



**20% car kilometre reduction route map**

**A Response from CTA**

**April 2022**

**[www.ctauk.org](http://www.ctauk.org)**

## Summary

The Community Transport Association (CTA) welcomes the 20% car kilometre reduction route map co-developed by the Scottish Government and the Convention of Scottish Local Authorities (COSLA).

The draft route map contains a number of positive proposals which will help the Community Transport sector and incentivise people and communities to reduce their car use – such as reforming the planning system; increasing investment in active travel; introducing Low Emissions Zones; investing in bus and rail services and infrastructure; and promoting car clubs.

We are pleased that the route map commits to work with CTA and the Community Transport sector to improve patient transport to NHS sites and help everyone access health & social care in a sustainable way.

However, we believe that the draft route map can and should be strengthened in key areas:

- **Working with Community Transport:** National and local government should recognise the Community Transport sector as a key partner in delivering the objectives of the route map. Community Transport schemes reduce car use, facilitate modal shift and empower communities to take climate action
- **Demand management:** The route map lacks robust interventions to disincentivise private car ownership and use. Implementation of the proposed Car Demand Management Framework needs to be brought forward from 2025. Existing timescales significantly reduce the window for behaviour change and threaten to make the 2030 target highly unrealistic
- **Just Transition:** Action to reduce car use should not reduce the freedom of disabled people. Disabled people in the UK make 38% fewer journeys every year than non-disabled people due to inaccessible transport. Investing in accessible, inclusive services delivered by Community Transport can ensure disabled people are not left behind in the transition to net zero
- **Local targets:** Every Scottish local authority should follow the lead of Glasgow City Council and City of Edinburgh Council and set its own target for reducing car kilometres by 2030
- **Fair Fares Review:** The Scottish Government's Fair Fares Review must ensure that public and community transport are more affordable than private car ownership and use. It should also consider whether concessionary travel schemes could be extended to Community Transport services delivered under Section 19 permits to eliminate unfairness in the status quo
- **Sustainable transport to health:** Welcome commitment to delivering the objective of NHS Scotland's Climate Emergency and Sustainability Strategy to increase active travel and the use of public and community transport to NHS sites. A joined-up, strategic approach is required, backed by long-term planning, stable public funding and genuine partnership working between the NHS and the Community Transport sector

## 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:*

- i. to make use of sustainable online options to reduce your need to travel;*
- ii. to choose local destinations to reduce the distance you travel*
- iii. switch to walk, wheel, cycle or public transport where possible*
- iv. combine a trip or share a journey to reduce the number of individual car trips you make, if car remains the only feasible option*

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

The Community Transport Association (CTA) agrees with the overall behaviour change approach of the route map and welcomes the ambitious commitment to reduce car travel by 20% by 2030.

CTA is a UK charity which champions, connects, supports and grows the Community Transport sector in Scotland, England, Wales and Northern Ireland. We have over 160 members across Scotland who deliver community-led, not-for-profit transport services in urban, rural and island communities by utilising a diversity of modes and modals, from demand responsive buses and electric car clubs to bicycle and e-bike share schemes. Many people rely on Community Transport to travel and to travel sustainably, especially older and disabled people, because they cannot access or afford private or public transport.

National and local government should recognise the Community Transport sector as a key partner in delivering the objectives of the route map. Community Transport schemes reduce car use, facilitate modal shift and empower communities to take climate action. CTA's mission is accessible, inclusive and sustainable transport for all.

It is clear that technological solutions such as Electric Vehicles (EVs) will be insufficient to achieve net zero at pace. Scotland's strategy must be to reduce levels of car dependency and ownership through a balanced approach of incentives and disincentives to encourage, enable and require behaviour change by people and communities, as well as business, industry and organisations across the private, public and third sectors. A more active and ambitious approach to demand management will be an essential element, not only to achieve the target, but also to transform our communities to be less dominated by private cars where everyone can conveniently and sustainably access amenities, education, employment, healthcare and public services.

The route map lacks robust interventions to reduce private car ownership and disincentivise car use. It notes that the actions it contains are ‘predominantly’ focused on how to ‘encourage alternative behaviours’. It admits that ‘incentivising desirable behaviours is unlikely to be sufficient in a context where car use remains highly attractive in terms of individual-level benefits, while the dis-benefits to environmental and population health are largely externalised’. The cost and inconvenience of car use needs to be increased through the powers available to the Scottish Government, local government and UK Government. The Workplace Parking Levy is one welcome, although so far isolated, example.

The route map commits to exploring ‘options to further discourage car use, including developing a Car Demand Management Framework, based on further research into equitable options to discourage car use, by 2025’. Although this would be welcome, these extended timescales for developing and implementing measures on demand management significantly reduce the window for behaviour change and threaten to make the 2030 target highly unrealistic to achieve. Behaviour change takes time and will require early and sustained action to deliver. The Climate Emergency demands that difficult choices and complex trade-offs cannot be postponed indefinitely or implementation of disincentives delayed beyond 2025. An emergency situation requires an emergency response.

The four sustainable travel behaviours identified in the route map are the correct ones and rightly reflect the Sustainable Transport Hierarchy, which with national and local government’s capital and resource spending priorities should also be aligned. For example, the welcome commitment to ensure 10% of Scotland’s national transport budget is spent on active travel should be achieved earlier than currently planned, as well as replicated by local authorities, to ensure that the capacity to effectively spend this money is developed on time.

It is welcome that the route map is a collaborative document which has been developed by the Scottish Government and COSLA. Action at national and local level, as well as partnership working, will be necessary to achieve the target by 2030. Local authorities should follow the lead of Glasgow City Council and City of Edinburgh Council and set local targets for reducing car travel by 2030, for example through their Local Active Travel and Transport Strategies. Scottish Government and COSLA should provide support and work together to ensure that local targets will add up to a 20% reduction nationally by 2030.

We welcome the recognition in the route map that ‘some private car use will need continue, especially for people in certain geographical areas and those with certain disabilities’ in order to deliver a just transition to net zero which does not exacerbate existing inequalities. It will be vital that disabled people, and the Community Transport sector which serves them, are not left behind. National and local government will need to step-up capital investment to assist disabled people and Community Transport operators to procure accessible zero-emissions vehicles given the significant up-front costs.<sup>1</sup>

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

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<sup>1</sup> <https://ctauk.org/scotlands-plugged-in-communities-fund-what-next>

The route map summarises well several of the key opportunities of reducing car kilometres – including addressing climate change, reducing inequalities, boosting local economies and improving health and wellbeing.

In addition, reducing car kilometres will make our communities more accessible. Fewer cars on Scotland's roads will mean safer, quieter and calmer streets. A lack of air and noise pollution created by high numbers of cars in residential and commercial areas will make communities more attractive places for residents, visitors and consumers, especially older and disabled people, to spend time and money. As research by Living Streets Scotland has evidenced, 'the walking environment in Scotland is hostile for older people' due to uneven pavements, frequent flooding due to blocked drains, pavement parking and air and noise pollution created or exacerbated by car traffic.<sup>2</sup>

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

There will be major challenges to reducing car kilometres by 20% by 2030:

- **Behaviour change:** Unsustainable travel behaviours are long-standing and entrenched. These habits and preferences are barriers to behaviour change and may be difficult to overcome for certain population groups – especially those for whom car use remains an affordable, convenient choice due to household income or location. A minority of the population is likely to be vocally opposed to measures which disincentivise car use, from 'Spaces for People' changes to road user charging. There will be a need for political will from the Scottish Government, local government and UK Government to drive forward changes which are necessary and will benefit everyone.
- **Reversing current trends:** Car use and ownership in Scotland has been increasing for many decades.
- **Impact of COVID-19:** While the short-term impact of the pandemic was to significantly increase walking, wheeling and cycling and reduce car use, public health restrictions and messaging have actually exacerbated car dependency. Car use has been encouraged, while public, community and shared transport have been discouraged, for safety reasons. EY has identified a 'COVID-induced car ownership boom'.<sup>3</sup> Carbon emissions have returned to pre-pandemic levels.<sup>4</sup> This needs to be reversed.
- **Investment:** The cost of investment in new capital infrastructure which facilitates active travel or improves public transport, such as Active Freeways, will be significant at a time of constrained public spending.
- **Affordability:** At present, alternatives to car use and ownership, from public and community transport to car clubs, often compare unfavourably on affordability. Although the cost of motoring in the UK has increased by over 25% since 2012, the cost of bus travel (58%) and rail

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<sup>2</sup> [www.livingstreets.org.uk/media/6660/our-streets-too.pdf](http://www.livingstreets.org.uk/media/6660/our-streets-too.pdf)

<sup>3</sup> [www.ey.com/en\\_gl/news/2020/11/millennials-to-lead-covid-induced-car-ownership-boom-ey-survey](http://www.ey.com/en_gl/news/2020/11/millennials-to-lead-covid-induced-car-ownership-boom-ey-survey)

<sup>4</sup> [www.newscientist.com/article/2296021-global-co2-emissions-have-almost-returned-to-pre-pandemic-levels](http://www.newscientist.com/article/2296021-global-co2-emissions-have-almost-returned-to-pre-pandemic-levels)

travel (30%) have increased even further over the same period.<sup>5</sup> The cost of travel should, ultimately, reflect the Sustainable Transport Hierarchy.

- **Just Transition:** Delivering reduced car use in a way that doesn't reduce ability of disabled people to travel. Disabled people in the UK make 38% fewer journeys every year than non-disabled people due to inaccessible transport.<sup>6</sup>

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

Public sector employers should lead the way and model best practice in delivering Interventions 1d (*Issuing a refreshed Fair Work First Action Plan in Spring 2022*) and 1e (*Progressing the Work Local Challenge Programme*). Flexible and remote working should be a right for all public sector employees wherever possible and appropriate. Working arrangements should ensure that there are not arbitrary requirements to commute. National and local government and other public bodies should cooperate and collaborate to share office space and create local work hubs, which could also be shared with local charities and community groups.

CTA's Mapping Scotland project, which will produce the first-ever map of Community Transport in Scotland with data and information on accessible transport services across the country, could be a useful resource to support the delivery of Intervention 1c (*Mapping digital connectivity alongside transport connectivity*).<sup>7</sup>

We recognise the view that we cannot and should not expect car use to decrease by as much in rural or isolated communities as in urban ones. However, while this is likely to be the case, and Scotland's complex geography must be considered, it is also true that Community Transport schemes are testament to the fact that modal shift is possible, and has significant potential, in rural and isolated communities. Rural Community Transport operators across Scotland are delivering transport such as scheduled bus services, demand responsive minibuses, electric car clubs and bicycle or e-bike hire which are reducing car use and carbon emissions. The Scottish Government and local authorities should work with CTA to invest in expanding and replicating these schemes.

#### **5. Are there any further actions you would like to see included in future to support behaviour change ii) – choosing local options?**

CTA welcomes the draft National Planning Framework 4 (NPF4), which represents significant progress towards ensuring that National Planning Policy is fit for purpose for achieving net zero, tackling inequalities and improving accessibility. The commitment to embed 20-minute neighbourhoods and the Sustainable Transport Hierarchy are positive and will support a reduction in car kilometres. It will

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<sup>5</sup> [www.racfoundation.org/data/cost-of-transport-index](http://www.racfoundation.org/data/cost-of-transport-index)

<sup>6</sup> [www.motability.org.uk/motability-news/motability-to-award-50-million-in-funding-to-charities-and-organisations](http://www.motability.org.uk/motability-news/motability-to-award-50-million-in-funding-to-charities-and-organisations)

<sup>7</sup> <https://ctauk.org/mapping-scotland-project>

be vital that the principles of ‘compact growth’ and ‘local living’ are properly implemented to increase levels of population and settlement density. However, we believe that NPF4 could be strengthened to ensure it meets the ambitions of the Scottish Government and local communities and to deliver sustainable transport for all.

Firstly, developments which build-in car dependency – such as out-of-town retail parks, ‘drive-thrus’ or new housing estates without sustainable travel infrastructure and services – should not be approved. Many older and disabled people find themselves isolated in their own homes or living in neighbourhoods which are not close to any amenities or services. Scotland’s Community Transport sector plays a critical role in helping many older and disabled people to travel to their nearest shop or supermarket for groceries and other basic necessities, because these amenities are increasingly not located in the places and communities where people actually live. Instead, they are increasingly in out-of-town locations which are inaccessible to those who cannot access or afford private or even public transport. Nearly 1 in 3 of Scottish households do not have access to a car, which is a higher proportion of the population than in any other part of the UK, and this rises to almost 1 in 2 households in Glasgow.<sup>8</sup>

Secondly, developer obligations under Section 75 should be strengthened to require residential and retail developers to make substantial contributions towards projects which reduce car use – including Community Transport schemes like electric car clubs.

Thirdly, planning authorities also need the right capacity, resources and skills to deliver more informed decisions which are better for the environment and will support, rather than hinder, the delivery of net zero and car kilometres targets at a national and local level. Planners and Elected Members need training in carbon literacy and accounting, for example.<sup>9</sup>

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

It is important that sustainable travel behaviour three – ‘switch to walk, wheel, cycle or public transport where possible’ – is inclusive of the Community Transport sector to maximise modal shift and better integrate Scotland’s transport system.

CTA welcomes the commitment to ‘support a safe and confident return to public transport’ and expect that this will include Community Transport. As we recover from COVID-19, it will be necessary to reverse the messaging of recent years, which has emphasised the car as a safe refuge from a deadly virus, while emphasising the risks of public and community transport, although mitigation measures have been high and transmission rates low in those settings. Demand management now needs to be applied to private car use.

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<sup>8</sup> [www.gov.scot/publications/scottish-household-survey-2019-supplementary-analysis/pages/6](http://www.gov.scot/publications/scottish-household-survey-2019-supplementary-analysis/pages/6)

<sup>9</sup> NPF4 response [LINK](#)

We welcome Intervention 3h (*Commissioning a Fair Fares Review*) and believe that it should be inclusive of Community Transport. Currently, people who rely on Community Transport, especially older and disabled people who cannot access public transport or do not have any public transport provision where they live, are discriminated against due to the fact that concessionary travel schemes and discounts do not apply on Community Transport services operated under Section 19 permits. The Fair Fares Review should explore extending operator eligibility for full reimbursement under the National Concessionary Travel Scheme and the Young Persons' Free Bus Travel Scheme. The Fair Fares Review must ensure that public and community transport are more attractive and more affordable than car ownership and use.

We welcome Intervention 3r (*Delivering the NHS Scotland Climate Emergency and Sustainability Strategy's actions to increase active travel and the use of public and community transport to NHS sites*) and are pleased to see its commitment to 'working with Community Transport Association UK and volunteer community transport groups to improve patient access'. Many Community Transport schemes deliver transport to health services with accessible vehicles which enable patients to access medical appointments and hospitals in a more sustainable way. However, most are not funded by any public body to do so, threatening the affordability or viability of these services in the long-term and reducing their ability to support sustainable transport to NHS sites.

At present, CTA members tell us that Community Transport is generally not brought in at the planning stage for the provision of health and social care-related transport and that the costs and necessary lead-in times for delivery of accessible, inclusive services in the right places is often underestimated or overlooked. Community Transport providers need time and resources to plan and scale-up their capacity to deliver these services.

Health, social care and transport services should be aligned, including as part of holistic packages of care, to help more people live independent, happy and healthy lives in their own homes and communities. A more joined-up, strategic approach is required, backed by long-term planning, stable public funding and genuine partnership working between the NHS, the forthcoming National Care Service and the Community Transport sector. We look forward to working with Transport Scotland and COSLA to drive forward this agenda.<sup>10</sup>

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

Mobility as a Service (MaaS) offers exciting opportunities to reduce car use by creating a seamless and digitally enabled experience of an integrated transport system, including Community Transport, for users. Many Community Transport operators currently deliver demand responsive services, such as 'dial-a-ride' community buses and taxis, especially in rural, remote and island communities where fixed bus routes have been declared commercially non-viable. Smaller, not-for-profit providers, however,

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<sup>10</sup> <https://ctauk.org/national-care-service-scotland-response>

are often not as data-driven or technologically-enabled as those delivered by the larger commercial bus operators. Therefore, it will be critical that MaaS pilots are aligned with outreach to and investment in capacity-building programmes for Community Transport providers.

We welcome Intervention 4b (*Re-promoting the benefits of car-sharing and car-clubs post-pandemic*) and note that many Community Transport operators deliver community-owned lift share schemes or car clubs, which are effective at reducing car ownership and use. So-called ‘closed loop’ community car clubs can be especially effective in smaller or rural communities in building trust between known users, empowering communities and creating momentum behind modal shift.

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

N/A

## **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*

## **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?**

We welcome recognition in the route map of the need to deprioritise and reallocate road space away from private cars given that car ownership is lower among lower income households, women, older people, young people, disabled people and ethnic minorities.

If the interventions in the route map increase the number of users on public transport, it is likely to increase public safety due to informal and social monitoring of buses, trains and so on by more passengers. However, lift share schemes and car clubs could potentially present some risks of discrimination or lack of personal safety for some users, such as women, ethnic minorities and lesbian, gay, bisexual and transgender (LGBT) community.

Action to reduce car use could harm the ability of disabled people to travel. Disabled people in the UK make 38% fewer journeys every year than non-disabled people due to inaccessible transport.<sup>11</sup>

**a. 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?**

There need to be appropriate protections, policies and safeguards in place to prevent, monitor and tackle discrimination and hate crime on public and community transport, especially in newer or emerging modes, such as lift share and car clubs. CTA plays an important role in developing and promoting best practice in terms of safeguarding in our sector.

It is vital that Scotland's public transport system is decarbonised and becomes more accessible at the same time to ensure that disabled people are not left behind or excluded from experiencing the benefits. Community Transport can also support mitigation of negative impacts given the high proportion of wheelchair accessible vehicles and professionally trained drivers in the sector.

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

N/A

**a. If you think the proposals will have a particular impact on island communities, what measures would you suggest to maximise positive impacts or mitigate negative impacts?**

N/A

**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 phenomenon of 'forced car ownership' means that due to a failure of public transport provision to meet society's transport needs, many people, including many poor households, have little choice but to own and operate a car at significant expense.<sup>12</sup> Increasing the cost of motoring could have a negative impact on these individuals and families, but can be mitigated.

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<sup>11</sup> [www.motability.org.uk/motability-news/motability-to-award-50-million-in-funding-to-charities-and-organisations](http://www.motability.org.uk/motability-news/motability-to-award-50-million-in-funding-to-charities-and-organisations)

<sup>12</sup> [www.scotsman.com/news/transport/scots-families-tight-incomes-forced-car-ownership-1456368](http://www.scotsman.com/news/transport/scots-families-tight-incomes-forced-car-ownership-1456368)

However, the proposals set out in this plan could significantly improve the accessibility and affordability of people facing socio-economic disadvantages if higher levels of investment deliver more and better services and the Fair Fares Review delivers reduced costs for passengers.

**a. 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?**

There is a need to ensure that the accessibility and affordability of public and community transport compares favourably to private transport. Meanwhile, promoting shared transport services like lift share and car clubs, and ensuring that they are affordable alternatives, can help reduce the costs and negative impacts associated with ‘forced car ownership’.

## **The Environment**

**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.**

We agree that the actions proposed in the route map will have a positive impact on the environment by reducing air and noise pollution, especially in our towns and cities; reducing carbon emissions; and, therefore, tackling climate change.

## **Further information**

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*The Community Transport Association (CTA) is the UK charity that represents and supports providers of Community Transport. Our 160 members in Scotland are local charities and community groups which provide transport services always for a social purpose and never for profit. We believe in accessible, inclusive and sustainable transport for all.*