

Climate Change Bill Consultation Response

1. INTRODUCTION

1.1 The Scottish Government launched a consultation on proposals to strengthen the ambition and strategic framework for action to reduce greenhouse gas emissions in Scotland. The proposals for a new Climate Change Bill will amend only those parts of the 2009 Climate Change (Scotland) Act that relate to emission reduction targets and associated reporting duties. SEStran has formed a response to the consultation based on the paper presented to the Partnership Board at the August meeting.

2. SESTRAN RESPONSE

2.1 SEStran welcome the ambition for Scotland to reduce greenhouse gas emissions by at least 90% from baseline levels by 2050 in the proposed Climate Change Bill, particularly the ambition of the proposals. However, there are clear implications for transport in terms of meeting these targets. SEStran would therefore welcome greater consideration of a wider range of potential demand side interventions and demand restraint to achieve emissions goals. The full response which will be submitted by 22nd September 2017 can be found in **Appendix 1**.

2.2 Board members are asked to submit comments on the proposed SEStran response ahead of the 22nd September deadline to allow sufficient time for comments to be included within the response.

3. CLIMATE CHANGE REPORTING

3.1 SEStran also have a duty in regards to The Climate Change (Scotland) Act 2009. Further to the Act, in 2015 the Scottish Government introduced an Order requiring all 150 Public Bodies who appear on the Major Player list to report annually to Scottish Ministers on their compliance with the climate change duties. SEStran is included on this list and will submit a report later this year.

3.2 SEStran Officers have begun collating evidence for SEStran's Public Sector Climate Change Duties Report 2017 which will be submitted by 30 November 2017. Some examples are as follows:

- In the financial year 2016/17, SEStran Tripshare contributed to 645.93 tonnes of CO₂ reduction and 1.69 tonnes of NO_x reduction.
- Staff travel for SEStran business in the financial year 2016/17 amounted to 7138.17 kg CO₂ equivalent which is a reduction of 26% from the previous year, largely due to a reduction of Domestic Flights.

4. CONCLUSION / RECOMMENDATIONS

- 4.1 The paper seeks to invite comment from the Board on the proposed Climate Change Bill Consultation response ahead of the submission deadline of 22nd September.
- 4.2 The Board is asked to note that SEStran will be submitting a report to Scottish Ministers relating to our Public Sector Climate Change Duties by 30th November.

Catriona Macdonald
Projects Officer
11th September 2017

Appendix 1 – Climate Change Bill Response

Policy Implications	The proposed Climate Change Bill could deliver significant change to the transport policy context through a more ambitious national target.
Financial Implications	Need for significant infrastructure and new technology.
Equalities Implications	Moving to electric cars could impact on certain socio-economic groups.
Climate Change Implications	Need for further action to increase modal shift and decarbonise the transport sector. SEStran will be submitting a Climate Change Duties Report which will be used to benchmark progress from the previous year.



Area 3D (Bridge), Victoria Quay, Edinburgh, EH6 6QQ, Tel: 0131 524 5150

Item 12(a) Appendix 1

Climate Change Bill Consultation
Scottish Government
3J South
Victoria Quay
Edinburgh
EH6 6QQ

12th September 2017

Dear Sir/Madam,

Climate Change Bill Consultation

I write on behalf of SEStran, the statutory Regional Transport Partnership (RTP) covering eight local authorities in the South East of Scotland. The area covered is diverse in both geographical and socio-economic terms, and includes City of Edinburgh, Falkirk, Fife, Midlothian, East Lothian, West Lothian, Scottish Borders and Clackmannanshire.

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.”

SEStran welcome the ambition for Scotland to reduce greenhouse gas emissions by at least 90% from baseline levels by 2050 in the proposed Climate Change Bill.

Due to the current rate of change and as transport has made less progress relative to other sectors since the 1990 baseline, the proposals will exert a significant amount of pressure on the transport sector to decarbonise and modally shift current mobility patterns. 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 are to be realised.

The draft RPP3 published in January 2017 envisaged a future where transport emissions will have reduced by around a third by 2032, through the wide-scale uptake of low carbon vehicles, enhanced freight logistics and measures

such as low emission zones. However, the CCC highlighted there has been less progress on reducing transport emissions relative to other sectors. In 2014, transport emissions (including those from international aviation and shipping) amounted to 12.9 MtCO₂e, marginally below the 1990 baseline figure of 13.3 MtCO₂e. Currently, transport accounts for 28% of total Scottish emissions. Within that long-term profile, we have seen significant reductions more recently: since transport emissions peaked at 14.9 MtCO₂e in 2007, they have fallen year on year by a total of 2.0 MtCO₂e. This is a 13% reduction in seven years. The ultimate goal by 2050 is that Scotland will be free from harmful tailpipe emissions from land transport, with other transport modes decarbonising at a slower pace, resulting in a healthier, more active population.

Given the predicted increase in population we should balance supply side measures with demand restraint to achieve emissions goals. SEStran has a successful and ever-growing Liftshare scheme and it would be welcome if further proposals and policies could be considered 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. However, the Draft Energy 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. The increase in lift-sharing opportunities could have a related co-benefit in terms of potential inclusion and accessibility impacts across urban-rural geographies. 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.

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. For example, SEStran recently submitted a response to the Consultation on Improving Parking in Scotland, and advocated for an investigation into the potential for workplace parking levies (WPL) in certain urban areas, to be brought into Scottish Law. With the focus on employers, rather than employees, being responsible for paying any WPL charge,

although employers can choose to reclaim part or all of the cost of the WPL from their employees as part of a travel plan

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 Energy Strategy and the 90% reduction target in the proposed Climate Change Bill. SEStran welcome the plans to promote ULEVs and phase out the need for new petrol and diesel cars and vans by 2032, laid out in the newly published Programme for Government. Similarly SEStran supports the plans to introduce low emission zones in Scotland’s four biggest cities by 2020 and into all other Air Quality Management Areas by 2023 where the National Low Emission Framework appraisals advocate such mitigation.

In terms of transport, SEStran believe that Regional Transport Partnerships offer a clear route for delivery of regional low-carbon outcomes and will engage with others to co-design on policies that deliver improvements to collective modes of transport and resource the maintenance and adaptation of existing networks to climate change and increased demand. Transport Scotland funding to Regional Transport Partnerships is a welcome contribution, however further resource would extend our ability to do more in relation to climate change mitigation and adaptation, enabling greater capacity to deliver on Scotland’s ambitious targets.

To conclude, we welcome the proposals laid out in the consultation document, particularly the ambition of the proposals. However, there are clear implications for transport in terms of meeting these targets. SEStran would therefore welcome greater consideration of a wider range of potential demand side interventions and demand restraint to achieve emissions goals. If you require any further detail on any of the points raised above, please contact myself at catriona.macdonald@sestran.gov.uk or 0131 524 5150.

Yours Faithfully,



Catriona Macdonald