

16<sup>th</sup> May, 2025

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

# Just Transition: draft plan for transport in Scotland

## About us

Consumer Scotland is the statutory body for consumers in Scotland. Established by the Consumer Scotland Act 2020, we are accountable to the Scottish Parliament. The Act defines consumers as individuals and small businesses that purchase, use or receive in Scotland goods or services supplied by a business, profession, not for profit enterprise, or public body.

Our purpose is to improve outcomes for current and future consumers, and our strategic objectives are:

- to enhance understanding and awareness of consumer issues by strengthening the evidence base
- to serve the needs and aspirations of current and future consumers by inspiring and influencing the public, private and third sectors
- to enable the active participation of consumers in a fairer economy by improving access to information and support

Consumer Scotland uses data, research and analysis to inform our work on the key issues facing consumers in Scotland. In conjunction with that evidence base we seek a consumer perspective through the application of the consumer principles of access, choice, safety, information, fairness, representation, sustainability and redress.

## Consumer principles

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The Consumer Principles are a set of principles developed by consumer organisations in the UK and overseas.

Consumer Scotland uses the Consumer Principles as a framework through which to analyse the evidence on markets and related issues from a consumer perspective.

The Consumer Principles are:

- Access: Can people get the goods or services they need or want?
- Choice: Is there any?
- Safety: Are the goods or services dangerous to health or welfare?
- Information: Is it available, accurate and useful?
- Fairness: Are some or all consumers unfairly discriminated against?
- Representation: Do consumers have a say in how goods or services are provided?
- Redress: If things go wrong, is there a system for making things right?
- Sustainability: Are consumers enabled to make sustainable choices?

We have identified access, fairness, sustainability and information as being particularly relevant to the consultation proposal that we are responding to.

# Our response

## Vision and Outcomes Consultation Questions

### Question 1A. Do the draft outcomes reflect what the Plan should be aiming to achieve?

Consumer Scotland considers that the draft outcomes set out in the Plan are wide ranging and appropriate. Focusing on the consumer experience, we especially welcome the proposed ‘Communities and Places’ and ‘People and Equity’ outcomes. Our response focusses on these areas as they are of most relevant to our role and functions.

Consumer Scotland has recently published a [consumer framework](#) for addressing climate change. This framework is based on a review of key evidence, including Consumer Scotland’s growing evidence base on consumers in relation to climate change and net zero legislation and policies. It has identified cost, convenience, clarity, and confidence (the 4 Cs) as key issues for considering the role of consumers in progressing the transition to a more sustainable future. This framework informs our response.

Figure 1 – A Consumer framework for addressing climate change (the 4 Cs)



Our recent [briefing](#) on consumer attitudes and behaviours related to sustainable transport showed that affordability, convenience, safety concerns, and accessibility are all important factors influencing whether consumers, and especially those in vulnerable circumstances, are willing and able to make sustainable transport choices. 38% of consumers with a disability or long-term health condition cited issues related to their health and accessibility as a reason to not use public transport, with 16% ranking it as a primary barrier.<sup>1</sup>

Meanwhile, 11% of consumers cited safety concerns as a barrier to choosing public transport, with 13% of women specifically citing safety as a barrier.<sup>2</sup> Other consumers with characteristics that could lead to them being in vulnerable circumstances have also reported safety concerns in other research.<sup>3</sup>

We welcome the commitment in Programme for Government for ScotRail to continue to implement measures to address anti-social behaviour to protect staff and passengers, particularly unacceptable behaviour targeted at women and girls. However, we would wish to see this focus on safe access adopted across all modes of transport.

We consider that the Plan's focus on the different needs of specific communities, and especially on rural and island communities is important and reflects the different realities for consumers in those areas. Consumer Scotland research has found that the geographical differences between urban, rural, and island regions result in differing experiences for consumers in each respective area. In rural and island areas, with more sparse populations, lack of public transport services and infrastructure can render sustainable transport 'out of reach' for many consumers.<sup>4</sup>

As a result, consumers in these areas are more likely to drive, with significantly more people (86%) in remote rural areas having full driving licences compared to 62% in large urban areas.<sup>5</sup> We therefore welcome the recognition in the plan that car use and reduction measures will require a different approach in rural and island regions. While public transport and active travel options must be improved and expanded, private car use will remain a necessity for many rural and island consumers. Support will be required to help these consumers switch to ultra-low emission vehicles in an affordable, practical and fair way.

Transport Scotland's Draft Electric Vehicle Public Charging Network Implementation Plan recognises the challenges around encouraging investment in charging infrastructure in rural areas due to lower traffic volumes and higher grid connection costs.<sup>6</sup> While previous Consumer Scotland research has found that particularly high proportions of current EV drivers in rural areas mostly charge their vehicles at home (83%),<sup>7</sup> there are consumers in rural areas for whom home charging is either not an option at all (e.g. those without driveways), or who can only meet part of their charging requirement (e.g. because of journey lengths). If EV rollout is to accelerate, implementation plans will need to consider support for those consumers who can't charge at home. Action will be needed to improve charging facilities to underpin the increased rollout that is desired, including action to ensure that both consumers in densely populated urban areas and rural and island Scotland can reliably and affordably charge their vehicles. We note that this is recognised in the draft plan, which highlights that the EV Infrastructure Fund (EVIF) has been designed with the needs of rural and island communities in mind.

Consumer Scotland also welcomes the recognition that communities must be actively engaged in decision-making processes around their transport and connectivity needs. For such engagement to be successful, improvements are needed to enable consumers to understand how their transport choices can support action towards a just transition. Our recent research found that 17% of consumers do not know how to reduce their transport carbon emissions, while 15% didn't think their actions would have an impact.<sup>8</sup> We therefore recommended that Transport Scotland should design and deliver a new consumer engagement programme to support the implementation of the Just Transition Plan for

Transport in Scotland.<sup>9</sup> This will help policymakers understand the different needs of consumers across Scotland, and to design future transport systems to meet these needs. It will also help address the consumer principle of representation, and contribute to increased fairness in consumer experiences of transport in Scotland.

While we recognise that the draft Just Transition Plan is centred around a wider vision and outcomes, we agree with the Climate Change Committee (CCC)<sup>10</sup> that strategies must be supported with clear plans for implementation. Transport Scotland and the Scottish Government must ensure that all major plans to reduce emissions in the transport sector clearly explain the expected contribution from each key action and allocate responsibility, and budget, for delivering work to meet targets.<sup>11</sup> Without such efforts, any plan is more likely to be unsuccessful in its aims and fail to address the needs of transport consumers in Scotland.

#### Question 1B. Is anything missing from the draft outcomes in the Plan?

While Consumer Scotland is broadly content with the draft outcomes included in the plan, there is no clear outcome related to the availability of sustainable transport methods and this represents a significant gap. A lack of availability of services was the most frequently cited barrier to use of sustainable transport options reported by consumers in our research.<sup>12</sup>

While some new rail lines and stations have been delivered in recent years, route kilometres in rail did not increase between 2020 and March of 2024.<sup>13</sup> Availability of bus services, meanwhile, is in long-term decline, with around 44% of registered bus routes being cut since 2006,<sup>14</sup> and both the overall budget to support bus services and the budget for bus prioritisation schemes have been reduced.<sup>15</sup> Transform Scotland have found that reductions in support for bus services are likely to impact the availability of these services for consumers.<sup>16</sup> Bus prioritisation schemes, where they have been funded, have been shown to reduce journey times and increase bus use.<sup>17</sup>

Consumer Scotland recognises the challenges in public spending, and the Plan must ensure that available resources are deployed as effectively as possible to deliver tangible improvements in the availability of public transport services. Transport Scotland should work with appropriate stakeholders to analyse and identify key parts of Scotland where targeted investment could most effectively improve public transport service levels for consumers, enabling consumers to choose more sustainable transport options.

In general, the plan identifies the current issues affecting transport consumers. It identifies where changes are needed, and lists a number of active areas of Scottish Government work and investment. However, it does not provide a detailed account of how the current challenges will be met, how the required changes will be generated and how a just transition can be fairly achieved. To do this, and to allow consumers and stakeholders to provide detailed comment, more information on delivery measures, the impact of these, and the trade-offs identified are needed.

We note that the Climate Change Plan is due to be published in September. It will be vital to have clear linkages between the detail in the transport envelope of the Climate Change Plan, the Just Transition Plan for Transport and other policy and legislative changes in this area. Clear linkages across these key policies will support consumer confidence, clarity and engagement in these matters.

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

The Plan is easy to use and to understand, with appropriate use of graphics and easily understood language. However, in line with our comments above, it is not clear from the Plan whether consumers will understand what difference it will ultimately make to their ability to make sustainable transport choices in their daily lives. The Plan could also be more effective at illustrating the impact that these choices have on our ability to reach climate change targets. As such, we disagree that the plan is as helpful and relevant as it needs to be.

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

The Climate Change Committee has estimated that around a third of total necessary emissions reduction from now until 2050 will directly involve changes at the household level,<sup>18</sup> and so working to support consumers to make individual changes will be crucial to making progress in this area. Consumer Scotland therefore suggests that existing transport groups need to consider the individual and household-level changes consumers are likely to have to make, examine the impacts of these and determine how the consumer experience of public transport can be improved in order to enable more consumers to make sustainable choices.

Our recent research on consumer attitudes to transport shows that environmental concerns are not the primary drivers of consumers' choices with many transport choices being driven by cost, convenience and ingrained habits.<sup>19</sup>

However, despite being less influential than cost and convenience considerations, environmental concerns are often a secondary factor which can affect consumers' transport choices. The majority of consumers (65%) would like to reduce their carbon emissions by using more environmentally sustainable transport methods,<sup>20</sup> but there are many barriers and factors that make it difficult for different consumers to do so. Our research briefing<sup>21</sup> highlighted that:

- The availability of appropriate sustainable alternatives, such as public transport, was the most commonly cited barrier to choosing more environmentally sustainable transport choices (73% of respondents to our qualitative research listed it as a barrier).
- The cost of choosing more sustainable options was another key barrier (cited by 70% of respondents).

- The time more sustainable modes of transport take for journeys to be completed is a practical consideration for consumers (cited by 53% of respondents).
- Many consumers either do not know how to make more sustainable transport choices or do not think such changes would make a significant difference to meeting emissions targets (cited collectively by 32% of respondents).
- Concerns about the safety of using public transport and active travel were key barriers for many consumers (cited by 11% of respondents) and may especially be a concern for consumers with protected characteristics, as outlined in the Equality Act 2010.<sup>22</sup>
- The accessibility of more sustainable transport methods such as public transport was a major barrier for many disabled consumers or those with long-term health conditions (cited by 38% of respondents with a disability or long-term health condition).
- In more remote rural and island areas, while improvements to public transport services and active travel infrastructure are necessary, private car use will continue to be relied upon by consumers, and so a focus on making EV ownership more affordable and convenient in those areas is crucial.

Ultimately, focusing on improving the consumer experience of more sustainable transport methods will be crucial for planning and implementing a just transition in the transport sector in Scotland.

## People and Communities Consultation Questions

Question 4. 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?

The priority actions broadly reflect the work needed to progress outcomes in this section.

A focus on encouraging increased public transport usage requires improving public transport experiences for consumers. The Plan addresses the need for different interventions for different geographical regions, which we welcome, given the differing experiences of consumers across rural and urban areas.<sup>23</sup>

We therefore agree that action to:

- make use of existing infrastructures
- make sustainable modes the default travel method
- ensure that the public transport network is accessible, affordable and available
- ensure better digital connectivity where needed, and
- take forward specific interventions for rural and island communities

are all appropriate ways of enabling consumers to make sustainable travel choices.

In our briefing paper on consumers and sustainable transport we also noted the need to analyse existing service provision to identify where infrastructure and services are potentially insufficient. This would allow for a strategic approach to addressing issues of service availability, which is a major barrier to public transport for many consumers.<sup>24</sup> Targeted infrastructure investment in such areas could lead to public transport being a more viable option for consumers.

We recognise that implementing policy measures to disincentivise car use has potential to reduce congestion, reduce journey times, improve air quality, and lead to wider public health benefits.<sup>25</sup> The plan notes that such measures must be implemented fairly, with costs shared across government, business and society. These measures must be subject to full and effective impact assessment, and measures must be introduced to mitigate effects where necessary. For example, some disabled people<sup>26</sup> and people on low incomes<sup>27</sup> remain dependent on car use, and could face significant challenges if they were to be penalised for this. The needs of consumers in vulnerable circumstances must be incorporated into any future car reduction measures.

The Plan appropriately recognises that private vehicle use will continue to be an important transport method for many consumers, and there is therefore a need to support actions to enable consumers to transition to ultra-low emission vehicles, for example the delivery of additional EV charge points.

The charging experience is an integral aspect of electric vehicle ownership and previous Consumer Scotland research has shown that public charging is less affordable and less convenient than domestic charging – risking inequity for those unable to charge at home. We have previously estimated that around half of Scotland’s households live in circumstances that mean they are not able to charge at home, e.g. in flats or terraced housing, and this proportion is likely to be significantly higher in high-density urban areas.<sup>28</sup>

While the draft Plan does include a number of actions related to supporting EV ownership and charging, including to support rural and island communities specifically, there is no mention of the need to provide a suitable and equitable alternative to domestic charging for those without access to it. We would therefore welcome the addition of a specific action and associated monitoring to address this particular issue. Work will also be needed by planning authorities to ensure that communities have access to the local services and amenities they need. We consider that in this context public charging infrastructure is an essential amenity.

Question 5. 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?

Consumer Scotland does not have detailed evidence to allow us to suggest which measures would be most effective at reducing how often and how far people drive in private cars. We

do, however, have interest in the potential consumer impacts, and benefits, of these measures. As noted above, we suggest that detailed impact assessments would be required to allow these measures to be prioritised and implemented.

There is a clear consumer benefit to better utilising space to help improve active travel and public transport offerings. Being unable to access these services acts as a barrier for some consumers to choose more sustainable transport methods.<sup>29</sup> We therefore recommend further analysis of transport provision across the country, and targeted investment in services and infrastructure where it could support increased access to public transport or active travel for consumers. As this consultation is at a more strategic level, we do not advocate for prioritising specific interventions over others, or suggest where they may be most effectively utilised, however there are a number of options that may be worth consideration in different contexts:

- **Mobility Hubs and integrated timetables**  
Mobility Hubs can bring different travel modes together, improving the convenience, comfort and safety of journeys and connecting with first and last mile travel more seamlessly.<sup>30</sup> When considered alongside integrated ticketing and better co-ordinated timetables they can potentially create meaningful improvements for public transport consumers, helping to address the barriers<sup>31</sup> set out in our recent briefing.<sup>32</sup>
- **Bus Prioritisation Measures**  
By prioritising parts of road space for buses, congestion and journey times in targeted areas can be reduced, improving reliability of service.<sup>33</sup> Audit Scotland recently produced a report on sustainable transport noting that bus prioritisation measures in Aberdeen had reduced journey times and increased ridership.<sup>34</sup>
- **New railway lines and stations**  
While the Scottish Government has invested in the rail network, there may be ongoing opportunities for further strategic investment as Scotland's population demographics change<sup>35</sup>. This could support consumers to choose sustainable transport methods,<sup>36</sup> allowing them to make public transport journeys they were previously not able to.<sup>37</sup>

Consumer Scotland supports further exploration of demand responsive transport (DRT) measures, which may offer ways to improve the transport experiences of rural and island consumers. Public transport may be less available for rural consumers, with private cars currently the only viable transport option for many consumers.<sup>38</sup> Along with support for increased uptake of electric vehicles,<sup>39</sup> DRT can also play a role in the rural and island transport network. Such services can better serve consumers who do not live close to set public transport routes but who can utilise DRT services to meet their needs.<sup>40</sup> This may reduce car dependence for some in rural areas, and improve the consumer transport experience. Developing DRT has a number of challenges around sustainability of financing, regional capacity, and potential for digital exclusion,<sup>41</sup> and we would welcome consideration

of ways in which these issues can be addressed. Consumer Scotland would be happy to be involved with this work as it progresses.

Measures to increase access to car clubs may be beneficial for consumers. There is evidence that car club users are more likely to utilise public transport or active travel more often than the general population, only using cars (via car clubs) when they feel circumstances require it.<sup>42</sup> Car clubs can allow flexible access to car use that suits the individual needs of consumers. CoMoUK estimate that in 2023, each active car club vehicle in Scotland replaced around 11 private cars on the road.<sup>43</sup> The environmental benefits of car clubs could be maximised by specific support for fleets consisting of EVs to further reduce their emissions, but this would require cost effective out of home charging solutions to be more widely available. Consumer Scotland recognises that car demand management policies will play a role in Scottish Government's future plans to meet net zero targets. Transport Scotland must consider the impacts on consumers who may be more reliant on their vehicles, especially people in vulnerable circumstances, and make efforts to mitigate any harms caused by such measures.

Question 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?

As above, we consider that the Plan goes some way to identifying the needs of differing communities, for example, women and girls, disabled consumers, low-income consumers and those living in rural and island areas. However, it is important that individual policy measures and responses, as well as the collective impacts of any package of measures, are subject to effective assessments to allow impacts to be drawn out and taken into account when considering which measures to implement and to prioritise.

Question 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?

Our research indicates that when considering more environmentally sustainable transport habits, 17% of respondents did not know how they could do this, and 15% didn't think their own actions would have an impact on reducing emissions.<sup>44</sup>

Negative perceptions of public transport and active travel may be a barrier to choosing them, highlighting the need for the Scottish Government to actively promote the various benefits of sustainable transport options.<sup>45</sup> As well as the environmental benefits of these choices, the co-benefits should be highlighted, with efforts made to especially target the groups most sceptical about the value of public transport. This could focus on both the public<sup>46</sup> and private health benefits,<sup>47</sup> the ability to work or relax<sup>48</sup> while commuting on public transport, and highlight instances where public transport or active travel may be more cost-effective or convenient than car use.

Similarly, we recommended that Transport Scotland should conduct a new consumer engagement programme to better understand the needs and attitudes of current and

potential transport consumers with a range of backgrounds and circumstances.<sup>49</sup> This will ensure transport systems are designed with consumers in mind as they continue to evolve.

These actions can improve policy makers' understanding of consumers needs and enable greater consumer awareness of issues and choices.

Question 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?

While each principle listed may increase fairness and impact in different contexts, we consider that it is not possible to apply a single principle across the question as a whole.

## **Monitoring and Reporting Consultation Questions**

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?

Consumer Scotland agrees that the indicators presented for each outcome will help to evaluate success. However, there may be some further indicators that could be employed. In particular, additional indicators would provide a more comprehensive picture of the consumer impacts for Outcome 5 "Communities (including in rural and suburban areas) are well connected, having better digital connectivity and shared transport options that meet their local needs" and Outcome 6 "Transport and the planning systems give communities access to the local services and amenities they need". We provide further detail on potential additional indicators for these outcomes below.

Across the monitoring framework as a whole, there are indicators across a number of outcomes that rely on new surveys where there is, as yet, no definite commitment to repeat the surveys in future years, such as the Scottish Climate Survey or the National Islands Plan Survey. This is a significant risk to the successful monitoring of progress towards these outcomes, and as such we believe these indicators should be quality rated as 'weak' until the future of these surveys is clear. Steps should be taken to confirm future waves of these surveys.

**Outcome 1** – The net zero transition supports new and existing well-paid jobs across Scotland, within transport services, supply chains and in the wider economy.

Indicator 1.3 will be an important metric to track, but could be improved by stipulating a maximum journey time from each datazone to core employment sites, i.e. measuring the number of datazones from which it is not possible to reach a core employment site within the four-hour window in less than a given time. An excessive journey time may be as much of a barrier to public transport use as lack of a service, especially when commuting, making a key aspect of this indicator.

**Outcome 5** - Communities (including in rural and suburban areas) are well connected, having better digital connectivity and shared transport options that meet their local needs.

We agree that communities need to be well connected, particularly communities outside of urban centres. However, improving these communities' connectedness requires an expansion in the reach of the public transport network that is not measured by the proposed indicators under Outcome 5. Our research noted that the availability of services was a barrier to making more sustainable transport choices for 73% of respondents.<sup>50</sup> Given the reduction in public transport services over many years, it is all the more important that we measure whether the necessary expansion of provision is taking place. An indicator that directly measures the number of active public transport services, as well as the number of both new and cancelled services, across public transport modes in Scotland would help to measure the extent to which access to public transport services and networks is changing. Alongside this, efforts to track the proportion of journeys undertaken using public transport, and where these take place – for example, using the Scottish Household Survey travel diary – would greatly improve the monitoring of the connectedness of communities. While the existence of active public transport routes themselves does not indicate their usage, tracking this data may help measure overall service availability and help support decisions regarding prioritisation of new services.

While there are indicators in the plan related to the manufacture of Zero Emission Vehicles and their use for businesses, there is no indicator related to the use of EVs and ZEVs for consumers. An indicator that tracks this under outcome 5, particularly one that goes beyond tracking a headline figure to consider EV uptake in different areas and for different household types, e.g. via a survey, would be helpful in identifying where more support is needed to enable consumers to transition to EVs.

**Outcome 6** - Transport and the planning systems give communities access to the local services and amenities they need

Given that 53% of respondents in our research cited journey time as a barrier to making sustainable choices,<sup>51</sup> the indicator focused on journey time to basic services is appropriate. However, we consider that this indicator could be strengthened by incorporating an element around the frequency of these services. Frequent services - there and back - are required if consumers are to be able to use public transport to access basic services in an acceptable timeframe. Therefore, we would suggest measuring the percentage of datazones that can access, within 20 mins via public transport, basic services and education provision a minimum number of times per day (though we do not suggest what that minimum number may be). This could either be considered as an adapted version of the suggested indicator 6.1, or could be considered as an additional indicator alongside the proposed indicator 6.1.

Transport to Health is established as a key focus of Scottish Government's transport agenda, with a delivery plan being published in 2024.<sup>52</sup> However, there is not a set means of indicating progress on this in either that delivery plan, or the draft Just Transition Plan. The Just Transition Commission's recent evaluation of the success of the just transition in

Scotland<sup>53</sup> recognised that while there is currently available data on access to key services generally, there is no measure for access to health services specifically. Consumer Scotland supports their call for efforts to be made to measure this and we consider that it would sit appropriately as an indicator under outcome 6.

Public EV charging infrastructure is an essential local amenity that would benefit from specific monitoring. The number of active charge points in Scotland will be measured as part of Scottish Government monitoring of the rollout of public EV charging,<sup>54</sup> and that data could be used as an indicator for outcome 6. We would, however, urge against monitoring only the headline figure as - having outlined the different needs for rural and island communities and high-density urban areas - this does not reflect the need to focus on ensuring the right charge points are delivered in the right locations. We have previously made recommendations to Transport Scotland on the data that would be required to effectively monitor public charging roll-out, and suggested that Transport Scotland should coordinate this at a national level.<sup>55</sup> One potential specific measure, however, could be the percentage of households within a given distance from a public charge point (with the appropriate distance to be determined). This type of measure is used in regulations to ensure consumer access to other public amenities, including, for example, local post offices.

We recommend therefore that consideration be given to a new indicator, related to outcome 6, that considers these factors, and measures how many consumers are served by the public charging network, alongside indicators for the overall number of available public chargers.

**Outcome 11** - Transport options are affordable and the transition to decarbonised transport does not disproportionately burden on those with least choice and ability to pay.

Though there is already a projected indicator for transport affordability in the plan, there is not one for the affordability of public charging. We therefore also recommend that consideration should be given to tracking data about the affordability of public charging specifically. We note that ensuring an affordable public charging network is an action within the Draft Implementation Plan for EV Public Charging Infrastructure with responsibility being assigned to the UK Government, CMA and local authorities. Unlike the rollout of public EV charging, there is no explicit action for Scottish Government to monitor this. We have recommended elsewhere that Scottish Government clarifies its role in delivering actions within its Draft Implementation Plan,<sup>56</sup> for example through undertaking monitoring activity, and suggest that such activity could provide indicators that would also support monitoring of the just transition outcomes.

The inclusion of an indicator tracking household expenditure on public transport could be helpful, but more clarity on how this data will be interpreted would be helpful. Given the focus on affordability, lower expenditure on public transport could be considered a positive outcome, but if public transport use is to increase, an increase in expenditure on public transport should be expected. As such it is not clear what should be considered a positive trend. It may therefore be more helpful to directly track public transport fares using a price

index approach. This could combine existing regulatory data with fare data gathered from operators or RTPs, covering different public transport modes and ticket types, across local authorities.

Additionally, tracking the proportion of transport expenditure households spend on public transport could be a useful measure, in conjunction with tracking households' expenditure on transport overall.

Consumer Scotland also recognises the role of transport poverty as a specific measure of access to transport for consumers based on various factors. In 2016, snapshot analysis of transport poverty measured the datazones at risk of transport poverty in Scotland.<sup>57</sup> In the Just Transition Commission's recent evaluation,<sup>58</sup> they note that there has not been a recent measure of this. As with our comment on the need to continually track the results of the Scottish Climate Survey and the National Islands Plan Survey, we consider that regular tracking of the risk of transport poverty may be a useful indicator to track to help inform future localised strategic decisions.

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<sup>1</sup> [Briefing - Consumers and the Transition to Sustainable Transport \(HTML\) | Consumer Scotland](#)

<sup>2</sup> [Briefing - Consumers and the Transition to Sustainable Transport \(HTML\) | Consumer Scotland](#)

<sup>3</sup> The Poverty Alliance research ( accessible at [Poverty-Alliance-Briefing-for-Debate-on-Fair-Fares-Review-March-2024.pdf](#)) has found that safety concerns exist for black and minority ethnic people, as well as disabled people and women and girls on public transport. Meanwhile, an LGBT Youth Scotland research briefing ([Transport-debate-230612-WEB.pdf](#)) found that only 48% of people in reported feeling safe when using public transport, a number that has been steadily falling since 2012.

<sup>4</sup> [Consumers and the Transition to Sustainable Transport | Consumer Scotland](#)

<sup>5</sup> [Scottish Transport Statistics 2024 | Transport Scotland](#)

<sup>6</sup> [Draft Electric Vehicle Public Charging Network Implementation Plan](#)

<sup>7</sup> [en24-02-low-carbon-technologies-electric-vehicles-publications-consumer-scotland-insight-report-clean.pdf](#)

<sup>8</sup> [Consumers and the Transition to Sustainable Transport | Consumer Scotland](#)

<sup>9</sup> [Consumers and the Transition to Sustainable Transport | Consumer Scotland](#)

<sup>10</sup> [Progress in reducing emissions in Scotland - 2023 Report to Parliament - Climate Change Committee](#)

<sup>11</sup> [Consumers and the Transition to Sustainable Transport | Consumer Scotland](#)

<sup>12</sup> [Consumers and the Transition to Sustainable Transport | Consumer Scotland](#)

<sup>13</sup> [Train Operating Company Key Statistics 2023-24 ScotRail](#)

<sup>14</sup> [Scottish towns risk being 'cut off' as 1,400 live bus routes axed](#)

<sup>15</sup> [Chapter 8 Transport - Scottish Budget 2025 to 2026 - gov.scot](#)

<sup>16</sup> [Draft Scottish Budget 2025-26: Our response - Transform Scotland](#)

<sup>17</sup> [Sustainable transport: Reducing car use](#)

<sup>18</sup> [theccc.org.uk/wp-content/uploads/2025/02/The-Seventh-Carbon-Budget.pdf](#)

<sup>19</sup> [Consumers and the Transition to Sustainable Transport | Consumer Scotland](#)

<sup>20</sup> [Consumers and the Transition to Sustainable Transport | Consumer Scotland](#)

<sup>21</sup> [Consumers and the Transition to Sustainable Transport | Consumer Scotland](#)

<sup>22</sup> [Equality Act 2010](#)

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- 23 [Consumers and the Transition to Sustainable Transport | Consumer Scotland](#)
- 24 [Consumers and the Transition to Sustainable Transport | Consumer Scotland](#)
- 25 [Annex: Reducing car use for a healthier, fairer, and greener Scotland](#)
- 26 [Car | Transport for All](#)
- 27 [Future of mobility: inequalities in mobility and access in the UK Transport System](#)
- 28 [en24-02-low-carbon-technologies-electric-vehicles-publications-consumer-scotland-insight-report-clean.pdf](#)
- 29 [Consumers and the Transition to Sustainable Transport | Consumer Scotland](#)
- 30 [Mobility hubs > Overview and benefits](#)
- 31 [Integration of services | Transport Scotland](#)
- 32 [Consumers and the Transition to Sustainable Transport | Consumer Scotland](#)
- 33 [Local Transport Note 1/24: Bus User Priority](#)
- 34 [Sustainable transport: Reducing car use](#)
- 35 [Scotland's Census 2022 - Rounded population estimates | Scotland's Census](#)
- 36 [Winchburgh Train Station - West Lothian Council](#)
- 37 [Baseline analysis and findings | Transport Scotland](#)
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- 39 [cm24-04-transport-sector-net-zero-briefing-march-2025-in-template.pdf](#)
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