

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

1. Are you responding as an individual or an organisation?

Individual
 Organisation

Full name or organisation's name

HITRANS (Highlands and Islands Transport Partnership)

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 Do not publish response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If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.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

Inverness

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.

Other – all of above except
Large Urban

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

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?

The principles that are set out for delivering a just transition for people and communities appear appropriate.

However, it is considered that in practice, consistent and supportive delivery processes to provide this just transition are not necessarily in place at the point of demand.

HITRANS considers that greater focus is required on consistent delivery mechanisms at regional and local level, particularly in rural and island areas where gaps remain between policy intent and practical delivery. Regional delivery through established partnerships such as RTPs and REPs is critical to bridging this gap

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?

Roads, structures and transport infrastructure will remain fundamental to Scotland's economy in the foreseeable long term. The existing transport workforce must be supported to transition to new vehicle technologies including battery electric and hydrogen vehicles, while maintaining service reliability and resilience.

A significant shortage of skilled electric vehicle (EV) mechanics is already impacting the uptake of EVs in rural and island areas with The limited availability of trained local mechanics and technicians a constraint, rather than a marginal issue, and without targeted investment in skills and local servicing capacity, uptake will remain uneven and inequitable

HITRANS highlights the importance of intelligence-led workforce mobility planning as part of this transition. Through initiatives such as the Workforce Mobility project, HITRANS has demonstrated how analysis of commuting patterns, shift structures, workplace locations and transport availability can inform more effective behaviour change interventions.

This approach is particularly relevant for large, shift-based employers such as the health and social care sector (including NHS Boards), the energy sector, and wider public sector employers including Local Authorities. These sectors have significant workforces, operate across dispersed geographies, and are central to regional economic resilience. Embedding workforce mobility analysis within skills and transition planning, aligned with Regional Economic Partnership priorities, would

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?

Public sector employers require consistent policy direction, stable multi-year full funding and clear incentives to enable effective planning and investment in fleet, infrastructure and workforce transition. For major regional employers such as health care, energy and local government, coordinated support through RTPs and REPs can help align transport, skills and economic development objectives.

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?

A regional approach to delivery within a national framework is essential. Regional bodies are best placed to tailor solutions to local circumstances, integrate transport and skills planning, and ensure accountability for outcomes. Alignment with Regional Economic Partnerships will help ensure that transport decarbonisation supports wider regional growth and labour market priorities.

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?

Grant support for heat pumps etc needs to continue to encourage a reduction in fossil fuel heating systems.

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.

- 2 Cost of new zero emissions vehicles needs to come down
- 3 Cost of used zero emissions vehicles needs to come down
- 4 Reliable infrastructure for vehicles (such as fuel or charging networks)
- 7 Noticeably cheaper running costs (including electricity, maintenance and insurance)
- 6 Convenient access to public charging infrastructure
- 5 Ensuring an adequate number of trained mechanics available to perform essential maintenance and repairs
- 1 Access to funding support /low cost finance
- All of the above
- Other (use box below)

All of the above are important to enabling the transition to zero emission alternatives.

Access to funding and affordable finance is the primary enabler for fleet transition for both the transfer of goods and people (public transport) within the area. Availability of suitable vehicle types, skilled maintenance workforce, and reliable charging and refuelling infrastructure are also critical, particularly for specialist fleets operated by health services, energy providers and local authorities.

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 Authorities and RTPs should lead community engagement, supported by early-stage design funding, multi-year revenue support and consistent national messaging. Engagement should also link to REP-led economic development and skills initiatives.

The recent implementation of a new model for delivering the national People and Place Programme that provides greater control for local authorities and RTPs whilst retaining national oversight and policy direction is a model which should be extended to active travel infrastructure funding. This would enable a more consistent approach and long term planning of infrastructure provision with supporting behaviour change initiatives.

Question 9

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

A whole systems approach is needed rather than a single policy or initiative. Delivery should be locally led within a consistent national framework, supported by timely funding and effective public communication, with transport considered as an integrated system linking land use, health, skills and economic development through regional partnerships.

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)

Any proposals should take full account of the emissions associated with transporting waste long distances, including by sea from island communities. Centralised treatment options may have lower on-site emissions but can result in significantly higher overall carbon impacts once transport and end-use emissions are factored in. The plan should ensure that carbon assessments consider the whole system, including transport, and should not disadvantage local solutions that may deliver lower net emissions despite higher point-source emissions.

Energy Supply

Question 11

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

Targets to increase electricity generation from renewable sources by 2045 will result in very high transport demand in the Highlands and Islands. **Significant investment in infrastructure will be required.** Roads, rail and ports and harbours will all require upgrading, along with wider workforce planning including housing and public transport services that reach the new, non-traditional employment centres

Business and Industrial Processes

Question 12

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

Through the Lifting the Spirit project HITRANS and partners demonstrated that the moving of bulk spirit via rail instead of HGV was feasible but required modest economic support to encourage permanent adoption by distillers. The evidence suggests that for the environmental benefits of transferring a significant element of freight generated by an important industry such as whisky are to be realised it will require public sector funding support and / or coordination in the short to medium term.

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?

The HITRANS area hosts vast carbon sinks in its peatlands, with 400Mt in the Flow Country alone. This capacity can be increased with enhanced support for peatland restoration.

Question 15

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

Crofting and farming are important sectors across much of the HITRANS area. Assistance with transporting livestock and any measures that enable produce to be cleaner, greener and reduce food miles will help the sector decarbonise and support rural population retention.

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?

Rural and semi-rural communities, and workforces employed in health care, energy and other public services, face particular challenges if the transition is not carefully managed. Workforce travel requirements and shift-based employment patterns must be factored into transition planning to avoid unintended exclusion. Support may be required for fuel stations and suppliers in remote areas where the transition is likely to be slower.

In rural and island communities, private vehicles are invariably essential rather than discretionary, and any transition to zero-emission transport must fully recognise this reality. In many contexts there are no public transport alternatives, and households and businesses rely on multi-purpose vehicles that serve farming, trades, towing, family and community functions simultaneously. These use patterns differ fundamentally from urban or mainland rural assumptions and must be reflected in both policy design and delivery.

While the provision of a comprehensive and reliable EV charging infrastructure is necessary, it is not sufficient on its own to enable a fair transition. Rural and island specific challenges around electricity grid capacity and resilience and the suitability of current vehicle models for exposed conditions including high winds, salt environments, heavy loads and long operational lifespans. These factors materially affect confidence in zero-emission vehicles and should be addressed explicitly within the Plan.

The final CCP also needs to consider the impact of the UK Governments proposed introduction of Electric Vehicle Excise Duty (eVED). As proposed this will have a hugely negative impact on rural and island areas. At a time when services are becoming more centralised, these communities are already disadvantaged through bearing the additional time and cost impacts of accessing these services. The proposed introduction of a uniform application of this replacement to road tax for EVs risks cementing in a regional competitive disadvantage rather than tackle core issues such as congestion.

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 Plan broadly aligns with Regional Transport Strategies and Regional Economic Partnership priorities. However, delivery risks remain linked to funding, workforce capacity and public acceptance of the pace of change, particularly in rural and island regions.

Evidence highlights that national leadership and support is required where policy implementation may initially financially or otherwise disadvantage a particular area.

The capacity of communities to get involved in consultation should also be recognised. Community involvement in planning but it must be properly resourced. Consultation without the capacity or funding to progress delivery risks disengagement and fatigue, particularly in small island communities where the same individuals are repeatedly asked to contribute.

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?

Key actions include expanding rural EV charging networks, strengthening public transport beyond core corridors, and applying workforce mobility analysis to target investment where it will have the greatest behavioural impact, in support of regional economic objectives.

Question 19

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

For transport, there is significant national data available on all modes, collated by Transport Scotland. Cycling Scotland manage open cycling data while local authorities collect a wide range of statutory and non-statutory data that would inform impact assessments.

Question 20

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

A range of evaluations for transport projects are available, including active and sustainable transport projects.

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 ICIA appears to function primarily as an analytical and reporting exercise rather than as a tool that meaningfully shapes policy design. While the Plan acknowledges that island communities face distinct challenges, particularly in relation to transport, energy, housing and workforce capacity, there is limited evidence that this has translated into differentiated approaches, island-specific delivery models or clear mitigation commitments. ICIA needs to consider differential impacts, constraints and opportunities across island communities.

Decarbonised solutions must also be resilient. Public sector fleets and workforce travel arrangements for critical services such as health and energy must remain operable during extreme weather events, power outages and emergencies.

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?

SEA information in relation to Transport appears to be appropriate

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?

Realising benefits of decarbonisation should not be at the expense of adverse impacts on the landscape of the landscape especially when the region is already a net contributor to national energy supply.
Care also required to ensure to the “off-shoring” of negative environmental impacts, such as the impacts of battery production for EVs elsewhere.

Question 24

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

Question 25

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

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?

Annual reporting is important but should be supported by clear contextual explanation and effective communication to link emissions trends with real-world changes in travel behaviour and service provision.

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?

It would be useful to have the information but the challenge will be to effectively communicate and interpret the statistics.

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?

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.

Transport affordability indicators should reflect availability, reliability and connectivity of sustainable transport, not solely cost. Availability being a primary indicator above the other indicators. If you do not have access to any form of transport, other indicators including cost are secondary.

Indicators should include national, regional and local level data and apply to areas which are the responsibility of local and regional bodies as well as national. Workforce accessibility metrics linked to major regional employers would provide additional insight.

Question 30

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.

Indicators should demonstrate meaningful engagement across communities, employers and workforce groups, including evidence that participation has influenced delivery decisions at regional level.

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).

The balance between ICE vehicle use and uptake of sustainable modes, including commuting patterns to major employment sites, provides a strong indicator of local net zero impact.

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?

In addition to national workforce surveys, HITRANS recommends the use of intelligence-led workforce mobility data to monitor transition outcomes. This includes analysis of commuting distances, mode choice, shift compatibility with public transport, and access to low-carbon travel options. Applied initially to sectors such as health care, energy and the wider public sector, and aligned with Regional Economic Partnership priorities, this approach can support more responsive, place-based planning and ensure workforce transition policies are grounded in operational reality.

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?

Subject to appropriate funding, HITRANS would be willing to support direct engagement with major employers, Regional Economic Partnerships, NHS Boards, energy sector organisations and local authorities to help deliver the workforce transition envisaged by the Climate Change Plan. This could include applying workforce mobility analysis to real employment sites, supporting intelligence-led behaviour change programmes, advising on the design of transport interventions aligned with shift patterns and service requirements, and helping translate national policy objectives into practical, regionally deliverable actions. HITRANS' existing relationships and delivery experience place it well to act as a regional partner in supporting this transition at pace.