



Confederation of Passenger Transport (CPT) Scotland Response to 20% Car Kilometre Reduction Route Map Consultation

April 2022

We welcome the opportunity to respond to the Scottish Government Consultation titled [20% Car Kilometre Reduction Route Map](#)

Who we are

The Confederation of Passenger Transport (CPT) Scotland is the trade association for the bus and coach sectors. CPT represents and facilitates a dynamic bus and coach industry in Scotland to provide better journeys for all, creating greener communities and delivering economic growth. We do this by representing over 100 members in Scotland from across the industry be they large or small, bus or coach, operator or supplier. We campaign for a supportive policy environment, give our members practical advice and support to run their businesses safely, compliantly, and efficiently, and bring the industry together to share ideas and best practice. We're ambitious to make things better for passengers, inclusive in seeking out different perspectives, and we're always there when our members need us.

Context

73% of all public transport journeys are made by bus. The bus and coach sector has an important role to play in the economic and environmental recovery of Scotland as we come out of the pandemic. To be able to deliver on the ambition to help us all achieve a just and green transition, and to be able to attain the numerous sustainable transport targets set by the Scottish Government in the National Transport Strategy 2, STPR2, and Climate Change Plan, the prioritisation of buses and sustainable transport in our towns and cities will be vital to help reduce car use in Scotland.



Consultation Questions Answered

Part 1 - The Route Map

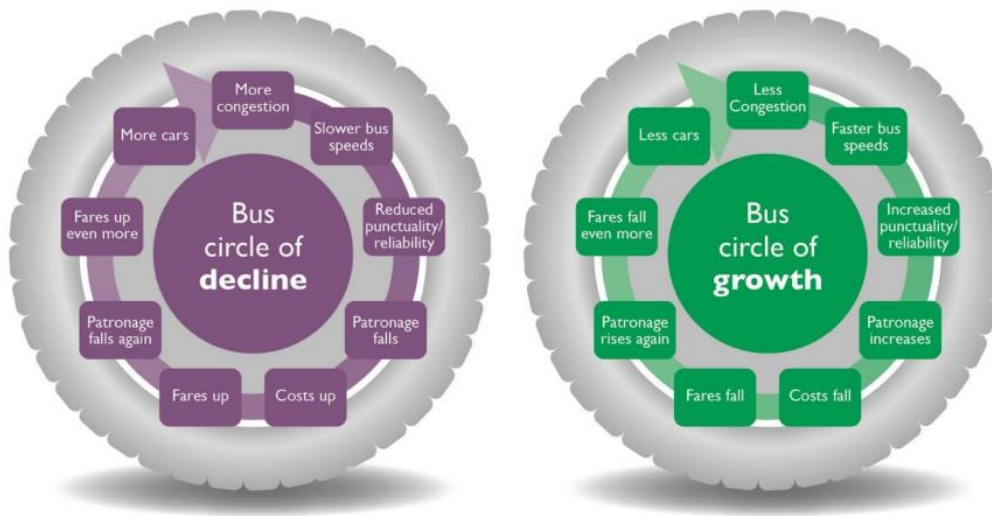
Question 1: Do you agree with the overall behaviour change approach, and do you have any comments on the four behaviours outlined above? Please explain.

CPT Scotland agrees with the approach for behaviour change in the route map. However, whilst we understand the focus on local living and reducing the need to travel, it is imperative that the route map does not lose sight of the fact that many destinations, for employment, education and leisure will be outside of the local area. This means that the provision of public transport options is key if we want to offer people real sustainable transport alternatives to the car for journeys that are beyond walking, wheeling, or cycling. Furthermore, CPT Scotland believes that to deliver successful behaviour change and modal shift, these affordable, reliable and sustainable transport alternatives need to be available before attempts to push people out of their car. If these alternatives are not available, then getting people out of their car will be more difficult.

2 What are the key opportunities of reducing car kilometres?

CPT Scotland believes that one of the main opportunities for reducing car kilometres will be less congestion on our roads. This will not only have a positive impact on air quality and road safety, but it will also make our buses quicker, more reliable and cheaper.

The increase in car ownership and car use has caused a significant increase in congestion on our streets. The more congestion there is, the more expensive it is for any bus operator as slower speeds mean the service is less reliable, which in turn increases costs because more buses are required to run the service. This in turn means it is more expensive for passengers. This leads to a circle of decline in bus use.



The Bus Circles of Decline And Growth¹

Over the last 50 years, bus journey times have increased by almost 50% in the more congested urban areas.² The net result has been a significant decline in bus use from over 13 billion journeys a year in UK to less than 5 billion.

There is a direct correlation between operating speeds and patronage levels: backed up by research which has shown that a reduction of 10% in bus speeds is estimated to result in a loss of between 9.6% and 14% in patronage.³ This correlation can also be found in increases to fares as congestion rose.

This roadmap, if delivered properly, offers a huge opportunity to reduce car use and congestion which will result in more affordable and reliable buses, which will attract more people to choose bus rather than car for some journeys, reducing car use and congestion even further.

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

We believe the key challenges are the convenience of, and perceived low cost of, car use versus other modes of transport.

¹ National Transport Strategy 2, Scottish Government, accessed March 2022-
<https://www.transport.gov.scot/media/47052/national-transport-strategy.pdf>

² *The Impact Of Congestion On Bus Passengers*, Greener Journeys, 2016- accessed Feb 2022
<https://greenertransportsolutions.com/wp-content/uploads/2016/06/Prof-David-Begg-The-Impact-of-Congestion-on-Bus-Passengers-Digital-FINAL.pdf>

³ *Intervention 10 – Reallocation of roadspace for buses*, STPR2, , Transport Scotland, accessed March 2022
<https://www.transport.gov.scot/media/49062/stpr2-phase-1-ast-project-10-bus-priority-3-feb-2021.pdf>



Cars are convenient, reliable and readily available to use from your front door and the towns and cities which are destinations all have the facilities needed to accommodate those cars. This makes convincing people to switch away from their car more difficult. Demand management measures are an important tool to counter this. Making parking very expensive or not available at all in city and town centres (except for provision for people who genuinely need their cars for health reasons) is a key way to deter people from driving to their destination. If they have to spend a long time trying to find a space, which may be far from their final destination and is very expensive, it will deter use. Charging them to drive in cities or busy town centres will also provide a disincentive. Of course, sticks will only deter use if the carrot of reliable and affordable public transport options are available for them to use as an alternative from their local area to destinations in towns and cities.

The other challenge we face is the perceived low cost of car use. Most people will compare the cost of a journey (jumping in car that already has fuel in it versus cost of ticket on public transport). People do not usually take into account the cost of that fuel, finance repayments, insurance, repairs, MOTs, and other costs associated with owning and operating a car. A recent survey has shown that it costs an average of £3406.80 a year to run a car in the UK – or £5744.40 for those with car finance.⁴ Depending on where you live, and the distance you commute, it is likely that the cost of a public transport season ticket will be much lower than using your car. For example, the average SPT Zonocard user in Glasgow region needs 4 zones to commute and use for leisure on their season ticket. This would cost £1,283 for the year⁵, almost half the cost of using a car, without finance. CPT Scotland suggests that as part of the roadmap, an information campaign explaining full cost of car ownership be delivered to help tackle the perception of low cost of car use and help people make that comparison.

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

CPT Scotland agrees with the focus on local living. However, it is important to recognise that many destinations, for employment, education and leisure will be outside of local areas. This means that the provision of public transport options is key if we want to offer people real sustainable transport alternatives to taking their car for journeys that are beyond walking or cycling.

⁴ *What Is The Cost Of Owning A Car In The UK?*, NerdWallet, accessed March 2022- <https://www.nerdwallet.com/uk/personal-finance/cost-of-car-ownership/>

⁵ *Zonecards*, SPT, accessed March 2022- <https://www.spt.co.uk/tickets/zonocard/>



We believe that a focus on modal interchange hubs should be included as an action for local options. We support the proliferation of sustainable and active travel measures across our towns and cities. It is imperative that active travel is properly linked to public travel options. We need hubs people can walk, wheel, and cycle to, that have storage for their bikes, and a safe and pleasant place to wait for their public transport connection. We also would like to note the importance of having bus prioritisation measures connecting these hubs, to ensure buses are fast, reliable, and affordable, which will increase use of them.

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?

CPT Scotland agrees with proposed actions and interventions in this section. However, we would like to highlight important issues about a few of the interventions which need to be considered.

Intervention 3b: Increasing investment in active travel:

and

Intervention 3c: Investing £50 million on Active Freeways:

We welcome any increase in budget for sustainable travel. However, we would like to point out that bus prioritisation measures, delivered via the Bus Partnership Fund, are equally as important as active travel measures to be able to connect people to work, education and facilities that are beyond their local area. Bus prioritisation measures need to be funded and delivered at the same level and at the same time as active travel measures. This strategic approach to road reallocation will be imperative to make sure both active travel and bus prioritisation are not competing for the same limited road space, or that one measure does not create disjointed routes for the other.

Intervention 3f: Introducing Low Emission Zones (LEZs) in Aberdeen, Dundee, Edinburgh and Glasgow in Spring 2022:

CPT Scotland welcomes the introduction of LEZs. The bus and coach sectors are very much determined to play their part by making sure their fleets are up to the required Euro VI standard or better. However, it is imperative that bus and coach operators are given the right time and support to upgrade their fleets to the standard required. Like many other sectors, bus and coach operators have endured a challenging period throughout the pandemic. With depressed patronage numbers and no profit being made for over 2 years, the ability to invest in fleet has been interrupted. It will take time for the sector to recover from Covid. If further LEZs are to be introduced, they should be cognisant of this.



Intervention 3h: Commissioning a Fair Fares Review:

CPT Scotland welcomes any review on fares, however the review has to consider the many factors that inform fare structures. Calling for fares to be restructured without taking actions that will reduce operational costs for operators risks making parts of the network unsustainable.

Every bus journey has a cost, regardless of ownership, and that cost must be met by someone. Fares can be subsidised by governments to keep prices down for users, but that cost must be met by all taxpayers. One of the most effective ways to reduce fares without increasing government support, especially in our towns and cities, is to reduce congestion.

Operators, whether they are publicly or privately owned, have an important role in making sure they deliver improvements for passengers. Profits are a key part of how improvements for passengers are funded, without it bus fleets and depots would age and innovation (adopting new technologies) would be stifled. Prior to the pandemic, on average, bus operators made less than 7% profit. Out of that profit, on average, less than 10% went to dividends.⁶ This means that for every £1 spent on a bus ticket, less than 1p of it went to dividends. On average, 90% of profits fund investment in new greener fleets, payment of taxes to government to pay for public services, debt payments (paying off improvements to infrastructure including depots) and investment in staff.

Intervention 3i: Providing nationwide free bus travel for Scotland's young people aged under 22 from January 2022:

CPT Scotland supports the launch of free travel for under 22s and has worked with government to structure and deliver this scheme. While the uptake has been slow to date we hope to make the most of the scheme and make lifelong bus users out of our younger people. Lessons could be learned about marketing such schemes, engaging school children about sustainable and active travel, and ensuring a simple application process. However, this scheme will play a key role in the sector's work to recover passenger numbers that dropped through the pandemic.

The money that government invests in buses directly benefits passengers, not the operators. It is important to highlight that concessionary travel is a reimbursement payment made for carrying concessionary passengers and made on a "no better, no worse off" basis. Bus operators will benefit from

⁶ *Understanding Buses*, Chris Cheek, 2019, <https://www.amazon.co.uk/Understanding-Buses-Chris-Cheek/dp/1898758166>



higher patronage use through these schemes, but they do not directly benefit from this public funding. It is the passenger who benefits by not paying at point of use.

Intervention 3j: Continuing to provide long-term capital investment to bus transport:

CPT Scotland very much welcomes the proliferation of bus priority measures via the Bus Partnership Fund. It is imperative that bus prioritisation measures are delivered at the same pace and in conjunction with active travel measures being delivered around the country. There is limited road space in our cities, and it is imperative that road reallocation is done in a strategic way with both bus prioritisation and active travel measures being considered and delivered at same time in a way which complements each other and connects at the right places. We also think that funding for bus prioritisation should mirror that of active travel measures as both active travel and public transport sit at the top of the sustainable travel hierarchy.

To deliver the ambitions of Bus Partnership Fund all local authorities should adopt Bus Service improvement Partnerships. This mechanism gets all relevant stakeholders around the table sharing the same goal, which is to deliver faster, more reliable and cheaper bus routes across their area. The involvement of local authorities can also act as a tool to make sure proposed active travel and bus prioritisation measures work in partnership with each other.

Intervention 3k: Introducing a Community Bus Fund:

CPT Scotland is not against discussing the future ownership models of buses in Scotland. However, it is imperative that all facts are considered when making decisions.

Research has shown that publicly owned or franchised models in other countries costs the taxpayer more money than the deregulated model we operate in Scotland. For example in Scandinavian countries their municipal and franchise systems cost on average double per head in tax payer funding than in the UK, whilst fares remain mostly comparable.⁷ In London, passengers using franchised TfL buses will benefit from over double the government public transport support per passenger journey than in other parts of the England.⁸

⁷ *The Scandinavian Way To Better Public Transport*, Transport Research Institute, Edinburgh Napier University, accessed March 2022, https://www.urbantransportgroup.org/system/files/general-docs/UTG%20Scandinavian%20Transport%20Report_Final.pdf

⁸ *Bus Subsidy Per Passenger Journey*, UK Government, 2015, accessed March 2022 <https://www.gov.uk/government/publications/bus-subsidy-per-passenger-journey>



Yet even with this increased taxpayer support London remains one of the worst cities in Europe for public transport affordability.⁹ It is important that taxpayers are aware that publicly owned buses will cost them more every year, whether they use buses or not.

Private operators are agile and have the ability to innovate. Across Scotland they are using recent technology to introduce smart and integrated ticketing across multiple operators and have worked together to pilot a ticket price capping system in Glasgow.¹⁰ It is expected that all these measures will begin to be rolled out across Scotland in the coming months and years, offering passengers a simpler and cheaper way to travel.

Intervention 3o: Pavement parking ban enforcement and other car parking interventions:

CPT Scotland welcomes in principle the pavement parking ban enforcement. However, similar to emergency vehicles, the carriageway has to be able to allow for the passing of buses and coaches. Buses have to be able to access and depart stops unencumbered, and passengers have to be able to access bus stops by walking or wheeling. Public transport routes have to remain operational and accessible to all and in instances where parking on the carriageway would restrict access to routes, exemptions must be made available. This is especially true when considering bus and coach access to schools, which are often in residential areas on streets with already very limited road space available.

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

CPT Scotland agrees that being able to go from one mode to another seamlessly is a key incentive for people to make the choice of modal shift. Already in Scotland bus operators are working with each other to use new technology so that they can deliver integrated and smart ticketing across different operators in the same region. Also being introduced is price capping in Glasgow¹¹, so that anyone using a bus in Glasgow will only pay a maximum set fee no matter how many times they use bus on the day and which operator

⁹ *Benchmarking European cities*, Clean Cities Campaign, accessed March 2022

[https://cleancitiescampaign.org/wp-content/uploads/2022/02/Clean-Cities -City-Ranking-Rating-briefing-2.pdf](https://cleancitiescampaign.org/wp-content/uploads/2022/02/Clean-Cities-City-Ranking-Rating-briefing-2.pdf)

¹⁰ GlasGo Bus Alliance <https://glasgobus.com/>

¹¹ GlasGo Bus Alliance <https://glasgobus.com/>



they use. All these allow people to plan in advance and not worry about their journey once they have started it.

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

CPT Scotland would like to reiterate the point that public transport has to play an equally important role as active travel when it comes to this roadmap. Focus on local living is important and welcome, but we have to recognise that many places of work, education and leisure will be located outside of local areas and walking or cycling will not be a solution in these instances. Buses will play an integral role in connecting people to different places and local areas have to have active travel/public transport hubs where modal shift can be made easily and bus prioritisation measures can be focussed on the routes these hubs are on.

Active travel and bus prioritisation measures have to be delivered at same pace and in conjunction with each other. Local authorities need to adopt Bus Service Improvement Partnerships to help with this process.

Part 2 - Social and Equalities

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?

CPT Scotland believe that proposals could have a positive impact on people facing socio-economic disadvantage. By making public transport more readily available and cheaper through less congestion, investment in bus prioritisation, and introducing car use demand management measures, individual people facing socio-economic disadvantages will benefit from faster, more reliable, available and affordable modes of transport to access work and education.



Part 3 - The Environment

Question 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.

Transport accounts for the highest contribution to greenhouse gases in Scotland and private cars account for the highest number in transport.¹² In Scotland, cars are the source of 39% of transport emissions and 58% of road emissions. Cars also contribute a high level of particulates in the air affecting the air quality at street level. By reducing car use this will help counter these issues. More specifically the introduction of active travel and bus prioritisation measures will make it easier for people to choose to walk, cycle or take public transport. By cycling or taking public transport instead of driving for one trip each week, an adult can save 0.5t of CO₂ emissions annually.

It is important to note that only around 5% of road transport emissions are attributable to bus and coach. Bus is also the mode that has recorded the biggest drop in its emissions with buses and coaches showing a substantive reduction since the 1990 baseline. In 2018, emissions from the bus and coach network had fallen from to 0.4 MtCO₂e, a 30.6% decrease. And as new zero emission buses have started rolling out depots bus has seen an impressive 20% drop in carbon emissions over the last four years.¹³ A full diesel bus can already replace up to 75 cars and is already a very environmentally conscious way to travel.

Switching all cars to Electric Vehicles will not be the solution as that will mean no change to congestion (lower congestion makes buses faster, more reliable and cheaper) and EVs still produce high levels of particulate pollution via their brakes and tyres. The key to impacting the environment positively is by reducing the number of cars on our street. We believe, if delivered correctly, with the right balance between prioritising active travel and public transport on our roads and putting in place car demand management measures, the roadmap can see a positive shift away from car use, which in turn will help us tackle the climate emergency we live in.

¹² *Greenhouse Gas Statistics*, Scottish Government accessed March 2022

<https://www.gov.scot/publications/scottish-greenhouse-gas-statistics-1990-2019/pages/3/>

¹³ *Cheaper Journeys Faster*, Our Scottish Futures accessed March 2022 <https://ourscottishfuture.org/wp-content/uploads/2022/03/Cheaper-Journeys-Faster.pdf>



Further Information

Website <https://www.cpt-uk.org/>

Twitter: [@CPT_Scot](https://twitter.com/CPT_Scot)

Contact

Andrew Lindsay

Public Affairs Manager
CPT Scotland

Mobile: 07867 637128

Email: andrew.lindsay@cpt-uk.org