

E: Cabinet Secretary for Transport

E: Cabinet Secretary for Climate Action and Energy

8 August 2025

Dear Ms Hyslop and Ms Martin,

Advice on the Draft Just Transition Plan for Transport in Scotland

We are writing to you in the context of the public consultation on the Draft Just Transition Plan for Transport in Scotland. We hope this letter and its annexes will be considered alongside the responses to this consultation, in line with the requirement within our remit “to provide scrutiny and advice on the ongoing development of Scottish Government-led just transition plans” for core economic sectors.

The following advice is intended to support work to revise the draft plan for transport as well as relevant aspects of the Climate Change Plan currently in development. We look forward to engaging constructively on the further development of these plans.

We welcome the draft as a positive step forward in the development of Scotland’s Just Transition Planning Framework. The draft plan highlights the value that can be added by applying just transition principles to mitigation policies so as to achieve emissions reductions as fairly as possible and build public understanding and social consensus around necessary changes.

Transport is an especially challenging, complex and fragmented sector, and there are precious few viable “win-win” solutions in this area. Developing an effective just transition approach will be critical in confronting and analysing key strategic challenges in terms of social and economic impacts at a relatively early stage to support a sophisticated strategy for achieving the long-term delivery of emissions reductions.

A strength of the draft plan is that it clearly establishes carbon inequality as a primary problem for the sector, while putting forward a positive vision for the future of Scotland's transport system. It shows clearly how extensive engagement work has been carried out and helped to inform the Scottish Government's approach, and it recognises that effective policy will be flexible to place-based needs, including rural areas and islands. This is an approach that should enable more rapid and equitable delivery than a one-size-fits-all model which would struggle to reconcile the overall goal of emissions reductions and a more equitable system with the specific needs of rural and island communities.

Furthermore, the plan does well to recognise the role the transition in transport must play in our adaptation and resilience to climate change right across Scotland, as well as the impact of the changing climate on transport workers specifically. The plan provides a useful starting point for the detailed planning on future skills for the sector that lies ahead.

The Commission published a briefing in 2023 titled "Can We Reduce Car Use Fairly?" Subsequently we have had a number of constructive meetings with officials working towards the development of the draft just transition plan for transport, as well as discussing key transport issues from a just transition perspective with the team involved in developing the new draft Climate Change Plan expected later this year. Transport has been a consistent issue raised in our engagement with communities across the country including in Grangemouth, Shetland, the North East, Dumfries and Galloway and the Western Isles. The Commission also published a statement in June regarding the proposed closure of Alexander Dennis Ltd. sites at Falkirk and Larbert, and this can be found in Annex C.

To support consideration of our advice (Annex A) and consistent with previous scrutiny work undertaken on draft just transition plans for core economic sectors, the Commission convened a series of roundtable discussions themed around (i) Economy, (ii) Equity and (iii) Environment. Please find high-level read-outs of these sessions appended under Annex B.

We look forward to providing further scrutiny and advice to support policy development in this area, and would welcome any opportunity to discuss how we can best work towards a just transition for Scotland's transport sector.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Dave Reay', with a long, sweeping underline.

Professor Dave Reay, Co-Chair
Just Transition Commission

A handwritten signature in black ink, appearing to read 'Satwat Rehman', with a long, sweeping underline.

Satwat Rehman, Co-Chair
Just Transition Commission

ANNEX A – Advice on the Draft Just Transition Plan for Transport in Scotland

CROSS-CUTTING ISSUES

The revised plan should set out clearly the major actions that will be taken to decarbonise the transport sector and how just transition principles will be applied in the design and delivery of these measures.

The outcomes and vision proposed by the plan are positive, but the revised plan should detail what new policies will be implemented to reduce the sector’s emissions, how much carbon they will save, when they will be taken, how they will be paid for, and how the distributional impact on key groups, principally workers and transport users, will be managed and assessed so as to achieve just transition outcomes. Sectoral just transition plans of this kind should be distinguishable from other plans (such as the National Transport Plan or Climate Change Plan) through the additional detail they provide on the question of “who pays?” Without sufficient clarity on the nature of mitigation policies at this stage, we are unable to evaluate them from a just transition perspective.

Delivery of the plan will need to be integrated across policy areas, taking a systems approach with transport at the centre of spatial planning.

The nature of the sector is that transport challenges and opportunities cut across a wide range of policy areas, including strategic planning and delivery on housing (there is clearly a premium on accessible housing close to amenities), energy demand and distribution, built environment and construction, depopulation, regional economies and adaptation. The revised plan should deepen linkages with related and overlapping areas of policy development, and show how the approach will inform just transition plans for other sectors as well as regions and sites, such as Mossmorran, Aberdeen/North East and the ongoing work on Grangemouth.

A high quality road map for the just transition in transport will add significant value for workers, communities and investors.

Consistent with our previous advice on the approach to critical economic sectors, sites and regions, we consider road maps to be a primary tool in the development of credible Just Transition Plans because these will build confidence and inform those whose livelihoods will be impacted by changes to the sector regarding options and support available to them, as well as providing greater certainty to businesses of all sizes operating within and related to the sector, industry and investors. Road maps should, as previously advised in regard to the draft plan for the energy sector, be “detailed and thorough, mapping interdependencies between actions and outcomes, and providing a critical path analysis that includes a realistic assessment of institutional capacity and other key constraints.” Road maps can also add value by identifying funding streams to support workers to transition.

Map and manage strategic risks.

Given the scale of the action required to reduce emissions in this sector and the likelihood that required changes may meet with a degree of public opposition, the revised plan should, in line with previous advice, include “a detailed and credible assessment of key risks to strategic delivery as well as actions to mitigate these risks”. The extent to which just transition principles are successfully applied and demonstrated presents a potential risk to the delivery of emissions reductions, since these measures will need to develop and sustain their social license in order to endure. Mapping of critical risks will also help inform the strategic sequencing of measures, such as investment in public transport prior to raising revenue through, for example, workplace parking levies or road pricing.

Quantify and communicate the social and economic benefits of transport emissions reductions and help people price-in the cost of inaction.

The major changes required can only be achieved through an assertive, evidence-based approach that seeks to build public understanding and buy-in around the benefits of a low carbon transport system, whether economic or social, including the opportunity the transition presents to enhance community life and public health. Short-term costs and inconvenience associated with required changes will certainly be communicated forcefully. These will need to be contextualised through a communications strategy which builds trust by recognising transport’s central role in economic development and assessing in a credible way the relative economic contribution of different interventions, quantifying the benefits as credibly as possible as well as the cost of inaction and delay in terms of climate impacts, worsening inequality, social division and isolation, road traffic accidents, costs incurred by the NHS from poor air quality, and health outcomes, as well as the very large amount of public money that would have to be spent to simply sustain the status quo. Clear, accessible and well-evidenced modelling of the counterfactual (what happens if we do nothing?) will help support successful delivery.

Establish a pragmatic delivery model based on collaboration and partnership working, with clear roles and responsibilities.

A just transition for Scotland’s transport system will require close and sustained collaboration between the Scottish Government and the rest of the public sector, as well as with the private sector, where much of the responsibility for delivery sits under the current plan. Strategic clarity on the optimal relationship between the public and private sector in terms of delivery will support long-term progress, help create a favourable context for private investment and ensure high social and environmental returns on public investment. To maximise the plan’s utility, it should set in train a joint work programme with identified partner organisations (as has happened, for example, with just transition planning for Grangemouth), such as major employers with a significant footprint in the transport system such as NHS Scotland. This should include ongoing collaboration on data and information sharing to support effective monitoring and evaluation of progress, as well as regular joint reviews of emerging risks, issues and opportunities to foster an approach based on collective problem-solving and rapid sharing of good practice across responsible bodies.

High emitters should pay more.

While a strength of the plan is its identification of carbon inequality as a core problem for the transport sector, a weakness is that it does not show how this will be addressed nor how the extent of our existing carbon inequality informs the overall strategic approach. The plan should develop a stronger definition of transport poverty, including by defining what thresholds of affordability, accessibility and safety will guide strategic interventions, investment and monitoring. As well as identifying key target groups and places for addressing this poverty, the plan should also seek to reduce the gap between those at the “top” and “bottom” of the distributional scale by tackling the problem of inequality at both ends. As previously advised in regards the development of the new Climate Change Plan:

‘in applying the core just transition principle of the equitable sharing of costs and benefits, there will be significant value in demonstrating that those with broadest shoulders and those responsible for highest emissions will be expected to pay a proportionately larger amount of the costs of transition. This could be applied to, for example, aviation (frequent fliers) and luxury high emitting vehicles. Even if these represent a relatively small percentage of emissions, addressing these more conspicuous forms of high carbon activity will be important to public perceptions of fairness and strengthen the credibility of other measures.’

JOBS AND SKILLS

Replace a potential cliff-edge for workers with credible transition pathways.

As with any just transition plan, a core objective will be achieving a managed and orderly transition for workers whose roles may change or no longer be needed through a co-ordinated and timely package of training and reskilling aligned with emerging needs within the sector and the broader economy. The plan should spell out not only where job losses are anticipated, but the specific measures that will be taken to mitigate the risk of disruption and loss of livelihoods. A key test for the plan is the extent to which it can be used practically to help transport sector workers understand the changes ahead and provides them with clarity and reassurance, detailing the form of support that will be available to them as the sector transitions. This should be tested out and reviewed through detailed engagement with transport sector workers, including those in vehicle maintenance and supply-chain roles.

Show how terms and conditions for transport workers will be enhanced by the transition.

This should include an assessment of the existing employment conditions experienced by workers across the sector, and tangible steps, including conditionalities, to ensure fair work standards are achieved in practice, supported by credible oversight mechanisms.

Long term skills and workforce planning will be needed as the sector is reshaped by new and emerging technology.

The plan should provide more detail regarding the skills that will be required for future roles within the sector and how these will be delivered in a timely way, as well as specifying the critical strategic role of colleges and how these will be supported to deliver the future workforce required.

Scotland's low carbon transport system, including buses, rail and ferries, must include the creation and retention of high value jobs in domestic manufacturing and supply chains.

Applying learnings from recent experiences with Alexander Dennis Ltd and Caledonian MacBrayne, the revised plan should set out the actions the Scottish Government will take to ensure the low carbon infrastructure and technology that a green transport system will routinely require brings the maximum economic benefit and social value to workers and communities in Scotland by creating large numbers of good new jobs.

The strategy should account for how different ownership models across the sector will require specific interventions and develop a better understanding of how small and medium-sized enterprises (SMEs) in particular will be supported.

More in-depth engagement and consideration is needed to understand the particular risks, issues, challenges, and opportunities for positive impacts given that some areas of the transport system are more consolidated (e.g. Scotrail under public ownership) whereas other areas, such as freight, are highly fragmented and complex, with the risk that small businesses in particular may struggle to deliver changes that may present technological challenges and carry additional costs.

ROAD

Set out the policies that will enable the switch to electric vehicles (EVs) to be achieved as fairly as possible.

The plan is heavily reliant on rapid expansion of EV uptake, but does not consider in depth the inequity that defines the switch to EVs so far, or how to address this pattern. Uptake has so far been predominantly by wealthier households, often via public subsidies which are not practically accessible in an equitable way - those who can afford to switch benefit disproportionately via investment in infrastructure and lower running costs, particularly for those households with access to off-street parking. If the wealthiest part of Scottish society is seen to have benefited most from the switch, subsidised by the public purse at a time when the cost of using public transport continues to increase, this will risk the credibility of the overall approach to decarbonising the sector.

Reductions in road use will be needed.

A broader set of emissions reduction measures will be required rather than relying on a single major change (switch to EVs), the timeline for which could represent a single point of failure both for reducing emissions and achieving public buy-in. Previous evidence showed that significant reductions in road use will be required if emissions are to be reduced in a timely way and that electrification alone will not suffice. The reliance on EVs as the route to decarbonisation risks perpetuating the pattern of car dependency and erosion of public transport patronage and service provision, with the result of increased inequality. Delivery strategy will need to include greater reductions in urban areas to allow for rural communities to remain connected, and since heavy goods vehicles inflate the sector's emissions and will be harder to treat, car use reductions will need to be delivered earlier. The Commission's 2023 briefing "Can We Reduce Car Use Fairly" set out some principal fairness considerations in achieving car reduction, including the benefits of a whole-systems approach, the need for a redistributive strategy that uses revenues from measures such as road user charging to improve public transport, and the need to address the risk that measures exacerbate social isolation.

A practical strategy for a high quality bus network that is accessible to all should be a core component of the plan.

We have heard from communities around the country about the effects of cuts to bus services in worsening transport poverty, inequality and social isolation, and limiting economic opportunities. A co-ordinated plan is needed to restore and enhance service provision, improve standards in information-sharing, ensure fair pricing and ticketing, safety on board and accessibility, and foster greater democratisation of bus services so that communities are better served. The revised plan should build on the extensive published work on this topic, including the [Fair Fares Review](#), and add value by explaining how the positive priority objectives set out in this work will be delivered.

RAIL

The plan should clearly identify the critical strategic role of a high quality public transport system in underpinning a fairer, low carbon, climate-resilient economy.

It should set out the new policies and delivery model to achieve this so that their anticipated distributional impacts can be assessed. Public ownership of rail is a critical asset and the Scottish Government now has significant leverage in the sector. The plan should detail how this will be used strategically to support a just transition, particularly by better aligning public procurement with just transition principles

We welcome the decision to permanently scrap peak fares as a step towards a long-term strategy of reducing the cost of public transport.

While the draft plan notes the rationale for ending the peak fare removal pilot, we warmly welcome the subsequent decision to remove peak fares for good, particularly given the risk that peak pricing acts as an effective tax on people who are unable to work from home and choose not to travel by car. Modal shift is recognised as a highly complex and long term policy objective that requires a range of sustained and co-ordinated interventions whose impact cannot be meaningfully evaluated over a period of just 12 months. Achieving the lasting changes to how people travel will require clear and consistent messaging and strong evidence whenever a change of course is required

INVESTMENT

Develop an investment prospectus.

The revised plan should set out the investment model by which just transition outcomes will be achieved, including through conditionalities applied to public investment and how revenue raising mechanisms will be assessed on just transition grounds. A just transition in transport will be best supported through long-term investment streams that are ring-fenced at local level to support the delivery of holistic plans developed at local level, rather than via piecemeal or short-term financing. The plan needs significant further development in order to detail the levels, timing and type of investment that will be needed to achieve a just transition for the sector, both from public and private sectors, as well as how community transport will be supported. The revised plan should show how demand management options established in recent Transport Scotland studies will be embedded and implemented. In plain terms: who will be paying for what, how will these costs be met, and how will just transition principles be applied to the investment strategy for Scotland's transport system? The revised plan should establish a process for long-term adaptive planning so that the allocation of investment can be responsive to changing circumstances and address long term issues of social equity in terms of who pays and how to overcome structural inequalities, aspects that lie beyond the current scope of Scottish Transport Appraisal Guidance which considers social impacts in a relatively short-term perspective and provides a tool for project appraisal whereas just transition planning and delivery for the sector should address root causes of inequality.

ANNEX B – Roundtable Discussions

The Just Transition Commission convened three themed roundtable discussions on the draft Transport Just Transition Plan. A note of the participants and key discussion points for each is provided below.

Roundtable 1: Economy

Participants were as follows:

- Caledonian MacBrayne
- Confederation of Passenger Transport
- Road Haulage Association
- The Highlands and Islands Transport Partnership (HITRANS)
- North East of Scotland Transport Partnership (NESTRANS)
- South East of Scotland Transport Partnership (SESTRAN)
- Strathclyde Partnership for Transport (SPT)
- Scottish Trades Union Congress (STUC)
- Just Transition Partnership

The key discussion points were as follows:

- The transport sector in Scotland is fragmented and complex, and will require a sophisticated long-term strategy if it is to be decarbonised in a way that redresses the existing inequalities that currently define it, while avoiding opening up new forms of social and economic injustice.
- Transport emissions are not currently shared equally and this plan should include action to address this in line with just transition principles.
- The draft plan is heavily reliant on electrification. A broader range of measures, including demand reduction policies, would mitigate the risk of a single point of failure on decarbonisation, as well as presenting a greater opportunity to address social and economic inequity associated with the transport system. The plan should also make clear what measures will be taken to mitigate the risk of exacerbating transport poverty and inequity through electrification.
- Greater clarity is needed on how the plan's delivery will be monitored and assessed, with specific figures and targets around key indicators, centred on core questions as follows: (1) whether or not decarbonisation is taking place at sufficient speed, (2) investment levels to support the changes required for adequate emissions reductions, (3) whether or not workers affected by changes are being sufficiently supported to find new employment and training opportunities.

- A revised plan could add value by including a clear route map establishing key milestones, as well as specifying roles and responsibilities for key partners and major players (such as the NHS) and the relationship between public and private sector in achieving just transition outcomes.
- A weakness of the plan is its move away from the expanded role which a renewed public transport will need to play in reducing emissions from the sector through modal shift to rail and bus, both of which require major investment to support economic gains and emissions reductions.
- In revising the draft plan, a priority would be to show how it has been informed by quality engagement with transport workers across different roles within the sector.
- The plan's focus on the diversity of the sector's workforce was welcomed, noting that further efforts will be required to encourage a diverse and inclusive workforce for Scotland's transport system.
- The skills element of the plan is focused on those with skills that can be transferred, rather than a more comprehensive plan to achieve the skills that will be required for a low emission transport system.
- Greater clarity is needed on working conditions and job pathways. The plan should give people whose jobs may be at risk (such as garage workers and mechanics) meaningful information about impacts anticipated, how these will be managed, and the options and support that will be available to them to support them through the transition.
- The plan should provide greater clarity on the impact of changes on small and medium-sized enterprises (SMEs) and how these will be managed equitably. The freight/haulage industry is approximately 95% micro business and faces considerable additional costs and technological challenges to decarbonise.
- The plan should reflect the regional dimension and how regional characteristics will shape delivery, for example, in Aberdeen specialised goods associated with the energy sector require to be transported.
- For many aspects of our transport system, whilst there is support for decarbonisation, this is not the priority. Many are life-line services, and providing reliable services is the focus (eg ferries and school transport). To jointly increase the public network and decarbonise is exceptionally hard. The Government needs to leverage in private investment; this isn't going to happen naturally.
- Scotland's transport system does not operate in isolation, but is integrated with UK and international transport systems. The plan should recognise this strategically.
- Planning for transport needs to be integrated into site and locality plans for industrial change, such as high emission sites, or Green Free Ports.
- Failure to invest in the long-term future of railway infrastructure may save costs in the very short term but will have significant long-term down-sides in terms of economic impact and emissions reductions.

- As the weather is becoming more unpredictable, our transport infrastructure will need to adapt to ensure resilience against unpredictable and extreme weather and associated disruption. For example, ferry services are likely to need more powerful vessels. The ferry network, a lifeline service for island areas, lends itself to electrification but this would require substantial investment.
- The stated aim of 30% of the ferry fleet being “low carbon” by 2032 is not a clear target and requires clarification if it is to inform strategic delivery.
- With the expansion of renewable supply, surplus generation could be cheaply redeployed rather than constrained, for example into the energy needs of the public transport system, such as charging electric ferries, buses etc.
- Given Scotland’s topography and the distribution of the population, there are acute challenges in ensuring the transport system serves people in rural and island areas, and economic activity in these areas is supported while emissions are reduced.
- Transport poverty is high in rural mainland and island areas, and the strategy should include specific measures to address this. A clearer link should be developed with the Rural Delivery Plan,
- Much of the plan as currently set out will need to be delivered by the private sector and the plan can add value by defining the relationship between public and private sector in achieving strategic delivery. Multi-year funding commitments have significant up-side in achieving long-term, ambitious changes by helping create greater certainty, consistency and reliability for investment than single year funding, e.g. the bus investment fund which replaced the multi-year bus partnership fund.

- Roundtable 2: Equity

- Participants were as follows:
 - Scottish Women’s Budget Group
 - Oxfam
 - Jacobs
 - Climate Emergency Response Group
 - Poverty and Inequality Commission
 - Civic
 - Just Transition Partnership
 - STUC

The key discussion points were as follows:

- Transport is central to social inclusion, for accessing employment and economic opportunities and can reinvigorate our towns and cities if planned well, but, as with the existing transport system, it can also create and embed inequality. Sustained work will be required to identify the impact of transport policies in terms of poverty, child poverty and gender inequality.

- An equitable transport system is critical for building and maintaining public support. There is potential for increasing friction between carbon reduction measures and the potential impact on people and communities, particularly the most marginalised without a clear strategy for specific actions to show how distributional impacts will be managed and assessed.
- A sharper focus is needed on what are the 3-4 key outcomes the plan is expected to produce, in terms of impact on workforce (particularly core workers affected) and transport users as opposed to a broader list of aspirations. The plan should show how Scotland can achieve a decarbonised sector by making rapid strategic changes in a way that protects workers and communities.
- Given the “hearts and minds” challenge, a strong strategy could focus on a small number of achievable key actions to help build trust. Equity questions are critical for building and maintaining public support and shifting behaviour at scale.
- Greater clarity is needed on the specific measures the Scottish Government plans to take to achieve a just transition for the transport sector, as well as the specific levers it will apply in order to achieve its goals, whether in terms of legislation, regulation, compulsion and incentives.
- The plan could include 3-4 priority actions that are achievable in the next year, for example reinstating conductors on buses for safer routes or measures to encourage car-sharing.
- The current draft plan does not include a rigorous approach to behaviour change, given the need to counter the many successive decades of policy, investment and infrastructure development that has been designed to encourage car use and established a right and aspiration toward car use that will require a shift in attitudes alongside changes to the transport system and place-making. Quote: “People will think first about what they will lose, rather than what is to be gained.”
- Changes associated with transport decarbonisation are likely to be particularly daunting for those on low incomes. Proposed measures such as the Minimum Income Guarantee would play a central role in supporting those who may feel they have most to lose from necessary changes to change attitudes and behaviours.
- There is currently a surprising lack of evidence underpinning the plan regarding the potential impacts of changes, including demand management and its impact in terms of equity.
- The plan needs to shine a light on carbon inequality as transport is a critical area where this is particularly evident. To some extent the plan tries to address this, but it doesn’t yet provide detail on how carbon inequality will be addressed strategically.
- There also needs to be detail on how much carbon specific measures will save in order to build the case for the most challenging and effectual policies.
- The principal policy lever in the plan is the switch to electric vehicles (EVs) however this switch has very significant equity challenges. It is more expensive to switch and typically only available to those with access to off street parking, but the benefits are cheaper running costs – “we couldn’t design a more unjust system”.

- The revised plan should show what measures will be taken to make the EV network accessible, both economically and for wheelchair users. Much more is needed to provide assurance that the technology switch will not worsen transport inequality.
- Greater clarity is required regarding how changes will be paid for in an equitable way, including the approach to tax justice and application of the principle that polluters should pay (currently absent).
- Investment isn't currently happening at the scale required to deliver emissions reduction or achieve a more equitable transport sector. There is currently a lack of sufficient detail in the plan on finance and investment to support meaningful evaluation of the financing model to be applied.
- As with low carbon heat, fair financing mechanisms will be required to enable change.
- There is a lack of evidence on the potential impacts of proposed measures, particularly in assessing the impact in terms of economic inequality of different policy measures.
- The Climate Change Committee has repeatedly advised the need for a demand management strategy on aviation, however this is largely absent from the plan despite this being the most pronounced area of carbon inequality.
- The power to tax the use of private jets is devolved. Funds raised from taxes on high emission activities could be linked to investment in rail and bus. Quote: "Even if you apply a private jet tax, those people are likely still do to this. But tax makes sure people at least pay for the damage."
- Oxfam published a discussion paper on the subject of taxing private jets in September 2024 [Cleared-for-Take-Off-Oxfam-Scotland-Discussion-Paper-1.pdf](#)
- Frequent flier levies are another potential source of revenue, applying the principle that the more you emit the more you pay. These could be applied with specific exemptions for e.g. lifeline services for island communities.
- It is positive that the plan acknowledges that public transport is not accessible (particularly for disabled women and carers) and that through a just transition public transport will be accessible, affordable and fair. Currently it is unclear how this will be achieved through costed and measurable interventions.
- The business section focuses on male dominated sectors. The care sector relies on private transport and this is missing. They are a critically important, low-paid workforce and often have to rely on personal cars. They are at risk of being disadvantaged by various initiatives (e.g. Low Emission Zones, road tolling) without specific protections.
- Specific measures will be required to manage the transition for those working low-paid jobs, such as retail, cleaning etc, including on non-standard shift patterns.
- The plan needs to consider how transport users, including those requiring step-free access or carers working in an island setting, use the current transport system, so that proposals are informed by specific patterns of usage.
- The example of Ember buses was cited as a company taking a positive approach to accessibility, with the option of booking specific spaces for wheelchair users on specific services.

- The current plan does not include consideration of the cost of further inaction and delay on the international sphere, since the cost of such delays is not only domestic.
- While the Scottish Government has direct control over rail, and councils have direct control over some bus operations, the current plan does not include anything on democratising bus services and expanding on the successful models of public ownership and operation. The plan should engage with the ongoing campaigns to democratise bus services, such as the Better Buses for Strathclyde campaign

Roundtable 3: Environment

Participants were as follows:

- Community Transport Association
- Scottish Land & Estates
- Transform Scotland
- STUC
- Stop Climate Chaos Scotland
- Scottish Wildlife Trust

The key discussion points were as follows:

- A starting point for a sectoral just transition plan of this kind could be the principle that it should have no damaging impact on the overall biodiversity metric, balancing the need for infrastructure (while making this as green as possible) with the broader benefits for species of emissions reduction.
- The inclusion of biodiversity and the natural environment in the annex is welcomed, however, this needs to be embedded throughout the plan and show how the plan's delivery will help achieve biodiversity targets. A useful link could be developed to the Natural Environment Bill, with nature recovery targets and associated metrics in development.
- In developing Scotland's transport system it will be necessary to combine hard engineering solutions to transport networks as well as nature-based solutions such as catchment-based interventions to mitigate against flood events.
- As the plan is developed, consideration should be given to the materials whose use are embedded within the sector, such as concrete and steel, including where these are made, their emissions profile and associated working conditions.
- Plan for transport should explore the positive synergy between mitigation options and adaptation solutions, since higher quality places are typically more resilient, embedding flexibility within the systems and lending themselves to clear mitigation solutions.
- While the plan has a largely positive vision, greater specificity is needed in spelling out what a low carbon transport system will look like, and what are the most significant social and economic opportunities from decarbonisation in the sector.
- While some of the benefits of the transition in transport are economic, others are social and human in character, whether in terms of helping to build communities or in health outcomes, including reduction in road traffic accidents. These should be highlighted and quantified where possible.

- The Scottish Government should lead on car use reduction where levers are devolved to disincentivise car use for those who can use alternative methods (for example, local car parking charges or road user charging).
- There is concern that the plan's focus on the private sector and the switch to EVs may leave significant numbers of people behind and exacerbate existing transport inequality without investment in clear measures to mitigate this risk to people who may not be able to access an EV due to cost, age, or disability.
- Transport is a lifeline service to many rural communities for preventing depopulation and helping the economy, Scottish Government needs to address the gaps in public transport in rural communities, particularly after cuts to bus services over recent years.
- The plan should show how it is integrated with the Action Plan to Address Depopulation (2024).
- Community transport organisations have a key role to play in achieving climate actions through the empowerment of local people and supporting “top down” mitigation policy with bottom-up actions. The revised plan should consider what potential improvements can be made to support communities to respond and enable the third sector to sustain sufficient resource and capacity to deliver services.
- The current trajectory in rural transportation exacerbates transport poverty, with car dependency increasing due to an ageing population.
- The plan's commitment to sustained engagement and co-design is welcome.
- More detail is needed across the plan. For example, there is no explicit detail on aviation, or on addressing the projected increase in demand for sustainable aviation fuel and what this would mean for land use, since it would entail the displacement of other land uses, such as growing food and producing crops such as barley required for whisky manufacture.
- Car restraint is not addressed in the plan.
- As well as car use reduction, a useful measure of success could be a reduction in the number of households in car-dependent neighbourhoods.
- The plan has a significant focus on road transport, and should expand on plans for rail, ferries and aviation.
- The plan should consider the terms and conditions of those working in the transport sector, and what actions the Scottish Government can take to support workers through the anticipated changes as the system decarbonises.
- Lessons should be applied from the scrapping of the peak fare pilot on Scotrail. The rationale provided for this step, i.e. that while a shift had been achieved in a short space of time it was not of a sufficiently high level, neglects the nature of modal shift as a long-term objective that is known to be difficult and complex to achieve. Strong and consistent policies will be required if transport users are to change how they travel.
- Public transport has continued to rise in cost over recent years, while the cost of motoring has flatlined. The plan needs to show how this will be addressed strategically.

- The plan could develop a better public understanding of the current allocation of resources in relation to the transport system. While there is extensive focus in public discourse around subsidies for public transport, private motorists are in receipt of significant subsidies, there has been no rise in fuel excise duties and investment in road schemes continues. Greater analysis of this would inform a better understanding of the distribution of costs and benefits under the current and proposed future transport system.
- The plan details how “business will be supported to transition” but it is not clear which businesses this applies to or the form such support will take.
- It is difficult to disagree with the overarching sentiment/vision of the plan, but there is a disconnect between its aspiration and recent policy and investment developments in terms of the reversal of car reduction targets and the allocation of funding to road projects (as opposed to rail). The current package of measures in the plan will not deliver sufficient emissions reduction or a more socially inclusive society.
- The plan should acknowledge that targets will not be achieved by sustaining the same level and mode of travel. The vision and outcomes don’t acknowledge the extent we need to reduce travel or shift modes. The approach of changing fuel sources and sustaining existing transport levels would then carry knock-on consequences for other areas of policy which would then need to decarbonise more rapidly if targets are to be achieved.
- The section in the plan on monitoring and evaluation should set out how the approach will support strategic policy enhancements and better delivery going forward, i.e. the process by which learnings from quantitative and qualitative assessments will be applied.

ANNEX C – Statement on proposed closure of Alexander Dennis Ltd. sites at Falkirk and Larbert – 24 June 2025

The Just Transition Commission welcomes the close collaboration between different levels of government, as well as constructive engagement with trade unions, to address the proposed closure of operations at Alexander Dennis Ltd.'s Falkirk site and suspension of production at Larbert.

As a major manufacturer of zero-emission buses, Alexander Dennis Ltd. can have a critical role to play in achieving a just transition in Scotland, as we invest in improving our public transport. The company has a proud industrial heritage in the Falkirk area that goes back more than a century and is deeply rooted in the community.

Job losses in this sector would be a major blow to the regional economy at a particularly sensitive time, following the closure of the Grangemouth oil refinery and while the renewal of the industrial site through Project Willow is at a relatively early stage.

We call on all stakeholders to work together positively towards a solution that avoids any cliff edge for workers, supports the retention of jobs at Falkirk and Larbert and manages any changes with due regard to just transition principles. This should include specific measures to achieve a long-term solution, such as furlough, to support constructive progress and avoid a disorderly and unjust transition



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