

## Consultation on the 20% Reduction in Car Km Route Map

In the Climate Change Plan Update published in December<sup>1</sup>, the Scottish Government committed to a 20% reduction in car kms travelled by 2030. This will be measured on a 2019 baseline, so it isn't impacted by the temporary drop in traffic due to Covid-19.

As transport is Scotland's biggest source of greenhouse gas emissions, with cars making up around 40% of all transport emissions<sup>2</sup>, achieving this hugely ambitious target would go a long way to achieving climate targets across the board.

A huge modal shift from cars to public transport and active travel would also provide a variety of other benefits, from reducing air pollution, increasing physical activity, improving social connectedness and boosting high streets and local economies.

Crucially, the target covers cars of all types. Moving to electric vehicles will help us reduce greenhouse gas emissions, but EVs still cause air pollution, traffic accidents, congestion, transport poverty, and are a preserve of well-off drivers for the foreseeable future. We need to reduce journeys from all cars, no matter the fuel they run on.

The Scottish Government's routemap<sup>3</sup> to achieving the target is currently out for consultation. <https://www.transport.gov.scot/consultation/consultation-on-the-20-reduction-in-car-km-route-map/> From 13th January to 6th April.

Below is a guide to the consultation from Friends of the Earth Scotland.  
For more information, contact Gavin Thomson [gthomson@foe.scot](mailto:gthomson@foe.scot)

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*1. Do you agree with the overall behaviour change approach, and do you have any comments on the four behaviours outlined above? Please explain.*

*Agree*

*Disagree*

*Don't know*

*Please explain your answer*

Agree. The document is right to say that "Individual behaviour change happens in the context of the social and material environments". Fundamentally we want people to have the opportunity to make safer, healthier travel choices. It takes longer, and is more politically costly, to completely remove options open to people but we need to urgently change the social and material environments governing our mode choices.

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<sup>1</sup> <https://www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/documents/>

<sup>2</sup> <https://www.transport.gov.scot/media/45659/sct09199659921.pdf>

<sup>3</sup> <https://www.transport.gov.scot/media/50872/a-route-map-to-achieve-a-20-per-cent-reduction-in-car-kms-by-2030.pdf>

## *2. What are the key opportunities of reducing car kilometres?*

There are a wide variety of benefits to delivering and achieving this target.

Measures such as making it safe to cycle - reducing car kms through modal shift - will also improve health outcomes, air quality and local economies.

Restoring bus routes to abandoned communities, where people were then forced into car ownership, will reduce transport poverty, take cars off the road, and reconnect people to healthcare, employment opportunities and social connections.

Expanding eligibility for free bus travel will also take cars off the road and reduce transport poverty.

The 20-minute-neighbourhoods agenda has the potential to improve community resilience, increase social connections and boost small businesses.

## *3. What are the key challenges faced in reducing car kilometres?*

Recent debates within local authorities over modest active travel schemes have turned toxic, with some politicians making false or exaggerated claims. These toxic debates merely lead to delays and reduced support for measures that are essential.

With the need to cut 75% of greenhouse gases by 2030, we cannot afford delays.

Another challenge we face is that people on lowest incomes often live in areas worst served by public transport and with the least navigable pedestrian and cycling infrastructure. These inequalities in funding allocation need to be addressed immediately before we can expect modal shift.

In considering the challenges in achieving this target, we must look at power and vested interests in our current car-dominated system. Many powerful building developers are intent on building large out of town estates with a 1-car-to-1-resident design. These developers are well resourced to overcome planning objections and have an apparent disinterest in sustainability.

Likewise, out of town commercial developers, retail parks which decimate high streets, and drive-through coffee shops. Many of these developments in recent years should not have received planning approval, so obviously at odds with local needs, but local authorities are not empowered or resourced to challenge.



*4. Are there any further actions you would like to see included in future to support behaviour change 1) - reducing the need to travel?*

The routemap correctly identifies the importance of broadband provision in enabling people to work from home, and reduce commutes. This is particularly important in rural areas where the commutes are longer and broadband coverage is currently insufficient.

*5. Are there any further actions you would like to see included in future to support behaviour change 2) - choosing local options?*

As stated, the 20-minute-neighbourhood agenda has huge potential to help deliver the traffic reduction we need. The routemap rightly identifies NPF4 as the vehicle for delivering much of this agenda, but stops short of specifying any ways in which this will happen. This routemap needs to be more prescriptive and explicit on how NPF4 will make it easier for people to choose local options and ultimately to travel less.

We need robust planning frameworks which prevent out of town developments and car-dependent developments.

*6. Are there any further actions you would like to see included in future to support behaviour change 3) - switching to more sustainable modes of travel?*

The Scottish Government has an admirable commitment for 10% of the transport budget to be spent on active travel by the end of this parliament. However, at present, many councils are accessing very little of the available active travel funding due to political intransigence, and poor policy-making. We need to build support for traffic reduction measures within communities.

Project workers should lead community consultations to ensure local residents steer the just transition away from fossil fuel vehicles. Some areas need more green space, while others need traffic calming measures. Letting communities lead is the only way to achieve this transition fairly and quickly, without toxic backlash and mis-steps which we cannot afford. Local authorities should be given funding for community consultations.

Simplifying the Traffic Regulation Order (TRO) process would make it easier for councils to change road allocation, and introduce small measures to improve safety for all road users.

The Scottish Government must support councils to start new municipal bus operators. These operators can re-start routes and reconnect communities. The Community Bus Fund currently supports councils to use the new powers in the Transport Act, although it is only £1m for this financial year, equating to only around £30,000 per council<sup>4</sup>.

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<sup>4</sup>[https://www.scottishparliament.tv/meeting/meeting-of-the-parliament-continued-january-13-2022?clip\\_start=14:51:40&clip\\_end=14:53:12](https://www.scottishparliament.tv/meeting/meeting-of-the-parliament-continued-january-13-2022?clip_start=14:51:40&clip_end=14:53:12)



For context, Glasgow City Council estimates that franchising Glasgow's bus network - giving much more democratic control - would cost upwards of £4m to set up<sup>5</sup>. There needs to be a step change in support for Scotland's councils to take back their buses.

The Scottish Government's £500m Bus Partnership Fund, for infrastructure such as bus lanes on motorways, is a great start in making bus travel more reliable, efficient, and cost-effective. Scotland sorely needs this investment. This pot should be expanded, with the funding criteria changed to avoid compelling councils into Bus Service Improvement Partnerships (BSIPs)<sup>6</sup>.

The Scottish Government's policy programme with the Scottish Greens proposes some limits on road building. This must be made tangible and legally robust. The billions saved must then be invested in walking, cycling and public transport<sup>7</sup>. This spending must improve pedestrian environments and implement a comprehensive cycle network, while also investing in projects that make active travel open and accessible to all<sup>8</sup>.

As the Annex to the roadmap states: "Walking must become the preferred mode of transport for short journeys".

The recommendations of 'A New Future for Scotland's Town Centres', should be introduced, including a digital tax, an Out-of-Town Car Parking Space Levy, and a moratorium on Out-Of-Town Development<sup>9</sup>.

*7. Are there any further actions you would like to see included in future to support behaviour change 4) -combining or sharing journeys?*

The Scottish Government must work with the UK Government to address the fact that the costs of public transport have skyrocketed, relative to inflation, while the cost of motoring have actually decreased<sup>10,11</sup>.

An increase in the costs of motoring, such as removing the freeze on fuel duty, would encourage people to share journeys. Clearly any increase in revenue to the UK or Scottish Government from motoring must be spent on sustainable transport.

*8. Do you have any comment to make on any of the specific policies contained within the route map?*

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<sup>5</sup> 5.7 <https://www.glasgow.gov.uk/councillorsandcommittees/viewSelectedDocument.asp?c=P62AFQDNZLDXT1NTZ3>

<sup>6</sup> <https://foe.scot/press-release/scottish-government-using-500mill-bus-cash-to-stop-councils-competing-against-private-bus-companies/>

<sup>7</sup> [https://infrastructurecommission.scot/storage/281/Phase1\\_FullReport.pdf](https://infrastructurecommission.scot/storage/281/Phase1_FullReport.pdf)

<sup>8</sup> [https://www.gcph.co.uk/assets/0000/7743/Bikes\\_for\\_All\\_evaluation\\_report.pdf](https://www.gcph.co.uk/assets/0000/7743/Bikes_for_All_evaluation_report.pdf)

<sup>9</sup> <https://www.gov.scot/publications/new-future-scotlands-town-centres/>

<sup>10</sup> P.42. <https://chrgj.org/wp-content/uploads/2021/07/Report-Public-Transport-Private-Profit.pdf>

<sup>11</sup> <https://www.statista.com/chart/24962/change-in-costs-of-uk-public-transport-and-motoring/>



The list of policies in the routemap are all already being delivered. Many of them are clearly effective, laudable and innovative measures, such as lowering the speed limit to 20mph in built-up areas and the expansion of broadband coverage. But to achieve this ambitious target, we will need new measures and a new level of ambition.

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*Equalities*

*1. Do you think that the proposals set out in this plan could have positive or negative impacts on any particular groups of people with reference to the listed protected characteristics?*

*Yes*

*No*

*Don't know*

*Please explain your answer*

The proposals set out in the current draft of the plan, all of which are ongoing Government projects, are too modest to achieve the target. They are unlikely to have particularly positive or negative impacts.

*1a. If you think the proposals will have a particular impact on certain groups due to protected characteristics, what measures would you suggest to maximise positive impacts or mitigate negative impacts?*

*As above.*

*2. Do you think that the proposals set out in this plan could have a particular impact (positive or negative) on island communities?*

*More information*

*Yes*

*No*

*Don't know*

*Please explain your answer*

*2a. If you think the proposals will impact on island communities, what measures would you suggest to maximise positive impacts or mitigate negative impacts?*

*3. Do you think that the proposals set out in this plan could have a particular impact (positive or negative) on people facing socio-economic disadvantages?*

*Yes*

*No*

*Don't know*

*Please explain your answer*

Low-income communities often face higher levels of air pollution and traffic accidents. Traffic reduction can have a positive impact, reducing health inequalities.

People facing socio-economic disadvantages often live in areas worst served by public transport and with the least navigable pedestrian and cycling infrastructure. These inequalities in funding allocation need to be addressed immediately before we can expect modal shift.

*3a. If you think the proposals will have a particular impact based on socio-economic factors what measures would you suggest to maximise positive impacts or mitigate negative impacts?*

Public transport should be made for free for all, paid for from a progressive taxation system and revenue from car journeys.

*4. Do you think the actions proposed in the route map are likely to have an impact on the environment? If so, in what way? Please be as specific as possible in your reasoning.*

*Yes*

*No*

*Don't know*

*Please explain your answer*

There are a number of environmental benefits.

All of the actions proposed in the routemap, while they might not collectively be enough to achieve a 20% traffic reduction, will certainly contribute to the reduction of Scotland's greenhouse gas emissions.

Reduced traffic and reallocated road space in particular, can allow for more greenspace and street trees, leading to greater biodiversity. This can also improve flood prevention and remove surface waters.

*5. Do you have views you would like to express relating to parts of this consultation which do not have a specific question? If so, please elaborate*

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Questions about you and contact info.

End of consultation