

JUST TRANSITION FOR TRANSPORT – Spokes response 17.5.25

<https://consult.gov.scot/energy-and-climate-change-directorate/draft-just-transition-plan-for-transport/>

Note: we responded using the online form, and the pdf of our response which is automatically generated will be on our website alongside this. However our response was prepared by copying the questions from the Just Transition Transport document into this file and preparing the answers here. This is far easier to read than the automatically generated pdf. There are a few minor differences due largely to differences in formats between the questions online and those in the document.. We did not answer all questions, and those remain blank below.

KEY

Black text = Questions/explanations pasted in from the consultation

Red text – Spokes response

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?

Largely, but see 1B

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

- a. Congestion will be a thing of the past, removing the huge time wasting and frustration currently experienced by large numbers of people and businesses
- b. Where funding is raised in the transport sector (e.g through congestion charging) it will be retained within transport and used for sustainable transport purposes.

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

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?

Spokes the Lothian Cycle Campaign

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

Spokes has campaigned on these issues for many years, since we were founded in 1977, and continues to do so.

It is incredibly frustrating to voluntary groups, such as ourselves, when aims, visions and policies do not lead to action, and consultations often feel like means of putting off decisions and actions. Yet we are now having to put precious volunteer time into responding to a consultation which is primarily about a vision rather than actions.

This follows 5 years in which the Scottish Government did very little effective on its now discarded 2020 Climate Plan commitment to cut car-km 20% by 2030. Ministers kept repeating their promise to achieve this, but were wholly unwilling to take the necessary but difficult decisions, relying solely on the 'carrots' which every expert told them from the outset were insufficient. The government failed even to publish a final action plan (the 'Route Map') to achieve the commitment. Moreover it delayed publication of, and then sidelined, the research it had commissioned on how to meet the 20% commitment, which showed that **it was possible to achieve this, and in an "equitable way"** through any of four options for road user charging.

What incentive does this give voluntary organisations such as ours to participate in consultations, and suggest ideas and actions which are unlikely actually to be implemented ... even if adopted as policy!

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.

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?

a. There is much to support in **this chapter**, notably the section titled "The Inequity of Transport Emissions." However, despite this useful analysis, very little effective is proposed in terms of actions to tackle the inequities! In particular, the chapter needs to be much stronger on the need for *demand management* as the critical tool to move towards a juster system of transport and place.

b. This chapter begins with **a vision** which includes..

"People less able to pay, and with fewer transport options, have not been disproportionately burdened by the transition away from fossil-fuelled vehicles."

This should be followed by a new para, something like this...

"People more able to pay, and with more transport options, are charged appropriately when they disadvantage others, for example by occupying limited roadspace, particularly in busy times or places"

c. It is notable that the lengthy section titled "**Actions to Date**" is almost entirely "carrots," the only nod to demand management being the LEZ paragraph. This very much ties in with our expression of frustration in 3A above. The Scottish Government knows, and has always known, that demand

management is critical to achieving a fairer, safer and climate-friendly transport system, but it has not acted convincingly on this.

Just as one of countless examples, in evidence to the Scottish Parliament in 2020, Chris Stark, then CEO of the UK Climate Change Committee, told MSPs that the 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.”**

d. In **“Future Priorities”** it is good to see explicit paras on demand management, and on road user charging. It is also right to press the UK government (vigorously, please!) on fuel duty – the move to EVs is increasing yet further the inequities of the present system, and if not tackled rapidly will lead to Exchequer receipts from fuel duty having to be replaced by general taxation, a huge inequity to non-car-users.

Nonetheless, the Transport Just Transition document is far too weak on the Scottish Government’s own responsibilities. The AECOM research commissioned by the Scottish Government on achieving the 20% car-km reduction listed four charging options under Scottish control, which could achieve the 20% and do so in an “equitable way” and “in line with Scotland’s geographic and social needs.” As an immediate first stage the research urged the government to create a *“Framework of Implementation for TDM measures”* – for example, 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.

The Scottish Government delayed publishing the AECOM research for over a year, it eventually put it on the publications website with an anodyne response and no publicity, and as far as we are aware there has been no work on the recommended Framework of Implementation.

e. Specifically on congestion charging, please investigate and learn from the success of the London scheme, and the recent highly successful New York scheme. In both cases, the prior predictions of disaster and unfairness have turned out to be the opposite. Political courage is required, something sadly lacking in the Scottish Government’s case so far, as above.

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.

We have numbered the list as below, with (1) being the top priority and (2) a close second.

2 Better use of space for active travel and public transport.

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

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

3 Access to ‘car clubs’ which allow people to hire a car or van for shorter trips.

1 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.

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?

The Plan considers the impacts of decarbonising transport on all groups in our society.

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?

With regard to fostering cycle use in urban areas, for people of all ages and abilities, but particularly those without car access, we strongly emphasise the need for safe and convenient segregated main road cycleroutes and traffic-filtered residential areas.

Recent Cycling Scotland usage data from new segregated main road cycleroutes in Edinburgh and in Glasgow is extremely encouraging.

Secondly, see also our comments in (9) below about specialised cycles, including cargobikes for business & family urban transport, and adapted bikes for people with disabilities.

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?

We support the principles we have numbered 1 and 2, with 1 at the top. On 2, there may need to be some charging affecting middle income groups, particularly if they are high emitters and/or at congested times and places. Finally, as in your note below, there is likely to be a fair bit of overlap between the people who fall into 1 and 2.

1 Those who emit the most pay the most, with protections for low-income groups.

2 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.

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.

On a quick skim of this section, we did not see any reference to employment in the cycling industry – if so, this is surely an omission, as there will be growing need for bike maintenance skills and bike manufacture, including e-bikes of course.

Secondly, there needs to be particular attention to cargobikes and other forms of specialised bikes, such as adapted bikes for people with disabilities. Such bikes need specialised attention and skills for manufacture and maintenance. Purchase costs are high and possibly this in part reflects too few skilled people and insufficient resource and experience in these areas. Comment on the needs and possibilities could usefully be sought from organisations and businesses such as [Laidback Bikes](#), [the Bike Station](#), [West Lothian Bike Library](#), and [Wheels for Wellbeing](#).

Thirdly, particularly for cargobikes, which are ubiquitous in some European cities for local urban deliveries and family transport, skills in promotion and working with potential user businesses, families and other groups are needed.

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

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

Public sector

Third sector

Individuals

None of the above

Don't know

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?

Select from scale for each statement:

The draft priorities for workers will address future skills challenges.

The draft priorities for workers will address transport workforce diversity.

The draft priorities will encourage new entrants to the transport workforce.

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/non-profit 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?

Following our comments in (9) above, it is disturbing that this chapter on businesses and organisations appears (on a quick skim) to have nothing significant about promoting the use of cargobikes in urban areas, the ultimate low-carbon, noise-free, easy-parking solution for many uses, notably for 'last mile

delivery.’ In many European cities where they are common, a whole variety of types has developed, for example refrigerated cargobikes for fresh food delivery, and we have even seen an ultra-insulated cargobike for delivery of sperm and other hospital needs.

Question 14 (All organisations):

14A: 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.

14B: Please tell us more about just transition planning in your organisation

As a voluntary campaigning organisation many of our activities are geared to encouraging a shift from car to bike as well as to other forms of active and sustainable transport.

For example, we produce highly regarded cycling & walking maps for Edinburgh and the 3 Lothians council areas, and have in total sold over 150,000 copies since our first (Edinburgh) map. The Edinburgh map is now in its 11th edition, whilst our Lothian maps are all into around 5th editions.

In addition to sales in bike shops and online, we have attempted, though only with limited success, to get the map used by businesses and public organisations to encourage staff to commute by bike. Feedback includes...

“The Spokes map is displayed prominently at our head office, beside our staff ‘pool’ bike. This makes active travel an easier option, allowing confident route planning throughout the city.”

“We’d like to buy 100 of the Spokes East Lothian maps ... They are very popular and we often distribute them when promoting cycling, especially to council staff.”

“As part of our brief to encourage more people to cycle, being able to provide a complimentary copy of the Spokes Map is a very useful tool ... it has proved to be very popular”

14C: Is your sector/organisation doing something others could learn from?

Question 15 (All organisations): Which of the following priorities would you consider to be most important to enable you to transition your vehicles to zero emissions alternatives? Please rate your choices from highest to lowest priority, where 1 is the highest priority. Please only give one ranking to each option.

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 – information, demonstrations and support for cargobike options

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?

See our suggested additional outcomes in (1) above - obviously these would also need indicators e.g. levels of congestion for the first; and sustainable transport enabled projects for the second.

Outcome 3 - Nothing about active travel/transport !!! Much current urban travel by businesses & other organisations could be conducted with bikes, ebikes, cargobikes, etc rather than car or van which, even if EV, require large emissions for construction, cause significant pollution from tyre wear, and add to congestion and domination of roadspace.

Outcome 4 - whilst very tiny at present in terms of export, this should include bike/cargobike in any reporting should this area be enabled and encouraged to grow

Outcome 5 - bike hire numbers in those cities or towns with bike hire schemes

Outcome 6 - journey mode is not specified. Should aim for low journey times by bus, bike, etc, otherwise car is likely to dominate this outcome, which disguises the situation for those who use sustainable/active modes, whether through choice or necessity.

Outcome 10 - Satisfaction with cycling conditions and walking conditions

Outcome 11, item 11.2. Unclear if you want this figure to be low (indicating low costs) or high (indicating ability to access lots of places). ie. it is not just the amount spent, but what you can achieve by it in terms of access

Outcome 12 : good to see this, but should also be covered in other indicators as above, as is implied for bus etc

16B: Make a comment about a specific indicator or indicators. Issues with specific indicators

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.

Respondent information form:

18. What is your name?

19. Are you responding as an individual or an organisation? (required)

20A. What is your organisation?

20B: Sector?

21. Further information about your organisation's response (e.g. research)

22. Where do you live most of the time?

22A: [Please enter the first half of your postcode. Postcodes will never be published]

22B: 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.

23. What is your email address [required]

24. Publication preference. [required]

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

Publish response with name

Publish response only [without name]

Do not publish response

Information for organisations only:

The option 'Publish response only (without name)' refers only to your name, not your organisation's name. If this option is selected, the organisation's 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.

25. Do you consent to the Scottish Government contacting you again in relation to this consultation exercise [required]

Yes

No

26. 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]