



environmental  
protection uk

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## Low Carbon Vehicles Consultation

### Response from Environmental Protection UK October 2009

Environmental Protection UK brings together environmental professionals, industry, policy makers, academia and the public to inform debate and influence changes to policy and practice in land quality, air quality and climate change, and noise. We are a national membership based charity with over 100 year's experience of environmental campaigning, public information provision, producing educational resources and policy formulation. Our Air Quality and Climate Change work is aimed at promoting integrated policies and practices that reduce the negative effects on health and the environment of both air pollution and greenhouses gases.

#### General Comments

Environmental Protection UK are supportive of a move towards low carbon vehicles however we would caution against judging new and emerging technologies purely on their carbon emissions and that new vehicles do not cause a detrimental effect on air quality and environmental noise. We are pleased that this consultation document recognises the role of biofuels and that, even though they are not yet commercially viable, the Scottish Government plans to commit to examine incentives to help industry develop these.

#### Specific Comments

<b>1</b>	Discussion on which low carbon technology and fuels will be the first to influence the emissions of GHG may be somewhat premature simply because the costs for the various technologies are still expensive. It is likely though that biofuels and hybrids are likely to be the first as these are further ahead in terms of research and development than electric and hydrogen vehicles.
<b>2</b>	No comment
<b>3</b>	No comment
<b>4</b>	No comment
<b>5</b>	The use of biofuels will depend on food security and whether or not the United Kingdom has sufficient agricultural land remaining to grow crops for biofuel production.

#### Environmental Protection UK – Scotland

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<b>6</b>	A 100% public sector target and a 30% of other road users 2020 timescale for the development and uptake of any low carbon technologies is hugely challenging. The technology is only now becoming available to produce LCVs on a small scale, increasing this to meet full-scale public demand will be difficult in 10 years. Likewise, the British public need to be shown successfully that they can get just as many benefits from LCVs than they can from the car they drive just now; the education for this change needs to start now if the 2020 target is to be met.
<b>7</b>	No comment
<b>8</b>	No comment
<b>9</b>	Grid upgrades would need to be funded by Government if there is to be serious public uptake in LCVs; the costs of low carbon vehicles must be within the budget of all, asking industry to finance both technological development and grid upgrade will push prices up.
<b>10</b>	The Scottish Government must take responsibility for providing island communities and rural areas with the means to run a low carbon transport system.
<b>11</b>	<p>The document acknowledges that existing technology is easier to implement in cars than HGVs, LGVs and buses yet the Scottish Government would like the entire public service – predominately HGVs, LGVs and buses – to be LCVs by 2020. With the Single Outcome agreement in place it will take a large amount of public money set aside specifically for the uptake of LCVs, this document states that at present there is an increased cost of approximately £100K per hybrid HGV – this works out at an extra cost to the public of £290million based on the number of LA HGVs in 2008. For cars this figure would be up to £10million. Making the public sector the leader in uptake of LCVs is laudable however if the technologies aren't cost effective the LA would need to balance its environmental objectives against cost to the tax payer.</p> <p>With regards to the targets listed within Section 6.3, we are concerned that making the public sector buy "best in class" would result in LAs purchasing best in class for carbon but not in other aspects. We would suggest that the either the public sector has to meet their emissions share as defined within the Climate Change (Scotland) Act 2009 or has a certain percentage of their fleet as LCVs by a certain date. We would support the target of 95% of all new vehicles purchased by 2020 be LCV provided they also meet other air quality criteria.</p>
<b>12</b>	See response to Q11
<b>13</b>	See response to Q11
<b>14</b>	No comment
<b>15</b>	No comment
<b>16</b>	See response to Q11
<b>17</b>	No comment
<b>18</b>	No comment
<b>19</b>	No comment
<b>20</b>	No comment
<b>21</b>	<p>No.</p> <p>Scotland cannot go it alone on this matter to ensure that one particular type of car is not rendered useless at the border i.e. Scotland goes ahead and develops the infrastructure for hydrogen cars whilst England and Wales go for electric cars. The United Kingdom must act as a whole.</p> <p>Likewise, Scotland must also look at any future infrastructure development in Europe as there are cross-border car and haulage journeys.</p>
<b>22</b>	Biofuels – will the UK have sufficient agricultural space to grow crops for biofuels as well as having food security?

<b>23</b>	No comment
<b>24</b>	No comment

Please Note that this form **must** be returned with your response to ensure that we handle your response appropriately

### 1. Name/Organisation

Organisation Name

**Environmental Protection UK - Scotland**

Title Mr  Ms  Mrs  Miss  Dr  Please tick as appropriate

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Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate  Yes

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate

Yes  No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate  Yes  No