

SUBMISSION FOR NET ZERO, ENERGY AND TRANSPORT COMMITTEE

Sustrans Scotland, March 2023

About us

Sustrans is the charity making it easier for everyone to walk, wheel and cycle. Our vision is a society where the way we travel creates healthier places and happier lives for everyone. We are currently delivering a wide range of projects in Scotland to deliver active travel to our cities and towns, and have had a good relationship with the Scottish Government and Transport Scotland these last years.

Views on CAFS2

CAFS 2 - Actions and themes

Sustrans Scotland agree with the majority of the action and themes proposed in CAFS2. We welcome the recognition of the detrimental effects of air pollution on health: the Royal College of Paediatricians estimated in 2016 that 2,500 premature deaths in Scotland are linked to air pollution.

We also endorse the acknowledgement of the inequalities impact of air pollution, as that those who generate the least air pollution suffer most from its effects. We also welcome the integration of placemaking and air quality. We supported the new National Planning Framework (NPF4) that came into force in February and its inclusion of attention to air quality: *“Development proposals that are likely to have significant adverse effects on air quality will not be supported. Development proposals will consider opportunities to improve air quality and reduce exposure to poor air quality. An air quality assessment may be required*

where the nature of the proposal or the air quality in the location suggest significant effects are likely.”. We reiterate our position that there is a **clear role for the Scottish government to coordinate delivery bodies and align priorities.**

Transport

- Over-reliance on technological solutions rather than modal shift

Air quality strategies tend to have an over-reliance on technological solutions, such as low emission vehicles, to reduce emissions. The use of electric and low emission vehicles is an efficient way to reduce emission from cars, but technological substitution via electrification will not be sufficient or fast enough to transform the transport system and electric vehicles have considerably higher lifecycle carbon emissions per passenger than bicycles or public transport (assuming electrification of trains and buses). In addition, an uptake in electric vehicles will still create congestion and air pollution. If we want the strategy to be successful, there is a need not only to promote active travel and public transport, but also to reduce car use, reduce the convenience and attractiveness of car driving, for example by limiting car access to some roads, or by implementing road pricing solutions.

The Element Energy report (2022) outlines 3 policies that will encourage behaviour change and encourage the switch to more sustainable modes of travel:

- Encouraging the use of active, public and shared transport
- Defining walking and cycling as preferred modes of transport
- Modal shift away from cars that will require a major increase in investment in public transport and active travel

In order to develop these policies, it will be important to integrate public transport with active travel modes: better links between the two modes will be an incentive to take up active travel.

The Climate Change Committee (CCC) notes that private transport rebounded much more quickly and completely following the lifting of restrictions than public transport. The total kilometres driven by cars in 2021 is four times higher than the equivalent distance travelled by rail and bus. Following the CCC’s lead, **we urge the Scottish Government to deliver the routemap to 20% car km reduction. This will help achieve the Scottish Government’s targets to reach net zero CO2 emissions but will have the additional benefit of reducing NO2 air pollution, especially in urban environments.**

- On active travel:

Sustrans Scotland welcome the proposals on active travel, although it is not clear whether these represent new measures or continuation of existing measures. Sustrans Scotland has been consistent in our call for **the provision of safe continuous routes for walking and cycling in line with the sustainable investment hierarchy to help deliver modal shift.**

We endorse the Draft Cycling Framework's **prioritisation of everyday journeys** as they are the ones where the largest benefits from shifting away from the car are to be found. Short car trips contribute disproportionately to emissions and are the most amenable to a modal shift towards active travel, including cycling.

- Role of last-mile deliveries

As mentioned in our previous consultation response, Sustrans Scotland welcome the commitment to collaborate with the freight industry and retailers on 'last mile delivery' approaches. Research shows that use of cargo bikes or e-cargo bikes can reduce congestion in towns and cities and often provide more efficient delivery mechanisms than private vehicles. For example, cargo cycles for deliveries are on average 60% faster than van deliveries, and cut carbon emissions by 90% compared to diesel vans and 33 compared to electric vehicles. E-cargo bikes are not only a convenient delivery method, they are almost zero emissions: Passenger and cargo service provider Pedal Me calculates that deliveries using its e-cargo bikes are over eight times cleaner per kilometre. This even includes the additional food required to feed riders, alongside manufacturing and use emissions.

We would encourage the Scottish Government to **improve delivery infrastructure and create safer conditions for cargo bike deliveries to be developed at a greater scale**. We would also recommend that the Scottish Government consider taxation levers to incentivise e-cargo bike use for last mile delivery.

- Public transport and inequalities

A reduction in traffic and car use has to be equitable, as people who suffer most from the negative effects of air pollution are the ones generation the least emissions. The current

transport system doesn't work for low-income households, as low income neighbourhoods are less likely to be served by buses that meet their needs. This needs to be addressed to ensure an equitable transition to net zero.

Sustrans Scotland welcomes the move to encourage the decarbonisation of bus fleets across Scotland. However, without an affordable public transport network, people will not be encouraged to switch car journeys for public transport journeys. **Modal shift away from the car needs to be encouraged by making public transport affordable and accessible, and ensuring that people have the choice to use the transport mode most appropriate to their needs** – public transport or active travel.

Need for more delivery plans and more urgency

Not enough is being done and Scotland is behind its ambitious net zero targets. On transport, the Climate Change Committee notes that Scotland will not be able to meet its targets. Indeed, it may be the case that Scotland will be surpassed by other parts of the UK in reaching targets.

Most of the actions proposed do not have delivery plans. There are no timeframes on the commissioning and gathering of evidence on the health section, or update on the task group. Sustrans would like to see more evidence of delivery plans. For instance, the 20% car reduction in car km consultation still has not published its results, and **we urge the Scottish Government to deliver the routemap to 20% car km reduction to tackle this issue**.

Governance structure

Sustrans Scotland notes the improved proposed governance. Involvement of a ministerial Group to provide leadership and direction will be of critical importance to the success or otherwise of its implementation. It would be beneficial to outline which Cabinet Secretary or Minister has ultimate responsibility for delivery of Clean Air for Scotland.

CAFS2, while describing actions that Sustrans agree with, is not prescriptive enough for its objectives to be attained. As the Environmental Standards Scotland (ESS) report points out, the current system will not be able to meet the revised EU limits without legal requirement for local authorities.

Views on LEZs

Scotland is facing numerous challenges, in particular the target of a 75% reduction in carbon emissions by 2030, which make zero or ultra-low emission city centres an essential action. LEZs should be employed to help reduce the use of fossil fuel vehicles in towns and cities and across Scotland in its entirety, as well as achieving zero emission city centres.

Banning the sale of petrol or diesel cars after 2030 is an important step in reducing air pollution in our cities and towns, but electric vehicles are not a silver bullet: this needs to go hand in hand with traffic reduction and encouraging modal shift away from private motor vehicles.

Sustrans Scotland welcome the introduction of the 4 LEZs in Glasgow, Edinburgh, Aberdeen and Dundee, but would like to highlight that **their scope may be insufficient**. In Aberdeen for example, the move to enable continued high levels of access to the city centre by non-compliant vehicles is inconsistent with objective 2 (tackling the climate emergency), as modal shift to active and public modes will form a key part of the transition. In Glasgow, some of the exemptions (Historic vehicles and Showman Vehicles) set up a regular, unchecked right of access to LEZs whether or not this is to support a specific need.

In terms of implementation, Sustrans Scotland would have liked to see **shorter grace periods** in Edinburgh, Dundee and Aberdeen. The 3 cities could have followed Glasgow's example of taking forward an LEZ with a split grace period of 1 year for non-residents and 2 years for residents. This would have created greater consistency for users, and accelerate the positive impacts of the different LEZs.

Support for residents to change to a less polluting car will be key to reducing inequalities that LEZs can create. We were glad to see Transport Scotland offering LEZ Support and Retrofit funding to eligible households and businesses.

We know that Low Emissions Zones work, and are an impactful tool in reducing air pollution in cities. However, they are **not a solution that works in isolation**. They should be used in addition to other measures such as traffic reduction, road pricing, improvement of public transport and active travel networks.

International comparisons

International standards

- Guidelines used

While Scotland has internal targets and follows European guidelines, the goals are not aligned with the revised WHO guidelines. Scotland's annual mean NO₂ objective is of 40µg/m³. WHO guidelines are 10µg/m³ annual average, a much lower limit.

Aligning on WHO guidelines, while harder to reach, would also show leadership and taking into account of health.

International case studies

Cities around the world have found solutions to reduce air pollution, via different ways to reduce traffic.

On peak pollution days, Lyon limits the number of cars allowed on the roads: only vehicles meeting certain emission levels are allowed on the roads, the speed limits are reduced by 20 km/h. In addition to this, public transport prices are reduced: a day ticket costs 3€ and allows passengers to travel on the entire network. The city council also encouraged vehicle share and the use of active travel. Paris has a similar policy, with an Antipollution travel pass that cost €3.80 and allows users to travel on the regional public transport network for the day.

Sao Paulo always limits the number of cars allowed on the roads: As traffic got busier and air pollution got worse, the government implemented a curfew system for part of the city based on the last number of a license plate. For each pair of numbers, a weekday is prohibited. For example, vehicles with license plates ending in 1 or 2 can't be driven on Mondays while those ending with a 9 or 0 can't be driven on Fridays.

The city of Madrid implemented many changes to improve air quality in the city centre:

- Creation of pedestrian zones

- Improvement of public transportation with the creation of 2 zero emission main lines, and a new bus fleet
- In 2018, the city created low emissions zone, with vehicles now barred from the city centre
- Parking: the city created discounted parking fees for green vehicles.