

SCOTLAND'S DRAFT CLIMATE PLAN CONSULTATION

1. INTRODUCTION

- 1.1 The purpose of this report is to update Members on SEStran's response to consultations between December 2025 and March 2026. In particular, to summarise the response given to the **Scotland's Draft Climate Plan Consultation** which was brought to the Board for responses in December 2025.

2. CLIMATE CHANGE PLAN

- 2.1 In the December 2025 report to board, it was highlighted that it was the consultation period for the draft version of Scottish Government's Scotland's Climate Change Plan for consultation: [Draft Climate Change Plan - Scottish Government consultations - Citizen Space](#). In particular, the detailed section on Transport, : [Supporting documents - Scotland's Climate Change Plan – 2026-2040 - gov.scot](#).
- 2.2 Following on from this, responses were received from Board members, and we reviewed the SCOTS response to the consultation, and a collective response was drafted.

The response notes concern around lack of clarity in delivery, insufficient detail on major policy levers, and the importance of ensuring a Just Transition. SEStran emphasises that delayed car-reduction targets create confusion for regional planning and risk undermining the necessary pace of change.

The main body of the response highlights persistent inequalities in public transport provision—particularly for disabled people, older adults, low-income households, and rural communities—and stresses that reducing car use must be accompanied by major improvements to public transport, active travel, and accessibility. SEStran calls for clearer outcomes, stronger monitoring, and more meaningful community engagement to build trust and support behavioural change. It advocates for investment in skills, training, diverse workforce pathways, support for employers, regionally tailored delivery, and better intermodal connections including smart ticketing.

Across sectoral and impact-assessment questions, SEStran reinforces the need for fair transition measures, adequate funding, and regional flexibility. It stresses that climate policies must not disadvantage rural areas, low-income communities, or those reliant on public EV charging. SEStran encourages the use of consistent indicators—such as car kilometres travelled, mode share, and bus reliability—and proposes stronger alignment between regional and national priorities. The response

concludes by emphasising the importance of resilience alongside decarbonisation, ensuring public-sector fleets and infrastructure can operate reliably under increasing climate-related pressures.

3. OTHER CONSULTATION RESPONSES

3.1 Local Services Franchises Draft Guidance

SEStran's response included feedback on the Transport (Scotland) Act 2019: Local Services Franchises Draft Guidance, and advocating for the recognition of Regional Transport Partnerships (RTPs) in various roles including supporting bus reform, collaboration across authorities, and governance in multi-authority franchising. It also suggests considering impact assessments at key points, integrating ticketing with timetables, clarifying terminology around transport services, and including RTPs in best practice lists, reflecting their statutory and strategic significance in regional transport planning.

Rebecca Smith
Projects Officer
March 2026

Appendix 1: Scotland's Draft Climate Plan Consultation SEStran Response
Appendix 2: Local Services Franchises Draft Guidance SEStran Response

Policy Implications	Potentially significant policy implications, although more likely to align closely with RTS and existing policies
Financial Implications	None
Equalities Implications	None
Climate Change Implications	Potentially significant in future dependent on outcome of the consultations

Consultation on the Draft Climate Change Plan



Respondent Information Form

Please Note the respondent form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy:

<https://www.gov.scot/privacy/>

Respondent Information Form

Are you responding as an individual or an organisation?

- Individual
- Organisation

Full name or organisation's name

South East of Scotland Regional Transport Partnership (SEStran)

Phone number

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Address

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Postcode (will not be published)

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Email Address

reception@sestran.gov.uk

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

- Publish response with name
- Publish response only (without name)
- Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

- Yes

No

Where do you live most of the time?

N/A – organisation response

How would you describe your local area? [SG Classification: Large Urban, Other Urban, Accessible Small Town, Remote Small Town, Accessible Rural Area, Remote Rural Area, Island*, Other (specify)]

*We have included a separate category for island residents in recognition of the potential impacts of decarbonising Transport on these communities.

N/A – organisation response

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy (required)

Questionnaire

Section 1: Delivering a Just Transition

Scotland's ambition to reduce car use and transition to sustainable transport is widely supported, but there are concerns that remain about the approach. While the need to move away from carbon-intensive travel is clear, progress on improving public transport has been slower than expected.

Public transport provision is still inconsistent, particularly for disabled people, older adults, low income households, and rural communities. The Accessible Travel Framework and National Transport Strategy (NTS2) set strong aspirations, but gaps in availability, affordability, and accessibility persist. For example, the SEStran Regional Bus Strategy highlighted that some markets are poorly served by bus, network delays and congestion are reducing the attractiveness of the bus network, and these issues are eroding passenger confidence and negatively impacting perceptions of bus travel. Without addressing these, reducing car use could unintentionally increase social isolation, limit access to employment and services, and widen inequalities.

Previous initiatives, such as free bus travel for under-22s, removal of peak rail fares, and investment in active travel, are positive steps, but their benefits are not yet fully realised. Greater clarity on outcomes, stronger monitoring, and meaningful engagement with communities are essential to build trust and encourage behavioural change.

Future policy should prioritise investment in frequent, safe, and inclusive public transport, alongside devolving decision making closer to communities. Equality Impact Assessments and collaboration with organisations representing disabled people and vulnerable groups will help ensure a just transition. Aligning Scottish and UK policy signals and communicating benefits clearly will also be key to success.

It is disappointing to see the car reduction targets being delayed and reduced. This contradicts the need, highlighted in this document, to react to the climate emergency. In the *Achieving car reduction in Scotland updated policy statement*, it was revised that Scotland would now need a 6% car use reduction by 2035 in line with its proposed meeting of carbon budgets. This is creating an unclear narrative which is difficult to action and disseminate at a regional level. The car reduction target being clear, measurable, and consistent is key to create public-facing messaging and allowing organisations to create delivery plans in relevant sectors. SEStran support ambitious reduction targets to tackle motonormativity and emphasise the need to maintain momentum in shifting more journeys up the sustainable transport hierarchy, through measures such as reallocating road space and addressing 'avoidable' journeys, and incentives to ensure those mentioned above are supported in this shift.

The following questions concern the Delivering a Just Transition section of the Plan, more specifically: communities, skills, workforce, employers and adapting to climate change.

Question 1

What are your views on our approach to delivering a just transition for people and communities?

Question 2

We recognise that workers face particular impacts from the Plan and we have outlined our approach to supporting the transition of the workforce, including skills for jobs. What skills, training and qualification provisions will be most important in a net zero future and what more could be done to support them?

Diverse training and qualifications: formal education, professional accreditations and vocational training should be used in collaboration to enable a wide range of people in the net zero sector. Within transport, there are many barriers to a more diverse workforce, and we would be supportive of other funding opportunities to address this such as SCOT-ZED. Work to support more diverse avenues into employment is key to reducing our climate emissions as we transition to greener skills and the job market requires a skilled and diverse workforce.

Question 3

The Plan will bring opportunities and challenges for businesses and employers. How can we best support employers across the private, public and third sectors to make the changes needed and seize the benefits of net zero?

Invest in upskilling and reskilling programmes for existing roles, alongside training for emerging green jobs in areas such as electrification, energy efficiency, and software systems which are supporting this new technology. The introduction of measurable actions, to support green jobs and increase diversity in the transport sector, would enable employers and trainers to invest in opportunities to move towards net zero.

To ensure skills are being met at a regional level, supporting training hubs and working with colleges to review skills development and how local challenges are being met.

Question 4

Our approach recognises that some of the Plan's impacts will have greater implications for particular regions of Scotland. What are your views on our approach to supporting places where the transition presents particular regional impacts?

Historic evidence and current lived experience demonstrate that public transport inequality remains a significant issue in rural areas and areas of high deprivation. Low-income households are most reliant on bus services, yet in many of these communities, services continue to be poor, infrequent, unreliable, inaccessible, and unaffordable.

There is also considerable work required to improve intermodal connections including better timetabling, improved accessibility, passenger assistance, and ensuring journey destinations meet community needs - both current need and future demand. In regions where public transport connections and ticketing can be a major barrier to public transport use, prioritising smart ticketing is a key initiative which would increase passenger confidence and ensuring people are confident making multi-modal journeys.

We propose a regional delivery approach within a national framework, providing opportunities for regional input into specific projects and supporting regional accountability.

Section 2: Sectoral contributions, Policies and Proposals

The following questions concern the Sectoral contributions, policies and proposal sections of the Plan.

Buildings (Residential and Public)

Question 5

How can we decarbonise homes and buildings in a way that is fair and leaves no one behind?

N/A

Question 6

How can clean heating systems (such as heat pumps) be made more affordable for everyone?

N/A

Transport

Question 7

Which of the following would be most effective in enabling you to transition your vehicle(s) to zero emissions alternatives? Please rank your choices from highest to lowest priority, where 1 is the highest priority. Please only give one ranking to each option:

If you're responding for an organisation: you may want to consider car fleets as well as HGV fleets.

- Cost of new zero emissions vehicles needs to come down
- Cost of used zero emissions vehicles needs to come down
- Reliable infrastructure for vehicles (such as fuel or charging networks)
- Noticeably cheaper running costs (including electricity, maintenance and insurance)
- Convenient access to public charging infrastructure
- Ensuring an adequate number of trained mechanics available to perform essential maintenance and repairs
- Access to funding support /low cost finance

All of the actions above are support to ensure the transition to net zero is successful. Additionally, it is important to ensure there is accessible design of vehicles including room for mobility and medical kit.

It is also essential in these considerations; the value of the transport hierarchy is emphasised to ensure vehicles are only used where no other viable or attractive options are available to the user. The language above indicates replacing vehicles will lead to removing emissions and zero tailpipe emissions, however, it is important to recognise the lifecycle emissions associated with the manufacturing and distribution of EVs. Likewise, when considering the impact of fleet, it is important to fully consider the opportunities to get vehicles off the road such as freight trams and freight consolidation centres as well as decarbonising fleet.

- All of the above
- Other (use box below)

Question 8

How can the Scottish Government support communities to participate in planning of local sustainable infrastructure (such as, walking, wheeling and cycling routes)?

Local communities must be meaningfully involved in planning sustainable transport and infrastructure, with their reasonable requests acted upon. Often engagement leads to responses focused on budget constraints, leaving communities feeling ignored and disengaged. This undermines trust and reduces appetite for behavioural change, which is essential for a just transition.

Persistent issues result in paths, bus stops and shelters being unsafe and impractical to carry out transport journeys sustainably. Communities need visible improvements and assurance that their voices matter. Priorities include better pavements and lighting, liveable neighbourhoods, accessible bus stops, frequent and reliable services, and enforcement of pavement parking and speed limits. Bus infrastructure funding enables Local Authorities to invest in their bus network through real time information and bus provision, and ensuring maintenance is supported is key to creating a consistent approach for the user.

SEStran advocates for valuing regional networks. The regional model with frameworks and partnerships to support Local Authorities will enable economies of scale and efficiencies across active and sustainable travel projects.

As well as supporting solutions that enable reliable travel for the end user, supporting officers at a local and regional level by continuing to advocate for multiyear funding. This would ensure programmes developed to support communities are carried out with thorough community engagement with longer term conversations being discussed.

Question 9

What action by the Scottish Government would be most helpful in supporting you to live a more climate-friendly lifestyle?

The emission target can be unhelpful in that it no longer aligns with the reducing car km. To ensure people's lifestyles are able to adapt to government policies on climate, any demand management needs to be alongside significant investment in active and sustainable transport infrastructure. Additionally, ensuring rural transport users are supported in adapting at a different speed due to the difficulties experienced in a lot of rural areas.

It would be great to see the Scottish Government encouraging behaviour change through national and regional communications to create a consistent message for individuals. This could include highlighting to people what they can do, and how they can access sustainable travel options more readily.

Waste

Question 10

Are there any additional proposals to support waste sector emission reduction that should be considered across the following 5 areas:

- Strengthen the circular economy
- Reduce and reuse
- Modernise recycling
- Decarbonise disposal
- Other emission sources (including waste water and anaerobic digestion)

N/A

Energy Supply

Question 11

What are your views on Scotland generating more electricity from renewable sources?

N/A

Business and Industrial Processes

Question 12

What support do industries need to reduce their carbon emissions while remaining competitive?

It is important to recognise the support required by businesses to make the shift to net zero. In many industries, margins are under constant pressure and many methods for reducing carbon are costly and require long-term investment which can be challenging. Supporting measures that help with workplace planning, business fleet support, and shifting working practices can enable organisations to practise reducing their emissions from transport.

The CPT Manifesto highlights the need for consistency of policy to give certainty to encourage private sector investment and issuing clear guidance to councils to include coach services in their local transport plans (LTPs).

Agriculture and Land Use, Land Use Change and Forestry (LULUCF)

Question 13

How can the Scottish Government encourage sustainable land use, that is also productive for local communities?

N/A

Question 14

What do you think about our proposals for planting trees and restoring natural habitats like peatlands?

Question 15

How can the Scottish Government support farming to become more climate-friendly while continuing to support food production and improve biodiversity?

Section 3: Impact Assessments

The following questions concern the Business and Regulatory Impact Assessment (BRIA), Child rights and wellbeing impact assessment (CRWIA), Island Communities Impact Assessment (ICIA), Equality Impact Assessment (EQIA), Fairer Scotland Duty Assessment (FSD). The purpose of these impact assessments is to understand the effects of government policy on specific groups, including children and young people, island communities, business and equalities groups.

Question 16

Which groups or communities do you think will be most affected by the transition to net zero, and in what ways?

Question 17

How do you think the Climate Change Plan aligns with existing local, regional, or national priorities that you are aware of or involved in?

The Climate Change Plan (CCP) broadly aligns with SEStran's Regional Transport Strategy (RTS) and national priorities set out in the National Transport Strategy (NTS2). Both frameworks share core objectives: reducing car use and emissions, enabling active travel, and improving access to sustainable transport options. SEStran strongly supports the CCP's emphasis on decarbonising transport and promoting modal shift, as these are central to our RTS vision for a connected, inclusive, and low-carbon region.

However, SEStran stresses the importance of regional delivery within a national framework, enabling local authorities and Regional Transport Partnerships to tailor solutions to local needs. Practical challenges, such as intermodal connectivity and regional variances, must be addressed through timely funding, skills development, and collaborative planning.

Question 18

If you identified there could be negative impacts of the Climate Change Plan, are there any ways you think we could reduce that negative impact and if so, what would you recommend?

Ensuring all communities can participate in decarbonisation measures to support climate emission reduction. An example of this in transport is the need to support rural communities in the switch to electric vehicles. The public EV charging network, now being supported by RTPs and LAs, highlights the need for public subsidy in ensuring a just transition. Many rural communities are car dependent with public charging being challenging. There is currently a large difference between home and public charging, with variation in cost making it difficult for costs to be budgeted, which needs to be addressed. To ensure those reliant on the public network are being supported, and not penalised, looking at solutions such as subsidising the charging network is key to enabling the switch whilst considering a just transition.

Question 19

Please share any other quantitative data, or sources of this, to assist in developing the impact assessments:

Question 20

Are there any previous examples or case studies we should consider when assessing potential impacts?

We would encourage case studies which incorporate the ASI approach (avoid, shift, improve) to enable long term behaviour change. The local authorities we work with as part of our People & Place Plan have demonstrated the benefits to targeting certain and building a theory of change. This includes looking a local living and supporting local routes and journeys. For example, Scottish Borders Council, alongside partners, have worked with new flooding infrastructure in Hawick to build an active travel network and support behaviour change initiatives alongside this. Projects which can highlight the co-benefits of improvements can enable quicker results and support cross-partner working.

Question 21

Can you think of any further positive or negative impacts, that are not covered in the impact assessments, that may result from the Climate Change Plan?

The critical balance should be considered between delivering decarbonised solutions and ensuring those solutions remain resilient in the face of increasingly severe climate impacts. For the public sector, vehicles and assets must not only reduce emissions but also operate reliably under challenging conditions such as flooding, power outages, and other climate-related disruptions.

Failing to address resilience alongside decarbonisation risks undermining essential services when communities need them most. A robust approach ensures continuity of operations, protects vulnerable populations, and builds public confidence in the transition to a low-carbon future. We could encourage decision makers to prioritise solutions that combine sustainability with resilience, supported by investment in technologies and infrastructure capable of withstanding adverse conditions.

Section 4: Strategic Environmental Assessment (SEA)

The following questions concern the SEA. There is a legal requirement to consult on the SEA Environmental Report (Environmental Assessment (Scotland) Act 2005). The purpose of the SEA is to assess the likely environmental effects of government policy, considers how negative impacts can be avoided or minimised and ways that positive effects can be enhanced.

Question 22

What are your views on the accuracy and scope of the environmental baseline set out in the environmental report? Are you aware of further information that could be used to inform the assessment findings?

N/A

Question 23

What in your view are the most significant environmental effects which should be taken into account as the Draft Climate Change Plan is finalised?

N/A

Question 24

What are your views on the predicted environmental effects as set out in the environmental report? Please share any other useful sources.

N/A

Question 25

What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?

N/A

Section 5: Monitoring emissions reductions

The following questions concern the reporting of annual emissions reductions.

Question 26

What are your views on the proposed approach to reporting annual emissions output and how this could support public understanding of Scotland's progress towards achieving our Carbon Budgets?

It is great to see annual emissions are being tracked more accurately. However, reporting should be manageable for local organisations, including local authorities, to collect and monitor. Where possible, additional resource and training would enable better data collection.

Question 27

How useful do you think reporting emissions statistics at a more detailed level (including at the sub-sectoral level), would be in helping people understand key sources of emissions, and our progress in reducing them?

Very useful

Question 28

How might the use of timely indicators, as proposed, help people to understand what needs to be delivered to achieve our Carbon budgets, and to understand whether

progress is on track?

Essential to ensure policy is understood and tracked against progress. With policy outcomes being delivered on a regional and local scale, indicators need to be appropriate for different measures as one national approach will not work for all areas.

Section 6: Monitoring Just Transition

The following questions concern the following 14 proposed indicators for monitoring and evaluation of the Climate Change Plan.

1. Participation in decision making
2. Community energy
3. Community benefits
4. Changes to places
5. Fuel poverty
6. Transport affordability
7. Socio-economic impact on oil and gas communities
8. Impact on household finances in oil and gas communities
9. Access to training for offshore oil and gas workers
10. Green jobs
11. Impact of energy prices on small businesses
12. Air pollution
13. Woodland creation
14. Peatland restoration

Question 29

Please detail any specific changes that would improve any of the 14 proposed indicators, including any data sources not currently included within this framework that could provide a useful indicator of progress towards a just transition in Scotland on an annual basis.

We would encourage the following documents to be considered as they've been developed utilising regional data:

- SEStran Regional Transport Strategy
- SEStran Regional Bus Strategy
- SEStran Regional Freight Strategy

SEStran developed a Regional Bus Strategy Case for Change which detailed the key opportunities and constraints in the region. This included the relationship between car dependency and rural poverty. SEStran can share any data collated as part of this work if helpful for measuring outcome 14.

Question 30

APPENDIX 1

What are the most appropriate indicators for judging whether we are achieving meaningful public participation in decisions related to the climate? This includes both the quality of the participatory process itself, and the impact of that participation on the decision-making process.

Identifying how accessible the engagement is – how often is participation being asked? Are there a diverse number of ways people can respond?
Measuring capacity building within communities – are people more informed to respond in a meaningful way?

Question 31

What indicator would provide the best measure of the impact of net zero development in local communities across Scotland? For example, the impact of the installation of renewable energy infrastructure or other land use changes (e.g. through peatland restoration or tree planting).

We encourage consistency in measuring impact. This can be gathered via:

Car Kilometres Travelled: A primary indicator in Scotland's climate and transport strategies, used to monitor progress towards the 20% reduction target by 2030.

Mode Share: Proportion of journeys made by private car compared to other modes, including short trips under two miles (walking) and under five miles (cycling).

Impact on Bus Reliability: Increased car use is linked to slower and less reliable bus services, which is monitored as part of regional strategies.

However, local needs and strategies should be considered and fed into the wider picture through tools such as the Scottish Climate Intelligence Service (SCIS)'s ClimateView Platform. Ensuring KPIs from local strategies can be fed into national KPIs will ensure data can be easily aggregated and understood on the national level.

Question 32

Ensuring positive outcomes for workers who have transitioned from jobs within high-carbon industries is central to delivering a just transition. What specific data or indicators could we use to monitor the extent to which workers in high-carbon industries are securing alternative employment?

Question 33

What specific data or indicators could we use to meaningfully monitor the impact of the transition to net zero on the environment and biodiversity across Scotland on an annual basis?

Any data collected should be supported with resource at a national level to ensure consistency. Understanding where data can be collected across industry to support better partnership working to ensure organisations are enabling work which is adapting to a changing climate and working with other sectors to ensure projects are aligned.

APPENDIX 2

SEStran response to Transport (Scotland) Act 2019: Local Services Franchises Draft Guidance document – Dec 2025

As we have a pdf? I thought it would be easier to give corrections—suggestions by a page by page list;

Alongside these specific changes? we would commend considering the role of RTPs in supporting the delivery of bus reform; A number of us have produced Regional Bus Strategies? Plans and Network Reviews? which can be essential tools in advancing nation? regional and local aims;

Pg 10	Foreword, not Forward
Pg 11	Don't need 'of' in the first box
Pg 12	2.3, RTP, not RPT
	2.6 and 2.7: It would be good to recognise that many LTSs are now historical, and that RTSs are in place, statutory, and up to date. Further, in a multi-authority context, RTSs and subsidiary strategies like Regional Bus Strategies are key documents.
Pg 13	2.7, apostrophe needed for LTAs'
Pg 15	Don't need of in final sentence
Pg 18	3.13, RTPs can play a key role in this work with neighbouring authorities, and it would be great to see that reflected here
Pg 21	Should impact assessments be considered at this key juncture?
Pg 23	Ticketing should be considered for integration, alongside timetables
Pg 24	DRT.or.other.road.transport.services, sounds like freight, but might be Community Transport? Unclear.
Pg 31	It would be good to see RTPs included in this list as best practice, even if not required to be consulted under the act
Pg 42	8.7 Again, think there's a role for RTPs here, that it would be good to see reflected.
Pg 51	Multi-authority franchising: In Section 11, there could be a mention of governance, either a committee of the relevant RTP, or a joint committee under the 1973 Act, which is how City Region Deal works.