

TAYSIDE AND CENTRAL SCOTLAND TRANSPORT PARTNERSHIP**13 JUNE 2023****DIRECTOR'S REPORT**Purpose

The report asks the Partnership to note progress in recruiting new non-elected board members and updates on Bus Alliances, Local Rail Development Fund, Active Travel and Fair Fares Review. The Partnership is also asked to consider and approve proposed responses to Transport Scotland stakeholder review of Local Transport Strategy draft guidance and Perth & Kinross Council's consultation on Let's Talk Transport Main Issues Report. The Partnership is also asked to note a response to Department of Transport's consultation on zero emission vehicle (ZEV) mandate and to delegate approval of a response to Scottish Government's consultation on Local Living and 20-minute neighbourhoods to the Executive Committee.

Summary

The report remits Executive Committee to interview a candidate for non-elected membership of the Tactran Board. The Director is also in discussion regarding appointing a Heath representative to the Board.

Updates are provided on Bus Alliances; Local Rail Development Fund; Active Travel and Fair Fares review, as follows:

- Tayside and Forth Valley Bus Alliances are at final stages of appraisals. The Tayside Bus Alliance has submitted their appraisal to Transport Scotland Gateway and is anticipating a recommendation, decision and award letter.
- Tactran's 3 Local Rail Development Fund appraisals are at various stages, with Stirling and Bridge of Earn appraisals having completed the detailed appraisal stage and Tay Cities appraisal completed the preliminary appraisal stage. Further feedback on Bridge of Earn and Tay Cities appraisals is awaited from Transport Scotland.
- Active Travel Progress update provides updates on the Active Travel Transformation Project, Tactran's 2023/24 Active Travel Capital Programme and the Regional Active Travel Network.
- Information is provided on progress with the Fair Fares Review.

Responses to Transport Scotland's consultation on Local Transport Strategy Guidance and Perth & Kinross consultation on Let's Talk Transport, main issues report are included for approval. The Executive Committee approved a response to Department of Transport consultation on a zero emission vehicle (ZEV) mandate and CO2 emissions regulation for new cars and vans in the UK and it is included for noting. The Partnership is also asked to delegate authority to the Executive Committee to consider and approve Scottish Government consultation on Local living and 20-minute neighbourhoods.

1 RECOMMENDATIONS

1.1 That the Partnership:

- (i) remits the Executive Committee to undertake an interview for the non-Councillor member of the Tactran Partnership Board and notes progress in recruiting a new health representative non-elected member to the Tactran Board;
- (ii) notes the updates on Bus Alliances, Local Rail Development Fund, Active Travel and Fair Fares Review;
- (iii) considers and approves the proposed response to Transport Scotland's stakeholder review on Local Transport Strategy: Draft Guidance as detailed in Appendix B;
- (iv) considers and approves the proposed response to Perth & Kinross Council's consultation on Let's Talk Transport, Main Issues Report as detailed in Appendix C;
- (v) notes the response to the Department for Transport consultation on a zero emission vehicle (ZEV) mandate and CO2 emissions regulation for new cars and vans in the UK as detailed in Appendix D; and
- (vi) delegates authority to the Executive Committee to consider and approve a response to Scottish Government's consultation on Local Living and 20-minute neighbourhoods.

2 DISCUSSION

Non-Councillor Members

- 2.1 Following a recruitment process that included advertising the position through Tactran's various social media outputs and Scottish Government's LinkedIn, one application was received. The process has been delayed as other candidates came forward late on in the application phase and the Director made the decision to allow more time for applications. Unfortunately, after further consideration the applicants who approached late did not go on to submit applications. Therefore, an interview will be set up with the Executive Committee and the one remaining candidate as it has been determined that they meet the requirements for interview. If the candidate is successful, the Board will be asked via email to endorse the appointment on the condition that endorsement is received from the Minister of Transport.

- 2.2 As Health Boards are required to perform their functions and activities which relate to or which affect or are affected by transport consistently with the regional transport strategy, the Tactran Partnership has always sought to have a health representative on its Board. Therefore, following the resignation of Dr Jonathan Berg, as informed by the Director at the Partnership meeting in March 2023, it was agreed to recruit a replacement health representative. The Director is currently in discussion with NHS Tayside and NHS Forth Valley regarding appointing a suitable candidate.

Bus Alliances Update

- 2.3 Both the Tayside, and Forth Valley Bus Alliances are in the final stages of their STAG appraisal and Strategic Business Case (SBC) submission. The Tayside Alliance made their submission to the Gateway review on 6 April 2023 and the Forth Valley Alliance will shortly do so.
- 2.4 As a part of the Gateway, the Tayside Bus Alliance was asked to participate in a workshop with Transport Scotland and its consultants, which took place on the 16 May 2023.
- 2.5 The Tayside Bus Alliance was asked to provide additional detail in respect of its submission and advised of the timescale for further Bus Partnership Fund work. Some elements of the timetable were subject to agreement within Transport Scotland and the Scottish Government. The Tayside Bus Alliance will submit additional supporting material by the end of May 2023, with a likely consideration to recommendation during June. Transport Scotland indicated a potential further period of up to 2 months following recommendation for decision and letter of award to be issued.

Local Rail Development Fund Update

- 2.6 Tactran received funding from Transport Scotland's Local Rail Development Fund (LRDF) to undertake three appraisals following the Scottish Transport Appraisal Guidance (STAG): Stirling Strategic Park & Ride Strategy; Bridge of Earn Transport Appraisal and Tay Cities Park & Choose Strategy. STAG appraisal has three stages; Case for Change; Preliminary Appraisal; Detailed Appraisal, with completion of each stage requiring approval from Transport Scotland.
- 2.7 The Stirling Strategic Park & Ride Strategy has now completed all stages of STAG appraisal and comments on the final Detailed appraisal from Transport Scotland's Transport Strategy and Appraisal Division have been addressed. Tactran officers are currently in discussion with Stirling Council officers regarding the recommendations arising from the appraisal, with the intention to take this to the appropriate Stirling Council committee, prior to formally submitting to Transport Scotland.

- 2.8 The Bridge of Earn Transport Appraisal has completed the STAG appraisal up to draft Detailed Appraisal stage. The draft Detailed Appraisal was submitted to Transport Scotland for their comment on 30 June 2022 and at the time of writing Transport Scotland has yet to provide comments.
- 2.9 The Tay Cities Park & Choose Strategy has completed the draft Preliminary Options Appraisal and it was submitted to Transport Scotland for comment at the beginning of July 2022. Transport Scotland provided comments on the draft Preliminary Appraisal at the end of November 2022, with these being responded to by Tactran in January 2023. A meeting to discuss this has been arranged with Transport Scotland for the end of May 2023. There remains a balance of £48,553 LRDF grant to undertake the Detailed Appraisal.

Active Travel Progress Update

- 2.10 The Scottish Government through its Active Travel Transformation Project announced record funding for Active Travel (Report RTP/23/03 refers) which will reach 10% of the total transport budget or at least £320M by 2024/25.
- 2.11 As reported to the Partnership meeting in March 2023 Tactran had responded to Transport Scotland's Partner Assessment and Project Pipeline application request. The primary purpose of this was to allocate funding for delivery of eligible construction-ready Active Travel schemes in 2023/24. However, it also asked for specific organisation information for those organisations that are developing Active Travel projects for future years.
- 2.12 Therefore, Tactran completed the application form, mainly for future years, but also included a couple of 2023/24 projects that had previously been submitted to Transport Scotland. These two projects have subsequently been funded by Transport Scotland as part of Tactran's 2023/34 Regional Active Travel Capital Programme grant. Of Tactran's constituent authorities, Stirling Council was successful in being awarded grant funding for construction-ready projects in 2023/24.
- 2.13 At its meeting in March, the Partnership also noted that Tactran continues to work jointly with other RTPs on how a new Active Travel regional delivery model may operate. These discussions between Transport Scotland and RTPs are ongoing.
- 2.14 Also, at its meeting in March 2023 the Partnership endorsed Tactran's submission to Transport Scotland for the 2023/24 Regional Active Travel Capital Programme (RTP/23/03 refers). Transport Scotland approved this submission and a grant letter totalling £649,750 was received. Further information and financial allocations to projects is given in Appendix D of the Budget and Monitoring Report to this meeting (RTP/23/14 refers).

- 2.15 Work on a review of the Regional Active Travel Network, being undertaken by ARUP, is continuing with digitised mapping based on multi-criteria nearing completion. A further £22,000 is available in 2023/24 from Transport Scotland's Regional Active Travel Fund to enhance this work and a brief for this is currently being drafted.

Fair Fares Review Update

- 2.16 Tactran received a letter from the Scottish Government Minister for Transport on 15 May 2023, providing an update on the Fair Fares Review, as attached at Appendix A. The letter states that:
- A public consultation on the Scottish Government's draft Vision for Public Transport be undertaken during summer 2023;
 - A Pathfinder Pilot scheme will be introduced for six months from October 2023 to remove peak rail fares from ScotRail services; and
 - The Fair Fares Review conclusions will be published at the end of 2023 and will take account of the public consultation and the initial findings of the Pathfinder Pilot.

Consultations

Local Transport Strategy: Draft Guidance for Stakeholder Review

- 2.17 On 17 March 2023 Transport Scotland published [Local Transport Strategy: Draft Guidance](#) for stakeholder review, inviting views on whether the draft guidance achieves its objectives of supporting local authorities and asking for a completed questionnaire to be returned by 15 June 2023.
- 2.18 In order to transform Scotland's places and transport system, bold strategies and transformative change is required at the local level. These choices may be challenging, and the Local Transport Strategy (LTS) offers an opportunity to set priorities, agenda, direction and process for change at the local level. The draft guidance is intended to support local authorities as they develop and implement their LTS.
- 2.19 Tactran's proposed response welcomes the guidance and the flexible approach to Local Transport Strategies recognising that the scale and scope of a LTS will vary by local authority. While Tactran considers that the right level of detail is provided in the guidance it is considered that the role of the Regional Transport Strategy (RTS) and the assistance it can provide to local authorities in developing their Local Transport Strategies is not given sufficient weight or detail.
- 2.20 The recognition that Regional Transport Strategies are statutory documents which are required to be produced by RTPs and submitted for approval by Scottish Ministers, is welcomed. However, it is considered that the purpose of a RTS is not an accurate description and a suggested alternative description is provided.

- 2.21 The Partnership is asked to consider and approve the proposed Tactran response, as detailed in Appendix B.

Perth and Kinross Mobility Strategy

- 2.22 On 28 April 2023 Perth & Kinross Council published [Let's Talk Transport, Main Issues Report](#) to assist in developing a robust evidence base to inform a draft Mobility Strategy, with the consultation period ending on 11 June 2023. Perth & Kinross Council has subsequently agreed to extend the consultation period for Tactran to allow the proposed response to be considered at this meeting.
- 2.23 Perth & Kinross Council are currently developing a Mobility Strategy that will set out their vision for managing and developing the transport network over a minimum period of 10 years. The Mobility Strategy will consider all modes of transport for the movement of people and goods across Perth and Kinross' rural and urban settings, to help achieve national targets and local objectives.
- 2.24 The Let's Talk Transport main issues report was approved by the Council's Environments, Infrastructure, and Economic Development Committee on 29 March 2023 and is the first stage in developing a Mobility Strategy by late 2024. It will be used as evidence for the Mobility Strategy, together with feedback gathered from this consultation.
- 2.25 Tactran welcomes the general direction that runs through the main issues report as it provides a sound basis towards improving the more sustainable forms of transport. In parts, the document remains rather Perth City focussed without any reference to the distinctive rural areas within Perth and Kinross. Tactran's response recommends strengthening the rural links within the document.
- 2.26 Whilst similar objectives apply across the geographic area, the relative importance will vary according to geography. The Strategy should, therefore, recognise the different natures of an area so that objectives and actions can be applied proportionately.
- 2.27 The Partnership is asked to consider and approve the proposed Tactran response, as detailed in Appendix C.

A zero emission vehicle (ZEV) mandate and CO2 emissions regulation for new cars and vans in the UK

- 2.28 On 30 March 2023 the Department for Transport (DfT) published consultation on [a zero emission vehicle \(ZEV\) mandate and CO2 emissions regulation for new cars and vans in the UK](#) with the consultation period ending on 24 May 2023.

- 2.29 The document consults on proposals to establish a regulatory framework for the use of zero-emission vehicles (ZEV), with the aim of reducing greenhouse gas emissions and improving air quality. The proposal includes a ZEV mandate requiring an increasing share of zero-emission cars and vans, alongside a CO2 emissions regulation to ensure that new non-zero emission cars and vans do not become more polluting in the future. The consultation was led by DfT, but was a joint consultation between the UK Government, Scottish Government, Welsh Government and Northern Ireland Department of Infrastructure and aims to ensure net zero emissions targets for transport are met within the required timescales.
- 2.30 Evidence received through the consultation will inform the design of a mandate and CO2 emissions regulations, and the Scottish Government will carefully consider feedback received through the consultation to assess whether the proposals benefit Scottish communities and businesses and helps achieve the Scottish Government's ambition to phase out the need for new petrol and diesel cars and vans by 2030. As this is a devolved policy area, the final determination on whether and how a mandate would apply in Scotland rests with the Scottish Government.
- 2.31 The proposals put forward in this consultation are a significant step to decarbonise transport within the United Kingdom and, indeed, Scotland.
- 2.32 Tactran supports the principles of the proposed ZEV Mandate, but the ambition of the proposed targets falls short of where they should be if the Mandate is to drive the market as intended. Tactran, subsequently, supports the principle of introducing separate regulations with more ambitious requirements in Scotland and encourages the UK Government to increase its targets in line with the high scenario set out in the consultation document.
- 2.33 In the wider design of the regulation, Tactran considers the proposal that only ZEVs count towards the awarding of certificates makes sense. Tactran supports keeping the eligibility criteria and methodologies as set out for deriving the price for the carbon certificates and excess carbon emissions simple. Simplicity also means that there should be no banking or borrowing, as including these can result on the important early targets during the initial three years between 2024 and 2026 to be weakened. This will have a significant impact on the UK's and Scotland's ability to meet their ambitious carbon targets.
- 2.34 Finally, Tactran considers that the proposed system design of fixing the CO2 regulation at its current level and keeping that separate from the ZEV Mandate also makes sense. This will keep the focus on the development and sales of ZEVs.
- 2.35 As the deadline for responses was prior to the June Partnership meeting, Tactran's response to the consultation was considered and approved by the Executive Committee to allow it to be submitted to DfT by the 24 May 2023 deadline.

- 2.36 The Partnership is asked to note Tactran’s response to DfT’s consultation, as shown in Appendix D.

Local Living and 20-minute Neighbourhoods

- 2.37 On 27 April 2023 Scottish Government published consultation on planning guidance for [Local living and 20-minute neighbourhoods](#) to support the implementation of National Planning Framework 4 (NPF4), with the consultation period ending on 20 July 2023.
- 2.38 The complex challenges faced, from the climate and nature crises to poverty and disadvantage and stark health inequalities, require a joined-up and collaborative approach to deliver positive outcomes for people and the environment.
- 2.39 Local living and 20-minute neighbourhoods can help to deliver the healthy, sustainable and resilient places required to support a good quality of life and balance our environmental impact. The Local Living and 20-minute neighbourhood concepts aim to create places where people can meet most of their daily needs within a reasonable distance of their home, by walking, wheeling or cycling.
- 2.40 The Partnership is asked to delegate authority to the Executive Committee to consider and approve a proposed response to the Scottish Government’s consultation on Local living and 20-minute neighbourhoods.

3 CONSULTATIONS

- 3.1 Elements of the report have been the subject of consultation with partner Councils, other RTPs, Transport Scotland and other partners/stakeholders, as appropriate.

4 RESOURCE IMPLICATIONS

- 4.1 This report has no direct or additional financial or other resource implications.

5 EQUALITIES IMPLICATIONS

- 5.1 This report has been screened for any policy implications in respect of Equality Impact Assessment and no major issues have been identified.

Mark Speed
Director

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NOTE

Papers, as defined by Section 50D of the Local Government (Scotland) Act 1973 (and not containing confidential or exempt information) were relied on to a material extent in preparing this Report:

Report to Partnership RTP/23/03, Active Travel Update, 14 March 2023

Report to Partnership RTP/23/14, 2023/24 Budget and Monitoring, 13 June 2023

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Fair Fares Review Stakeholders

12 May 2023

Colleagues

I am writing to you in my new role as the Minister for Transport to provide an update on the Fair Fares Review, an area of work on which you have previously engaged with my predecessor Ms Jenny Gilruth MSP and officials at Transport Scotland.

Firstly I would like to thank you for your engagement on the review to date and for sharing your evidence and expertise with Transport Scotland. This has helped inform the development of the review and build a vision of the features and attributes that we want our public transport system to embody in the years ahead in support of the priority outcomes set out in our National Transport Strategy (NTS2).

The importance of this agenda is set out in the First Minister's Policy Prospectus, "Equality, Opportunity, Community: New leadership – A fresh start", published on 18 April 2023, which sets out our commitment to make our public transport system more accessible, available, and affordable, with the costs of transport more fairly shared across government, business, and society. The Fair Fares Review is key to delivering on this commitment and I therefore once again thank you for engaging constructively with the review to date and look forward to your further engagement in the coming months.

In launching his Policy Prospectus, the First Minister confirmed that as part of the Fair Fares Review, a Pathfinder Pilot scheme will be introduced for six months from October 2023 to remove peak rail fares from ScotRail services. This will make rail a more attractive proposition for travellers and support modal shift from car. It will also provide us with an opportunity to test new fares structures in response to the changes in travel patterns that have emerged since the onset of the Covid pandemic.

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See www.lobbying.scot

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It is vital that the Fair Fares Review is informed by the most robust and up-to-date evidence and I am therefore confirming that the Fair Fares Review's conclusions will now be published at the end of 2023 in order to take into account emerging findings from this Pathfinder Pilot.

The Scottish Government will, as previously advised, launch a public consultation on our Draft Vision for Public Transport and the issues within scope of the Fair Fares Review in summer 2023. The evidence and views set out by respondents will help inform the review's conclusions.

I trust this letter provides you with an update on our plans for the Fair Fares Review and the Future of Public Transport in Scotland and I look forward to discussing this further with you and hearing your views when we launch the consultation this summer.

Kind regards



Kevin Stewart

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See www.lobbying.scot

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Stakeholder Review: Draft Local Transport Strategy (LTS) Guidance

Tactran Response

Questionnaire

There is no requirement to answer all questions - please provide responses to as many of the questions as you would like to respond on.

1. Do you consider that the approach / structure of the draft guidance is appropriate and helpful?

It is helpful that the guidance is supportive rather than prescriptive in tone and approach and recognises that the scale and scope of the LTS will vary by local authority. The approach is appropriate, recognising that the LTS is a non-statutory document, but also that it can be a helpful tool to for Local Authorities to set priorities, agenda, direction and process to change at the local level.

2. Do you feel that the LTS guidance achieves the right level of detail?

In general the LTS achieves the right level of detail, however, it is considered that the role of the Regional Transport Strategy (RTS) and the assistance it can provide to Local Authorities in developing their Local Transport Strategies is not given sufficient weight or detail (see response to questions 3 and 6)

3. Is there any further information that the guidance could signpost to help local authorities make best use of existing resources as they prepare their LTS? Please provide details of the suggested resources.

RTPs in developing their Regional Transport Strategies (RTS) undertake a similar process as outlined for Local Transport Strategies within the draft guidance: preparing main issues reports, setting objectives and outcomes and identifying options. To help inform this process Strategic Environmental Assessments and Integrated Impact Assessments are undertaken as well as public and stakeholder consultation. A significant amount of the information and data gathered during this process can be disaggregated into each constituent Council area and can therefore provide a good source for Local Authorities when developing their LTS.

4. Do you have any comments on how the draft guidance could be strengthened to support NTS priorities?
 - a. Reduces inequalities
 - b. Takes climate action
 - c. Helps deliver inclusive economic growth
 - d. Improves our health and wellbeing

Given transport's role in supporting the economy, in addition to referencing National Strategy for Economic Transformation, it would be good to reference regional economic strategies, such as those developed for City Region Deals.

5. Other than what the draft guidance sets out on the Regional Transport Strategy (RTS), Local Development Plan (LDP), and Regional Spatial Strategy (RSS), what other local and regional strategies do you think that local authorities should ensure the LTS is aligned with?

See answer to question 4

6. Do you have any other comments you wish to share on the draft guidance?

The recognition that Regional Transport Strategies are statutory documents which are required to be produced by RTPs and submitted for approval by Scottish Ministers, is welcomed. It may also be worthwhile mentioning that all Local Authorities are members of an RTP, with local elected members of each constituent Council represented on their Board.

It is considered that the purpose of Regional Transport Strategies given on page 9 of the guidance document is not an accurate description. It is suggested that the current text:

'Regional Transport Strategies and Delivery Plans provide the regional priorities, projects, actions and services, aligned with the NTS priorities. While these provide a framework for travel and transport in the region, the RTS generally has a particular focus on regional travel covering several Local Authority boundaries, i.e. travel between local authorities rather than travel wholly within local authority areas, while the LTS will consider transport within its local area.'

Is replaced by the following text:

'Regional Transport Partnerships bring together local authorities and other key regional stakeholders to take a strategic approach to transport in each region of Scotland. Their Regional Transport Strategies provides a framework for the transport activities of constituent councils, health boards and others but do not necessarily go into detail on those delivery issues that remain outwith their direct responsibility. Whilst the RTS acts as a framework, the LTS of the constituent councils will also contribute to the RTS.'

'When taken together, the national, regional and local strategies will represent a hierarchy of interventions in transport services, infrastructure and travel behaviour and a comprehensive framework for the improvement of transport across the whole of Scotland.'

Tactran's Response to the consultation on the draft main issues report forming part of the Big Place Conversation and the development of Perth and Kinross Council's Mobility Strategy

The Tayside and Central Scotland Regional Transport Partnership (Tactran) welcomes the opportunity to respond to the consultation on the draft main issues report forming part of the Big Place Conversation and the development of Perth and Kinross Council's Mobility Strategy.

Overall, Tactran welcomes the general direction that runs through the main issues report as it provides a sound basis towards improving the more sustainable forms of transport offer.

The main issues report recognises the multiple benefits that this can bring.

Section 1.2 'What is the Mobility Strategy?'

- i. The Regional Transport Strategy provides a key input to Local Transport Strategies. As such the role of the Mobility Strategy to help achieve national and regional targets and objectives should be recognised. The role of the Mobility Strategy is to identify and deliver improvements locally in line with the framework (strategic objectives / outcomes / actions) as identified in the RTS.

Section 1.5 'Alignment with National, Regional and Local Strategies and Policies'

- i. While reference is made to the strategies and policies by the Cairngorms National Park Authority, respective policies and strategies by the Loch Lomond and the Trossachs National Park Authority have been omitted.
- ii. While there is reference to the seven Local Action Plans in Section 4 Public Engagement, there is no reference made to the documents here.
- iii. Tactran suggests to also include Perth and Kinross Council's Electric Vehicle Infrastructure Fund Strategy and Expansion Plan and, the assessment report compiled for Perth and Kinross Council through their participation in the Tay Cities Hydrogen Project. The report identifies near and mid-term opportunities for replacing (or possibly retrofitting) existing public sector fleet internal combustion engine (ICE) vehicles with hydrogen fuel cell electric vehicles – drawing on an understanding of current and emerging hydrogen technologies.
- iv. Scotland's Road Safety Framework to 2030 sets out a compelling long-term vision for road safety, Vision Zero, where there are zero fatalities and injuries on Scotland's roads by 2050.

Section 2 'Nature of the Region'

- i. In parts, this section remains rather Perth City focussed without any reference to the distinctive rural areas within Perth and Kinross. Examples include the presented datasets in relation to traffic flows.
- ii. Ownership of a strategy is critical to its delivery. It, subsequently, needs to speak to all. Whilst similar objectives apply across the geographic area, the relative importance will vary according to geography. The Strategy must, therefore, recognise the different natures of an area so that objectives and actions can be applied proportionately.
- iii. It is also important to recognise that people do not live their lives within single council areas and hence there is need to work across LA boundaries. Examples include:
 - Invergowrie – Dundee
 - Crieff – Dunblane (Stirling)
 - Breadalbane (Aberfeldy/Kenmore/St Fillans – Killin/ Lochearnhead)
 - Kinross – Fife
 - Coupar Angus – Forfar
- iv. While the Strategy recognises that many of the solutions may not necessarily be transport related, the opportunity of providing local services and digital infrastructure and inclusion, could be strengthened.

Section 3 'Transport Network Problems and Opportunities'

- i. In parts, this section remains rather Perth City focussed without any reference to the distinctive rural areas within Perth and Kinross. Examples include the presented datasets in relation to access to health care facilities.
- ii. Reference is made to the uptake of the free bus pass for under 22s in Perth and Kinross. Rather than giving an absolute figure, an indication of the share would provide further insight.
- iii. Tactran suggests that reference is made to the Electric Vehicle Infrastructure Fund Strategy and Expansion Plan currently being developed by Perth and Kinross Council.
- iv. Connection to other Scottish Cities. It remains unclear why some of the journey times are highlighted in bold.

Tactran look forward to continuing to work with Perth and Kinross Council over the lifetime of the Mobility Strategy on the identified issues to help realise the ambitions of the Council of fair and sustainable access for all.

ZEV Mandate and CO2 Emission Regulation for New Cars and Vans in the UK Consultation

UK Government Consultation

Tactran Response

Tactran welcomes the opportunity to respond to consultation on the ZEV Mandate and CO2 Emission Regulation for New Cars and Vans in the UK.

Question 1:

- (a) Do you agree or disagree with the UK Government's preference to introduce a UK-wide regulatory framework?**
- (b) Or, do you agree or disagree with the introduction of different trading schemes with separate requirements in one or more of the nations, different from the rest of the UK? Please explain your answer.**

Tactran disagrees with the UK Government's preference for a UK-wide regulatory framework. As noted in the document, Scotland has more ambitious carbon reduction targets than the United Kingdom. The Scottish targets remain amongst the most ambitious targets in the world and are aligned with a path to keep global warming to below 1.5°C above preindustrial levels. Therefore, the regulatory framework in Scotland must be consistent with the ambitious targets set in Scotland.

The purpose of this regulation is to drive ambition. Governments should not set targets that are lower than the market would achieve anyway. Targets should be ambitious, but realistic, ensuring that manufacturers produce and deliver increasing numbers of zero emission vehicles for the UK market. Tactran, subsequently, agrees with the principle of introducing separate regulations with more ambitious requirements in Scotland.

Question 2:

- (a) Do you agree or disagree with the UK Government's preference to introduce UK-wide annual targets?**
- (b) Or, do you agree or disagree with year-on-year targets having to be met within each nation of the UK annually? Please explain your answer.**

Tactran disagrees with the preference to introduce annual targets, with two or three yearly being more appropriate. Annual targets can pose a challenge for manufacturers in terms of having to sell a set proportion of vehicles each year which does not necessarily fit with production plans. Targets should be set for Scotland that reflect the ambitions for Scotland.

Question 3:

- Do you agree or disagree with the proposal for the central trajectory for new zero emission cars set out in Table 1?**

The proposed annual targets for cars can, and should, be more ambitious in the early years of the Mandate. The purpose of this regulation is to drive ambition. Governments should not set targets that are lower than the market would achieve anyway. Targets should be ambitious, but realistic, ensuring that manufacturers produce and deliver increasing numbers of zero emission vehicles for the UK market.

With BEV sales already around 15% of the market and rapidly rising, a target of only 22% in 2024 is below what the market will deliver anyway. If the current trajectory is maintained this would result in approximately BEV sales of 34% of the market. Tactran, subsequently, supports a target in line with the high scenario in Figure 7, achieving 41% by 2025 and 50% by 2027.

As stated previously, the ZEV mandate should drive ambition. The Scottish Government's ambition is to achieve 100% by 2030. Therefore, the proposed target of 38% for 2027 is also too low; it is towards the lower end of the SMMT's projections, meaning it is what would happen anyway. We therefore support a more rapid increase in ZEV sales culminating in 100% by 2030, this would be almost in line with the high scenario set out in Figure 7 which reaches 97% by 2030.

Question 4:

- **Do you agree or disagree with the proposal for the central trajectory for new zero emission vans set out in Table 2?**

Tactran believes that the targets set out for vans are behind where they should be. While it is understandable to set the initial target at a lower level than cars due to the differing maturity of the electric van market, the targets beyond 2024 must accelerate at a much faster rate than currently proposed and again aim for 100% by 2030, in line with Scottish Government ambitions and similar to the high scenario set out in Figure 8.

Question 5:

- **Do you agree or disagree that the proposed derogations (thresholds and adapted trajectories) strike an appropriate balance between supporting small volume manufacturers while also ensuring that all manufacturers play a part in the transition to ZEVs?**

Tactran agrees with the proposed derogations.

Question 6:

- **Do you agree or disagree with these proposals for the inclusion or exclusion of SPVs? If you disagree, please state your reasons for specific SPV categories.**

With the proposals to include a trading element, Tactran believes that there is no need to include exemptions for specialist vehicles. Specialist vehicles represent a very small share of the overall market and manufacturers can purchase credits to meet targets for these vehicles.

If exemptions are to be included in the Mandate, they must be specifically laid out in the regulation.

Question 7:

- **Do you agree or disagree with the proposals for banking during the 2024-2030 period?**

Tactran disagrees with the proposed provision for borrowing. Existing systems that use banking and borrowing, such as the Effort Sharing Regulation (EU) 2018/842, show that such flexibilities can delay much needed climate action.

This is contrary to what is needed if the UK is to achieve the Sixth Carbon Budget targets. Achieving the targets requires ZEV sales to be ambitious, especially during the initial three years between 2024 and 2026.

Tactran does not believe that banking and borrowing is needed in this regulation. Allowing companies to delay action will not stimulate further innovation.

It is obvious that the overwhelming majority of OEMs recognise the role of electric cars and vans, with an increasing number of OEMs already planning to end the production of ICE cars.

Question 8:

- **Do you agree with the proposed provisions for borrowing in the 2024-2026 period? If you disagree with the proposal, please provide alternative options and your rationale.**

Tactran disagrees with the proposed provision for borrowing. Existing systems that use banking and borrowing, such as the Effort Sharing Regulation (EU) 2018/842, show that such flexibilities can delay much needed climate action.

This is contrary to what is needed if the UK is to achieve the Sixth Carbon Budget targets. Achieving the targets requires ZEV sales to be ambitious, especially during the initial three years between 2024 and 2026.

Tactran does not believe that banking and borrowing is needed in this regulation. Allowing companies to delay action will not stimulate further innovation.

It is obvious that the overwhelming majority of OEMs recognise the role of electric cars and vans, with an increasing number of OEMs already planning to end the production of ICE cars.

Question 9:

- **What are your views on the proposed minimum requirements for ZEVs (emissions, minimum range and warranty)?**

The regulation should be kept under open review to enable the Government to monitor the market and make changes if necessary. If the market is not providing the quantity of quality vehicles needed for the transition, criteria could be added at a later stage.

Question 10:

- **Are there additional minimum requirements that should be added to the regulation (in the first year or at a later point)? Please provide your rationale.**

Tactran believes that that the eligibility criteria should be kept simple. Adding too many criteria on eligibility could be detrimental. The regulation, however, should be kept under open review to enable the Government to monitor the market and make changes if necessary. If the market is not providing the quantity of quality vehicles needed for the transition, criteria could be added at a later stage.

Question 11:

- **Do you agree or disagree with the proposal to provide additional credits to ZEVs used in car clubs? Are there any additional criteria or provisions that can increase the effectiveness of these incentives? Please explain your reasoning.**

Recognising the role of car clubs, Tactran agrees with the proposal to provide additional credits to ZEVs used in car clubs. Benefits of car clubs include the potential to introduce ZEVs more widely more quickly to replace journeys by ICE vehicles. They would also provide lower cost access to EVs, feasible for those unable to afford a new car. This is important in combination with local / regional demand management measures such as differentiating charges by vehicle size and emissions.

Question 12:

- **Is the proposed incentive mechanism an appropriate and beneficial way to support the development of zero emission WAVs?**

Tactran agrees with the proposed incentive mechanism. However, this would need to be accompanied by regulations by the Government to ensure that all taxi companies must operate a certain share of their fleet as wheelchair friendly taxis to be available to all wheelchair types. All too often wheelchair users are left stranded due to the lack of accessible wheelchair taxis.

Question 13:

- **What are your views on the proposed payment levels in the ZEV mandate?**

Tactran does not have a particular view on the payment levels but is supportive of the criteria set out in paragraph 2.103.

Question 14:

- **What are your views on the proposed methodology to set baseline CO2 emissions targets for manufacturers?**

Tactran considers the methodology to be reasonable.

Question 15:

- **Do you support the flat scenario, the tightening scenario, the lightweighting scenario or a different trajectory for the CO2 standard? Please explain your reasoning.**

Tactran supports the flat scenario to fix the CO2 regulation so that non-ZEV vehicles sold do not become less efficient. This scenario will enable manufacturers to focus their development plans on ZEVs which will help the UK to achieve its decarbonisation targets. The ZEV Mandate regulation is the best tool to help achieve that. The proposed approach would eliminate the concern that manufacturers will be required to meet two separate targets.

Question 16:

- **Does the proposal for derogations under the non-ZEV CO2 standard strike an appropriate balance between supporting small volume manufacturers and minimising increases in emissions from combustion engine vehicles?**

Tactran does not have a particular view on derogations under the non-ZEV CO2 standard but would urge the Government to stick to the principle of simplicity where possible.

Question 17:

- **What are your views on the proposed categories for exemptions from the non-ZEV CO2 standard?**

Tactran has no preference or contribution to make to Question 17.

Question 18:

- **Do you agree or disagree with the proposal for how pooling would operate under the ZEV mandate and non-ZEV CO2 standard?**

See answer to Question 6

Question 19:

- **What are your views on the proposed method for setting non-ZEV CO2 targets for new manufacturers entering the UK market?**

Tactran supports the proposed method.

Question 20:

- **What are your views on this proposed mechanism to enable overcompliance with the ZEV mandate to help toward compliance with the non-ZEV CO2 regulation?**

Tactran considers it essential for the CO2 regulation not to be linked to the ZEV Mandate certificate system. Allowing the two systems to work independently ensures that they are at their most effective in increasing the number of ZEVs sold in the UK while ensuring non-ZEVs do not become less efficient.

If the two schemes are to be linked, they must not be linked in a way that allows for companies to overperform on the CO2 regulation and offset that against underperformance on the ZEV Mandate. This would likely result in the continued development of hybrid vehicles, contrary to the Government's intention with the overall design of the ZEV mandate regulation.

The risk of allowing companies to use certificates earned on overperformance on the ZEV Mandate to offset underperformance on the CO2 regulation is that it could allow some companies to sell more polluting vehicles, albeit at the same time as selling more ZEVs. Although this may not be a significant problem, particularly in the long term, Tactran is of the opinion that the two schemes are not linked to ensure the greatest effectiveness.

Question 21:

- **What are your views on this proposed mechanism to enable overcompliance with the non-ZEV CO2 standard to help toward compliance with the ZEV mandate targets?**

As above under Question 20.

Question 22:

- **What are your views on the levels and structure of the proposed payment system for the non-ZEV CO2 regulation?**

Tactran does not have a particular view on the level of the payment for non-ZEV CO2 regulation but would urge the Government to stick to the principle of simplicity where possible. As such Tactran supports using the existing CO2 regulation whereby the manufacturer pays per gram (or fraction of a gram) of CO2 above their target multiplied by the number of non-ZEV cars or vans sold.

Question 23:

- **What are your views on the proposed timeline and process for reporting data and meeting compliance with the ZEV mandate and non-ZEV CO2 scheme?**

Tactran does not have a particular view on how the ZEV mandate and non-ZEV CO2 regulation should be enforced, but we would urge the Government to stick to the principle of simplicity where possible.

Question 24:

- **Do you support or oppose the proposal to keep the regulation under review?**

Tactran believes that the regulation should be kept under open review to enable the Government to monitor the market and make changes if necessary. If the market is not providing the quantity of quality vehicles needed for the transition, criteria could be added at a later stage.

Question 25:

- **What are your views on the potential impact of the two proposed schemes on communities in the more rural and remote parts of the UK and to those businesses involved in the sale of vehicles in those areas?**

Tactran supports the swift electrification and decarbonisation of vehicles. While at present the public charging network is sufficient to meet current BEV numbers in most regions, there is the risk that regions will fall behind when the anticipated accelerated uptake in BEV numbers occurs from 2024, impacting on the reliability of EV charging. This particularly applied to the peripheral and more rural and remote regions.

Tactran welcomes the Scottish Government's initiative to support Scottish Councils to develop and implement Electric Vehicle Infrastructure Strategies and Expansion Plans. We believe that this is an important step to plan and deliver the public charging infrastructure that is required to ensure the target of 300,000 charge points throughout UK by 2030 is met to provide a sufficient network for all regions.