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14th May 2025

(Sent by email to: [TJTP@gov.scot](mailto:TJTP@gov.scot))

Dear Just Transition Team,

**SCCS response to consultation on “Just Transition: draft plan for transport in Scotland”**

Stop Climate Chaos Scotland (SCCS) is Scotland's climate coalition, bringing together over 70 civil society organisations campaigning together on climate change. Together, we represent hundreds of thousands of people across Scotland and stand in solidarity with communities most affected by climate impacts around the world. Our shared goal is for Scotland and the UK to take full responsibility for the past and present climate damage we have caused, leading to action that quickly lowers our emissions and moves away from our reliance on fossil fuels in a way that is fair and beneficial to everyone.

SCCS is pleased to respond to the above [consultation](#) on “Just Transition: draft plan for transport in Scotland” which purports to identify “the key challenges and opportunities that the transport sector faces in making a just transition to net zero”. The climate and policy contexts are outlined in the box below and it is against this background that we offer the observations that follow. As our comments are primarily strategic, this submission takes the form of a written contribution, rather than seeking to answer the specific questions in the online consultation.

**Climate context**

From devastating droughts to catastrophic floods, the impact of the spiralling climate crisis could not be clearer, and those with the least responsibility for causing rising global temperatures are facing the most severe consequences.

Scotland has been a global climate leader. When our 2009 Climate Change Act first set targets for emissions' reductions, they were “world-leading” – and this was sustained by the 2019 Act's amendments, which set rightly ambitious targets, based on our historic responsibility, the science, and public mandate. However, on 18 April 2024, [the Cabinet Secretary responded](#) to the Climate Change Committee's latest advice, announcing a proposal to revise the targets framework and seeking to reinvigorate action. Our [analysis of the measures](#) announced indicates that they lack ambition and much additional effort is needed to get anywhere near to delivering the emission reductions needed.

Then, on 18 June 2024, [official statistics for emissions in 2022](#) revealed that the annual target for reductions was missed again – meaning that [Scotland has now missed its targets in nine of the past thirteen years](#). On the following day, the [Cabinet Secretary's statement](#) confirmed that the Government's “legislative proposals on a new emissions reduction framework will include establishing five-yearly carbon budgets”; and that “the bill is introduced as soon as possible after recess”. This bill has now been introduced, considered, passed and is now the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024.

The 18 April statement listed a number of welcome achievements, contributing to the 50% reduction in emissions since 1990, and reiterated the commitment to achieve Net Zero by 2045. However, it was disappointingly light on new proposals for meaningful action to ensure that emissions reductions get back on track and that the future budgets and 2045 target can be achieved. The latest [CCC Report to Parliament on Progress in Reducing Emissions in Scotland](#) sets out the current situation very well and highlights that:

- **Current overall policies and plans in Scotland fall far short of what is needed to achieve the legal targets under the Scottish Climate Change Act.** The CCC identifies risks in all devolved policy areas - transport, buildings, agriculture, land use and waste. The CCC did, however, welcome policy actions and proposals related to heating but sought a clearer timeline for the Heat in Buildings Bill.
- **The Scottish Government has delayed its draft Climate Change Plan.** A draft CCP was, previously, expected in November 2023 but has been delayed. Scotland is therefore lacking a comprehensive strategy that outlines the actions and policies required to achieve the 2030 target.
- **Most key indicators of delivery progress are off track**, with tree planting and peatland restoration rates, heat pump installations and community energy, electric van sales and recycling rates significantly so.

With the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 now passed, attention now turns to the setting of the first carbon budgets, and the production of a Climate Change Plan to meet that budget. As indicated above, there is an urgent need for faster and bolder action to deliver emissions reductions, both immediate and to be set out in the forthcoming plan.

### **The importance of the transport sector**

The climate crisis has been caused by a wide range of human activities. The sectors contributing most and that must be decarbonised are heat in buildings, land use and agriculture, and transport. As the Ministerial Foreword to the draft notes: ***“transport accounts for the largest share of our greenhouse gas emissions. That needs to change, and the sector needs to decarbonise, in order for us to achieve net zero. We can and must cut emissions, by changing how people, goods and services move around our country and beyond.”*** This plan is therefore vital to delivering the Scottish Government’s commitment to net zero by 2045.

### **Response to the “Just Transition: draft plan for transport in Scotland” consultation: general observations**

Our overriding and strategic response to this consultation on a draft Just Transition Plan is that it **does not propose a plan**. Most people’s view, or indeed, [most dictionary definitions](#), of a plan would be “a detailed proposal for doing or achieving something”. This draft includes very little in the way of definite actions or timescales that would, normally, be considered to be part of a plan to achieve something (in this case the just transition of the transport sector). It sets out nothing that is actionable and is mainly a re-statement of existing policies and statements. Indeed, the document itself says:

*“The draft Plan is not intended to set out new, standalone policies. Instead, it is designed to make the connections between existing and developing policy, and serve as a guide for people across our society, to understand what a just transition means for transport.”*

**In light of the above, SCCS strongly suggests that, if this approach is maintained in the final version, it is inappropriate to call this document a ‘plan’ – it may be better viewed as guidance on the application of just transition principles. Alternatively, it would be preferable for the document’s next iteration to be significantly revised to set out what will be done (by the Scottish Government and others) and when so as to deliver the desired just transition.**

SCCS understands that it is likely that the Scottish Government does not want to pre-empt the Climate Change Plan by announcing new actions here. If this is the case, there needs to be greater clarity as to the respective roles of the Climate Change Plan and the Just Transition Plans – and each should make clear their respective contributions (with clear cross-references to the other).

Even without new actions, more could be done to really focus on activities/policies which explain how actions to deliver net zero will be ‘just-transition-proofed’; that is, how will the Scottish Government ensure that an action they are taking will be delivered fairly and address inequalities. In addition, too many of the outcomes/activities/proposals are focussed on something to deliver net zero or something

to deliver justice and fairness rather than bringing these together. The former are just climate change policies while the latter are social justice policies – all commendable in their own right, but just transition policies should deliver both objectives and/or bring the two together. Community Transport initiatives act exactly in this space; community-owned sustainable transport options can both reduce emissions but also increase access, especially for groups (e.g. disabled people) and communities (e.g. rural places) otherwise excluded or disadvantaged. The plan should highlight and deliver more support for such dual objective initiatives.

SCCS is also concerned about how the definition of a just transition is being interpreted into action. There is a need to understand how the Scottish Government intends to go about delivering “fairness and [tackling] inequality and injustice”. The principle should **not** be interpreted to mean that anyone or any business which is impacted should be supported or be exempted from action. At times, this draft document appears to suggest that the Scottish Government wishes no-one to be impacted in the transition (however, wealthy or profitable they may be or whether or not their current travel choices are appropriate in a future net-zero world). This should not be the objective.

For example, Outcome 3 suggests that “businesses currently relying on fossil fuel vehicles are supported to transition to zero emissions alternatives”. This is a commendable objective – but may be read as implying that ‘every business should be funded to convert to electric cars, vans or lorries’. It should therefore be clarified in three respects: first, to ensure that considering appropriate travel choices and possible modal shift is addressed prior to any conversion to alternative fuel, second, to specify that state financial support will be available to those who are unable to afford the transition or where the transition would cause disadvantage and only to address the cost over and above the ‘usual costs’ of e.g. fleet replacement. Finally, of course, such support should also be available to non-businesses – especially non-profit providers of transport services to disadvantaged communities.

The above issue illustrates our final strategic observation that the plan says barely anything about how the transition in transport will be paid for – and nothing about the application of the principle that should be a core part of any just transition, that of making polluters pay. The plan and/or parallel Scottish Government policies (that would be cross-referenced in the plan) must set out more about the use of fiscal measures to fund a just transition (and/or how limited funds will be targeted to those most disadvantaged).

### **Response to the “Just Transition: draft plan for transport in Scotland” consultation: strategic comments**

The **Vision** proposed in the draft for consultation is:

*“By 2045, we will have a net-zero sustainable, inclusive, safe and accessible transport system helping deliver a healthier, fairer and more prosperous Scotland for communities, businesses, workers and visitors”.*

There are two issues with this vision that need addressing. First, there is a need for greater clarity about ‘net zero’ and, secondly, there is a need to recognise that achieving this vision will mean different travel choices. We consider these two points in more detail below.

#### **1. Net-zero**

A transport system that is ‘net zero’ will not be fully decarbonised. It is likely to be one with some ‘residual’ carbon emissions that are ‘offset’ by removals. Any vision of a net-zero transport system must be clear as to:

- (a) the extent of these residual removals, and how they will be delivered – and, in addition, it must be clear that such removals are not also being used to ‘offset’ residual emissions in other sectors (double counting); and
- (b) how the removals will be delivered – given the failures, to date, to meet targets on the creation or restoration of peatland and woodland, and the extreme uncertainty, non-efficacy and expense of NETs.

In the light of the above, the vision might be revisited to consider if it is more appropriate for the transport sector to seek to get as close as possible to zero carbon (rather than net zero). This would both emphasise the need for real decarbonisation and remove the pressure on policies that might deliver removals (probably more necessary to offset harder to decarbonise

sectors). This would, however, need our second issue with this vision to be addressed – namely, if and how the vision addresses the question of travel choices and modal shift.

As indicated by the above, we consider that the plan, in its current form, lacks vision and ambition as well as failing to set out how to deliver its limited vision. The final form of the plan (and/or the parallel Climate Change Plan) must be clearer and more ambitious.

## 2. Travel choices and modal shift

This vision, as drafted, and the draft plan as a whole appears to neglect the key issue of any (just or otherwise) transition to net-zero for the transport sector. This is that, in a future net zero world, in order to minimise residual emissions and to reach as close to decarbonisation as possible, we will need to adjust our travel choices – this will mean, for some, travelling less and changing the way we travel (that is, trains instead of planes, and public/active travel instead of private cars). Reducing the number of journeys and modal shift will be necessary as well as changing the fuels used by road vehicles and airplanes.

The significant issues of demand management and modal shift – and how these can be delivered in a just manner – are absent from the draft plan and the vision must recognise that a future transport system will only be “*sustainable, inclusive, safe and accessible*” if these matters are addressed.

For instance, on p21, the draft plan says: “a big part of this will be about continuing to ensure people and communities are supported in switching to EVs, and in accessing the necessary EV infrastructure.” This, and other references and emphasis suggests that net zero will be achieved mainly by switching fuels; this is an incorrect emphasis. There needs to be much greater focus on both reducing car usage (see below regarding the recently abandoned target) and by more of a focus on car clubs and modal shift.

The issues discussed above also apply to the proposed **Outcomes** set out in the draft document. First, it is surprising that, in a document setting out a path for a just transition to a net zero transport system, that the first, and overarching, outcome is not achieving net-zero (or, as discussed above, as close as possible to zero carbon). This should be rectified by clarifying that this is an overarching outcome or, if it is considered implicit, by cross-referencing other such commitments (e.g. the Climate Change Plan) and indicating this is a plan to deliver those.

Secondly, the outcomes should set out the changes needed to achieve a net-zero transport system; this would mean setting outcomes that reflect the travel choices and modal shift issues discussed above. Thus, there should be an Outcome about reducing private vehicle numbers and/or use, setting out that the transition will lead to fewer private vehicles on the road. So, while the car use reduction commitment is re-stated (albeit that this has now been withdrawn), there is no demand management to achieve it, and no measurement around reducing levels of car ownership, for example, or increasing access to shared cars. Equally, in relation to aviation, there is no recognition of the need for demand management (as recommended by the Climate Change Committee) with a focus, almost exclusively, on new fuels.

Outcome 8 should refer not only to the active involvement of communities in decision-making about their transport needs but also empowering communities to take control of local transport provision. Through Community Transport, local people and communities can design and deliver their own community solutions to their unmet transport needs. This requires investment and support from national and local governments to enable the sector to grow, decarbonise and give people more sustainable transport options where they live. Such an approach is clearly set out in [a recent report](#) from our member, the Community Transport Association.

The section of the plan on car use and, particularly, aviation highlight these fundamental issues. Both recognise inequalities but propose nothing to fix it. Rather, the focus is on transitioning to alternative fuels for those using cars/planes, with no analysis of the wider impact of the manufacture of those fuels or the need for demand management in those sectors. While there is recognition for the availability of reliable and affordable public transport, as well as for benefits of more active travel, no policies are proposed to deliver these – which are crucial to addressing inequalities as well as the transition (by, of course, enabling the modal shifts which appear unrecognised).

### **Target to reduce car km by 20% by 2030**

A final observation relates to this target, referenced in the document at least four times. Of course, when published this was an extant target of the Scottish Government. However, since then, while the Scottish Government claims it "remains committed to reducing car use", [it has been announced that the target will be subject to review](#) (and probably reduced/dropped), with "a renewed policy statement with COSLA on car use reduction" to be published in the spring. SCCS, our members and sustainable transport advocates [have expressed dismay at this approach](#) which is another example of delay, dithering and inaction on climate related policies.

In the light of this, the Just Transition Plan will need to be revised to amend the reference to this target. However, this will provide an opportunity to ensure that the commitment to "reduce car use" is not, in fact, a 'watering down' of the target - but that the ambition is, in some way, retained.

SCCS considers that the 20% reduction in car km was such an ambitious target and, ideally, the review and new approach should result in its reinstatement. However, if this is not possible, it must be noted that reducing car km is one of the best ways to secure a just transition in transport - and an ambition to that end must be retained. Indeed, the draft plan itself notes on p.14 that "56% of households on the lowest income do not have access to a car" - thus, a focus on improving public transport, community transport, active travel provides for social justice as well as climate targets.

Reinstating the target, or other high ambition, for a reduction in car usage is important for all of the categories of 'Outcomes' in this Plan:

- Investing in improved public transport and connectivity will create jobs, skills and economic opportunities.
- Reduced car usage leads to safer streets, more opportunities for children to play and neighbours to interact, and increased pedestrian footfall on high streets, benefiting Communities and Places.
- Reducing car usage improves air quality and public health outcomes, supporting the People and Equity outcomes.
- Reduced emissions from reduced car usage directly contributes to the Adaptation, Biodiversity and Environment outcomes.

Notwithstanding the above general observations and strategic comments, much of the document provides helpful guidance on the application of just transition to transport policy making and a useful analysis of inequalities and issues of disadvantage that need to be addressed, albeit with few if any actions to address these. In this regard, for example, the document does set out and discuss quite well the issue of carbon inequality in various ways; however, this is undermined by the absence of many actions to address it. Likewise, it provides analysis of disadvantage and the need to ensure this is addressed – but fails to highlight any measures to make polluters pay as a means to fund measures to address this issue.

Ideally, SCCS would recommend that these strategic issues are addressed and the final plan is produced as an actual plan to support the transport elements of the Climate Change Plan. However, in the absence of such a significant redraft, the positive part of this document should be retained as guidance to policy makers on the implementation of net-zero policies for transport – but this implies that those net-zero policies for transport are clearly set out elsewhere (e.g. the Climate Change Plan).

Thank you again for the opportunity to respond to this consultation and I hope the general, and section-specific, comments above are useful – and can be taken into account as the Scottish Government finalise this Just Transition Plan for the transport sector (and related policies and proposals to be set out in the Climate Change Plan). SCCS would, of course, be pleased to discuss these issues with Ministers and/or officials if that would be useful.

Yours faithfully,



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