

Scottish Government [Traffic Reduction draft Route Map](#)

Comments by Spokes, April 2022

Our comments are in the form of responses to the questions on the consultation website. Text and questions from the consultation website are in [blue](#); Spokes comments are in ordinary black text.

Two-sentence summary of our response:

The draft Route Map contains much good material on the background and need for the 20% car-km reduction commitment, and the 'carrots' to help achieve it. However [see Part 4] it will not be achieved without tougher *and much earlier* steps to restrain car use – the 'sticks' of demand management, which politicians are often reluctant to grasp, but are essential in parallel with the carrots.

Part 1 - The Route Map

The [route map](#) - 'Reducing car travel by 20% by 2030 for a healthier, fairer and greener Scotland' – is a joint publication by the Scottish Government and COSLA and sets out the actions that the Scottish Government and local authorities in Scotland are taking to make it easier for people to reduce their car kilometres through four key sustainable travel behaviours.

These behaviours are:

1. to make use of sustainable online options to reduce your need to travel
2. to choose local destinations to reduce the distance you travel
3. switch to walk, wheel, cycle or public transport where possible
4. combine a trip or share a journey to reduce the number of individual car trips you make, if car remains the only feasible option

QUESTIONS

1. Do you agree with the overall behaviour change approach, and do you have any comments on the four behaviours outlined above? Please explain.

Agree with the 4 above behaviours, and the order in which they are presented.

However, In terms of the behaviour change approach – obviously behaviours have to change, but how is that change to be achieved? Exhortation alone, even with explanations, although valuable, will be quite insufficient to achieve anything like the change needed.

The document itself rightly states, *“Individual behaviour change happens in the context of the social and material environments.”* It is now the responsibility of government to change those environments sufficiently to achieve the 20% car-km reduction; an extremely tough commitment which will require equally ambitious changes in the social and material environment – not least demand management measures including road user charging (in whatever forms Scotland has powers) and reallocation of roadspace – both in traffic lane and kerbside areas.

Furthermore, since there will often be a lag between various types of change in social and material environments and subsequent behaviour change, a lag of possibly months or years for many households, such change must be as early as possible. The approach of trying something mild, waiting to see if it has an effect, and only then doing more, is insufficient for such a tough climate-emergency-based commitment.

2. What are the key opportunities of reducing car kilometres?

The over-riding opportunity, and the underpinning rationale for the 20% commitment, relates to the climate crisis. As the report states, *“Transport accounts for 29 per cent of Scotland’s greenhouse gas emissions, with cars making up 38 per cent of those transport emissions. Carbon-reduction modelling has concluded that **it will not be possible** to reach net zero emissions through technological solutions alone. **Reducing car use is essential** in order for the transport system to be decarbonised at a pace that meets the statutory emissions targets set by the Scottish Parliament.”*

Of course, as the report recognises there are many additional societal benefits to reducing car use. These are well described in the report (1.6) under these subheadings...

- **Reducing inequalities** including “re-prioritising space and investment in streets so that they can be accessed safely and easily by everyone, not just those with access to cars”
- **Delivering inclusive economic prosperity** towards a wellbeing economy; 20-minute neighbourhoods, more local spending, using space-efficient modes to cut congestion
- **Improving health and wellbeing** – tackling community severance, pollution, injury, physical inactivity, inaccessibility, noisy and unhealthy environments

3. What are the key challenges faced in reducing car kilometres?

Several challenges are described in the draft route map (2.1), including...

- Car-km was on a long-term rising trend pre-covid – reversing a trend drastically is difficult
- Public transport is often poor in rural areas – and car trips there tend to be longer

In addition, we point out the following challenges, some of which are self-inflicted...

- Politicians are wary of **demand-management** policies, for fear of electoral consequences. This is one of several reasons why demand-management should be introduced *in parallel with* the incentives to use sustainable modes ... not leaving it to later, as the Route Map intends.
- **Covid** initially caused a major drop in car use, but instead of taking the opportunity to find ways to bake in some of this fall in view of the 20% commitment, the Scottish Government effectively decided to wait and see what would happen. What has in fact happened is that many of those who still travel to work have shifted from public transport to car; whilst for those who work at home the car is available all day to all members of the household. Thus commuter car numbers are approaching pre-pandemic, whilst car use at other times of the day probably now exceeds pre-pandemic. Not only was this a tragic wasted opportunity, but we also have the above *new patterns of car use* to contend with
- The decision to 'wait and see' during covid has also meant that the Route Map is unlikely to be finalised until at least 18 months into the 10-year period from the date of the commitment (December 2020)
- As the report states, trip lengths vary hugely, with the 4% of trips over 55km accounting for 30% of total km. Reducing the number of long trips would therefore contribute greatly to meeting the commitment. Unfortunately, current **road investment priorities** are making long trips by car easier, and short trips more difficult! Car capacity is being expanded on the trunk road network; whereas the local road network, in both urban and rural areas continues to deteriorate, with a pothole epidemic. Whilst local authorities are responsible for the latter, the government nonetheless has the power to redirect road investment, *from* expanding trunk roads in a few parts of Scotland, *to* quality repair of potholes in every village, town, city and rural byway
- In addition to the physical impact and the opportunity-loss of these wrong investment priorities, the **message to the public** is dreadful. *Why spend many £100m's on expanding road capacity to cater for a 20% reduction in car-km??* This gives a very clear message, albeit unintentional, that the government is not serious about the 20% reduction.
- Finally on major road projects – the future programme is justified by outdated assumptions, taking insufficient account of the climate crisis and other changed factors. This is discussed in detail (with English examples) by transport expert Prof Phil Goodwin in [Local Transport Today, 11.2.22](#). And this does not even take account of the already questionable assumptions used, such as the unique “driver frustration” factor used to make A9 dualling attain a sufficient CBA figure [[SPICe 18.2.20](#)]

- There are **extensive delays** to many AT schemes, notably Edinburgh's flagship city centre [CCWEL](#) route, first officially adopted in 2014 but work commencing 2022. There are multiple reasons, but two of the most significant are...
 - The arcane and **antiquated Traffic Regulation and Redetermination Order rules**. We welcome that the government has taken early steps to improve this, more in line with the better English rules. However further steps [some discussed in Q7a Q7c, Q11 [here](#)], which require primary legislation, should also be pursued urgently
 - Whilst we welcome **full public consultation on schemes, it is often taken too far**, with multiple stages – effectively planned delay, and a bonanza for consultants. An example in Edinburgh is [Meadows-George Street](#), which, unlike CCWEL, has *not* suffered many *unexpected* delays but which was first funded in 2017 yet did not plan to begin construction until 2022 (may now be 2023), in part due to an excess of consultations. Whilst less than the CCWEL delay, a five-year timescale is incompatible with rapid car-km reduction policies.
- It is common for people familiar with existing road layouts to **fear the worst and react negatively** when change is proposed. Sadly some politicians or local activists amplify these fears, with exaggerated or unrepresentative claims. The steps below may help minimise such negativity...
 - Public consultations are fully open to opponents (and supporters) to mobilise opinion through existing social networks. This can result in highly unrepresentative outcomes, particularly where large social networks spread misinformation. Furthermore, several local authorities in the UK (including Edinburgh 4.46-4.51 [here](#)) have identified malign attempts to manipulate consultation outcomes through multiple entries. For such reasons, it is vital that consultations are seen as information/ideas-gathering exercises, **not as referenda**.
 - To help ameliorate this known problem, Edinburgh Council commissioned an **independent representative survey** alongside the recent *Spaces for People* public consultation. The survey found support/opposition very different in the two approaches, and the Council rightly placed greatest reliance on the representative survey in deciding to go ahead. Consultation results do of course help reveal reasons for support or opposition, and ideas for changes, all of which can lead to a more successful implementation. Commissioning independent representative surveys is costly, but may be necessary for schemes which are likely to be particularly controversial
 - Under the above-mentioned recent changes to Traffic Orders, Councils can now much more easily introduce **Experimental Traffic Orders** (ETRO) and, if successful after 18 months, make such a scheme permanent without a further standard TRO process. ETROs also allow for modifications to improve a scheme on the basis of experience. This approach of “*try then modify*,” with ETROs, should now be widely used, so the public can see a scheme in operation before commenting on its detail and impacts, rather than consulting on details in the abstract.
- As FOE has pointed out, a major challenge is the **power and vested interest** in our current car-dominated system. To maximise profit, developers tend to prefer large out of town car-based estates and retail and leisure parks, contributing to *rising* car-km. Developers, whether urban or out-of-town, are well resourced to overcome planning objections and their impressive wording on sustainability can be very misleading. As we write, a developer with deep pockets has just appealed Edinburgh Council's decision to [refuse permission for a drive-thru](#) coffee outlet, meaning potentially high legal costs for the Council. *Government regulations should ensure that all developments, and planning application approval criteria, from now on, contribute to, and certainly do not damage, climate objectives and specifically the 20% car-km reduction commitment.*

4. Are there any further actions you would like to see included in future to support behaviour change 1) - reducing the need to travel?

The interventions [3.2] of the route map on digital connectivity and local working and facilities are valuable.

One important way to reduce the need to travel is to bring opportunities to the door. Home delivery means that multiple deliveries are achieved on one journey. However, most home delivery is currently by motor van, and there is scope for government, probably through councils, to do far more to promote, and incentivise, e-cargobike operation. It is similar for many home services, often arriving by car, when ebike is often a realistic but unfamiliar option and would contribute to car-km reduction.

5. Are there any further actions you would like to see included in future to support behaviour change 2) - choosing local options?

We strongly support the Route Map's recognition (3.3) that planning and transport need more closely integrated. Our experience in Edinburgh shows that whilst there have been improvements there is still far to go. Developers (despite their fine words) are often allowed to get away with...

- residential bike storage insufficiently convenient, secure or managed; resulting in reduced bike ownership and/or use
- access routes, through routes and adjacent routes which fail on cycling potential, and which sometimes build in pedestrian/cycle conflict
- individual developments which pay lip service to area plans, and so frustrate cyclist route potential.

In order to encourage people to choose local options, government must...

- **prevent new out-of-town retail, leisure and other developments which attract large numbers of people.** Developer promises to encourage public or active travel will only attract limited numbers to those modes when the location itself militates against their use
- **prohibit car-based in-town developments** (in most cases). A recent case in Edinburgh, for example, shows that developers expect urban drive-thru's to get planning permission, and will appeal if permission is refused. Thus, in effect, current government policy frameworks *support* developers seeking car-based development
- **disincentivise use of existing car-based facilities**, both in-town and out-of-town. One simple approach is a customer-spaces levy on businesses, similar to the workplace parking levy but dependent on the number of customer car spaces provided. Businesses would thus be incentivised to encourage customers to come by sustainable modes and to repurpose sections of car parks, valuable urban land, to expand local services further. A further option is to amend the rates system "so as to reduce rates for town centre uses and increase them elsewhere including for out-of-town uses." Both options, and others, are recommended in the government-commissioned [A New Future for Scotland's Town Centres](#) (70a, 73d)
- **encourage locally-based businesses and facilities**, perhaps via adjusting rates as above - particularly in deprived areas where businesses and services are often reluctant to locate
- **ensure that local conditions for getting about safely by foot and bike are high quality**, and car access and speeds restricted. Whilst such retrofitting is vital, our experience is that even new developments are sometimes allowed to get away with [worsening local active travel routes](#) - because active travel is not taken sufficiently seriously in planning approvals.

Finally, we emphasise most strongly that government must not just issue fine words and pass the sometimes politically difficult onus for action entirely to local councils. Rather, government must itself lead and legislate – for example, powers for a customer-spaces levy, and planning policies which prevent drive-thru's and car-based out-of-town development.

6. Are there any further actions you would like to see included in future to support behaviour change 3) - switching to more sustainable modes of travel?

If the government is really serious about the 20% reduction, we suggest a positive and far-reaching financial incentive which, whilst costly, would make a major contribution – with consequent cost savings in road construction, NHS costs, etc. Namely a 'Freedom of Scotland' card giving free public transport, bike hire, and a bike servicing discount to anyone prepared to forego a driving license. Clearly much discussion would be needed to refine this into a practical proposition fair to essential car users including those in areas of poor public transport. However, at present, people who do not use a car are penalised through high and still-rising fares, whilst fuel duty has been frozen for some 10 years, and indeed recently cut.

Additionally, the draft Route Map has an extensive set of proposed interventions (3.4) for cycling and public transport (walking is covered in 3.2) but several need tightening up, as below...

- **3b – Active Travel Investment** We hugely welcome the commitment to 10% of the total transport budget by 24/25, a level which should enable Scotland to begin to catch up with bike-friendly European countries. However, [we are concerned](#) that the steps towards this figure in preceding budgets are not of equal size, so we are heading for a 'cliff-edge' rise in 24/25, meaning that many councils may not have built up the skills and staffing capabilities to use it to best effect. Some appear relatively uninterested and unappreciative of the potential: government must do more to build policy understanding and technical skills rapidly in such councils. *Secondly*, if most major projects only begin construction in 2025 they will have limited time to contribute to the 2030 commitment. Given this, with an AT budget of £115m in 21/22, and £320m+ promised for 24/25, one would expect £180m in 22/23 and £245m in 23/24; but instead the 22/23 figure is just £150m. A much larger increase, to around £240m, is therefore important in the next budget, 23/24.
- **3c - Active Freeways** This is a puzzling entry as there is no separate Active Freeways line in the Scottish Budget, so we presume that the £50m (over several years) comes from the general 'Support for Active Travel' budget line which is already covered in 3b. Furthermore, £50m over several years seems very inadequate for the ambition in 3c, and is dwarfed by the sums in 3b.
- **3d – Transport of bikes** – it is surprising and concerning that bike-rail is not mentioned. We not infrequently hear of families, and even individuals, who have chosen to travel by car because bike-rail carriage was impossible or too unreliable.
- **3f – LEZs** Whilst welcoming LEZs, we are disappointed at the lack of ambition displayed by our limited-area Edinburgh scheme. For people concerned about toxic pollution, or with breathing difficulties, knowledge that they are in a LEZ may help decisions on active travel.
- **3h – Public transport costs** – these costs are highly significant in choice of travel mode and may be the tipping point which forces some people into unwanted car ownership, which in turn reduces the propensity to travel actively or sustainably. The *Fair Fares Review* is therefore of great importance.
- **3o – Car parking interventions** – The second part of this intervention is perhaps the most significant to car-km reduction since *parking availability and parking cost* influence modal choice, destination choice and car ownership, occupancy and use. However, the proposed action appears to be little more than talking to councils, whereas it is vital that the government itself acts, including, as in (5) above, legislating for levies on car-based developments, adjusting business rates, etc. As regards pavement parking *and double parking*, we are very disappointed at the length of time taken to implement these measures, and also at [the proposed exemptions](#), which would nullify much of the value of the legislation in many places. The draft regulations must be tightened.

7. Are there any further actions you would like to see included in future to support behaviour change 4) - combining or sharing journeys?

- **The biggest incentive to car-share is likely to relate to costs.** Given that petrol is a major and highly 'visible' motoring cost, the recent price rises, if maintained, may incentivise car share between motorists. The Scottish government should argue against any reduction in petrol duty, although a temporary cap at times of extreme rises may be necessary for certain categories of user. However, car share may not always be beneficial to car-km reduction and so should be treated with caution. For example, public transport has become more and more costly in relation to car, and so non-car-owners have a growing incentive to car share with friends or colleagues, representing a *loss* for public transport. This should be considered in the *Fair Fares Review* (Q6 above, para 3h).
- **We strongly support car clubs**, which have been shown to substantially reduce car ownership and trips by participants, and to boost sustainable and active travel. However, bike share schemes should also be mentioned here, and the government should act to ensure linkage, including combined subscriptions for car and bike share.

8. Do you have any comment to make on any of the specific policies contained within the route map?

We have commented on specific policies and interventions in the previous questions.

However there is a fundamental flaw in the draft route map, the lack of urgency or specificity on demand management. This is discussed in Part 4 below.

Part 2 - Social and Equalities

In creating the route map to reduce car kilometres, the public sector equality duty requires the Scottish Government to pay due regard to the need to the following:

- Eliminate discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010
- Advance equality opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a relevant protected characteristic

These three requirements apply across the protected characteristics of:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion and belief
- sex and sexual orientation

The Scottish Government must also include consideration of:

- children and young people (Child Rights and Wellbeing)
- socioeconomic disadvantage, low wealth, and area deprivation (Fairer Scotland Duty)

Section 8 of the Islands (Scotland) Act 2018 (Scottish Parliament, 2018) requires the Scottish Government to prepare an island communities impact assessment in relation to a policy, strategy, or service, which is likely to have an effect on an island community which is significantly different from its effect on other communities.

The current draft impact assessments have been published alongside the Route Map and are available on the Transport Scotland website.

The Scottish Government will consider the responses from the consultation process in determining any actions needed to meet its statutory obligations. Your comments will be considered in the completion of the impact assessments to determine whether any further work in this area is needed

1. Do you think that the proposals set out in this plan could have positive or negative impacts on any particular groups of people with reference to the listed protected characteristics?

The [Equalities, Protected Characteristics, impact assessment](#) makes clear the benefits of the 20% car-km reduction commitment to affected groups, notably the young, the old, women, disabled people and ethnic minorities. This is a further reason for early and determined action to achieve the commitment. We do not believe the measures in the Route Map are sufficient to ensure this – see in particular Part 4 below.

1a. If you think the proposals will have a particular impact on certain groups due to protected characteristics, what measures would you suggest to maximise positive impacts or mitigate negative impacts?

Measures within urban areas (including towns and villages) should be particularly beneficial in making it easier, safer and more pleasant for people with protected characteristics to access nearby facilities.

2. Do you think that the proposals set out in this plan could have a particular impact (positive or negative) on island communities?

Enhancement of local facilities in island communities should enable fewer ferry car trips to the mainland, which would reduce pressure on ferries and the provision of ferry facilities

3. Do you think that the proposals set out in this plan could have a particular impact (positive or negative) on people facing socio-economic disadvantages?

The [Fairer Scotland impact assessment](#) makes clear the benefits of the 20% car-km reduction commitment to economically deprived individuals and communities, who often face higher levels of air pollution and traffic accidents and lower public transport, walking and cycling provision. This is a further reason for early and determined action to achieve the commitment. We do not believe the measures in the Route Map are sufficient to ensure this – see in particular Part 4 below.

3a. If you think the proposals will have a particular impact based on socio-economic factors what measures would you suggest to maximise positive impacts or mitigate negative impacts?

Cycling and walking are the cheapest way to get around, so high quality and secure facilities are vital. It is important that this includes careful thought to the sometimes difficult problem of secure overnight bicycle storage for households. Availability of bikes, whether individually owned or in shared-use schemes, is also vital, since for people in dire economic straits even the cost of a second hand bike can be problematic. Finally, people with protected characteristics living in economically deprived areas may need access to particular types of equipment including adapted bikes and child-carrying/ luggage-carrying machines such as cargobikes.

Part 3 - The Environment

The Environmental Assessment (Scotland) Act 2005 ensures those public proposals that are likely to have a significant impact on the environment are assessed and measures to prevent or reduce adverse effects are sought, where possible, prior to implementation.

1. Do you think the actions proposed in the route map are likely to have an impact on the environment? If so, in what way? Please be as specific as possible in your reasoning.

The draft [Route Map](#) itself and the associated [technical annex](#) make clear the benefits of the 20% car-km reduction commitment to the environment. Indeed the primary motivation for the commitment is the over-riding environmental issue facing our world – the climate crisis; with the worsening position and the high probability of missing 1.5 degrees highlighted in the 2022 [IPCC](#) Sixth Assessment Report. This is an overwhelming reason for early, determined action to achieve the commitment. We do not believe the measures in the Route Map are sufficient to ensure this – see in particular Part 4 below.

Part 4 - Other Comments

1. Do you have views you would like to express relating to parts of this consultation which do not have a specific question? If so, please elaborate

a. The 20% commitment is extremely ambitious, and hence very bold action is needed

The Scottish Government 20% car-km reduction commitment first appeared over a year ago, December 2020, in the [Climate Change Plan Update](#). From the outset we recognised [section 2(b) of [our response](#)] that this was a very bold target which we said “*will demand exceptional determination and commitment.*” An excellent detailed commentary, [Reducing Car Travel in Scotland](#), was published by SPICe, the Scottish Parliament's independent information service, and this reinforced our concerns.

A report commissioned by Transport Scotland, and referenced in the [Annex to the draft Route Map](#), states that in order to achieve the 20% reduction (our emphases) ...

*The **main transport mode** for people moving within and between the urban regions of Scotland (this is assumed to include Edinburgh, Glasgow, Dundee, Aberdeen, and the satellite towns and villages that surround them) **must switch from private cars** to active or public and shared transport modes over the next decade.*

The need for early action and determination is reinforced by the dismal failure of previous ambitions such as the Scottish Government's [2010 target](#) for 10% of trips to be by bike in 2020.

Although there is much to support in the draft Route Map, our responses to this survey highlight various areas which we do not believe demonstrate the necessary level of ambition, and which suggest to the public that the government is not serious – for example *continued funding of greater trunk road capacity whilst committing to a 20% reduction in car kilometres!*

However, the biggest failing of the Route Map is its lax and delayed treatment of **demand management** i.e. roughly speaking, the 'sticks' to accompany the 'carrots' in the draft Route Map.

b. Demand management must not be delayed

Chris Stark, Chief Executive of the independent statutory [UK Climate Change Committee](#), told the Scottish Parliament's former REC Committee, following the announcement of the commitment, that a 20% reduction *“will not happen unless there is a combination of carrots and sticks, and the kind of policies (in the Climate Change Plan Update) are mainly carrots.”*

However, politicians are nervous about demand management and, perhaps for that reason, the Route Map concentrates heavily on the 'carrots' approach (i.e. improving non-car options) – indeed this is almost stated explicitly (3.6, first para). It only moves to significant measures to deter unnecessary car use much later, with a *Framework for Car Demand Management* not to be published until 2025 – and presumably implemented even later.

This would be a sure recipe to miss the 2030 deadline since car trips are notoriously difficult to shift by carrots alone. *Rather, demand-management measures must be introduced and explained to the public in parallel with the carrots of improved active travel, public transport and digital connectivity opportunities, so that people see and understand the quid pro quo and do not settle into new post-covid patterns of continuing – and growing - car use despite improved sustainable opportunities.*

In terms of demand management, whilst some important powers (e.g petrol duty) are UK-wide, this is not an excuse for inaction. For example, the Scottish Government could now be taking actions and/or providing powers to Councils such as...

- congestion charging zones, as in London
- toll roads, as in many [European countries](#) and reversing the scrapping of bridge tolls
- generalised road-user charging, to the extent of available powers
- expanding Workplace Parking Levy powers to a full Premises Levy, so that large stores and leisure centres are charged for the number of customer spaces over a certain minimum
- providing political leadership to support councils in the politically difficult task of reducing car parking opportunities, as some European cities have achieved.

c. Cross-government action

Given the ambition of the commitment, all government departments and agencies need to understand and actively contribute to its achievement. It must not be pigeonholed exclusively in transport. *In particular, all departments and agencies must be asked to report on what actions they are taking to contribute.* Education, for example, on school and college travel; Health on staff and patient travel, and so on.

d. Evidence from elsewhere

We would like to see evidence that Transport Scotland is learning from car-km reduction projects elsewhere in Britain and/or overseas - whether successful or unsuccessful. Is there evidence that a process similar to the Route Map, without prominent use of demand management, has worked in other countries? A document answering such questions would be useful.

e. Public meeting on traffic reduction - report

Finally, in February Spokes held a public meeting, addressed by the Active Travel Minister **Patrick Harvie MSP**, and Edinburgh Transport Convener **Cllr Lesley Macinnes**, and chaired by **Dr Sam Gardner**, head of Edinburgh Climate Commission, on the traffic reduction ambitions of Scotland (20%) and Edinburgh (30%). Many useful ideas emerged. A report and link to a full recording is on the Spokes website www.spokes.org.uk/2022/02/achieving-traffic-reduction-spokesmtg-report.