

to: mike.stewart@gov.scot, apd@gov.scot
date: 3 June 2016 at 10:18
subject: Air Passenger Duty consultation

I am emailing on behalf of Spokes the Lothian Cycle Campaign, with our comments on [the above consultation](#) and would be grateful if you would confirm receipt.

We fully support the points in [the submission by Stop Climate Chaos Scotland](#), and therefore we will not go into any detail other than briefly mention one or two points specifically related to active travel. The first two bullet points are our top concerns.

In particular...

- **The consultation is seriously flawed** - for the reasons stated in the SCCS submission.
- **The proposal is totally inconsistent with Scotland's climate commitments.** As an organisation concerned with active travel we feel this issue particularly strongly. The government has since 2009 had a 'vision' that 10% of all trips in 2020 will be by bike - an objective reiterated with 'determination' in the manifesto of the leading party in the 2016 Holyrood election. This 2020 figure is embedded in climate targets, for example as a '[milestone](#)' in the RPP. Yet, for the whole of Scotland, the government can find no more than £40m a year, under 2% of the transport budget, to invest in active travel - as a consequence of which the 2020 vision will not be met (and is likely to be missed by a great deal) as confirmed by the independent Parliamentary Information Service, SPICe [[SB-13, pp46-47](#)]. Meanwhile the government is willing to forego £230m-£300m a year to achieve an objective which would be a *reverse milestone* on the path to meeting its legally binding climate targets.
- **The proposal will impact negatively on rail travel** - a mode highly compatible with active travel, the former for long journeys, the latter for short.
- **The proposal is socially regressive** - in contrast, providing for active travel assists all members of the community.
- **Tourism impacts** - if reduced APD is likely to bring more tourists to Scotland, it is equally likely to shift some Scots from holidays at home to holidaying abroad. In turn that is likely to reduce active travel, since it is much easier to have a cycling holiday starting from home or by rail than by plane.

Yours Sincerely

Dave du Feu

for Spokes