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# DRAFT CLIMATE CHANGE PLAN CONSULTATION

Transform Scotland response

**January 2026**

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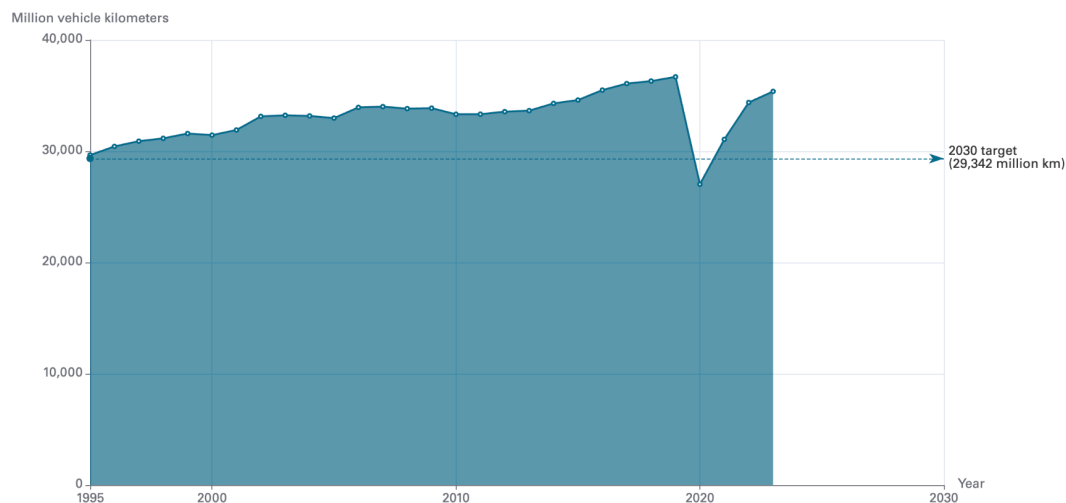
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## 1. Inadequate plans for road traffic reduction

The failure of the government to bring forward a robust implementation plan for its previous 20% reduction in car kilometres by 2030 target, let alone deliver on it, demonstrated a wider failure of political leadership. This commitment was for an absolute cut on 2019 levels. The revised target, by contrast, is to reduce car use by at least 4% relative to a 2030 “business-as-usual” projection, making it a much weaker goal: a smaller percentage reduction measured against a higher baseline, so absolute car kilometres could still increase. This inaction on traffic leaves the government open to accusations of willing the ends, without providing the means; wanting the PR hit of announcing ambitious policies to help deliver more sustainable living, and then largely continuing with business-as-usual amongst a distracting fog of consultation and delay.

It is intellectually incoherent to believe you can drive forward a multi-billion pound road-building and widening programme while also claiming you want to reduce annual car mileage. The government would never announce a multi-billion pound house-building programme if it had a commitment to, for argument's sake, provide homes to fewer people.



Scotland annual car kilometres continue to rise post-pandemic. Source: Scotland's annual car kilometres, 1995 to 2023, [Audit Scotland \(2025\)](#)

Given the huge constraints on public spending it is astonishing that there is no mention of road-user charging as means of getting much better value out of our existing road network. It is also increasingly pertinent that we have sensible conversations about how we plug budgetary gaps as [revenues from fuel duties decline](#).

So it is impossible to take any part of the government’s proposed car reduction plans seriously in the context of the wider roads programme, and particularly given the government’s record of failure in this area. Nothing in the draft CCP suggests the government has either the leadership qualities or political courage to move from yet more words into actual change on the ground.

## 2. Heroic assumptions about electric vehicle uptake

As the Parliament’s own Information Centre has [pointed out](#), between 88% and 95% of the total transport emissions reduction in the CCP, over the three carbon budgets periods out to 2040, is predicated on rapid uptake of electric vehicles. These assumptions are fraught with risks, particularly given that decarbonising transport, amongst all sectors, is now the most pressing national challenge in reaching Scotland’s net zero targets. So the plan places a worryingly high dependency on the success of a very narrow policy outcome to avoid a much wider failure of the whole plan.

We concur with the SPICe analysis that “there is insufficient detail in the draft CCP to assess whether the policies and proposals are likely to deliver the stated outcomes”, and a complete lack of detail about how other policy measures would need to be adjusted under different scenarios should electric vehicle uptake fail to materialise at the rate anticipated.

**Transport related emissions reductions produced by CCP electric vehicle policies (reductions relative to CCC baseline figures)**

	2026-30	2031-35	2036-40
Measures to encourage EV take up	4.8 MtCO2e	13.8 MtCO2e	17.7 MtCO2e
Measures to reduce emissions from Heavy Duty Vehicles (HGVs and buses)	1.8 MtCO2e	2.8 MtCO2e	4.9 MtCO2e
Total CCP transport policy related emission reductions	7.5 MtCO2e	17.8 MtCO2e	23.8 MtCO2e
<b>Proportion of total transport emissions reduction reliant on EV uptake</b>	<b>88%</b>	<b>93%</b>	<b>95%</b>

Source: [SPICe \(2026\)](#)

There is an urgent need for the government to press forward on other measures that would defray the risk of the EV ‘magic bullet’ dependency. A national speed limit enforcement programme, with zero tolerance for speeding, would deliver better fuel efficiency as well as a multitude of co-benefits in terms of accident and congestion prevention. Progressive local parking, congestion, and air quality schemes can all be used to push people away from vehicles, such as SUVs, that cause the [most harm both to the environment and to other vulnerable road users](#).

### 3. Aviation let off scot-free

The plan starkly sets out the contribution that domestic and international aviation makes to the transport sector's carbon emissions - 15% in 2023, and under the plans in the CCP, rising to 29% in 2035 and 44% in 2040. This belies the belief that aviation only contributes a small percentage of the country's carbon emissions, not now, and certainly not in the future.

The plan also shows that aviation's absolute emissions will show hardly any decline at all by the end of 2040, even assuming the highly questionable availability and effectiveness of the [so-called sustainable aviation fuel](#).

So once again, aviation is being allowed to continue to merrily pollute while every other sector in society, both within transport and outwith, is expected to devise and implement stretching, sometimes expensive, and complicated plans to rapidly reduce their own emissions.

Of course aviation is singled out as deserving of special treatment as it's such a 'hard to abate' sector, with so much dependant on actions at the UK and international level, and on technological break-throughs. But of course the Scottish Government, should it so wish, has all sorts of mitigation levers it could pull in terms of airport planning constraints, being ambitious with the endlessly delayed implementation of the Airport Departure Tax regime, and running communication campaigns that highlight the hugely disproportionate impact that frequent fliers have in contributing to climate breakdown.

The consultation documents talk of the government's desire to "support modal shift through more sustainable forms of travel" and yet not a single aspect of the policy platform outlined in the plan is directed at a societal modal shift away from flying, the single most damaging mode of transport anyone can take.

### 4. Public transport & active travel in theory, cars in practice

The draft CCP talks a good game on public transport and active travel, but again fails to provide the funding or policy clarity needed to deliver behaviour change at scale. There is a stark absence of multi-year, ring-fenced funding aimed explicitly at shifting how people travel, despite [behaviour change being central to any credible climate strategy](#). Instead, responsibility for reducing traffic is pushed down to local authorities, without the fiscal powers, political cover or national direction required. This is not just timid but knowingly ineffective: while a handful of more ambitious councils may act, many may not.

This lack of seriousness is reinforced by the plan's skewed use of targets. The government is content to set clear targets for electric vehicle uptake, yet offers no equivalent national targets for increasing public transport or active travel mode share. This reveals a persistent bias towards technological substitution. Measures such as concessionary fares are also spotlighted as demand-reduction tools, despite [clear evidence](#) that when implemented in isolation, they do not reduce car use.

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## Scotland's alliance for sustainable transport

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We campaign for walking, cycling and public transport to be the easiest and most affordable options for everyone. Our diverse membership brings together public, private and third sector organisations from across Scotland. We are a registered Scottish charity (SC041516).