

WRITTEN SUBMISSION FROM STRATHCLYDE PARTNERSHIP FOR TRANSPORT

SPT welcomes the opportunity to engage with the Transport, Infrastructure and Climate Change Committee regarding Scotland's leading commitment to climate change. We look forward to working closely with our public and private sector stakeholders in this challenging time to deliver a world class transport system that may contribute significantly to the statutory framework proposed by Government that will result in considerable reductions in greenhouse gas emissions across Scotland.

SPT recognises transport's contribution to greenhouse gas emissions and actively promotes more sustainable transport through the development and delivery of our Regional Transport Strategy. The RTS is available to view or download via the SPT website (www.spt.co.uk), however, copies of all documents are available on request.

In terms of the consultation questions, SPT provides the following comments:

Q1 The Bill creates a statutory framework for greenhouse gas emissions reductions in Scotland by setting a 50% reduction target for 2030 and an 80% reduction target for 2050.

What are your views on the 2050 target and a 2030 interim target proposed in the Bill?

SPT believes that, while ambitious, both the 2050 target (80% GHG emission reduction) and 2030 interim target (50% GHG emission reduction) show that the Scottish Government recognises the need for immediate and sustained action over the long-term to mitigate the impact of Climate Change due to GHG emissions.

Q2 The Bill requires that the Scottish Government sets annual targets, in secondary legislation, for Scottish emissions from 2010 to 2050. It is proposed that these annual targets will be set in batches, the first being for the years 2010 to 2022 inclusive.

What are your views on the setting of targets in batches from 2010 to 2022?

We agree that the setting of batches, with the first from 2010 to 2022, is necessary to ensure that mitigation measures are developed and implemented in the short term.

Q3 The Bill provides that from the year 2020, the annual emissions targets must be set so that each is at least 3% lower than the target for the previous year. Prior to 2020, the Scottish Government has indicated that it intends to set annual targets which build towards delivering emissions reductions of at least 3% each year.

What are your views on this approach or any possible alternative approaches?

SPT agree that this is a suitable approach.

Q.4 The Bill introduces the concept of a "net Scottish emissions account" as a point of reference against which the target for reducing greenhouse gases can be measured. It is defined as the net Scottish emissions plus or minus any carbon units credited to or debited from the account. Any units purchased may be used to offset Scottish emissions. Any carbon units generated in Scotland and sold to customers outside Scotland, count as emissions made in Scotland.

What are your views on the proposals in the Bill relating to the net Scottish emissions account, and should there be a limit on the number of carbon units which Scotland can purchase?

SPT believe the concept of a 'net Scottish emissions account' will provide the essential baseline to which future targets can be measured at national level. We believe that a limit should be implemented on the number of carbon units which Scotland can purchase because

it will ensure that Scotland takes further strides to sustainability through real change rather than offsetting our emissions through fiscal measures. The Scottish Government should also consider implementing a process to further reduce the limit over time to encourage even greater levels of reduction through innovation and working in partnership.

Q5 The Bill defines “Scottish emissions”, in relation to a greenhouse gas, as being emissions of that gas which are attributable to Scotland. The policy memorandum states that “Scottish emissions” are defined as being those greenhouse gases which are emitted in Scotland or which represent the Scottish share of emissions of gases from international aviation and international shipping.

What are your views on this definition of Scottish emissions?

SPT agrees that the proposed definition of Scottish emissions is suitable.

Q6 The Scottish Government has indicated that initially it intends to seek independent, expert advice on climate change from the UK Committee on Climate Change. The Scottish Government states in the policy memorandum that if it determines that the UK Committee on Climate Change does not meet all the advice needed for Scotland, the Bill contains provisions which will allow the Scottish Government to establish a Scottish Committee on Climate Change or to designate an existing body to exercise these advisory functions.

What are your views on the Scottish Government’s approach to obtaining independent, expert advice on climate change?

SPT agrees that provision to obtain independent, expert advice is necessary to ensure that Scotland’s needs are met, particularly since more stringent GHG emission reduction targets than the rest of the UK are being set. Furthermore, it is appropriate that the Scottish Government obtains advice that is fully impartial on prioritisation of actions needed to reach the targets.

Q7 The Bill places duties on the Scottish Government requiring that it reports regularly to the Scottish Parliament on Scotland’s emissions and on the progress being made towards the emissions reduction targets set in the Bill. The Bill sets out details of these reporting requirements.

What are your views on these proposed reporting arrangements?

We agree that the proposed reporting arrangements are fit for purpose.

Q8 The Bill contains powers to allow the Scottish Government, by regulations, to impose duties on public bodies in relation to climate change, to issue guidance to those bodies relating to their climate change duties and to require that they report upon the discharge of those duties.

What are your views on this proposal?

SPT agree it is right to impose duties on public bodies in relation to climate change. However, we recommend that those public bodies should be consulted as early as possible to ensure that those duties, and associated targets, are both realistic and achievable. Furthermore, we recommend that there be a strong commitment from the Scottish Government to provide sufficient financial support to public bodies in order to achieve their agreed targets.

Q9 The Bill places a duty on the Scottish Government to produce a report for Scotland, setting out its objectives in relation to adaptation to climate change, proposals and policies for meeting them and the timescales within which they will be introduced.

What are your views on this proposal?

SPT agree that the proposed reporting arrangements should be introduced.

Q12 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?

SPT believe that the energy efficiency of buildings in Scotland will be an important component in reducing GHG emissions since it is recognised that non-domestic buildings are responsible for nearly a fifth of all carbon emissions.

SPT is committed to improving its environmental performance through the development and implementation of an Environmental Management System accredited to ISO14001. As part of this commitment, we have developed a corporate Environmental Policy Statement that outlines key environmental objectives, including building energy efficiency measures, and how SPT will act to achieve these.

Similarly, SPT seeks to enable behaviour change through initiatives encouraging the use of more sustainable transport options, for example through campaigns, improving bus services, travel planning, and new initiatives such as the recently launched car-sharing scheme, SPT Journey Share (www.sptjourneyshare.co.uk).

SPT therefore agree that the creation of an action plan covering the energy efficiency of buildings and the behaviour change is vital for a co-ordinated approach in Scotland. We would welcome a commitment from the Scottish Government to involve organisations such as SPT in the development and delivery of the action plan, and again, that adequate resources are in place which allow organisations like SPT to deliver on the commitments in the action plan.

Q19 Do you have any comments on the impact of the Bill on sustainable development?

The introduction of the Bill will necessitate a 'step-change' in Scotland's approach to sustainable development. A focus on more sustainable transport options – and investment therein – is vital as part of an integrated approach to achieving targets set. A key part of this will also be the further integrations of transport and land-use planning, particularly for new developments, ensuring that appropriate sustainable transport options are in place and thereby encourage people to leave their car at home, at least for part of their journey. SPT, at a regional level, is working closely with Glasgow and Clyde Valley Strategic Development Planning Authority on the first Strategic Development Plan, both organisations being focused on ensuring a more sustainable approach is taken to development in future.

SPT recognises the vital role that the public sector will play in meeting the targets set by Government.

As a Regional Transport Partnership, SPT understand that we cannot tackle climate change in isolation, and that we must work in partnership with our member councils, other public sector agencies and the private sector (e.g. operators). Public sector financial support can encourage greater levels of commitment from the private sector to improve vehicle technologies that will reduce emissions.

A recent example includes SPT's trial introduction of two state-of-the-art hybrid buses – low floor vehicles converted from purely diesel power to the latest diesel-electric hybrid drive technology. Hybrid-drive buses are powered by a battery pack connected to a small car-sized diesel engine or the existing bus diesel engine running at greatly reduced speed. The buses also use regenerative braking technology as a further energy-saving feature, which recharge the batteries whilst braking. These buses were provided to a private bus operator under contract to SPT. We intend to monitor reduced CO2 emissions, fuel consumption and noise

levels throughout this extensive trial and will communicate the results to industry to encourage greater uptake of newer, cleaner technology.

However, the trial could only have been undertaken through both collaboration and investment from SPT. Therefore, it is essential that the public sector must be fully supported by the Scottish Government to ensure that we continue to lead the way in the implementation of more sustainable transport practices.