

## WRITTEN SUBMISSION FROM CONFEDERATION OF PASSENGER TRANSPORT UK

Climate Change (Scotland) Bill – Call for Views Transport, Infrastructure and Climate Change Committee

The Confederation of Passenger Transport (CPT) is the trade association for bus, coach and light rail operators across the United Kingdom. In Scotland our members run over 90% of the registered bus network. CPT has already submitted a response to the Climate Change Bill Consultation but is grateful for the opportunity to make a further response to the Transport, Infrastructure and Climate Change (TICC) Committee in advance of the Committee's consideration of the Bill at Stage 1.

This response only addresses the questions outlined by the Transport, Infrastructure and Climate Change Committee that are relevant to the interests of our members. The earlier CPT response to the Climate Change Bill Consultation, which gives more detail on areas not specifically referred to in the questions outlined by the TICC Committee, is attached as an annex to this response.

Issues on which the Committee is seeking views:

Question 12. The Bill requires the Scottish Government to produce an action plan setting out current and proposed measures to improve the energy efficiency of buildings in Scotland, as well as measures to encourage behavioural change. What are your views on this proposal?

The Confederation of Passenger Transport (CPT) supports the requirement for action plans to improve the energy efficiency of buildings as well as measures to encourage behavioural change.

Many of the ways in which public transport can aid the Scottish Government in achieving the ambitious targets for the reduction of greenhouse gas emissions were detailed in CPT's response to the initial Climate Change Bill Consultation (Annex 1). However, the business of running Scotland's bus and coach services extends beyond the actual rolling stock. CPT's members are also responsible for the offices and depots they operate from and, to an extent, the behavioural attitudes towards climate change and energy efficiency expressed by staff.

One example of good practice is First Group, who are carrying out a series of initiatives to reduce energy usage from their depots, resulting in a drop in energy usage of 19% since 2004 (The 19% equates to 4,537 tonnes of carbon dioxide). This reduction has been achieved through behavioural changes, new and low cost energy reduction initiatives and investment in heating management systems.

First Group are also in the process of installing half hourly meters at all 600 locations with the energy being derived from 100% renewable sources -including on-shore wind, small scale hydro and biomass. The installation of smart meters will support the company in achieving further energy reductions in their buildings.

Stagecoach has also signed a contract to source most of its electricity requirement for its UK bus operations from renewables. Energy generated from mostly small-scale hydro, as well as on-shore wind and biomass, will provide more than 70% of the company's required supply, with the remainder coming from cleaner, low-carbon sources. Smart meters are also being installed to help cut energy use across its 240 UK sites.

Other operators are following suit by reducing energy consumption through investment in new buildings and workshops, temperature control systems and smart metering; sourcing electricity from renewables; reducing water consumption through investment in low usage/recycling devices; improving waste management by the recycling of passenger, maintenance and office waste and engaging staff in environmental management through training and development.

Public transport is rightly regarded as the greener alternative to the private car. Therefore, it would be remiss of our industry if we were not readily aware of the many ways in which an operator can reduce emissions, cut energy use and encourage behavioural change amongst staff and passengers.

Scottish Government action plans on these subjects would be welcomed to help spread these messages and to give examples of best practice to enable our members to attain the enhanced Energy Performance Certificate mentioned within the Climate Change Bill.

Question 20. Do you have any comments on the Bill?

CPT supports the Minister for Transport, Infrastructure and Climate Change, Stewart Stevenson's view that it is unfeasible to create sectoral targets as the relatively high margins for error would make it difficult to record sectoral progress in smaller sectors accurately.

However, CPT has recently carried out some research that demonstrates the potential value of encouraging modal shift to achieving the Scottish Government's 2030 and 2050 targets:

Carbon Dioxide emissions from the surface transport sector are around 25% of the UK total  
54% of UK transport sector emissions are from cars with bus accounting for 3% and train 2%  
(source: Defra 2007)

Carbon Dioxide emissions from the surface transport sector continue to rise.

Carbon Dioxide emissions per passenger journey from buses and coaches are around one third less than those of cars.

Around 63% of carbon dioxide emissions from cars arise from journeys of less than 25 miles which can readily be made by bus.

Use of public transport helps reduce congestion, which in turn improves road safety and local air quality.

Moving buses produce far less emissions than an idling bus. In fact, increasing average road speed by just a couple of km/h reduces emissions significantly while also increasing reliability and punctuality.

If every bus in the UK took just one more car driver we could save up to 1.2 million tonnes CO2 per annum.

Public transport, by its very nature, is a greener solution. However, operators in Scotland are not resting on their laurels:

The average fleet age in Scotland compares favourably to the rest of the UK and is decreasing further as operators gear up to run full accessible fleets by 2017.

The introduction of the Driver's Certificate of Professional Competence (CPC) means that all bus drivers will receive continuous professional development with training on subjects including how to drive more efficiently and economically. This includes smoother braking, slower acceleration, more efficient gear changes and less idling.

The UK's first bio-buses, which run on 100% biodiesel, are running in Kilmarnock.

Scotland's first carbon neutral bus network is in operation between Fife and Edinburgh; and, Hybrid vehicles will shortly be introduced in Glasgow.

Scotland is really leading the way in several of these areas.

CPT welcomes the Climate Change (Scotland) Bill and hopes that the action plans and guidance that will inevitably follow will take note of the work that Scotland's bus and coach industries are already undertaking and will consider measures to support investment in emerging transport technologies; encourage partnership working with the public sector to improve local bus infrastructure; and promote modal shift.

## ANNEX 1

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