

TAYSIDE AND CENTRAL SCOTLAND TRANSPORT PARTNERSHIP**EXECUTIVE COMMITTEE****7 MAY 2025****RESPONSE TO TRANSPORT SCOTLAND'S DRAFT JUST TRANSITION PLAN
FOR TRANSPORT IN SCOTLAND****REPORT BY SENIOR STRATEGY OFFICER**Purpose

The purpose of this paper is to seek approval to submit a response on behalf of the Partnership to Transport Scotland's consultation on their Draft Just Transition Plan for Transport in Scotland.

Summary

Transport Scotland's Draft Just Transition Plan for Transport in Scotland identifies the implications for people, communities, workers, businesses and organisations of transitioning to a net-zero transport system in Scotland by 2045 and suggests mitigation measures to support a fair and just transition.

1 RECOMMENDATIONS

- 1.1 That the Executive Committee considers and approves the submission of Appendix A to this report as a response to Transport Scotland's consultation on a Draft Just Transition Plan for Transport in Scotland.

2 BACKGROUND

- 2.1 The Scottish Government have set a target to transition to a Net Zero society by 2045. Such a transition will mean significant changes for individuals, organisations and businesses. It is vital that this transition is managed in a manner which does not increase inequalities and enables the continuation of the provision of goods and services to society.
- 2.2 On 24 February 2025 Transport Scotland issued a [Draft Just Transition Plan for Transport in Scotland](#), seeking comments by 19 May 2025.
- 2.3 The Partnership Meeting of 18 March 2025 delegated authority to the Executive Committee to consider and approve a response to Transport Scotland's 'A Draft Just Transition Plan for Transport in Scotland' (report RTP/25/12 refers).

3 DISCUSSION

- 3.1 The Draft Just Transition Plan for Transport in Scotland recognises that the changes involved in Scotland transitioning towards Net Zero will create opportunities and challenges, and that these challenges must be met in a way that is fair and just.
- 3.2 Change is – to a greater or lesser extent – difficult for people, businesses and organisations. The ability to, and ease, of change will vary according to a number of factors, including:
- Financial opportunity: e.g. ability to buy a new car, or pay extra for public transport when you already have a car
 - Flexibility in lifestyle: ability to change where and when you travel. E.g. A shop or factory worker will have less flexibility about where and when to work as opposed to a professional working in an office
 - Skills to adjust to new behaviours: e.g. using public transport instead of the car requires the ability to plan and make a multi-modal journey
- 3.3 It is therefore likely that the most vulnerable in society - and the least financially sustainable organisations/business - will struggle most with a transition. Conversely the wealthier will have greater ability to take advantage of the opportunities presented and promoted by change.
- 3.4 The Draft Plan considers the necessary changes for transition to a Net Zero transport system. This includes the implications of:
- Changing to low emission vehicles: not just in terms of access to low emission vehicles themselves, but also charging networks, maintenance skills etc;
 - Changing behaviour: for example, access to alternatives to the car and measures discourage car use (including demand management measures)
- 3.5 The Draft Plan then considers the impacts of these changes on, and the necessary mitigation measures for:
- People and communities
 - Workers
 - Businesses and Organisations
- 3.6 Currently the Draft Plan considers the impacts of change without assigning timescales to such. For example, it will be the least affluent communities who benefit most from improved public transport, but in terms of managing the transition, measures are required to ensure that there is affordable access when change is enforced. Enabling fair and equitable change means that careful consideration needs to be paid to the phasing of improvements and disincentives.
- 3.7 The Draft Plan does a reasonable job of identifying both the risks to a Just Transition and appropriate mitigation measures. However, it is likely that the

full range of impacts – and hence the full range of mitigation measures – will only be able to be identified in the detailed delivery plans of the interventions proposed to take climate action.

3.8 The proposed response to the consultation on the Draft Just Transition Plan for Transport in Scotland is included as Appendix A.

3.9 Members will be aware that officers have commissioned work to understand the comparative equality and economic impacts of different demand management options which can help reduce car km. Of particular relevance to the car km reduction discussion, the Draft Plan recommends that “transport options are affordable and the transition to decarbonised transport does not disproportionately burden on those with least choice and ability to pay.”

4 CONSULTATIONS

4.1 There has been no consultation on the publication of this report.

5 RESOURCE IMPLICATIONS

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

6 EQUALITIES IMPLICATIONS

6.1 This report supports work to identify the equalities implications of implementing the Regional Transport Strategy.

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NOTE

The following background 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/25/12 'Directors Report' 18 March 2025

Report to Executive Committee RTP/25/123 'Public Sector Equality Duties Reporting 2025' 15 April 2025

Appendix A

Consultation on the Draft Just Transition Plan for Transport



Respondent Information Form

Please Note the respondent form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy:

<https://www.gov.scot/privacy/>

Respondent Information Form

Are you responding as an individual or an organisation?

- Individual
- Organisation**

Full name or organisation's name

Tactran

Phone number

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The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- Publish response with name**
- ~~Publish response only (without name)~~
- ~~Do not publish response~~

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

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?

Yes

No

Where do you live most of the time?

Response is on behalf of Tactran representing the Tayside and Central Scotland area (Angus, Dundee City, Perth & Kinross and Stirling Council areas)

How would you describe your local area? [SG Classification: Large Urban, Other Urban, Accessible Small Town, Remote Small Town, Accessible Rural Area, Remote Rural Area, Island*, Other (specify)]

*We have included a separate category for island residents in recognition of the potential impacts of decarbonising Transport on these communities.

Large urban, Other Urban, Accessible Small Town, Remote Small Town, Accessible Rural Area, Remote Rural Area

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy (required)

YES

Questionnaire

Vision and Outcomes Consultation Questions:

Question 1

Vision and Outcomes Consultation Questions: Aim: To get feedback on the overall structure of the Plan and general comments or gaps identified in the outcomes, This is also to invite views on future engagement on just transition issues in Transport.

Audience: Everyone is invited to answer all consultation questions, but we have suggested that there are some questions which are more relevant to organisations or businesses, so it is possible for you to skip questions you don't want to answer.

Question

1A: Do the draft outcomes reflect what the Plan should be aiming to achieve? Please give reasons for your answer.

1B: Is anything missing from the draft outcomes in the Plan?

1A: The draft outcomes are reasonable, with the exception of the relevance of *Outcome 12 Access and Support for active travel options leads to healthier outcomes* which is questioned. Active travel is supported in relation to supporting a number of transport related health and equality objectives. However, as active travel trips are of a length that they will not be able to replace those car trips which generate car km and greenhouse gases, then the relevance of active travel to this debate is perhaps limited to accessing public transport as part of a multi-modal journey.

There is a risk in any one sub-strategy/plan of the National Transport Strategy to cover all 'desirable' outcomes irrespective of their relevance to the principle focus of the sub-strategy/plan. Doing such risks diverting focus from the core issues.

Question 2: (Everyone): Please look at the draft Transport Just Transition Plan and tell us whether you agree or disagree with the following statements. [Strongly agree, agree, neither agree nor disagree, disagree, strongly disagree, don't know]

Agree:

- The Plan is easy to understand
- The Plan is easy to use
- The information in the plan is helpful
- The information in the plan is relevant to me
- The plan is accessible to me

Question 3 (Everyone): Are you involved in any organised groups (for example a campaigning group, industry working group or public sector forum, which does not have to be climate-related) that considers how the transport sector is changing or could change in future?

Regional Transport Partnerships have the statutory responsibility to produce Regional Transport Strategies. The Transport (Scotland) Act 2005 places a duty on constituent Councils, Health Boards and other public bodies to perform their functions which relate to, or which are affected by transport, consistently with their respective Regional Transport Strategy.

3A: How could existing transport groups consider just transition issues?

Note on Q3: These questions are about understanding how people, organisations and communities want to engage on issues relating to a just transition for Transport. We have heard that people want to use existing groups, not create new ones, and that many groups and organisations have already taken actions, ideas or best practice that others could learn from when considering a just transition for Transport.

The changes required to mitigate and adapt to climate change are significant across society.

A broad and extensive public conversation needs to be maintained on why change is necessary, what changes are necessary, and what they could mean for people / organisations so that we can design or mitigate against measures appropriately.

Failure to undertake such a public conversation will put at risk the ability to bring forward many of the more difficult measures.

People and Communities Consultation Questions:

Aim: To understand priorities for people and communities, gather feedback and identify gaps in the content, including the vision, and collect evidence to inform Just Transition Planning for the sector. Inviting people to reflect on how costs of the transition might be shared fairly.

Audience: Individuals answering on their own behalf as members of communities and households. Organisations representing communities, places, or groups with protected characteristics, as well as the public sector.

Question 4 (Everyone): This question relates to all the content in the section on People and Communities. Are there any gaps in our priority actions to support people and communities in the transition of the transport sector?

CONTEXT SETTING

Change is difficult for the more vulnerable groups in society

Change is – to a greater or lesser extent – difficult for people. The ability to, and ease, of change – and the degree to which it may cause stress – will vary according to a number of factors, not least:

- Financial opportunity: e.g. ability to buy a new car, or pay extra for public transport when you already have a car
- Flexibility in lifestyle: ability to change where and when you travel. E.g. A shop or factory worker will have less flexibility about where and when to work as opposed to a professional working in an office
- Skills to adjust to new behaviours: e.g. using public transport instead of the car requires the ability to plan and make a multi-modal journey.

The more vulnerable groups in society will have less finances and less flexibility to change behaviours. The wealthier will have greater ability to take advantage of the opportunities presented and promoted by change.

The impact of change could short or long term

It is useful to consider whether impacts are short or long term

- Changes from one technology to another: the transition could have issues that need to be managed, but once the change has been made, then impact of the change will be minimal. Of course, a short-term barrier (e.g. financial outlay) can prevent change occurring in the first instance
- Change in behaviour: where a different lifestyle is adopted, the impacts of change could be long term

ARE THERE ANY GAPS IN OUR PRIORITY ACTIONS TO SUPPORT PEOPLE AND COMMUNITIES?

The Draft Plan does a reasonable job of identifying both the risks to a Just Transition and appropriate mitigation measures. However, it is likely that the full range of impacts – and hence the full range of mitigation measures – will only be able to be identified in the detailed delivery plans of the interventions proposed to take climate action.

Supporting people and communities in switching to EVs, and accessing the necessary infrastructure

- It will be necessary for the scale of the proposals to ‘meet’ the gap in terms of charging infrastructure or ability to access / own electric vehicles

Incentives for people to travel more sustainably

Action: Locating and designing new developments in a way which makes sustainable modes the priority for everyday travel

- New development accommodates both population growth and transfer from housing stock which is no longer fit for purpose. Hence, not only will only a small % of the population live in new developments, but also there will only ever be a very small transfer from old to new stock over time. Therefore whilst this is the right intention, the impact will be minimal in supporting a transition to 2045.

- This action should either be expanded (or a new action introduced) to include actions to increase the provision of local amenities. Being able to provide more services locally (*the 20minute / liveable neighbourhoods principle*) is a desirable but difficult goal. Nonetheless, if achieved it can both reduce the length of trips people need to make (reducing car km), and in doing so make services more accessible to people (by destinations being more easily accessible by a choice of modes).

Action: Better geographical digital connectivity / MaaS

- Those that struggle with digital inclusivity (broadband reception; using new technology; owning and affording the latest technology to operate the latest apps etc) are the more vulnerable groups in society. All programmes with a digital element must be connected to a broader digital inclusivity programme, or else we risk continuing to widen inequalities

Disincentives to car use

Action: Demand management interventions, more focused on urban areas, and designed and implemented to ensure fairness

- Focusing this work on urban areas is ignoring the hard truth – most car km is generated to / from / between our rural areas. There must be consideration of how we can provide alternatives to car use in our rural areas.

Action: Local Road User Charging and Workplace Parking Licencing schemes

- Tactran has commissioned work to understand the equality impacts of different demand management measures to reduce car km
- Whilst it is the wealthier groups in society that drive the most, it is the least affluent groups which have the least ability to change
 - The Tactran quantitative public opinion survey conducted for the new [Regional Transport Strategy](#) identified that:
 - ‘Essential’ trips (education and work) are a greater % of the trips undertaken by the least affluent compared to the more affluent
 - Least affluent feel least able to change their trips (less flexibility regarding time/location)
 - Least affluent are least able to accommodate the cost of change
 - Many vulnerable groups, including people leading chaotic lifestyles and those with disabilities, are less able to manage change or have reasonable alternatives
- The Draft Plan considers the impacts of change without assigning timescales to such. For example, it may be the least affluent communities who benefit most from improved public transport, but in terms of managing the transition, measures are required to ensure that there is affordable access when change is enforced. Enabling fair and equitable change means that careful consideration needs to be paid to the phasing of improvements and disincentives.

- The Tactran and Central Scotland Regional Transport Partnership has adopted the following principles in relation to investigating the introduction of charging mechanisms to reduce car km in its RTS. The Partnership agreed that any change to charging to reduce car km must:
 - Follow sufficient improvement in alternatives to the car
 - Have an impact on kilometres driven
 - Not undermine the viability of a location and consequently the co-ordination of measures across local authority boundaries will be required
 - Not increase transport poverty
 - Be able to be responsive to changes in fuel duty or its successor

Question 5 (Everyone): Which of the following priorities we have set out in the draft Plan do you think would be most helpful **for people like you** to reduce how often, or how far, they drive in a private car? You do not need to own or drive a car to answer the question, because reliance on private cars impacts everyone.

- Better use of space for active travel and public transport
- More access to online services so people don't need to travel unnecessarily
- Availability of demand responsive transport for some areas for example dial-a-bus services.
- Access to 'car clubs' which allow people to hire a car or van for shorter trips.
- Increasing costs to make driving a less attractive option in some circumstances, especially where there will be other benefits such as reducing pollution and congestion.

None of the above will have an impact on my personal circumstances

Better use of space for active travel and public transport

- Improving the attractiveness of public transport and active travel will assist in making these modes relatively more attractive compared to the private car. However:
 - Replacing car trips with walking or cycling trips will have little impact on car km and CO2 emissions – except where it improves access to public transport (approximately only 15% of car km is generated by trips below 5km)
 - Our streets can be made far more accessible for everyone without significant road space reallocation
 - Removing on-street parking for people with disabilities will restrict their access

More access to online services so people don't need to travel unnecessarily

- Those that struggle with digital inclusivity (broadband reception; using new technology; owning and affording the latest technology to operate the latest apps etc) are the more vulnerable groups in society. All programmes with a digital element must be connected to a broader digital inclusivity programme, or else we risk continuing to widen inequalities

Availability of demand responsive transport for some areas for example dial-a-bus services

- This is not a mass transit solution that will result in significant car use reduction in itself. It will however be important for e.g. remote communities to access town centres (directly or via connection with a fixed route service)

Increasing costs to make driving a less attractive option in some circumstances

- Increasing costs will reduce car km. Whether it encourages a modal shift, or results in people not accessing services or opportunities will depend on
 - Availability and cost of accessing the same destination by alternative modes
 - Availability of closer alternatives and relative cost of car vs cost and availability of accessing the destination by alternative modes

It is important to note that different charging mechanisms to discourage driving will have different impacts on

- Reducing car km
- Different populations and locations

Question 6 (Everyone): Does the draft Plan take all groups in society into account in setting out a vision for a future transport system for people and communities?

No ~~The Plan considers the impacts of decarbonising transport on all groups in our society.~~

N/A ~~The Plan considers the impacts of decarbonising transport on people like me.~~

Question 7 (Everyone): Is there anything else you would like to see in the draft Plan for people who are more likely to face challenges accessing affordable, convenient and safe travel options?

In the first instance, initiatives should be targeted at those populations / trips / locations that generate the most greenhouse gases. That will help, but will certainly not eliminate, the burden on the more vulnerable groups in society (see Qstn 8 below). In addition:

- Restrictive measures should consider the ability to provide exemptions and/or charge proportionally
- Any income from charges should be reinvested in measures that will provide an alternative to the car for those trips which generate the most car km. However, there is likely to be the need to consider measures which make access to alternatives affordable for the most vulnerable groups
- An extensive and ongoing public conversation is required: bringing forward many of the changes required will not be successful unless the reason for change, and the necessary measures, are understood and supported by society

In addition:

- Digital inclusion will underpin many changes in society. The plan is light on measures (or at least links to measures being brought forward in other policy areas) to ensure digital inclusion.

Question 8 (Everyone): Which of the following principles do you think should be the most important to guide the development of a fair system of payment, to deliver a just transition to net zero in Scotland?

- Those who emit the most pay the most, with protections for low-income groups.**
- ~~Those who earn the most pay the most, without disadvantaging middle-income groups.~~
- ~~Costs shared through taxation and incentives, such as reduced costs, will support low-carbon choices.~~
- ~~None of the above.~~

The Scottish Government has adopted the Polluter Pays principle

[1. Introduction - Environment - guiding principles: statutory guidance - gov.scot](#)

Question 8 Context note: This question is based on independent evidence suggesting that there is a link between households with higher incomes and higher harmful emissions from personal transport. Meanwhile those on lower incomes are more likely to be reliant on public transport and more impacted by negative effects of emissions such as air pollution. We commissioned researchers to work with members of the public to consider how the costs of transforming our transport system and changing travel behaviours should be shared. Over a series of discussions, the group came up with different ideas, or principles, for how costs could be shared based on earnings, emissions, or incentives

Workers Consultation Questions

Aim: To understand priorities, gather feedback and identify any gaps in the vision and content; to collect evidence to inform just transition planning for the sector; and to seek views on scope of challenges around skills provision.

Audience: Individuals answering on their own behalf thinking about their work and lived experience. Organisations representing workers in transport and other sectors, and employers, including the public sector.

Question 9 (Everyone): This question relates to all the content in the section on Workers. Are there any gaps in our priority action to supporting workers in the transition of the transport sector? It would be helpful if you could say whether your answer relates to all workers or transport workers.

Preparing workers and businesses need to reflect the areas where changes are required:

- Maintenance of low emission vehicles (road and rail). This needs to be targeted not only at those entering work, but also those already employed in maintaining vehicles
- Maintenance of low emission networks (road and rail)
- Upskilling all sectors in digital inclusion
- Sufficient bus and train drivers

Will low emission vehicles – and respective charging/fuelling patterns – result in different work patterns for drivers? Understanding whether there are any adverse impacts on drivers' hours/shifts from the use of low emission vehicles need to be considered.

Question 10 (Everyone): We have set out some actions in the draft Plan which we hope will address Transport workforce challenges. How important are the following actions to make transport jobs more attractive to people who are not as likely to work in the sector, such as women and younger people?

- Programmes which encourage women and girls to enter science, technology, engineering and maths (STEM) courses at school and college or university
- Actions to promote diversity and inclusion within the industry, including workplace culture changes.
- Actions that address existing pay gaps for certain groups.
- Actions to increase access to childcare.
- Other - please specify

All the identified actions are important. What would assist in identifying how each address identified problems with a Just Transition

Question 11: (Everyone): Actions to improve diversity in the transport sector would be most effective if they were mostly led by (choose one):

- Public sector
- Third sector
- Individuals
- None of the above
- Don't know

Measures will be most effective if they are undertaken by or with those that employ workers in the transport sector

Question 12 (For business/ organisations and Transport workers): Does the summary of priorities for workers in the draft Just Transition Plan address future workforce and skills challenges you expect to have, as the transport sector decarbonises?

The identified priorities could be expected to improve the pipeline of those working with low emission vehicles.

They do not address other potential issues with a Just Transition (e.g. digital inclusivity; driver shortages etc)

However, whilst the Draft Plan does a reasonable job of identifying the risks to a Just Transition and appropriate mitigation measures. However, it is likely that the full range of impacts – and hence the full range of mitigation measures – will only be able to be identified in the detailed delivery plans of the interventions proposed to take climate action.

Businesses and Organisations Consultation Questions:

Aim: To seek views on the priorities we have set out to address the challenges and opportunities of decarbonising transport. To gauge how effectively we are engaging all businesses, including non-transport businesses, social enterprises and public/nonprofit sector, in just transition planning.

Audience: We think these questions are most relevant to all private and public organisations, including local authorities and businesses which manufacture, provide or use any form of transport. We also invite responses from social enterprises, charities and non-profit organisations.

Question 13 (Everyone): This question relates to all the content in the section on Businesses and Organisations. Are there any gaps in our approach to setting out opportunities and priorities for businesses and other organisations in the transition of the transport sector?

This section identifies the key issues in relation to organisations transitioning from fossil fuelled to low emission vehicles.

It does not consider:

- Impacts on service delivery for organisations that struggle to transition to low emission vehicles in Low Emissions Zones. And any consequences on customers
- Resilience of electric charging networks. In the recent past storms have resulted in prolonged electricity power cuts in some areas of Scotland
- Extent of charging networks. The scale and pace of the introduction of charging infrastructure must ensure that communities in Scotland are not left with reduced services (whether public sector (Council waste collections; Police; NHS access) or business or personal deliveries (including food deliveries) because of lack of charging infrastructure

The latter two examples will mean that public and private organisations will need to carefully consider the phasing out of fossil fuelled vehicles in line with introduction of any restrictive measures to discourage vehicle use in their respective areas.

However, whilst the Draft Plan does a reasonable job of identifying the risks to a Just Transition and appropriate mitigation measures. However, it is likely that the full range of impacts – and hence the full range of mitigation measures – will only be able to be identified in the detailed delivery plans of the interventions proposed to take climate action.

Question 14 (all organisations)

What does just transition planning mean for your organisation or industry?

- A just transition for the transport sector is important**
- ~~Just Transition planning is important for my organisation~~
- ~~Just Transition planning is happening in my organisation~~
- ~~My organisation needs more support for just transition planning~~

Please give reasons for your answer.

Unless a Just Transition is ensured

- Increasing inequalities in society
- Changes to behaviour / increasing costs placing at risk organisations ability to maintain services
- If barriers to change are not recognised and addressed, these barriers may prevent a transition

Question 15 (all organisation)

Which of the following priorities would you consider to be most important to enable you to transition your vehicles to zero emissions alternatives?

- Access to low-cost finance
- Cost of replacement vehicles needs to come down
- Technology for replacing vehicles needs to be proven
- Mechanism to work with other businesses on fleet transition
- Reliable infrastructure for vehicles (such as fuel or charging networks)
- Certainty about availability of parts and maintenance services
- Other (please tell us more)

Monitoring and Reporting Consultation Questions:

Aim: We invite views on the draft indicators and would like to identify any additional relevant data sources. Please see the Monitoring and Evaluation Annex in the draft Just Transition Plan for Transport for more details on the indicators, data sources and quality assessments.

Audience: Everyone

Question 16A: What are your views on the draft indicators we have set out for measuring our progress toward delivering the just transition outcomes for the transport sector?

- Data needs to be able to be aligned to vulnerable groups, or else Just Transition issues could be masked
- Other data sources will be required. These do not need to be identified as primary indicators, but will be needed to understand the primary indicator (e.g. digital inclusivity is about much more than just digital connectivity)

16B: Make a comment about a specific indicator or indicators, or issue with specific indicators:

Outcome 3: Businesses currently relying on fossil fuel vehicles are supported to transition to zero emissions alternatives

- Useful to highlight public sector fleet data

Outcome 5: Communities (including in rural and suburban areas) are well connected, having better digital connectivity and shared transport options that meet their local needs.

- Data needs to be able to be aligned to vulnerable groups, or else Just Transition issues could be masked (rural areas / SIMD quintiles / demographic & socio-economic breakdown of membership & uptake)
- Other digital inclusivity indicators need to be included (e.g. access to smart phones / computers / digital skills)
- Shared transport uptake: Prior to understanding uptake, an understanding of availability of shared transport choices is required. Mapping availability of community and demand responsive services, along with car clubs, bike share etc will be required (NB the collection of this data will overlap with Traveline / MaaS work)

Outcome 6: Transport and the planning systems give communities access to the local services and amenities they need

- **Access to services and availability of transport:** Accessibility mapping tools can provide a useful baseline of this information (including providing information as it relates to SIMD datazones, age, gender) but they are less useful at mapping progress over a short-time period (e.g. less than 5 years). Mapping progress (or deterioration) will require an understanding of the change in the transport services AND the number and location of services (e.g. shop/post office closures in rural areas; centralisation of public services such as health, education, department for work and pensions etc)

Outcome 10: Transport is accessible and easy to use for all, especially those with additional accessibility needs and isolated people.

- This is vital, but it is suggested that information that can cover the whole journey is poor

Outcome 11: Transport options are affordable and the transition to decarbonised transport does not disproportionately burden on those with least choice and ability to pay

- **11.2 Spend on transport, by lowest income and most deprived:** this also needs to cover rural areas to recognise all areas at risk of transport poverty

Outcome 12: Access and support for active travel options leads to healthier outcomes.

It must be noted that switching to active travel for short journeys is not an intervention which will have a significant impact on car km and greenhouse gas emissions, except where they are part of a multi-modal journey that is centred on public transport.

Appropriate active travel indicators relevant to the core focus of the Just Transition Plan would be those, for example, that identify:

- % of people (inc socio-economic breakdown) that can access significant bus or rail interchanges by walking / cycling
- Walking / cycling barriers/infrastructure at or near these interchanges

Outcome 14: The transport transition has contributed to improvements in air quality across Scotland.

- To reflect the Just Transition nature of this work, this data needs to be presented by impact on SIMD datazones

Outcome 15: The transport system is prepared for the current and future impacts of climate change and is safe for all users, reliable for everyday journeys and resilient to weather-related disruption

Suggest this indicator (or at least commentary to accompany reporting on the indicator) is widened to include other resilience issues for transport networks that can affect a Just Transition (extended power cuts for geographic areas; weather related road closures affecting public transport connecting our rural areas)

Question 17: If you are aware of any other data being collected that could be used to monitor progress towards any of the outcomes set out in this Plan, please share details below.

Public Health Scotland are considering indicators to understand and monitor Transport Poverty