

WRITTEN SUBMISSION FROM LIVING STREETS SCOTLAND

Thank you for the opportunity to give our views on the Climate Change (Scotland) Bill. Living Streets is the national charity that stands up for pedestrians. With our supporters we work to create safe, attractive and enjoyable streets, where people want to walk.

We have been the national voice for pedestrians throughout our 80 year history. In the early years, our campaigning led to the introduction of the driving test, pedestrian crossings and 30mph speed limits. Since then our ambition has grown. Today we influence decision makers nationally and locally, run successful projects to encourage people to walk and provide specialist consultancy services to help reduce congestion and carbon emissions, improve public health and make sure every community can enjoy vibrant streets and public spaces.

Our response to the Climate Change Bill (Scotland) covers seven key points:

- **We welcome and support this bill;**
- **Transport is the key priority area for action to cut emissions;**
- **To achieve the bill's aims, the role of walking in cutting emissions must be recognised;**
- **We believe the bill doesn't go far enough, in three areas in particular;**
- **The Bill must set annual emission reduction targets of at least 3% from 2010;**
- **The Bill must establish a duty on all public bodies to reduce emissions in line with the national targets;**
- **The Bill must include mechanisms for the enforcement of the emission reduction targets.**

We welcome and support this bill

We strongly welcome the principle of Scottish climate change bill and the aspiration to lead the way on reducing climate change emissions.

Transport is key priority for action

In 2006, the Scottish transport sector was responsible for 24.4% of all greenhouse gas emissions. Transport is the main sector where emissions continue to rise: greenhouse gas emissions from the Scottish transport sector rose by 14.3% between 1990 and 2006, whereas all Scottish emissions fell by 12.3% over this same period. If this rise in transport sector emissions cannot be halted in the near future, then **consideration should be given to setting specific targets for the sector.**

Must recognise role of walking in cutting emissions

The VIBAT study¹ by the Bartlett School of Planning at University College London set out to explore ways to reduce UK carbon dioxide emissions by 60% by 2030. It concluded that technological change on its own, even with a very strong push on efficient vehicles and alternative fuels, could not provide the necessary reductions in carbon emissions because of the additional car-based travel to be expected in the future.

Walking can contribute to the modal shift required provided specific policies are put in place. Since the end of the 1980s, the average amount of time spent travelling by car increased by 7% whilst the amount of time spent walking decreased by 20% to 67 hours in 2004. People are also less willing to consider walking for short distances compared to driving by car. In 2000 the proportion of people agreeing they could just as easily walk or cycle as take the car for short journeys was 41% compared with 37% in 2002.

To tackle this decline in walking, Living Streets believes we must create an environment in which walking is more pleasant, less obstructed by vehicle traffic and poor street design and where more jobs and services are in walking distance of people's homes.

¹ Visioning and Backcasting for UK Transport Policy (Bartlett School of Planning, University College London and Halcrow Group Ltd. Department for Transport-Horizons Research Programme, 2004-05). Available at: <http://www.ucl.ac.uk/~ucft696/vibat.html>

The VIBAT study suggested that measures to enable and increase walking as a mode of transport could directly or indirectly contribute to significant reductions in CO2 emissions. The measures and potential impacts are listed below:

Area of focus	Individual measures	Potential reduction in carbon emissions (million tonnes across UK)	
Liveable Cities	<ul style="list-style-type: none"> — higher density urban areas with local centres — upgraded public transport — improved urban design — heavy investment in walking and cycling 	2.4	
Smarter measures	<ul style="list-style-type: none"> — workplace travel planning — school travel plans — personalised travel planning — travel awareness 	2.4	
Ecological driving	<ul style="list-style-type: none"> — slower speed limits, including implementing default 20 mph in residential streets 	4.6	

The Bill must set annual emission reduction targets of at least 3% from 2010

The Bill allows the Government the option of setting emission reduction targets for the crucial period up to 2020 that could barely reduce emissions during this period, despite the fact that all the scientific evidence shows that achieving early reductions in emissions is essential. The interim target (50% reduction by 2030) is not challenging enough; it compares unfavourably with the UK Committee on Climate Change’s Intended budget (42% reduction by 2020). We therefore support the Stop Climate Chaos Scotland recommendation of an interim target of 50% reduction by 2020.

It is imperative that the Bill establish annual emission reduction targets of at least 3% from 2010, not just from 2020, and that the interim target be amended accordingly. An early start in delivering emission reduction would also help focus minds in sectors - especially transport - where emissions are currently rising.

The Bill must establish a duty on all public bodies to reduce emissions in line with the national targets

The Bill fails to place upon public bodies a duty to reduce climate change emissions, providing only that Ministers “may” choose to do so at a later date. Local Authorities especially and the entire public sector generally have a key role to play in achieving the necessary emissions, especially under the new National Performance Framework. The Bill should be amended to establish a duty upon *all* public bodies to reduce emissions in line with the national targets.

The Bill must include mechanisms for enforcement of the emission reduction targets

The Bill contains no mechanisms for enforcement. As such, we question what will make Scottish Ministers (and public bodies) comply with the emission reduction targets that are set. Waste water and drinking water quality are regulated and enforced by specific bodies. This mechanism has proved a successful model in helping meeting targets for water quality, and the meeting of climate targets will require similar levels of scrutiny and sanctions. The Bill should therefore be amended to include measures for effective enforcement of the targets.