

# Scotland's Draft Climate Change Plan (CCP) 2026-2040 – consultation

Response from Spokes, the Lothian Cycle Campaign January 2026

*Please note:*

- a. Our response concentrates on transport issues, primarily traffic reduction and active travel
- b. The consultation's three transport questions don't adequately cover our concerns, hence this submission. However, we do respond to the questions, in section 9 below, largely by reference to this main submission
- c. Spokes is a member of SCCS coalition and we endorse their submission, particularly the transport section

## **0. Top Takeaways** [references are to sections below]

- [3] **Demand management** (notably road-user charging) is essential to car-km reduction. The Scottish Government should act urgently on its own commissioned research recommendations
- [2] The draft new '**traffic reduction**' **target** is incredibly weak. It should be toughened and, if not, the government should be **honest** that its new target is to *limit traffic growth*, not to *reduce traffic*
- [4.1] The promise of **multi-year funding** for active travel projects should be implemented rapidly
- [4.2] **Disguising of active travel funding** by combining it with bus infrastructure money should end
- [4.3] **10% of the transport budget** should be invested in active travel infrastructure and promotion
- [6] The move to zero-emission vehicles should include **strong support for cargo bikes**, particularly for last-mile urban deliveries and reducing motor van transport, but also for family transport

## **1. Introduction – the previous report**

In January 2021 Spokes responded to the previous Climate consultation – the 'Climate Change Plan Update, 2018-2032.' In particular, we strongly welcomed the headline commitment to reduce car-km by 20% by 2030 – but we expressed considerable scepticism that the government would take the steps necessary to achieve it. Our words could not have been more prescient! We said (abbreviated)...

*We are delighted and, frankly, astonished, by the unexpected commitment (3.3.19) to “reduce car kilometres by 20% by 2030.” Whilst some cities have significant traffic reduction ambitions we are not aware of such targets being set across an entire country anywhere in the world.*

*Needless to say, we cannot avoid a strong fear that policies will not be sufficiently ambitious to achieve anything like this goal. The example (1b above) of the Government's utter failure to achieve its 2020 cycle use target, gives serious cause for concern.*

*Moreover, to achieve 20% reduction in car kilometres, a major reversal of existing trends, demands exceptional determination and commitment, including tough decisions on demand management and on allocation of investment. All past experience suggests that it cannot be achieved solely by 'carrot' measures of more cash for active and public transport, although these are essential. The challenges are well laid out in the Scottish Parliament Information Centre's recent paper, Reducing car travel in Scotland, and we can do no better than refer the Committee to that document.*

Our 'strong fear' was wholly justified, with a long delay to publication of a draft route map to achieve the 20% reduction, an eventual draft which relied on carrots alone for at least the first five years, and then the non-publication of a final route map document! The opportunity of the massive change in travel patterns due to covid was squandered by a decision to just wait and see what happened. An eventual research report on demand management, commissioned by the Scottish Government, was too hot a potato, and was sidelined. Finally, and inevitably, the 25/26 Programme for Government in May 2025 abandoned the commitment (which by then Ministers had already started calling merely a 'target').

**Whilst we have covered this background in some detail, the objective is to show how critical it is that words are matched by action – and action which is both *timely* and *determined*.** The government's cycle use target and then its car-km reduction commitment both failed almost completely, returning us to where we started. The same will happen again this time without determined action on demand management.

## 2. A new traffic reduction target

**Sadly, however, it now appears likely that, rather than action to achieve traffic reduction, the new approach will be to set far more modest targets, which will still allow for a rise in car-km, and merely attempt to constrain the level of increase.**

In June 2025, following abandonment of the 20% commitment, a new government report, [Achieving Car Use Reduction in Scotland](#), did not set a target (let alone a ‘commitment’) but said that, working with COSLA and other stakeholders...

*We will revise the existing car use reduction target, informed by the advice of the (UK) Climate Change Committee and other relevant evidence, to develop a new, longer-term target which will support our 2045 net zero target.*

The report’s Foreword quotes Climate Change Committee (CCC) advice ([Scotland’s Carbon Budget](#) document) that Scotland needs a **6% reduction in car use by 2035** as its contribution to the 2045 overall net zero target. However, unlike the Scottish Government’s previous 20% reduction commitment, which was a reduction on *actual car-km levels*, the 6% figure is a reduction on *predicted traffic growth*. The CCC expects that, even assuming 6% modal shift, car-km will nonetheless rise by between 5% and 11% between 2025 and 2035. **And, therefore, if the government continues its failure to achieve modal shift, then car-km will rise by between 11% and 17%.** An impressive analysis by the independent [Scottish Parliament Information Centre, SPICe](#), in August 2025, lays these issues out in more detail – and discusses what is needed now.

Turning to the draft CCP, the Transport section of the [Sectoral Annex](#) (CCP-SA) refers on page 33 to a new draft target to reduce car-km 4% by 2030. Again, this draft target is just a reduction on *predicted growth*, not an *absolute reduction*. Albeit that it then goes on to say...

*We wish to be more ambitious on car use reduction both due to its emissions reduction potential, and the co-benefits on health and well-being, tackling inequalities and improving places for people.*

This recognition of co-benefits is an extremely important point. The benefits of incorporating active travel, rather than car use, into everyday travel patterns such as commuting, shopping, or getting to school, have huge potential for public health, just as for emissions reduction. They are indeed a co-benefit, not just a minor side-benefit, and the same is the case vice-versa.

**Given this, the government should step up to the mark and adopt a stronger target, and one based on absolute reduction of car-km, not just reduction on predicted growth. To move from a 20% absolute reduction ‘commitment’ to a 4% relative reduction ‘target’ would mark a truly drastic loss of ambition.**

Specifying a traffic reduction target as a reduction in predicted growth is also misleading to the public, and indeed we can imagine some politicians giving the raw figure without mentioning that vital qualification. **It would be far more honest to say that the new target is to *limit growth in car-km to X %***

## 3. Achieving traffic reduction (CCP-SA, Outcome 1)

It has for some years been widely acknowledged by experts that significant traffic reduction is only achievable through a combination of carrots (infrastructure and behaviour change) and sticks (demand management, notably road user charging of some form).

This was clearly summarised, back in 2020, in evidence to the Scottish Parliament’s then REC Committee, by Chris Stark, then CEO of the [UK Climate Change Committee](#), who told MSPs that car-km reduction

*“will not happen unless there is a combination of carrots and sticks, and the kind of policies (in the government’s Climate Change Plan) are mainly carrots.”*

Transport Scotland's [own commissioned research](#) (completed by AECOM in 2023, but not made public by the Scottish Government until December 2024) showed it was perfectly possible to achieve the government's then commitment to a 20% reduction in car-km by 2030, and in a "deliverable" and "equitable" way, through any one of several forms of road user charging.

It is clear that Ministers were unwilling to adopt such measures, relying largely on 'carrots,' despite the firm expert advice that this was insufficient. Unfortunately CCP-SA (Outcome 1, p33-34) suggests this approach will continue under the new CCP unless it is considerably strengthened in terms of demand management...

- The drastically eased car-km target will reduce the pressure on government and on councils for strong demand-management, since *they will be able to say that the 'traffic-reduction' target has been achieved even though there is an increase in car-km (provided the absolute level of the increase is not so high as to break the target)*
- The regulatory "check of powers" for local authority charging schemes, which began in August 2025, and without which [councils are reluctant](#) to even consider congestion charging, will not be completed until 2027, a period of some two years, suggesting a very low priority
- Whilst it is right to press the UK government for faster action on motoring tax reform, that is no reason to go slow on Scottish demand-management options. The recommendations of the government's AECOM research (above) should be acted on rapidly, including that government creates a "*Framework of Implementation for TDM measures*" – common legal, technical and other standards to ensure interoperability between different local and/or national schemes, particularly if councils use existing powers to create local schemes prior to, or additional to, a national scheme.

## 4. The carrots (CCP-SA, Outcome 2)

After the above very unambitious section on reduction of car use, there follows this much more comprehensive section on the carrots to encourage use of public and active travel for everyday journeys.

### 4.1 Key policies (CCP-SA p34)

We strongly welcome the "key policy" of multi-year funding "*to enable build-up of capacity and capability in the active and sustainable sector and confidence for planning and delivery of long-term, large-scale ambitious infrastructure programmes.*" The previous requirement for local authorities to bid annually for projects which occupied more than a single year was a major problem for councils.

We also welcome the explicit support for "*20-minute neighbourhoods and low traffic neighbourhoods – connected, accessible places where people can meet their daily needs locally, enabling people to live, work and pursue opportunities to improve their learning and wellbeing in communities close to home.*" Clear support for such initiatives is important at a time when some politicians seek to mislead the public over what these schemes are about and are intended to achieve.

### 4.2 Integration – and funding implications (CCP-SA p35)

Whilst welcoming the principle of an integrated approach to the shift to more sustainable forms of travel, we are very concerned that this can be used to reduce funding and action on active travel investment. The change from a separate budget line for *active travel* to *active and sustainable* had the effect of [disguising cuts to active travel funding](#). It also introduces a very unfortunate competition for funding between bus and active modes throughout the year, as ongoing decisions on disbursement of the 'active and sustainable' budget are taken. For example, increasing the bus infrastructure fund from £10m to £20m during the course of the year meant a [£10m cut in the sum available for active travel](#).

For the avoidance of doubt, Spokes strongly supports bus infrastructure investment, and we are disturbed at the scrapping of the government's previous £500m (over several years) promise for this purpose - and after only £26.9m had been allocated. This should be reinstated in some form, rather than being extracted from what was previously the active travel budget.

We of course accept that integrated public/active behaviour change initiatives sometimes do make sense; and that main road corridor infrastructure projects should often encompass both bus and bike. **Nonetheless, such integration should not be used to disguise cuts to active (and/or bus) funding.**

#### 4.3 Active Travel (CCP-SA p36)

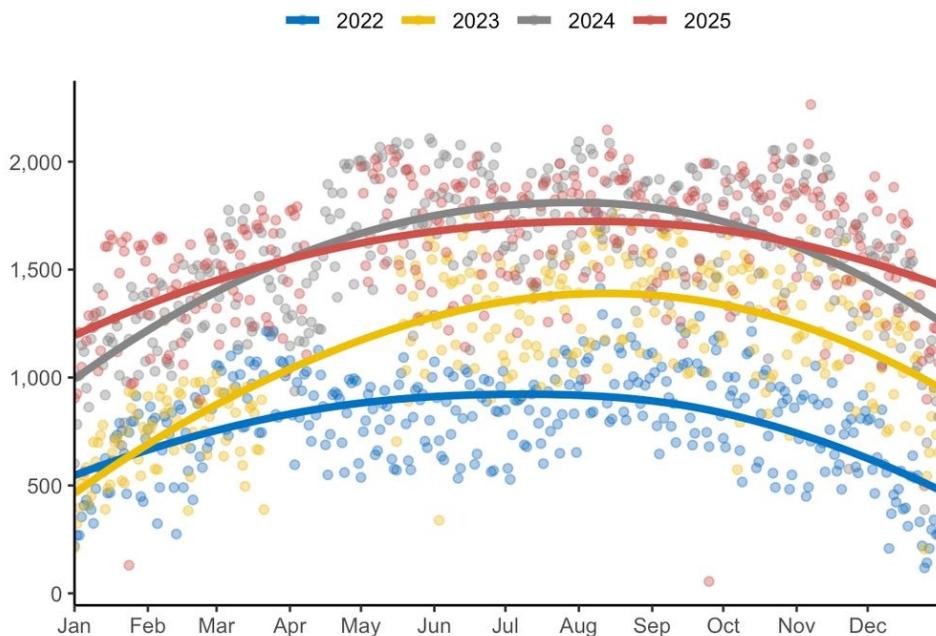
The points in the AT section of CCP-SA are all valid, but everything in terms of active travel increases, and consequent emissions reductions, will depend on the level of funding allocated to these purposes. Whilst funding is decided in the annual budget, it is disappointing that this section does not give a strong steer toward the need for a high priority. Along with over 50 other Scottish organisations, we call for a commitment to 10% of the Scottish transport budget to be allocated to active travel.

This section should also give positive support to some of the more controversial issues that local authorities have to confront when implementing measures to boost use of active travel and make it safer, notably roadspace reallocation. This is covered for bus in the bus section, but not here for active travel. We note that high quality infrastructure in Edinburgh and Glasgow, which has required roadspace reallocation, has achieved considerable success in boosting cycle usage for everyday journeys.

The graph below (by [Edward Tissiman](#), using Cycling Scotland automatic counter data) illustrates the growth in bike use near the top of Edinburgh's Leith Walk as the Edinburgh City Council successively built segregated cycle provision along Leith Street, then Leith Walk, then York Place, all converging at the Picardy junction where the counter is located.

Cyclists per day, Omni Centre cycle lane

Data from Cycling Scotland, graph by @edtiss



#### 4.4 Rail (CCP-SA p37)

Spokes supports investment in rail, as an important form of public transport.

Bike/rail integration is of particular interest to our members. Significant numbers of people already use bike/rail for multi-mode journeys and this should be mentioned in the rail section.

We very much welcome the '[Railway for Everyone](#)' initiative by Scotland's Railway, to encourage integration between rail and walk/wheel/cycle, covering everything from routes to stations through to use of space within carriages. This initiative deserves to be better known and could be referenced in CCP materials.

However, we draw attention to an important current failure – the previous formal bike/rail consultation arrangements (2 or 3 meetings a year) ceased when the Scottish government took control of Scotland's railway, a very backward step for a public body which should be listening to user groups. Furthermore the fact that procurement of two major new train fleets\* is underway makes user consultation absolutely vital in respect of bike carriage. Spokes was involved in discussion on bike spaces during specification of the Edinburgh/Glasgow trains, and this generally works very well, especially in comparison to some earlier rolling stock where there had been no or inadequate consultation.

\* (see also CCP-SA p46-47) Long distance Inter-City trains to replace the existing HST fleet linking Edinburgh/ Glasgow to Inverness/ Aberdeen; and local electric/battery hybrid trains for lines to Dundee via Fife Circle and for Borders railway; to be followed later by replacements for existing diesel trains on rural lines.

### 5. Modal shift of freight to rail (CCP-SA, Outcome 3 p38)

As recognised in CCP-SA modal shift here can have major emissions benefits, and there are major co-benefits. The opportunities and benefits are of course most pronounced for long-distance transport.

As such, it is extremely disappointing that the government is investing heavily in increasing road capacity from the Highlands to the Central Belt whilst largely neglecting the parallel railway which is single track for most of the way. **Rather than supporting the above CCP outcome, this approach will encourage transfer from rail to road.**

### 6. Zero-emission vehicles (CCP-SA, Outcomes 4&5 p38-44)

It is clear, not least from the amount of space devoted to this topic, that moving to zero-emission road vehicles is the government's top CCP priority under the transport heading. The [SCCS response](#) points out that the comparatively weak proposals on modal shift, compared to the EV proposals, are one of the reasons why road transport emission reductions are projected to come very largely from EVs etc.

Whilst nonetheless supporting transition to zero-emission vehicles, it is unfortunate that similar emphasis is not given to active and sustainable travel – particularly given the major co-benefits. In contrast, moving to zero-emission road vehicles, whilst an important objective, does come with very significant co-disbenefits. In particular, particulates from road & tyre wear are if anything increased by the heavier vehicles, congestion and road danger remain, whilst the lower running costs encourage more road journeys, more congestion, and a disincentive for modal shift to sustainable modes.

Secondly it is regrettable that the policy does not include a major effort to encourage a shift to cargo-bikes and delivery bikes for 'last-mile' urban delivery by public and commercial bodies, and for everyday family travel. This is common in some European cities and in embryonic growth in our own local city of Edinburgh, including through a growing number of [community initiatives](#) to make cargobikes available to local residents. **Such a shift would be accompanied by co-benefits in place of the co-disbenefits of the existing CCP intentions.**

## 7. Flying (CCP-SA, Outcome 6, p44-46)

There is of course a strong case to work towards zero-emission flight for internal journeys, notably to the islands where flight is an important, sometimes essential, means of transport.

However, it is very disappointing that this section of CCP-SA pays so little attention to longer-distance air travel originating in Scotland, given the high emissions of flying as compared to surface transport, and the major technical problems of reducing such emissions and of obtaining sufficient sustainable fuel without encouraging forest destruction and other environmental negatives, counter to CCP objectives. In particular, [internal flights to England](#), where there are excellent rail services, should be strongly dis-incentivised or banned (as with long-distance internal flights [in France](#)).

We welcome the planned tax on private jet use, announced in the 26/27 budget, but this should only be a first step, with frequent-flyer levies for all flights (except essential internal) and action on internal UK flights which compete with rail.

## 8. UK government action (CCP-SA, Outcome 6, p52-54)

Whilst supporting the call for UK government action on a wide range of transport issues to aid a just transition to net zero in respect of transport, we are concerned that this may distract somewhat from the many actions which the Scottish Government itself could take, such as those in this submission. For example, urgency on road user charging, a frequent flyer levy, action on last-mile delivery, upgrading rail rather than road, and much more.

Probably the single most important action the UK government could take (in a 4-nations approach) is the complete reform of motoring taxation. Following the last UK budget there are belated signs of action, but much more urgency is needed and we support the Scottish Government in pressing on this. CCP-SA (p52) makes two important points...

*This (complete reform of motoring taxation) is urgently needed to replace dwindling revenues as the transport sector decarbonises, which the Office for Budget Responsibility identified as the “largest single cost” of the transition to net zero. If properly designed, a broader, coherent reform of the motoring tax regime that aligns with wider transport and net zero policy objectives can also help incentivise the transition to EVs and contribute to meeting our climate change ambitions.*

## 9. Consultation Questions on Transport (Q7,Q8,Q9) – see next page

## 9. Consultation Questions on Transport (Q7,Q8,Q9)

The three questions in the consultation do not adequately cover the points we wish to raise, hence the above submission. However, we respond to the questions as follows, largely by reference to the above.

### 9.1 Question 7

*Which of the following would be most effective in enabling you to transition your vehicle(s) to zero emissions alternatives? Please rank your choices from highest to lowest priority, where 1 is the highest priority. Please only give one ranking to each option:*

*If you're responding for an organisation: you may want to consider car fleets as well as HGV fleets.*

1. Cost of new zero emissions vehicles needs to come down
2. Cost of used zero emissions vehicles needs to come down
3. Reliable infrastructure for vehicles (such as fuel or charging networks)
4. Noticeably cheaper running costs (including electricity, maintenance and insurance)
5. Convenient access to public charging infrastructure
6. Ensuring an adequate number of trained mechanics to perform essential maintenance and repairs
7. Access to funding support /low cost finance
8. All of the above
9. Other (use box below)

This is not within our competence to answer, but see our comments in 6 above on net-zero vehicles.

With regard to our point about cargobikes for last-mile delivery, it is instructive to consider their benefits in regard to each of the 9 options above, as compared to conventional EVs and other zero-emission vehicles.

### 9.2 Question 8

*How can the Scottish Government support communities to participate in planning of local sustainable infrastructure (such as, walking, wheeling and cycling routes)?*

Planning of local infrastructure can best be assisted by measures to reduce the numbers and impacts of motor vehicles, thus making active travel feel a more realistic prospect (3 above). Traffic-reduced neighbourhoods will feel more conducive to walking and cycling, and are thus likely to lead to greater demand for active travel routes connecting up neighbourhoods, town centres and community facilities.

A specific point is the long-delayed need for the Scottish Government to **modify traffic order rules** – for example following England's example with regard to Redetermination Orders and TRO Loading restrictions. These are local decisions and should be for local councils to take. Furthermore, if and when **public hearings and ministerial decisions** are, regrettably, required, this should be done expeditiously. We point to the truly appalling example of the Scottish Government taking [literally 2 years](#) to respond to objections on Edinburgh's CCWEL cycle route, objections which were eventually deemed to be largely groundless, and a delay which put the project timeline into disarray causing considerable extra expenditure.

### 9.3 Question 9

*What action by the Scottish Government would be most helpful in supporting you to live a more climate-friendly lifestyle?*

Again, the measures in our submission would be most helpful in supporting more climate-friendly (and healthy) lifestyles with respect to transport and travel around everyday activities such as shopping, commuting, school travel, and leisure. These include...

- traffic reduction (section 3 above)
- substantial & multi-year funding for AT facilities (4.1-4.3)
- frequent, reliable, inexpensive rail travel, with quality AT integration to stations and on trains (4.4)
- town centres highly conducive to travel by bike and other active means (6)
- availability of cargobikes for one-off needs (6) and of easy-to-use urban bike-hire schemes
- encouragement of local holidaying by dis-incentivising flying (7)
- reforming taxation to pay-per-mile, adapted also for vehicle weight and other factors (8)