

Response ID ANON-5UA4-6X5X-T

Submitted to Draft Just Transition Plan for Transport

Submitted on 2025-05-17 01:16:11

Vision and outcomes for transport (Part 1 of 6)

1 Do the draft outcomes reflect what the Plan should be aiming to achieve?

Outcomes radio - I understand the draft outcomes:

Agree

Outcomes radio - The draft outcomes reflect what the Plan should be aiming to achieve:

Agree

Is anything missing from the draft outcomes in the Plan? (optional):

Other outcomes...

- 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.

2 Please look at the draft Transport Just Transition Plan, and tell us whether you agree or disagree with the following statements.

Plan structure - The Plan is easy to understand:

Agree

Plan structure - The Plan is easy to use:

Neither agree nor disagree

Plan structure - The information in the Plan is helpful:

Agree

Plan structure - The information in the Plan is relevant to me:

Strongly agree

Plan structure - The Plan is accessible to me:

Strongly agree

Please give us any comments below (optional):

See comments in (3) below, re visions v. actions. Is this a 'plan' ?

3 Are you involved in any type of organised group which considers how the transport system is changing, or could change in future?

Yes

Name of group (optional):

Spokes, the Lothian Cycle Campaign ... www.spokes.org.uk

How could existing transport groups consider just transition issues? (optional):

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!

People and communities (Part 2 of 6)

4 Are there any gaps in our priority actions to support people and communities in the transition of the transport sector?

Yes

If yes, please comment here:

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.

5 Which of the 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?

People and communities priorities radio - More access to online services so people don't need to travel unnecessarily.:

Neither helpful nor unhelpful

People and communities priorities radio - Access to ‘car clubs’ which allow people to hire a car or van for shorter trips.:

Helpful

People and communities priorities radio - Availability of demand responsive transport for some areas for example dial-a-bus services.:

Helpful

People and communities priorities radio - Better use of space for active travel and public transport.:

Very helpful

People and communities priorities radio - 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.:

Very helpful

Comment (optional):

The government-commissioned AECOM research suggests that to achieve substantial reductions in car use, some form of road user charging is not just desirable but essential - and that this can be done in an "equitable" way. See our answer in 4(d) above.

6 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?

People and Communities: Impacts on Groups - The Plan considers the impacts of decarbonising transport on all groups in our society:
Agree

People and Communities: Impacts on Groups - The Plan considers the impacts of decarbonising transport on people like me:
Agree

Comment (optional):

7 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?

Please add your response below.:

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.

8 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.

Additional comments (optional):

We would like to tick both the top two boxes, and in fact there is likely to be considerable overlap between those who emit the most and those who earn the most.

In the second box, those who earn the most, there may well need to be some charging affecting middle income groups, particularly if they are high emitters and/or at congested times and places.

Workers (Part 3 of 6)

9 Are there any gaps in our priority actions to support workers in the transition of the transport sector

Yes

If yes, please comment here:

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, <https://laid-back-bikes.scot/>

the Bike Station, <https://www.thebikestation.org.uk/>

West Lothian Bike Library, <https://www.wbikelibrary.co.uk/>

Wheels for Wellbeing, <https://wheelsforwellbeing.org.uk/>

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.

10 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?

Workers Priorities radio importance - Programmes which encourage women and girls to enter science, technology, engineering and maths (STEM) courses at school and college or university.:

Workers Priorities radio importance - Actions to promote diversity and inclusion within the industry, including workplace culture changes.:

Workers Priorities radio importance - Actions that address existing pay gaps for certain groups.:

Workers Priorities radio importance - Actions to increase access to childcare.:

Workers Priorities radio importance - Other (please specify).:

Other::

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

Public sector

12 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?

Future priorities ranking - The draft priorities for workers will address future skills challenges.:

Future priorities ranking - The draft priorities for workers will address transport workforce diversity.:

Future priorities ranking - The draft priorities will encourage new entrants to the transport workforce.:

Comment (optional):

Businesses and organisations (Part 4 of 6)

13 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?

Yes

If yes, please comment here:

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.

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

Business: just transition planning - A just transition for the transport sector is important:

Business: just transition planning - Just Transition planning is important for my organisation:

Business: just transition planning - Just Transition planning is happening in my organisation:

Business: just transition planning - My organisation needs more support for just transition planning:

Please tell us more about just transition planning in your organisation (optional):

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"

Is your sector/organisation doing something others could learn from? (optional) :

See above

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

Business priority ranking - Access to low-cost finance:

Business priority ranking - Cost of replacement vehicles needs to come down:

Business priority ranking - Technology for replacing vehicles needs to be proven:

Business priority ranking - Mechanisms to work with other businesses on fleet transition:

Business priority ranking - Reliable infrastructure for vehicles (such as fuel or charging networks):

Business priority ranking - Certainty about availability of parts and maintenance services:

Business priority ranking - Other (please tell us more):

If you selected other, please tell us more:

Other – information, demonstrations and support for cargobike options

Monitoring and reporting (Part 5 of 6)

16 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?

Indicators radio - The indicators will help measure progress towards delivering the just transition outcomes:

Make a comment about a specific indicator or indicators (optional):

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

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.

Please add details here:

About you (Part 6 of 6)

18 What is your name?

Name:

Dave du Feu

19 Are you responding as an individual or an organisation?

Organisation

20 What is your organisation?

Organisation:

Spokes, the Lothian Cycle Campaign spokes.org.uk

Sector:

Other third sector

21 Further information about your organisation's response

Please add any additional context:

Our response was circulated in draft to members of our planning group, and the the larger draft responses were posted on Bluesky, in case there was any feedback and to encourage others to respond.

Our final response will be on our website at <http://www.spokes.org.uk/documents/campaign-submissions/national2/>

22 Where do you live most of the time?

Please enter the first half of your postcode. Postcodes will never be published:

EH11 2JG

Large urban

Other (please specify):

23 What is your email address?

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

Publish response only (without name)

25 Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

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.

I consent