



The Scottish Government
Climate Change Bill Consultation
1-G North, Victoria Quay
Edinburgh
EH6 6QQ

Dear Sir/ Madam,

Climate Change Bill Consultation

I am writing to you on behalf of the Confederation of Passenger Transport (CPT). CPT is the trade association for the bus, coach and light rail industries and in Scotland our members run over 90% of the registered bus network.

Buses can play an important role in facilitating Scotland's renewed focus on the climate change agenda. Buses offer the best combination of energy efficiency and space consumption in urban streets. One double-deck bus can take 75 cars off the road, giving a potential annual carbon saving of 67,200kg.

The bus industry in Scotland is committed to providing a clean and efficient fleet for Scotland's passengers and has invested over £450 million in new vehicles over the past ten years. The industry has also been quick to trial new technologies and fund research and development. In May 2006 First switched to using ultra-low sulphur diesel for its Scottish fleet of over 1,500 buses and coaches as part of its aim to minimise First's impact on the environment. In October 2007 Stagecoach began trialling 8 bio-buses in Kilmarnock which run on 100% bio-diesel manufactured from used cooking oil and other food industry by-products, resulting in an expected 82% cut in CO2 emissions.

CPT Scotland welcomes this consultation on proposals for a Climate Change Bill and hopes that the final bill will recognise the role that the bus industry can play and will make positive steps towards tackling congestion and encouraging modal shift.

The Consultation makes the point that hard policy measures, such as those reserved to the UK Government on taxation and regulation of product standards, may have more potential than softer devolved measures to reduce emissions. CPT believes the Scottish Government needs to utilise the devolved powers at its disposal effectively in policy areas such as planning, development and transport to compensate for an inability to amend reserved matters.

There are many measures that could be introduced within devolved policy areas that would make a considerable impact on Scotland's emissions. This consultation needs to focus on what the Scottish Government can do and not dwell on what it cannot.

With regards to transport, the Government can place a renewed impetus on encouraging modal shift through promotion of public transport above private car use. Consideration of public transport at the outset of planning decisions, the limitation of car parking spaces in town centres and shopping outlets and investment in park and ride schemes and enforced bus priority measures are all steps that can be taken to encourage public transport use and limit emissions generated by private car journeys and the associated congestion these journeys bring.

The consultation identifies the need for new technologies to reduce emissions. Bus manufacturers are constantly working towards providing even greener vehicles. Bus manufacture uses modern materials and construction and maintenance techniques that have much in common with aviation engineering. Work is continuing on Environmentally Enhanced Vehicles (EEVs), biofuels and hybrid technology.

As well as setting emissions targets into law, the Government should consider methods to provide funding to bus operators willing to invest in emerging technologies. As with all new technologies there is a financial risk in the form of the initial costs and the ongoing costs of maintenance. Only through the proper funding of the bus industry can the Scottish Government hope to encourage continuing research and development. However, the Government must temper their demands on the bus industry with the realisation that there is a global demand for the latest clean technologies – vehicle manufacturers are limited in the quantity of new vehicles they can provide to operators.

The consultation states that the Scottish Government is addressing the environmental impacts of transport through a package of funded measures that promote more sustainable travel. CPT feels that more can be done by Government. As well as promoting sustainable travel the Government should consider methods to discourage car use. For example, car parking charges should reflect the true impact of motoring on the environment. Rather than removing tolls the Government should be looking at increasing elements of road-charging.

The consultation states, 'the small changes that each of us make are important. Walking, cycling and taking public transport rather than the car when we can.' This message needs to be enforced through governmental actions and funding decisions. To encourage people to leave their cars at home the alternative modes of travel must be made as attractive and reliable as possible.

Local authorities are responsible for funding initiatives such as Statutory Quality Partnerships, Punctuality Improvement Partnerships and Bus Route Development Grant schemes. These initiatives involve local authorities working with bus operators to improve the bus services within the council area; improving reliability and tackling congestion. Such initiatives need to be encouraged to bring about further modal-shift and the associated environmental benefits.

CPT is supportive of the Scottish Government's intent to ensure Scotland reduces its impact on the climate. CPT members are already working to improve the environmental credentials of the industry and hope the Climate Change Bill acknowledges the great importance of the transport sector and dedicates appropriate funding and attention to make Scotland's public transport network an example of best practise for quality and reliability with minimal environmental impact.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Paul White', written in a cursive style.

Paul White
Public Affairs Executive, CPT Scotland