the existing cross boundary travel and travel to work areas.

The use of franchising may be appropriate for larger council areas or larger regional schemes, where there are already existing profitable bus routes in place. However we would not envisage adopting a franchising approach, due to the lengthy process involved in setting up a franchise and the lack of long term commercial viability of the existing bus network. Franchising would make this unattractive to us as a small local authority.

Information should be provided in a form that is consistent across the whole network and enables passengers to make informed decisions on their mode of transport. This requires all information relevant to a journey to be consistent with that displayed on Traveline Scotland, e.g. times, destinations and cost of travel. This information should then be readily available across multiple formats from paper timetables, on-street timetables (whether printed or electronic), and online through both websites and apps. Efficiencies could be achieved if there were one single mandatory process for operators, requiring them to adopt electronic registration and deregistration of services, linking directly into each council's timetabling system and incorporating notification to the Office of the Traffic Commissioner. This would reduce the amount of time spent updating and checking information together with reducing the potential for errors.

### **Smart Ticketing**

SMART ticketing may benefit the travelling public, especially in joining up journeys and providing alternative payment methods. However in light of how quickly technology is advancing and of the cost involved in setting up a single SMART ticketing system, the use of more standardised and increasingly conventional payments such as 'contactless' may

actually outpace the development and implementation of a SMART ticket. There should be a requirement for all transport operators to implement either 'contactless' payments or SMART ticketing, at minimum cost to the council and the travelling public. Certainly any through ticketing scheme will hopefully make things easier for people travelling on the transport system and may increase patronage by reducing barriers. However clarity will need to be given to the public on how fares are calculated on multi-modal journeys and these fares need to be transparent and fair.