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# Consultation on the 20% Reduction in Car Km Route Map

## Contents

<b>About this consultation</b>	<b>3</b>
Responding to this consultation	3
Handling your response	4
Next steps in the process	4
Comments and complaints	5
Scottish Government consultation process	5
<b>Consultation Questions</b>	<b>5</b>
The Route Map	5
Social and Equalities	9
The Environment	12

## About this consultation

In response to the global climate emergency, [Scotland's Climate Change Plan update in 2020](#) set out a world-leading commitment to reduce car kilometres by 20% by 2030. Transport accounts for a quarter of Scotland's greenhouse gas emissions, with cars making up almost 40% of transport emissions. Carbon-reduction modelling has concluded that it will not be possible to reach net-zero emissions through technological solutions alone. Reducing car use is essential in order for the transport system to be decarbonised at a pace that meets the statutory emissions targets set by the Scottish Parliament.

The Route Map, co-developed by Transport Scotland and the Convention of Scottish Local Authorities (COSLA), sets out the suite of transport and non-transport policies that will be implemented to support car-use reduction in order to deliver a healthier, fairer and more prosperous Scotland for communities, businesses and visitors.

While we recognise that using cars less may be more challenging for some people in certain geographical locations and those who have certain travel needs such as specific disabilities, we want to ensure that we enable an inclusive conversation on sustainable travel. We have therefore deliberately chosen a range of sustainable travel behaviours that people can choose to adopt. Our aim is to enable everyone in Scotland to feel empowered to re-think their car-use behaviour for as many journeys as possible, and we therefore need to ensure we communicate on this issue with as broad an audience as possible.

Through this consultation, we aim to understand further the public opinion on the approach taken in the Route Map; as well as opinion on the potential impacts, and mitigation of said impacts, of the interventions on groups with protected characteristics, island communities, and across socio-economic disparity.

## Responding to this consultation

The Scottish Government and COSLA are inviting responses to this consultation by 6 April 2022.

Please respond to this joint Scottish Government and COSLA consultation using the Scottish Government's consultation hub, Citizen Space [[hyperlink](#)].

You can save and return to your responses while the consultation is still open. Please ensure that consultation responses are submitted before the closing date of 6 April 2022.

If you are unable to respond to the joint Scottish Government and COSLA consultation using our consultation hub, please complete the Respondent Information Form and return to:

- Email: [20percentroutemapconsultation@gov.scot](mailto:20percentroutemapconsultation@gov.scot)
- Post: 20% Reduction in Car Kms Route Map, Transport Strategy & Analysis Directorate, Transport Scotland, Buchanan House, 4th Floor, 58 Port Dundas Road, Glasgow, G4 0HF

## Handling your response

If you respond using the consultation hub, you will be directed to the 'About You' page before submitting your response. Please indicate how you wish your response to be handled and, in particular, whether you are content for your response to be published. If you ask for your response not to be published, we will regard it as confidential, and we will treat it accordingly.

All respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

If you are unable to respond via Citizen Space, please complete and return the Respondent Information Form included in this document.

To find out how we handle your personal data, please see our [privacy policy](#).

## Next steps in the process

Where respondents have given permission for their response to be made public, and after we have checked that they contain no potentially defamatory material, responses will be made available to the public on [Citizen Space](#). If you use the consultation hub to respond, you will receive a copy of your response via email.

Following the closing date, all responses will be analysed and considered along with any other available evidence to help us further progress the joint Scottish Government and COSLA Route Map. Responses will be published where we have been given permission to do so. An analysis report will also be made available.

## Comments and complaints

If you have any comments about how this consultation exercise has been conducted, please send them to the contact address above or email your comments to [20percentroutemapconsultation@gov.scot](mailto:20percentroutemapconsultation@gov.scot).

## Scottish Government consultation process

Consultation is an essential part of the policymaking process. It gives us the opportunity to consider your opinion and expertise on a proposed area of work.

You can [find all our consultations online](#). Each consultation details the issues under consideration, as well as a way for you to give us your views, either online, or by email or post.

Responses will be analysed and used as part of the decision making process, along with a range of other available information and evidence. We will publish a report of this analysis for every consultation. Depending on the nature of the consultation exercise the responses received may:

- indicate the need for policy development or review
- inform the development of a particular policy
- help decisions to be made between alternative policy proposals
- be used to finalise legislation before it is implemented

While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process, consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.

## Consultation Questions

### The Route Map

*The Route Map - 'Reducing car travel by 20% by 2030 for a healthier, fairer and greener Scotland' – is a joint publication by the Scottish Government and COSLA and sets out the actions that the Scottish Government and local authorities in Scotland are taking to make it easier for people to reduce their car kilometres through four key sustainable travel behaviours.*

*These behaviours are:*

- to make use of sustainable online options to reduce your need to travel;*
- to choose local destinations to reduce the distance you travel*
- switch to walk, wheel, cycle or public transport where possible*
- combine a trip or share a journey to reduce the number of individual car trips you make, if car remains the only feasible option.*

1. Do you agree with the overall behaviour change approach, and do you have any comments on the four behaviours outlined above? Please explain.

<i>Agree</i>
<i>Scottish Rural Action (SRA) and Scottish Rural and Island Transport Community agree, in principle, with the four behaviours outlined and the order in which they are presented. We do, overall, agree that this</i>

*behavioural change approach can help. However, reducing car miles will require incentives and improvements to infrastructure and services, as well as a joined-up approach to planning on rural areas that provides key services in communities and reduces the need to travel. Greater focus needs to be placed on removing the barriers to accessing alternative modes of transport, rather than merely promoting them.*

*The behavioural change approach must recognise that there are distinct reasons as to why people do not have a car or why they do not use public transport. This approach must not innately assume that people do not care about carbon emissions or net zero. Our rural residents are closely connected to the natural environment, and wish to reduce their environmental footprint. In fact, many are acutely aware of carbon emissions and the need to transition to a low carbon, equitable world. For example, three-quarters (75%) of adults in the UK said they were worried about the impact of climate change, according to the Office for National Statistics' Opinions and Lifestyle Survey in October 2021. The Route Map must therefore be bold and meet the aspirations of the public; our members alone highlighted that they are frustrated by the lack of alternatives. The Route Map should be much less about education and individual behavioural change and more about providing viable alternatives.*

*Finally, we would welcome additions to the behavioural change approach that implicates those not living in Scotland: for example, the tourism industry and its impacts should be interwoven into these sustainable behaviours.*

*We now offer some nuance on each behaviour:*

***Behaviour 1: Reduce the need to travel***

*In many rural and island areas, there are serious connectivity issues which means that people **must** travel to access service provisions. For example, we have one member who must drive 20+ miles every time they wish to access a stable broadband connection, which proves exceptionally challenging given that their work is desktop-based. This challenge is further compounded in that there is no viable public transport for them. Data from the Scottish Indices of Multiple Deprivation supports this analysis, with rural areas more likely to score worse in the Geographic access domain compared to urban areas. Other members of SRA, many of whom are closer to urban centres, have similarly told us they have connectivity issues.*

***Behaviour 2: Help people live locally***

*We welcome the language of 'living well locally' but give caution to using the concept of 20-minute neighbourhoods in rural and island Scotland. In fact, 30–45-minute neighbourhoods are not applicable for many rural and*

*island places and therefore a geographical approach to 'living well locally' becomes spurious.*

*Furthermore, this notion of 'living well locally' must not solely centre on the concept of health and well-being. It should also be deeply connected to the health of communities, local economies, and rural futures.*

*To reduce car mileage in rural areas necessitates a radical shift in the provision of public services in rural areas, away from centralisation of services and towards providing services in communities. Trialling community and mobility hubs in rural areas, and ensuring their sustainability, holds significant potential to help people live locally, and encourage local travel by walking and cycling.*

### **Behaviour 3: Help people switch modes**

*We welcome this in principle but in many cases, there is no option: historically and contemporarily, it is frequently not feasible for alternative modes of transport in parts of rural and island Scotland despite local wishes to reduce carbon emissions. The North Coast 500 is a helpful example: it remains incredibly difficult to navigate this route unless by using a car, no matter if you live in the locality or are visiting. This is a point we will further expand upon.*

*It is also important to note that, in some cases, it is not safe to switch modes. This can be due to a host of reasons including road traffic, lack of safe infrastructure, lack of wheeling paths, challenging weather and a lack of joined-up services. For example, one member expressed concern that switching modes might mean her young children having to stand adjacent to an exceptionally busy road (where cars are travelling +60mph) whilst they wait for the bus.*

*Helping people to shift modes in rural areas requires a new approach to how public transport and active travel in rural areas is planned. The needs of rural residents are, in some ways, common to those in urban areas - reliable services with good frequencies, along with safe infrastructure. Additionally, there is potential to trial solutions that make better use of existing vehicles through car sharing, and combined passenger and freight services.*

### **Behaviour 4: help people combine or share journeys**

*We welcome this behaviour but note that there are only two interventions associated with it in the Route Map, despite it being a very feasible option for rural and island Scotland. We would welcome further exploration of this behavioural change and would encourage Transport Scotland and COSLA*

*to consult with rural and island communities given it seems particularly feasible in these areas (and there are also many useful case studies already in existence).*

*Our members welcome the promotion of car sharing and car clubs (NB: the Route Map refers to 'car cubs' [sic]). We would stress, however, that there remains a need to support communities to not only purchase some means of sharing trips: e.g., a fleet of electric vehicles or a community bus, but that there needs to be support and capacity for this to be sustainable: i.e., revenue stream funding and associated job creation.*

*Furthermore, opportunities for combining the carriage of passengers and the carriage of freight in rural areas should be more positively considered as part of the road map.*

## 2. What are the key opportunities of reducing car kilometres

*The overriding opportunity, and the underpinning rationale for the 20% commitment, relates to the climate crisis. As the report states, "Transport accounts for 29 per cent of Scotland's greenhouse gas emissions, with cars making up 38 per cent of those transport emissions. Carbon-reduction modelling has concluded that it will not be possible to reach net-zero emissions through technological solutions alone. Reducing car use is essential in order for the transport system to be decarbonised at a pace that meets the statutory emissions targets set by the Scottish Parliament."*

*Furthermore, as the report alludes, there are many additional societal benefits to reducing car use. These are described in the report (1.6) under the following subheadings:*

- *Reducing inequalities*
- *Delivering inclusive economic prosperity towards a well-being economy*
- *Improving health and wellbeing.*

*We would also add that reducing car kilometres can present certain opportunities for rural and island Scotland, such as much needed investment in public transport, the development of safe cycle and wheeling paths, and joined up transport modes (e.g., ferry and bus links).*

*Within rural communities, there is an additional positive feedback loop. Encouraging more local travel by sustainable modes locally can increase spend in local shops and in local communities. This supports rural businesses, who in turn are then able to employ more people locally.*



*Furthermore, it also opens the possibility to explore low carbon forms of transport in rural and island areas, such as electric ferries. There is thus a unique opportunity to explore how mobility and transport can best **suit** communities and work for them. We would argue that testing these interventions in rural and island Scotland **first**, rather than after the fact, would offer many national solutions. As one member noted: if we can make it work on Mull, we can probably make it work in Glasgow. But if you can make it work in Glasgow, you most likely can't make it work on any Scottish island.*

3. What are the key challenges faced in reducing car kilometres?

*There are a variety of challenges, notably for certain demographics such as those with disabilities, and those living in rural and island areas. We welcome the nuance found within the Route Map as to the uneven implications of a national 20% car kilometre reduction. We appreciated statistics throughout that highlighted the significant challenges faced in certain geographies:*

- *80% of adults travel to work by car in rural Scotland (p. 15)*
- *6% of total car kilometres driven in the Highlands despite only 4% of the country's population (p.16).*

*We are pleased to see that this Route Map does not 'stipulate a uniform 20 per cent kilometre reduction in all geographical areas' (p.6)*

*It should also be noted that there are different types of rural areas, with resulting variability in the challenges that are faced when reducing car kilometres. Villages and settlements on the periphery of larger urban areas are more likely to have access to a variety of transport options (e.g. bus and rail services) compared to isolated rural hamlets. There are a wide variety of place typologies in rural Scotland, and so flexibility in adapting solutions to specific circumstances is welcomed.*

*An under-reported challenge in rural areas is the impact of disability and/or on low incomes. Our members told us that these include but are not limited to: long travel times when using public transport, a lack of appropriate sanitation (for example, toilets on trains frequently not functional), a lack of sufficient waiting areas and services not joined up (between and across modes of transport). All these challenges are compounded with longer journeys.*

*The incentive to use a car less may mean more reliance on public transport – and societal pressure to use public transport, too – when, for many, this is not a feasible nor viable option. Additionally, we are concerned that*

*reducing car kilometres without providing alternatives could isolate those with mobility restrictions, both in rural and urban areas.*

*Furthermore, there are several challenges described draft Route Map (2.1), including:*

- *Car-km was on a long-term rising trend pre-covid – reversing a trend drastically is difficult*
- *Public transport is often poor in rural areas – and car trips there tend to be longer.*

*In addition, we wish to highlight that there are challenges related to:*

- *Covid-19: switching modes could contribute to increased exposure; socio-cultural change and a lack of willingness to share cars; reduced services due to lockdowns and these have not yet rebounded. [We point you to the following report from the Scottish Rural Parliament in 2021 on how covid can be an accelerator for rural mobility.](#)*
- *Young people and the socio-cultural norms in rural and island areas; the culture of ‘passing driving test’ and its freedom, the potential isolation if there are no other modes of transport available, unaffordable ways of travelling e.g. high cost of ferry fares;*
- *People who use services that cannot be provided locally – such as, for example, certain health care provisions. We wish to also note that this is becoming more of an issue as healthcare providers cannot recruit healthcare professionals in many areas due to a variety of reasons, including lack of housing*
- *People who require to travel to connect with communities of interest where there are no other feasible options and online connectivity is an issue*
- *People who are/are not involved in local neighbourhood activities;*
- *People who transport goods*
- *Service providers and those who do not have the option of working from home*
- *Finally, there is not enough support for organisations that can help promote change in behaviours; capacity and over-reliance on volunteers in rural and island areas is a huge barrier.*

4. Are there any further actions you would like to see included in future to support behaviour change 1) - reducing the need to travel?

*We would, primarily, welcome asking specific communities about this - community consultation is key. The solutions that need to be delivered need to reflect the characteristics and needs of individual communities.*

*One important way to reduce the need to travel is to bring opportunities to peoples’ doors. However, we note that this needs careful monitoring (i.e.,*

*being attentive to community cohesion and the real risk of isolation if everything is home-based).*

*For example, home delivery means that multiple deliveries are achieved on one journey. However, in many cases, particularly on the islands of Scotland, deliveries are dropped into one central hub such as a village hall because the local postal service cannot cope. This then means that people use their own private car to go to the hall to pick up individual packages. We would welcome certain wrap-around initiatives to better facilitate this, including:*

- Exploring whether deliveries could provide other services as well as distributing packages – such as a transport service, for example, as postal vans once provided in the Outer Hebrides*
- Using central hubs for drop-offs but then encouraging the use of e-bikes/electric mopeds (though still illegal) to deliver to people's houses.*

*Furthermore, connectivity must be addressed in rural and island areas, and this tends to be overlooked in particular geographies. We would welcome an extremely ambitious broadband rollout across Scotland for a host of reasons but would emphasise that this is not the only solution and must be paired with other initiatives. For example, if communities can access fast broadband connections, they are also still entitled to have the option of other modes of transport. It is not either-or.*

5. Are there any further actions you would like to see included in future to support behaviour change 2) - choosing local options?

*We would, primarily, welcome asking specific communities about this. Community consultation is key. The solutions that need to be delivered need to reflect the characteristics and needs of individual communities.*

*Please note that for rural areas a strict 20 minute neighbourhood principle may not be achievable considering the range and distribution of services. However, the principle of 20-minute neighbourhoods, such as co-locating services, could still be taken forward as a general principle.*

*One member offered caution in that the desire to 'live well locally' must not be disconnected from 'communities functioning well sustainably'. For example, it is not only about health, but also the health of the community and the local economy. They stated, speaking from their experiences on an island, that the single biggest thing that the public sector could do to support 'live well locally' is to devolve and distribute public sector jobs to*

*local, rural, remote and island communities. This speaks to a more radical decentralisation of services, jobs, and enabling infrastructure.*

*Additionally, some members welcomed more detail on mobility hubs and suggested better research and consensus on using electric scooters. This was with the caveat that they need to produce a sound so that those who are visually impaired can hear them.*

6. Are there any further actions you would like to see included in future to support behaviour change 3) - switching to more sustainable modes of travel?

*We would, primarily, welcome asking specific communities about this. Community consultation is key. The solutions that need to be delivered need to reflect the characteristics and needs of individual communities.*

*Tourism should be addressed in this section. There is no single mention of tourism throughout the document despite its hugely important socio-economic impact and that much tourism in Scotland relies on private car use. One member noted that “helping people switch modes is about making existing infrastructure lined up, safe, affordable and reliable and if the Scottish Government is not taking on board the huge number of people who use that infrastructure at certain times of the year (during the tourist season) then we may not get much further ahead.”*

*Furthermore, the community bus fund – and other similar incentives providing such a service - should be about revenue funding rather than simply the purchase of vehicles. It should be structured in such a way that it builds capacities for communities to develop and run services on their own terms, ensuring that they are sustainable. Rural communities have a number of examples of making the best use of vehicles, such as community transport vehicles being used for school trips.*

*Increasing investment in active travel is also welcomed, but there is an issue insofar that funding goes predominantly via Sustrans who focus on segregated, off-road active travel infrastructure. That is not the solution for most of rural and island Scotland. We welcome specific initiatives which are rooted in and responsive to the tailored needs of rural and island communities.*

*Furthermore, the concessionary travel budget (e.g., under 22s free bus travel) is mostly used for urban areas and rural Scotland sees a fraction of that. We would welcome extensions into ferries and air travel, which often perform a similar role to local bus services in urban areas.*

*Finally, we welcome developments with STRP2, the Fair Fares Review and, indeed, transport governance more broadly, but note that there needs to be coordination. Transport across Scotland is muddy, complicated by geographies, diverse needs, different companies, and local authority*

*oversight. We would encourage a coordinated approach so that the already present disparities do not become even bigger.*

7. Are there any further actions you would like to see included in future to support behaviour change 4) - combining or sharing journeys?

*We would, primarily, welcome asking specific communities about this. Community consultation is key.*

*Our members noted that this section of the Route Map contained little detail in comparison to preceding sections, yet this section remains hugely important and feasible for rural and island areas.*

*Our members stressed certain issues and noted several further actions:*

- Real-time information is incredibly helpful and important. For example, the bus frequency is often much lower in rural and island areas and so having that level of detail means that people do not have to wait outside for lengthy periods of time. Having real-time information as to when the bus arrives, but also how many people are waiting at that stop, would be hugely beneficial.*
- Linking journey legs and different modes of transport is hugely important. It can, however, be hugely challenging for many – particularly when there are timing issues and different companies responsible for different sections of a long journey. Members spoke about the importance of accessible, real-time information, including examples such as City Mapper which works well in London and the development of the Go-HI App in the Highlands. Members also stressed that having a feedback loop to providers (e.g. the number of people waiting at that station) is helpful too.*
- Finally, members noted that car clubs can work very well but they must be affordable. It is worth looking at examples of those already in use. e.g., Dumfries and Galloway and Strathaven in South Lanarkshire.*

*In summary, rural and island places are struggling with a lack of infrastructure to reduce our car ownership. We encourage the Scottish Government to be more ambitious to support rural and island communities to achieve their aspirations, and part of that requires supporting incentives which are already in development/fruition. For example, SRA and COMO UK have demonstrable work showing that whilst rural and island communities may not have some of the service provision they need, what they do often have is tremendous trust and a sense of community. This trusting spirit can be foundational to certain initiatives working well such as car clubs; people immediately feel they can trust members of their community. This can also apply well to community-led transport schemes, where that level of trust and community cohesion can make it an exceptionally viable option if supported appropriately.*

*We also welcome certain initiatives that support communities to manage their own resources, such as renewable energy, and use the revenue from that income stream to support their local transport provision. For example, some communities have bought electric cars upon using the revenue from their wind farm. This is but one example of the brilliance of local economies if their ambitions are supported and strengthened.*

8. Do you have any comment to make on any of the specific policies contained within the Route Map?

*Overall, we would welcome specific policies in relation to the tourism industry in Scotland. 'Tourism' is not mentioned once in the Route Map, yet it has a huge presence and impact in rural and island areas, not least because a substantial number of tourists use private cars to travel. We would encourage the Scottish Government to align this Route Map with other initiatives such as Visit Scotland's Destination Net Zero initiative and develop specific policies that implicate the tourism industry.*

*In addition, we comment on the following interventions in particular:*

**1c:** *we are worried that this intervention, paired with **2d** 20-minute neighbourhoods, could propel a system of development where only those in areas of increasing population are prioritised for digital connectivity. The focus should also be on outlying areas which need better connectivity, rather than only focusing on areas that are developing – e.g., new builds. We would encourage the government to support existing communities too and see that depopulation in rural and island areas is deeply connected to transport, or lack of.*

*Having good connectivity and good transport is the goal; it is not either-or. If a community has great connectivity, then they still need good transport options and vice versa.*

**1a and 2a:** *That NPF4 be more ambitious for rural and island Scotland. We point you to our response [here](#).*

**2d:** *That 20-minute neighbourhoods be used with caution: this concept is not appropriate to rural and island Scotland.*

**2f:** *We welcome a safer speed limit of 20mph on appropriate roads in built-up areas by 2025 and hope that reducing speed limits in rural and island Scotland is also put forward, such as in certain tourism hot spots. This is*

particularly important for the 'Safe to School' initiative, where it is often not safe for children to walk to their school if under two miles.

**3a and 3b:** We welcome active travel plans and would encourage the use of e-bikes where appropriate, particularly for longer distances. On the Black Isle, one community owns several e-bikes and rents them out for £20 a day. It provides a small job for someone local to look after these bikes, and they receive a proportion of the revenue. There must be support for these sorts of initiatives: it is more than just providing several e-bikes.

Furthermore, whilst separate bike and wheeling lanes are appropriate in certain rural and island areas, there are some areas where this is not feasible. We would encourage Transport Scotland and COSLA to take a localised approach to this and tailored these initiatives to specific contexts.

**3d:** It can be a huge challenge to put bikes on trains and buses. This intervention needs more detail: how is this implicated with the nationalising of ScotRail? There needs to be an increased amount of space on public transport for bikes, wheelchairs and buggy space.

**3g:** We welcome a review on transport governance, particularly with attention to ferry provision. This is a hugely complex mode of transport, managed by private companies and local governments. This needs to be reviewed, joined up, and connected with other forms of travel such as buses and trains.

**3h:** We welcome a Fair Fares Review and emphasise that those under 22 can access not only free bus travel, but free ferry and discounted air travel as appropriate. We recommend working with local communities here to understand the specific needs of people, particularly young people, those with disabilities, and older generations. We also recommend that equity runs through these types of interventions and welcome attention to the needs of low-income households. Public transport is too expensive: people tend to act sustainably when social and material structures enable them to do so and reducing the cost of public transport would be a huge incentive.

**3i:** As above, consider extending this to other forms of public transport and increasing the age range of those who qualify for concessions.

**3j:** We welcome this and would also note minor details such as: ensuring that public transport advertising is appropriate. For example, bus number 26a from Inverness to Cromarty has a large advert on the back of the bus for Arnold Clark and glamorises buying a new car. This is simply not necessary and counterproductive.

**3k:** We welcome the introduction of a Community Bus Fund, noting that electric buses should be considered. We would stress that there needs to

*be built-in capacity to run these buses: for example, resources to support the ongoing administration of such a service. The Scottish Government must be attentive to the ongoing reliance on volunteer efforts, particularly in rural and island Scotland.*

**3m:** *We welcome investing in the maintenance and enhancement of the rail network. We would note, however, that rail is often very time-consuming. We would also recommend better sanitation on board public transport, better places for those to wait (particularly for those who have disabilities and additional support needs), integration to other modes of travel, and a serious review of fares. It is very often the case that it is cheaper to fly or drive than it is to take a train – this should change. Furthermore, one member expressed concern that the government also be wary that some train stations are already at capacity, such as Waverley.*

**3n:** *This is a hugely important intervention for rural and island Scotland, and we welcome this is undertaken in a timely manner, is rigorous, and centres on the needs of communities and users.*

**3r:** *This policy could be further expanded upon to ensure that there are better health services in rural and island Scotland. One of our members told us that every Friday, he drives someone from South Mull to Fort William (via ferry) for dialysis and then back again. It is a 12-hour journey. This is just not acceptable – there should be adequate health provision in Oban to reduce the need to travel this far and for so long.*

**4a:** *We welcome testing the viability of Mobility as a Service in Scotland but would argue that the roll out of such an initiative needs to be inclusive, accessible, and appropriate in rural and island areas.*

**4b:** *Note ‘car-cubs’ [sic] used in the Route Map.*

*We welcome this intervention and argue that it warrants several different interventions. We would offer caution in that car clubs need to be affordable, they need more resources than simply a fleet of cars in rural and island (i.e. revenue funding to support the administration of such a service), that attention is given to families and those with disabilities to ensure they can use the service, and that safety is continuously reviewed and evaluated. Overall, we encourage Transport Scotland and COSLA to consult with rural and island communities on such interventions.*

*We would also encourage the development of other apps for car sharing in rural and island areas.*

*We refer you to our answer to question 7 for more detail.*



## Social and Equalities

*In creating the Route Map to reduce car kilometres, the public sector equality duty requires the Scottish Government to pay due regard to the need to the following:*

- *Eliminate discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010,*
- *Advance equality opportunity between people who share a protected characteristic and those who do not, and*
- *Foster good relations between people who share a relevant protected characteristic.*

*These three requirements apply across the protected characteristics of:*

- *age*
- *disability*
- *gender reassignment*
- *marriage and civil partnership*
- *pregnancy and maternity*
- *race*
- *religion and belief*
- *sex and sexual orientation*

*The Scottish Government must also include consideration of:*

- *children and young people (Child Rights and Wellbeing)*
- *socioeconomic disadvantage, low wealth, and area deprivation (Fairer Scotland Duty)*

*Section 8 of the Islands (Scotland) Act 2018 (Scottish Parliament, 2018) requires the Scottish Government to prepare an island communities impact assessment in relation to a policy, strategy, or service, which is likely to have an effect on an island community which is significantly different from its effect on other communities.*

*The current draft impact assessments have been published alongside the Route Map and are available on the Transport Scotland website.*

*The Scottish Government will consider the responses from the consultation process in determining any actions needed to meet its statutory obligations. Your comments will be considered in the completion of the impact assessments to determine whether any further work in this area is needed*

## Impact Assessment

1. Do you think that the proposals set out in this plan could have positive or negative impacts on any particular groups of people with reference to the listed protected characteristics?

<p><b>Yes</b></p> <p><i>Yes – there is the likelihood that the proposals set out in the plan will have both positive and negative impacts on groups of people.</i></p> <p><i>Reducing the need to travel could affect (both positively and negatively):</i></p> <ul style="list-style-type: none"> <li>● <i>All those who live and work in an area and pass through</i></li> <li>● <i>People who shift to work from home more often</i></li> <li>● <i>People who move work location to local work hubs</i></li> <li>● <i>People who use services that are delivered remotely</i></li> <li>● <i>Service providers and staff of services that are delivered remotely</i></li> <li>● <i>Communities and local businesses in areas with local work hubs and/or increased proportion of people working from home</i></li> <li>● <i>People who are unable to work from home may be affected by, e.g., changes in local communities, changes in availability of transport, changes in other people’s expectations of work availability</i></li> </ul> <p><i>Living well locally could affect (both positively and negatively):</i></p> <ul style="list-style-type: none"> <li>● <i>Car drivers who reduce their car use</i></li> <li>● <i>People who cannot travel without a car due to disability</i></li> <li>● <i>People who cannot drive or do not own a car</i></li> <li>● <i>People in rural and island locations</i></li> <li>● <i>People living in peripheral estates that are poorly serviced</i></li> <li>● <i>People who live in/work/use new developments</i></li> <li>● <i>People who live in/work/use existing developments</i></li> <li>● <i>People who use services that cannot be provided locally</i></li> <li>● <i>People who use services that become available locally</i></li> <li>● <i>People who require to travel to connect with communities of interest</i></li> <li>● <i>People who are/are not involved in local neighbourhood activities</i></li> <li>● <i>People who transport goods</i></li> <li>● <i>Service providers</i></li> </ul> <p><i>Switching modes could affect (both positively and negatively):</i></p> <ul style="list-style-type: none"> <li>● <i>Those living and working in communities</i></li> <li>● <i>Those currently driving a car</i></li> <li>● <i>Local businesses if footfall and trade increase – link to pedestrian pound. Some may be concerned about the workplace parking levy, particularly given the impact of Covid-</i></li> </ul>
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*19 and the increase in remote working and online shopping for professionals.*

- *Tourism in rural areas if driving is discouraged*
- *Public transport users*
- *People who are currently unable to use public transport but would like to, e.g., isolated communities with no service, disabled people who find public transport inaccessible*
- *Service providers – drivers, conductors, others*
- *Commuters*
- *Community transport users*
- *Community transport operators*
- *Older and disabled people who already receive free bus travel*
- *Younger people newly eligible for free bus travel*
- *Some groups may also be more likely to experience discrimination on public transport if not properly tackled.*

*Combining or sharing car trips could affect (both positively and negatively):*

- *People who do not own a car*
- *People who currently own a car, especially those in forced car ownership*
- *People who currently live near a car club /those who don't but may gain one*
- *People making short journeys / people making long journeys*
- *Commuters*
- *People who work from home*
- *People who work flexible hours – this may make it easier to lift share*
- *People with various levels of mobility – may be reluctant to trust public transport if not confident access needs will always be met*
- *People in urban areas/ rural areas - in small towns with infrequent public transport, car club can work*
- *People with low digital literacy*
- *Anyone affected by car traffic.*

- a. If you think the proposals will have a particular impact on certain groups due to protected characteristics, what measures would you suggest to maximise positive impacts or mitigate negative impacts?

*We note some of the following aligns with 2050 Climate Group's response and is also rooted upon conversations with public health professionals:*

- *A transport system should prioritise the needs of those with the lowest forms of mobility, i.e., those with disabilities, those with families, those on low incomes, those in rural and island areas*
- *Those with mobility issues should have access to cars in pedestrianised areas, or suitable alternatives such as e-scooters.*

- *Increase the availability of electric vehicle car clubs to allow low-carbon ways for those with limited mobility. This seems a particularly feasible option for many rural and island areas where car use is extremely high. Development of services such as car-sharing should build on existing community initiatives, and include flexible models to suit needs, for example in rural areas.*
- *Continuously consult those who are most impacted by travel proposals. There should also be further work to integrate services across modes and operators, including integration of timetables, ticketing and information. Simplified, integrated information about public transport services should be developed to allow easier, streamlined journey planning. The Fair Fares review should involve transport users, aim to streamline fares across operators, ensure parity across public transport modes and ensure that public transport is not priced higher than the cost of the equivalent car journey. Where the road equivalent tariff is used to subsidise cars on ferry crossings this should ensure the whole journey cost by public transport is less than the whole journey cost by car. Apps that support smart ticketing should enable seamless journey planning and allow users to confirm support will be provided to meet their accessibility needs where appropriate. They should be designed to be simple to use, including by people with sensory or cognitive impairments.*
- *Communities should have opportunities to be involved in discussions about local public transport investments, in the Fair Fares review and in the development of Smart Ticketing standards. Community engagement activity should ensure all parts of the population, especially groups at risk of transport exclusion, are able to contribute their needs and priorities for public transport services.*
- *Sufficient training for those providing transport services to deal with discrimination.*
- *Provide greater support for organisations running their own transport schemes, such as those in rural and island areas (e.g., community buses).*

2. Do you think that the proposals set out in this plan could have a particular impact (positive or negative) on island communities?

*[More Information - Engagement with island communities was undertaken as part of the development of National Transport Strategy (NTS2). This engagement identified unique transport challenges relevant to island communities, [click here for more information.](#)]*

Yes
<i>Yes. Island communities are most reliant on car usage due to a lack of access to reliable and expansive public transport, and longer distances to travel which makes active options more challenging.</i>

- a. If you think the proposals will impact on island communities, what measures would you suggest to maximise positive impacts or mitigate negative impacts?

*Similar to the 2050 Climate Group's response, our members were keen to emphasise that expansion of public transport is needed **alongside** electrification of fuel sources. Improving "first and last mile" connectivity within rural hubs and creating mobility hubs which link-local active travel with regional public transport will help intensify alternative modes of travel. We commend CoMoUK's approach to mobility as it applies to rural and island Scotland.*

*For those that need to continue to use cars, the impact could be managed by making sure provision and infrastructure for alternative fuels are readily available, for example electric charging stations and electric ferries.*

*Furthermore, much attention should be focused on the affordability of service provision. We are also hesitant about increasing road taxes nationally without due consideration to a lack of alternatives in many island (and rural) areas.*

*It is crucial that island and rural communities must be consulted with sufficiently and be robustly involved in the decision-making process.*

3. Do you think that the proposals set out in this plan could have a particular impact (positive or negative) on people facing socio-economic disadvantages?

**Yes**

*Yes, if the interventions are bold and ambitious enough and centre those who are facing socio-economic disadvantages then this may have potential positive impacts.*

- a. If you think the proposals will have a particular impact based on socio-economic factors what measures would you suggest to maximise positive impacts or mitigate negative impacts?

*We recommend ensuring that infrastructure (be that digital, public transport, bike provision, etc) is affordable, accessible, and inclusive. It is less about raising awareness but more about providing viable options.*

*We would also recommend continuously and meaningfully consulting and working with communities to ensure that developments are appropriate and centre their needs.*

## The Environment

*The Environmental Assessment (Scotland) Act 2005 ensures those public proposals that are likely to have a significant impact on the environment are assessed and measures to prevent or reduce adverse effects are sought, where possible, prior to implementation.*

1. Do you think the actions proposed in the Route Map are likely to have an impact on the environment? If so, in what way? Please be as specific as possible in your reasoning.

*Yes*

*Yes, but are they ambitious enough given the climate and biodiversity crises and the paired challenges of fuel poverty, depopulation in rural and island areas and the rising cost of living?*

*The draft Route Map itself and the associated technical annex make clear the benefits of the 20% car-km reduction commitment to the environment. Indeed, the primary motivation for the commitment is the climate crisis. This is an overwhelming reason for early, determined action to achieve the commitment but it must be fair, just and ambitious for rural and island Scotland.*

## Other Comment

1. Do you have views you would like to express relating to parts of this consultation which do not have a specific question? If so, please elaborate

*The 20% commitment is extremely tough and hence bold action is needed – but the levers to ensure this are different across Scotland. Rural and island Scotland presents a vastly different picture to urban Scotland, and of course, is itself not homogenous; there are specific contexts that need to be considered.*

*Although there is much to support in the draft Route Map, and we agree that there is a significant need to reduce carbon emissions within the transport sector given its enormous impact, we must centre the needs of people and provide viable alternatives. It is less about awareness and education and more about providing the means for people to act.*



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SCOTLAND**

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