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Job Name: HITRANS Regional Transport Strategy
Job No: 330610615
Date: 05/07/2023
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Subject: **HITRANS Regional Transport Strategy: 'Case for Change' Consultation Analysis**

1. Background and Purpose

- 1.1. As a part of Stantec's work supporting HITRANS with the development of its new Regional Transport Strategy (RTS), a consultation has been carried out on the 'Case for Change' in line with the requirements of the Scottish Transport Appraisal Guidance (STAG).
- 1.2. As the 'Case for Change' provides the basis for the RTS overall, it was important to consult on its content with stakeholders and the public at large. To this end, the 'Case for Change' Report, Strategic Environmental Assessment, Equalities Duties Report and Island Communities Impact Assessment were published as consultative drafts. The consultation ran between 27th March and 9th May 2023 and took the form of: an online-based consultation using ArcStory Map (with paper-based versions available at the HITRANS office) summarising the 'case for change'; publication of the four draft reports which collectively make-up the 'case for change'; and a short online survey.
- 1.3. In total, **202** responses to the survey were received, with **181** respondents identifying as a member of the public and **21** as an organisation. The survey results were analysed and have been used to inform the final package of documents which collectively form the 'case for change'.

2. Case for Change Report

- 2.1. The engagement on the main 'Case for Change' Report was focused on the:

- Transport problems framework
- RTS Strategy Objectives

Transport Problems Framework

- 2.2. Respondents were asked for their views on the transport problems outlined in the 'Case for Change' and to identify any other problems which they think should be included. A review of responses to this open-ended question confirms that the 'Case for Change' has comprehensively identified and evidenced the problems in the study area. Most of the responses received highlighted either specific local issues or options that should be considered, each of which will be useful in developing the Preliminary Appraisal Report and the RTS itself.
- 2.3. In the interests of brevity, individual comments are not summarised here – however, the full list of responses are included in **Appendix A** and updates or additions to the 'Case for Change' report have been made where appropriate. It is worth though highlighting the recurring problem themes which emerged in the consultation responses – these are as follows:
 - Many journeys in the region require a change within or between modes, particularly for those living in island communities. A strong sense of frustration was prevalent in the comments in relation to **poor integration between public transport services**, leading to 'forced' car ownership, extended journey times and the need for overnight stays for some.
 - More generally, **all-mode connectivity between settlements**, and in particular to Inverness and the Central Belt **is considered to inhibit the economic performance of the region**.

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- Perhaps heightened by current issues across the region, significant concerns were raised around **ferry service reliability and resilience**. When combined with only limited plans for capital replacement, this was identified as an increasingly critical issue in relation to the sustainability of island communities.
 - Several respondents also noted that there is a **lack of safe active travel routes and provision within and between settlements**.
 - **Cost of travel**, particularly for island communities, was identified as a significant problem and contributor to transport poverty.
- 2.4. The following table summarises **specific omissions** in the ‘Case for Change’ report identified by stakeholders, together with our response setting out how these changes have been incorporated in the final report.
- 2.5. It should be noted that several of the omissions cited were actually included in Appendix A: RTS Strategic Development Framework, Steps 1-5. There was overall a balance to strike in terms of the level of detail presented and our objective was to ensure that the report is strategic in nature but provides a ‘home’ for all of the individual local issues therein.

Comment	Response
<p>The <i>Sustainable Travel Hierarchy</i> does not include mention of air and ferry services.</p>	<p>Aviation and ferry services are critical elements of the transport and travel network for the region; HITRANS recognises that Transport Scotland’s <i>Sustainable Travel Hierarchy</i> does not however include these modes of transport, except perhaps under the ‘public transport’ category.</p> <p>Transport Scotland’s Islands Connectivity Plan (ICP) will replace the <i>Ferries Plan 2013-2022</i> but will be broader in scope, taking account of aviation, ferries and fixed links, and onward and connecting travel. It is understood that this will be developed within the context of the National Transport Strategy and the National Islands Plan and will be informed by the outcomes of the Strategic Transport Projects Review 2. Transport Scotland report that work on the ICP is underway, with priority being given to a Long-Term Plan for Vessels and Ports. Work on the other elements of the ICP will follow, with a view to further engagement, consultation and publications in 2023.</p> <p>The omission of air and ferry services from the <i>Sustainable Travel Hierarchy</i> has been described in the text of the ‘Case for Change’ report. An additional comment has been added into Section 3.2 of the ‘Case for Change’ to further elaborate on this point. The hierarchy has not though been reworked, but the RTS will continue to highlight this inconsistency through option generation, development, appraisal and Strategy drafting.</p>
<p>The documents consider individual travel modes but fail to consider the importance of key connections to an integrated travel network, and in particular how major population centres are connected to rural areas.</p>	<p>The structure of the document around the problems associated with individual modes is appropriate based on the data available to inform this. The purpose of the Strategy Objectives and the option generation which will follow in the Preliminary Appraisal is to draw together the individual modes into a coherent package of modal and multi-modal measures.</p>
<p>There needs to be [a] more explicit focus on modal shift to active travel. Whilst pages 11-13 mention relevant problems such as forced car ownership, there is no explicit recognition of the need for a modal shift to active travel until page 121.</p>	

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Comment	Response
We would like to see more detail about the problems involved in getting freight onto rail.	We agree that this would strengthen the report and have included additional text at the foot of Section 4.6.
Private boat usage is not covered, other than a brief mention of harbours.	We agree that this would strengthen the report and have added additional text at the foot of Section 4.7.
Despite there being two navigable canals in the region, they are not covered.	We originally omitted the Caledonian and Crinan canals as they are primarily (although not exclusively) used for leisure purposes. However, a new section has been included at 4.11 to recognise the future potential role of canals in meeting the freight needs of the emerging pumped hydro schemes in the Great Glen area, e.g., at Coire Glas.
The report focuses heavily on commuting and travel to health care but does not consider journey patterns more typically made by women (typically women are more likely to trip chain – e.g., combining travelling to school, shopping, caring responsibilities over the single daily commute).	It is noted that a variety of factors impact upon travel across the region, that is: journey purposes, how journeys are made, and the relative accessibility, affordability and suitability of travel options, if indeed options are available. In considering the Equalities Duties associated with the RTS development, detailed consideration has been given to how different people use the transport network at different times, more or less frequently, and for different purposes. Specifically, noting that people with protected characteristics ¹ are more likely to use and rely on public transport, particularly bus services, and therefore a lack of public transport services and options disproportionately impacts on disabled people, women and the young and old in particular. These differential impacts will be explored fully as part of the development of RTS options.
An additional problem that could be considered is the transition to low/zero emission bus fleets particularly in relation to smaller operators, who may benefit from additional support to transition fleets, and medium/long distance routes that may benefit from investment in on route/opportunity charging facilities.	Added the point about smaller operators. The provision of on-route charging opportunities for medium to long-distance routes will be included as an option in the Preliminary Appraisal.
The HITRANS Regional Transport Strategy report does not note the impacts of the delay to the roll-out of RET across the Northern Isles Ferry Services, initially set to be implemented in June 2018.	We agree that this should have been incorporated and is now included at Section 4.7.23. It will also feature as an option in the Preliminary Appraisal and the RTS itself will likely comment upon it.
The document does not make reference to the Orkney-based Sustainable Aviation Test Environment (SATE) led by Highlands and Islands Airports Limited.	A new paragraph has been added to the foot of Section 5.2 to reflect opportunities in relation to the decarbonisation of aviation. Opportunities for zero-emission aircraft will also feature in the Preliminary Appraisal.
It would be valuable to include STPR2 Action 36 – Strategy for improving rest and welfare facilities for hauliers in the STPR2 section.	We agree that this should have been incorporated and is now included in Table 3.2.

RTS Strategy Objectives

2.6. Six Strategy Objectives were developed to resolve the identified transport problems. These are:

¹ The Equality Act 2010 provides protection for people in protected characteristics groups. These are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

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- **Strategy Objective 1:** To make a just transition to a post-carbon and more environmentally sustainable transport network.
- **Strategy Objective 2:** To transform and provide safe and accessible connections between and within our cities, towns and villages, to enable walking, wheeling and cycling.
- **Strategy Objective 3:** To widen access to public and shared transport and improve connectivity within and from / to the region.
- **Strategy Objective 4:** To improve the quality and integration of public and shared transport within and from / to the region.
- **Strategy Objective 5:** To ensure reliable, resilient, affordable, and sustainable connectivity for all from / to our island, peninsular and remote communities.
- **Strategy Objective 6:** To improve the efficiency, safety, and resilience of our transport networks for people and freight and adapt to the impacts of climate change.

2.7. Respondents were asked to whether they agreed or disagreed with each Strategy Objective, using a five-point scale. The table below displays the net agreement score for each Strategy Objective².

Strategy Objective	Net Agreement	Sample Size
Strategy Objective 1	83%	165
Strategy Objective 2	84%	173
Strategy Objective 3	98%	186
Strategy Objective 4	98%	189
Strategy Objective 5	98%	192
Strategy Objective 6	97%	179

2.8. As can be seen from the table, there was strong support for RTS Strategy Objectives as defined. Comments provided by stakeholders have been used to refine the commentary in relation to the objectives. In addition, several respondents that agreed with the objectives also included comments in relation to their application, which will feed into the Preliminary Appraisal process.

2.9. The table below provides a summary of responses for those who **disagreed** with an RTS Strategy Objective, together with our response setting out how this has been addressed in the final 'Case for Change' report. It is worth noting here that the comments of those who disagreed helpfully highlight some of the potential challenges and tensions between different priorities which the RTS must reflect, e.g., reducing vehicle kilometres without further increasing the isolation of remote rural communities.

Note that the comments are reported verbatim (although typos have been corrected).

RTS Strategy Objective	Comment	Response
1	Placing environmental travel as a priority, above reliable and affordable travel for all is troubling for the communities that are currently being crippled by shockingly bad ferry and bus links to the mainland.	There is no prioritisation between the Strategy Objectives, nor will they be weighted in the appraisal. A comment to this effect has been added at Section 6.2.6.
1	This objective is not achievable on the islands due to the aging ferry fleet. Fixed links should be considered as a priority.	At the 'Case for Change' stage, options are not considered. However, fixed links will feature as an option in the Preliminary Appraisal.
1	Environmental implications should be an integral part of the transport options, not a standalone objective. Having it as a standalone policy risks skewing priorities as the RTS should be	Whilst we agree with the point about environmental implications being integral to the options (once developed), it is nonetheless important that the RTS

² This is calculated by subtracting the sum of all negative responses from the sum of all positive responses to create a net figure. Don't know or neutral responses were omitted.

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RTS Strategy Objective	Comment	Response
	determining the transport that is needed and then ensuring it is executed in a way that will have maximum environmental sustainability / minimum impact.	clearly states as an objective the desire to transition to a post-carbon and more environmentally sustainable transport network.
2	Cycling should be a lower priority due to the distances people have to travel [between communities]. Focus needs to be on reliable and sustainable infrastructure.	There is no prioritisation between the Strategy Objectives, nor will they be weighted in the appraisal. A comment to this effect has been added at Section 6.2.6.
2	Objective 2 does not feel sufficiently succinct.	This Strategy Objective is focused on improving active travel connections within and between settlements. This distinction will feed into the option generation.
3	There needs to be discussion on how the bus frequency limits the ability for those who have a free bus pass (either under 22 or 60+) to use their services.	A reference to this point is cited in 4.5.2. Options to address this problem will also feature in the Preliminary Appraisal.
3	Connectivity within the region also needs to include areas of interest (i.e., National Parks) rather than between Local Authorities.	Whilst this is undoubtedly true, it is implicit within the Strategy Objective, which is focused on all connections to, from and within the region.
4	The nature of rural transport is such that many journeys will involve different modes, particularly when travelling to or from the area so this objective is supported. However, it is suggested that the objective be widened slightly to also include integration with active travel modes as this will frequently be the most appropriate option for people to connect with bus or train services.	Whilst we agree with this point, we have tried to capture active travel in Strategy Objectives 1 and 2. The Preliminary Appraisal will include options related to integration between public transport and active travel, which will thus record benefits against at least Strategy Objectives 1 and / or 2 and 4.
5	The cost and limited capacity of air travel on multiple routes is limiting island residents' ability to reach the Central Belt.	Noted – this is captured in the section on aviation.

3. Impact Assessment Reports

- 3.1. Respondents were also provided with an opportunity to comment on the Strategic Environmental Assessment, Equalities Impact Assessment and Island Communities Impact Assessment. As with the 'Case for Change' report, the responses suggest that the three impact assessment reports are robust and effectively assess the outcomes of the 'Case for Change' process.
- 3.2. The following table summarises **specific omissions or comments** identified across the three impact assessment reports by respondents, together with our response setting out how these changes have been incorporated in the final report. The full set of responses can be found in **Appendix A**.

Report	Comment	Response
SEA	Island locations have a huge amount of natural renewable energy which is not being harnessed or not fed back into the local / island network to provide greener and cheaper public transport.	Noted and agreed. The option generation process will incorporate strategy options focused on decarbonising island transport networks.

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SEA	There is limited green/electric public transport in island locations. Island locations should be one of the easier places to implement alternative fuelled vehicles (AFV) for public transport as the distances and frequency of current services would suit the current range and recharging of AFVs.	Noted and agreed. The option generation process will incorporate strategy options focused on decarbonising island transport networks.
SEA	The report seems to suggest moving people to public transport from private cars should be a priority. This is unrealistic and focus should be on converting cars from combustion to electric.	<p>The RTS and associated impact assessment reports are being developed within the context of a national target to reduce vehicle kilometres by 20% by 2030, which is allied with the legally binding commitment to deliver net zero emissions by 2045 (with interim targets therein). The RTS will therefore seek to widen choice by improving active travel, public transport and electric vehicle charging provision and services.</p> <p>It will however highlight the challenges with mode shift and decarbonisation specific to the HITRANS region, in particular its rurality and low population density.</p>
SEA	Providing EV chargers on longer ferry routes should be considered.	This an option which will be included within the Preliminary Appraisal.
SEA	Green ethanol should be highlighted as a potential fuel for ferries.	This an option which will be included within the Preliminary Appraisal. It should though be noted that the utilisation of biofuels is not yet common practice – there are several barriers to its development including, price, logistics, safety requirements, commercial viability and limited expertise at present.
EqIA	There should be more disabled access as its currently hard to use public transport.	The option generation and appraisal process which follows-on from the 'Case for Change' will include options to improve access to public transport for those with a disability. All options will be qualitatively scored in the appraisal against the STAG 'Equality and Accessibility' criterion and the individual equalities duties.
EqIA	There needs to be equal transport options for island populations, currently this is not the case.	The option generation and appraisal process which follows-on from the 'Case for Change' will include both a theme around transport for island and peninsular communities and options to improve transport connectivity and quality and reduce costs. All options will be qualitatively scored in the appraisal against the STAG 'Equality and Accessibility' criterion and the individual equalities duties, including the Island Communities Impact Assessment.
EqIA	Reliability and capacity of transport systems, especially air and ferry services, is crucial to ensure equitable access to key services such as health for island communities.	
EqIA	More consideration needs to be given to health security on public transport, in light of experiences during the COVID-19 pandemic, especially since there is an increased pressure to use shared public rather than private transport.	Noted and agreed. The option generation and appraisal process will include an option around health security / cleaning of public transport.
EqIA	Much more consideration needs to be given to the practicalities of changing to electric	The RTS 'Case for Change' includes commentary on the issues associated with EV charging.

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	vehicles (i.e., economic cost and availability of charging points).	Options to improve coverage and reduce cost will be included in the Preliminary Appraisal.
EqIA	At present wheelchair users often cannot get on or off buses because there is no enforcement of [the] ban on parking at bus stops. We need [a] ban on parking at bus stops and strict enforcement.	The option generation and appraisal process which follows-on from the 'Case for Change' will include options to improve access to public transport for those with a disability. All options will be qualitatively scored in the appraisal against the STAG 'Equality and Accessibility' criterion and the individual equalities duties.
EqIA	The lack of disabled taxis in rural areas should be highlighted as they are needed for wheelchair users.	Agreed. This point is captured in Table A16 of the RTS 'Case for Change' Report.
ICIA	The Western Ferries service is reliable but does not have Road Equivalent Tariff fares. This does not meet the 'Assessment Framework: Fairer Scotland Duty'. People who do not have private vehicles are significantly disadvantaged, with the cheapest tickets coming in books of 10, which is difficult for those who lack the finances to purchase them. The passenger only service is highly unreliable, and disadvantages people who need to get to work, further education and access to health care.	<p>Western Ferries is a commercially operated service and its approach to the setting of fares is a commercial matter. The Preliminary Appraisal will however include an option around reducing the cost of ferry fares, including the potential extension of RET to commercial operators.</p> <p>The RTS more generally will comprise strategic options for transport across the region. The RTS will integrate with aspects that are the responsibility of Transport Scotland and Scottish Government, including HITRANS making the case for change through approaches, such as Transport Scotland's <i>Fair Fares Review</i> and <i>Islands Connectivity Plan</i>.</p> <p>The ICIA recognises transport <i>poverty premiums</i>, such as the example stated of people unable to afford the upfront cost of advance purchase multi-journey tickets.</p>
ICIA	The ICIA is too broad brush and does not reflect the unique social, environmental, and economic make up of these communities. There must be better mapping that includes below VAT threshold economic activity; digital connectivity; the significant seasonality of transient people movement, primary produce and how the increasingly disruptive weather differs from island-to-island, and the mapping of ideas and opportunities co-designed with these communities.	<p>The ICIA process is intended to describe the likely significantly different effect of a policy, strategy or service on island communities. As such, the 'Case for Change' ICIA report intentionally deals with the multitude of problems and challenges in a general way rather than concentrating on details (as is appropriate in a strategy context).</p> <p>In doing so, the RTS approach and ICIA assessment intends to embed fairness as a key value to underpin a commitment to equality and human rights for all across the region, and particularly drawing out the challenges faced by those living in island and remote rural communities.</p>
ICIA	This report quotes a few examples of various island situations with regards to travel, such as differences in the frequency of ferry provision. However, we feel the overall approach is too vague. We want to see better focus on those islands which are on the verge of unsustainable population decline largely because of poor transport provision, islands such as Coll. We do not feel that this report represents an adequate Islands Community Impact Assessment for Coll: there is no differentiation in terms of the nature of our particular transport provision. For example, we only have one	<p>The ICIA particularly flags the complexity of the data for islands that is available and the identification of averaging affects that often hide the extreme variability of aspects across island areas, which is in keeping with the comment.</p> <p>The next stage of the ICIA process aligned with the RTS development will be to ensure that island issues, and therefore duties associated with The Islands (Scotland) Act 2018, are considered actively in parallel with the development of the</p>

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	<p>ferry per day in the summer to and from Oban. Our neighbouring island of Mull has approximately 30 per day, spread over three ferry routes. The isle of Barra has a twice-daily flight to Glasgow whilst Coll has one flight per week to Connel Airport (with 2 x scholar flights at the weekend for Oban High pupils). How can our needs be assessed in the same categories?</p> <p>Therefore, we cannot agree that the report is adequate as regards our island community. Local views and specific needs must be recognised, and our expectation is that we will receive our fair share of transport provision.</p>	<p>emerging RTS to ensure key island issues inform the make-up of the new RTS.</p>
ICIA	<p>The impacts of ferry cancellations on island communities should be stated more and highlighted as a significant issue.</p>	<p>The ICIA flags these impacts in terms of: <i>“many routes suffer as a result of poor service reliability, with aging assets especially, which in turn disrupts the connectivity for island communities, leading to adverse economic and social impacts for island residents and businesses.”</i> This is further highlighted in Chapter 4 of the ‘Case for Change’ report.</p>
ICIA	<p>Road Equivalent Tariff should be extended to all ferry routes within Scotland.</p>	<p>RET for passengers, cars (including small commercial vehicles up to 6 metres in length) and coaches was rolled out across the Clyde and Hebrides Ferry Services network as a series of pilots beginning in 2008 and concluding in 2015, fulfilling a key commitment of the <i>Ferries Plan 2013-2022</i>.</p> <p>During the period 2022 to 2023, Transport Scotland state that they will be working to reduce inequalities through actions including³ undertaking a <i>Fair Fares Review</i> to ensure a sustainable and integrated approach to public transport fares as we recover from the pandemic. The <i>Fair Fares Review</i> will look at the range of discounts and concessionary schemes which are available on all modes including bus, rail and ferry. The <i>Fair Fares Review</i> will also take into account of the cost and availability of services, and will consider options taking cognisance of the relative changes to the overall cost of travel.</p> <p>The HITRANS RTS development will reflect this Transport Scotland work.</p>
ICIA	<p>There is a significant equalities issue regarding the provision of discounted / free public transport for islanders. Even with the discount, air fare / ferry service is expensive and limits access to the mainland.</p>	<p>Issues of <i>poverty premiums</i> for island residents and businesses is highlighted. Further, for example, the ICIA highlights the U22 bus concessionary travel scheme, which has been rolled out as being for bus travel only. For many islands and remote rural areas, ferry or air services (or indeed community transport and rail) are the equivalent of bus services in more built-up urban areas. Hence the omission of these services in the national scheme can be considered inequitable from the perspective of</p>

³ [Our Actions for 2022 - 2023 | Transport Scotland](#)

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		<p>some of that factors that we consider in terms of the ICIA.</p> <p>Furthermore, and in more general terms, it is agreed that high costs of travel for island communities limits access, connectivity and socio and economic viability / sustainability, and hence the RTS recognises this in Strategy Objective 5, which will in-turn be reflected in terms of the RTS options.</p>
ICIA	<p>There needs to be equal transport options for island populations.</p>	<p>The ICIA highlights that there are challenges affecting island economies brought about by geographic location – the cost and / or time associated with transport connectivity, distance to and from markets and suppliers and government centres. The issues and impacts felt at the periphery are often underestimated and poorly understood by the centre.</p> <p>The development and appraisal of transport options for the RTS will be examined in the context of the identified themes of: population characteristics; poverty; housing / land use; access to jobs / economic development; infrastructure; costs; public services; and integration.</p>
ICIA	<p>It must be recognised that the dispersed population of the islands makes it very difficult to provide an effective public transport service. Reliance on the motor car is not a luxury for island households; it is a necessity. Urban based solutions that seek to reduce vehicle mileage will work where there is a comprehensive public transport system but seeking to reduce vehicle mileage in the islands where public transport provision is less effective equates to a differential application of policy between urban and island situations. The impacts of this should be picked up in an Islands Impact Assessment.</p> <p>Similarly, the provision of EV charging points in a city or large town will mean a concentration of charging points in one location. Installing the same number of EV charging points in the island situation could result in gaps of 10 or 20 miles between individual charging points.</p> <p>Regarding: 'All local authorities are being encouraged to collaborate and develop strategies to attract private investment in EV infrastructure', there is no common boundary with another local authority and there is no large scale industry for investment in Eilean Siar - the impacts of this should be picked up in an Islands Impact Assessment.</p>	<p>The ICIA recognises that very low frequency or thin transport networks limit connectivity between islands and the Scottish or island mainland, which also in turn shapes and can limit the supply-chain and increases costs to live and do business on islands.</p> <p>For many of the islands, a ferry or an air service provides their connection to the nearest town, or local service centre, and as such is the equivalent of a local bus service in a corresponding mainland town or city. Furthermore, for many island communities, there is no connecting bus service to that ferry or air connection or, on larger islands (without the need for a ferry / air connection), no or limited geographic coverage of bus services to the nearest town or service centre. This is the same issue as for much of rural Scotland, in that bus or equivalent ferry, air, train or community transport services are operated thinly or are not available at all. Sometimes, informal arrangements for shared transport are in place, people within communities helping each other out with lifts to shops or to the ferry or air service, but the gaps in organised transport provision can cause isolation and hardship, including if expensive, for example, taxi or informal arrangements are at a cost. A further knock-on impact that is seen is that households <i>forced</i> into car ownership in island and rural settings; and in lower income households often a situation whereby the car is an older and less reliable model that needs replaced more often and is more costly to run.</p>

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	<p>The ICIA has not been prepared as a dedicated ICIA with respect to Eilean Siar communities.</p>	<p>The evolving RTS options will identify potential solutions to be explored to address / overcome these issues, identifying innovative solutions, but also recognising that progress could be challenging and / or expensive to deliver.</p> <p>Furthermore, the Scottish Government's <i>Just Transition Transport Discussion Paper</i>⁴ highlights that, in line with the 20% reduction in car kilometres route map, the Scottish Government recognises that people in rural areas will not be expected to reduce the distance they travel by car at the same pace as urban areas. Scottish Household Survey participants in rural areas identified 'lack of service' and 'too infrequent services' as barriers to public transport use⁵. This will be reflected in the RTS, together with consideration of options suited to support such island and rural areas to fully participate in society on an equal footing to people living in more urban areas.</p>

⁴ [Just Transition - Transport \(www.gov.scot\)](http://www.gov.scot)

⁵ <https://www.transport.gov.scot/media/51676/monitoring-and-evaluation-2019-baseline-report-may-2022-national-transport-strategy-nts2.pdf> Monitoring and Evaluation Baseline Report, p.20