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Consultation name: Draft Just Transition Transport Plan

To: Scottish Government

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Question 1B: Is anything missing from the draft outcomes in the Plan?

The Draft Plan broadly frames outcomes around people and communities, workers, businesses and the environment. Within these there are specific outcomes for safety and security (Outcome 9), accessibility (Outcome 10), and affordability (Outcome 11). But there is no clear reference to disabled people within the outcomes except, in wide ranging terms, to "vulnerable people" (Outcome 9) and "those with additional accessibility needs" (Outcome 10). Whilst these are helpful, they may be too broad and imprecise to give disabled travellers and passengers visibility in the draft Plan and the assurance necessary for a just transition.

Disabled people make up around a quarter of Scotland's population and they experience some of the most severe transport barriers. Not to name them explicitly is a lost opportunity. Clear wording in the relevant outcome, or the establishment of a cross-cutting commitment for outcomes to be monitored for their impact on disabled people, would make it easier for decision makers to monitor progress towards a fair and just transition. It would also enable stakeholders to be better assured that disabled people will receive an equitable share of the benefits in moving to net zero emissions.

This is crucial because our research has identified a persistent 'transport accessibility gap' for disabled people due to there being a significant disparity in transport patterns and frequencies compared to non-disabled people (The Transport Accessibility Gap, Motability Foundation, 2022). A key reason for this gap is because current transport provision (in both public and private modes) does not adequately cater for disabled people's needs.

Inability to travel when and where they would like also helps contribute to wide ranging socio-economic disadvantage. For instance, disabled people are twice as likely to be unemployed than non-disabled people, with the employment rate for disabled people being consistently lower than that for non-disabled people (Scotland's Labour Market Insights: April 2025, by Scottish Government, 2025).





Furthermore, around a quarter of people in Scotland's disabled households are in poverty. Analysis by the Scottish Government shows that relative poverty rates are higher in disabled households compared to those without someone who is disabled (Poverty and Income Inequality in Scotland 2021-24: Published on 27th March 2025, by Scottish government, 2025).

Placing disabled people explicitly within the outcomes and tracking delivery, through indicators which disaggregate measurement by disability status (see our response to Question 16B), will help ensure the transition to a decarbonised transport system is both fair, effective and inclusive for everyone in Scotland.

Question 3B: How could existing transport groups consider just transition issues?

This joint response, by the Motability Foundation and Motability Operations, is from two organisations who offer direct support to disabled people and also provide strategic leadership in transport accessibility, working to influence policy, improve infrastructure, and drive systemic change to ensure that disabled people are not left behind in the transition to a net zero transport system. Our response illustrates how a unique, national, all-inclusive leasing scheme is leading the transition to net zero by providing an accessible and affordable private transport solution for disabled people.

Disabled people often struggle to make journeys because of a lack of access to transport. They also struggle to have accessible transport options. In 1977, the Motability Foundation, a national charity, was established to work towards changing this. We believe that access to transport is fundamental to independent living, social inclusion and economic participation for disabled people. As Scotland progresses towards a net zero transport system it is essential that this transition is just. Its benefits should be shared fairly. Any costs or constraints of the decarbonisation of the transport sector should not fall disproportionately on disabled people and their families.

We recognise that the freedom to leave one's home, reach different places and spaces, and connect with the people who matter most is a vital part of life, yet many disabled people, whether travelling by private or public transport, still face significant barriers in doing so. Our vision, therefore, is to help build a future in which every disabled person has accessible, affordable, reliable and safe transport options enabling them to make the journeys they choose, on equal terms with everyone else. The Foundation drives systemic change through its activities, including:

• funding other charities and organisations who give disabled people everyday transport options, from community buses to wheelchairs;





• awarding grants to other charities and organisations who provide different types of transport, or work towards making transport accessible;

- carrying out research, in partnership with disabled people and key stakeholders in the industry, to inspire innovations that continue to champion accessible transport for all; and
- overseeing the Motability Scheme and providing grants to help people use it.

The Motability Scheme is the main way we provide access to transport for disabled people. The Scheme offers disabled people a new car or Wheelchair Accessible Vehicle (WAV), through a value-for-money, all-inclusive leasing package which includes insurance, breakdown cover, maintenance, tyres and any adaptations required. It is currently used by around 84,000 customers in Scotland within an overall customer base in the UK of over 800,000. The Scheme is delivered by Motability Operations, a separate, independent company working under contract to the Motability Foundation.

The Scheme itself can be considered as a best practice example of ensuring a just transition. It ensures that disabled people are not penalised due to the inherent market failure in the provision of suitable private transport for them. When it was launched 48 years ago, disabled people faced limited choice and prohibitively expensive costs to adapt and insure motor vehicles. This is still an issue today and whilst this failure persists, the Scheme continues to provide a worry-free, affordable way for eligible, disabled people to build and maintain their independence.

In making a just transition to a net zero and climate resilient economy for Scotland, the Motability Scheme can play a critical contribution to Outcome 10 (People and Communities), which seeks to ensure that transport is accessible, especially for those with additional accessibility needs. This is likewise with Outcome 11 (People and Communities), which seeks to ensure that people, who may have the least choice and ability to pay, are not disproportionately burdened in the transition away from fossil fuelled vehicles.

By removing much of the upfront costs (adaptations, home chargepoint installation etc) and ongoing expenses (insurance, maintenance, etc) associated with getting a new car, the Motability Scheme enables disabled people to choose whether to make the change from internal combustion engine vehicles to the latest electric vehicles (EVs). Those who choose the latter are paving the way for the mass adoption of EVs, being some of the very first drivers of these vehicles on Scotland's roads. Over 7,000 Motability Scheme customers in Scotland have already made this transition. This early uptake shows that EVs can be a practical option for everyone, not only those with higher incomes.





We oversee and operate the largest EV fleet not only in Scotland but also the UK. Our commitment to helping disabled people make their own transition to net zero is illustrated by comparing the geographical distribution of the Motability Scheme's EV fleet with that of other commercial fleet providers, throughout the UK. Independent analysis by Oxford Economics, via a market-concentration analysis, identifies that the Motability Scheme is setting the standard for an inclusive EV transition in Scotland.

Whereas most commercial fleet providers cluster their EV provision in relatively affluent parts of the UK, most notably the South of England, the Motability Scheme's EV fleet is intentionally more evenly distributed. This ensures that disabled drivers in remote, rural and lower-income areas of the UK are not left behind in this transition

Furthermore, in terms of composition, the Scheme's EV fleet is at the lower end of the price range compared to other commercial EV fleets, with a median value of £34,995 compared to £43,450 (The Impact of Motability Operations and the Motability Scheme, by Oxford Economics, 2025). Our approach to supporting disabled people underlines strong, practical leadership in aligning the goal of achieving transport decarbonisation with fairness and social justice - our transition to a net zero future must be inclusive of all.

By taking this approach, the Motability Scheme enables disabled drivers access to the same offers and service standards irrespective of where they live in Scotland. This is an important principle because, in general, disabled people and their families face additional costs to maintain the same quality of life experienced by non-disabled people.

For example, the disability charity, Scope, has been tracking the extra costs faced by disabled households since 2018. Its latest Disability Price Tag data indicates that disabled households need on average an additional £1,010 to maintain the same living standards as non-disabled households (Disability Price Tag 2024: Living with the extra cost of disability, by Scope, 2024). A household with a disabled member is more likely to be low income in comparison to a non-disabled household (Disability and Transport 2021, by Transport Scotland, 2023; Households Below Average Income: an analysis of the UK income distribution: FYE 1995 to FYE 2023, by DWP, 2024). Whilst the median household disposable income is £34,500 (Average household income, UK: financial year ending 2023, by ONS, 2024), our data indicates that more than half of Motability Scheme customers live on an income of less than £30,000 per annum.

Focusing on Scotland, the Motability Scheme's commitment to supporting the transition to EVs for disabled people is clear. Eight per cent of all EVs, purchased by Motability Operations for the Scheme, are allocated to Scotland, compared with





six per cent of the wider leasing market's EV stock (op. cit. Oxford Economics, 2025). In other words, Motability Operations dedicates a greater proportion of its UK EV fleet to Scotland than other fleet providers. In doing so, we are supporting the Scottish Government's ambition for a fair, nationwide shift to zero emission mobility

for disabled people.

A just transition can only be achieved if the structural barriers faced by disabled people are addressed as part of, not after, the decarbonisation process. The Motability Scheme provides a unique, proven model for sharing the benefits of net-zero mobility whilst also preventing the costs from falling on those least able to bear them.

Question 4: Are there any gaps in our priority actions to support people and communities in the transition of the transport sector?

Following the Transport Secretary's evidence at the Public Audit Committee meeting on 'Sustainable transport: reducing car use', on 23 April 2025, we understand that the Scottish Government will be reviewing its strategic commitment to achieve a 20 per cent reduction in car kilometres by 2030.

This commitment requires a fundamental transformation in how people travel and is a necessary step for the Draft Plan's vision of securing a "net-zero sustainable, inclusive, safe and accessible transport system" by 2045. As a distance based, economy wide target, it could secure significant public health gains, through improving the quality of the air we breathe to encouraging uptake of more routine physical activity, with trips shifting to active travel forms of transport (walking, wheeling and cycling) as well as encouraging greater use of public transport.

It could also advance social equity, through a just transition in transport, by addressing the issue of transport poverty. Evidence supporting this indicates that there is inequality in access to private cars, which is not just based solely on income levels. According to the Scottish Government's, 'A route map to achieve a 20 per cent reduction in car kilometres by 2030' (2022), disabled people are also less likely to have access to a car than the general population in Scotland. The Draft Plan also acknowledges that "disabled people face particular challenges in accessing transport options."

Against this backdrop of unequal access, the Motability Scheme plays a fundamental role as an enabler of an inclusive, just transition. It supports disabled people to have the freedom to travel, so that they can regain and enjoy the independence so many others can take for granted. We do this by enabling eligible disabled people to use their Adult Disability Payment (ADP) to lease a new car or Wheelchair Accessible Vehicle (WAV). They are supported with a comprehensive package that is





significantly cheaper than comparable market offerings. We also provide grants (such as Advance Payments for cars and even driving lessons) to those who would

otherwise be unable to afford and use the vehicle they need.

Transitioning our fleet to electric vehicles (EVs), is also another way we are actively supporting a just transition to a net zero and climate resilient economy. We give our customers the choice to make the switch from internal combustion engine vehicles to fully electric alternatives in an easy, affordable way. It ensures that disabled people, who may have the least choice and ability to pay, are not disproportionately disadvantaged or excluded in the transition away from fossil fuelled vehicles. This aligns with the Draft Plan's concept of fairness, ensuring that people and communities are supported in switching to EVs.

It is in this context we wish to emphasise that any revised strategy to curb car dependency must continue to guarantee door-to-door mobility for people whose conditions and impairments make public or active travel impractical for them. This is made clear in the route map (ibid) in the acknowledgement that private car use would need to continue for those with "certain disabilities". The Draft Plan also recognises that "car use will remain a necessary option for some with particular mobility needs". But this may also be the case for those with other disabilities too. Those with conditions affecting cognitive abilities, mental health and dexterity and stamina, for instance, may also be wholly dependent on car usage.

For disabled and non-disabled people, car travel is the most popular mode of transport (Disability and Transport 2021, by Transport Scotland, 2023). But it can be a necessity for those with disabilities. For example, for 67 per cent of Motability Scheme customers their car is the only vehicle in their household. A key reason for this is that disabled people are far less likely to be able to rely on public transport than those without disabilities.

Research conducted by the Motability Foundation has identified a 'transport accessibility gap' for disabled people (The Transport Accessibility Gap, by Motability, 2022). This is due to a significant disparity in transport patterns and frequencies they experience compared to non-disabled people. A key reason for this gap is because current transport provision (in both public and private modes) does not adequately cater for the needs of disabled people. For many disabled people, car travel, is an essential part of daily life.

As so many disabled people and their families are reliant on private transport to support their independence, freedom and well-being, it is imperative that any review of the target for a reduction in car journeys continues to take this into account so that the transition to a net zero, inclusive transport system is both faster and fairer for the many disabled Scots who rely on private vehicles for their independence.



Question 5B: Which of the following priorities we have set out in the draft Plan do you think would be most helpful for people like you to reduce how often, or how far, they drive in a private car?

On more access to online services so people do not need to travel unnecessarily, there is a need to improve digital connectivity, especially in Scotland's rural and island communities. But it will be important that shared transport options, which meet local needs, are improved too. This is particularly the case for disabled people, where digital exclusion can increase living costs. But digital options are no substitute for accessible, affordable transport when in-person contact is essential. Our research (The Transport Accessibility Gap, 2022) has identified that having better mobility through accessible transport can improve disabled people's overall physical/mental health. It widens access to healthcare, employment, education, and social activities, improving the ability to participate in society. Irrespective of better digital connectivity, it will be important that disabled people have the means and opportunities for human engagement and interaction via accessible, affordable transport options. Failing to close gaps, related to digital connectivity and transport, could place a disproportionate share of decarbonisation transition costs on those with the fewest alternatives and the least financial means.

On access to 'car clubs' which allow people to hire a car or van for shorter trips, this form of shared transport can be a useful solution for disabled people, especially those living in rural environments. However, they remain minority users. The Motability Foundation has funded TRL Ltd and CoMoUK to conduct user research into the experiences of disabled users of car clubs. Through this, it seeks to understand the challenges faced and explore how car clubs could be more inclusive. Findings will be published in summer 2025.

On the availability of demand responsive transport (DRT) for some areas, for example dial-a-bus services, there are numerous benefits, not just for rural and island communities but also for disabled residents in those communities or elsewhere. Research funded by the Foundation (The value and potential of Community Transport for disabled people, by Collaborate Research, 2021) illustrates the potential for DRT to provide flexible, accessible community-led solutions for unmet local transport needs. It found that disabled people make more frequent trips using DRT than those without disabilities. A key reason is that they have a lack of suitable alternatives due to availability, affordability or accessibility reasons. DRT can provide reliability, affordability, personalised care, reduce social isolation, and enable independent access to essential services and activities. There are various challenges in establishing DRT services, not least start-up costs and financial sustainability. But expanding DRT can ensure that those with the fewest transport options, particularly disabled people, receive an equitable share of mobility and are not left behind in the transition to net zero.





On the better use of space for active travel and public transport, the Draft Plan states that Scotland's journey to net zero must be inclusive, safe and accessible. Recent research (Raising the bar: Boosting the accessibility of shared micromobility, by RiDC & CoMoUK, 2025), funded by the Foundation, indicates that shared micromobility (SMM) has the potential to improve the lives of disabled people, transforming their day-to-day mobility. Yet, take up levels of the main forms of SMM (manual/electrically powered bike schemes; and e-scooter schemes – currently unavailable in Scotland) by disabled people are low. The key barriers revolve around safety, design limitations and limited integration with public transport. A collaborative, multi-stakeholder approach is required to make SMM services viable for the 1.5m disabled people in Scotland. This will require service innovation by providers to increase accessibility, private sector investment, UK legislation on vehicle definition and commitment from the Scottish Government to develop suitable infrastructure. It is vital that disabled people are engaged and involved in developing accessible, inclusive SMM solutions from the outset.

On increasing costs to make driving a less attractive option in some circumstances, the Draft Plan rightly seeks to curb fossil fuelled car dependency to meet net zero. Yet for Scotland's 1.5m disabled residents, driving is often a necessity rather than an option. Our research (The Transport Accessibility Gap, 2022) identified a 'transport accessibility gap' faced by disabled people, largely because current transport provision (in both public and private modes) does not adequately cater for their needs. For many disabled people, car travel, including the ability to independently refuel and recharge, is an essential part of daily life. Blanket measures that raise the cost of driving risk a distributionally unjust outcome, forcing the very people with the least viable alternatives to bear a disproportionate share of transition costs.

Question 6: Does the draft Plan take all groups in society into account in setting out a vision for a future transport system for people and communities?

We recognise this is a draft, with further iterations of the Draft Plan to be published, which will reflect on progress made as well setting out future progression towards the decarbonisation of the transport sector by 2045 under a just transition. A just transition, by definition, must distribute the benefits of decarbonisation fairly and protect groups who could otherwise be left worse off by the shift to low carbon travel.

Whilst the Draft Plan explicitly recognises the existing transport inequities faced by disabled people it adopts a largely broadbrush view, save for the reference to "those with additional mobility needs", thereby appearing to treat disabled people as a homogenous group. Using this generic lens could overlook how decarbonisation levers, such as shifting travel behaviours and transport modes (such as reducing



private transport, encouraging active travel and improving public transport) and developing support infrastructure (such as expanding the EV public charging network and improving digital connectivity) affect, for better or worse, those with different disabilities.

Around one in four Scots (27 per cent of the population or 1.5 million people) meet the Equality Act definition of disability (Family Resources Survey, 2025); this is a figure more than the entire combined populations of Glasgow and Edinburgh. Scotland's Census 2022 data (updated February 2025), reveals the diversity of disability prevalent within Scotland, with "long term illness" (21.4 per cent) and "mental health condition" (11.3 per cent) reported most often, followed by "physical disability" (9.7 per cent).

It is therefore important to consider the diverse nature of disability within the disabled population and how types and levels of disability affect people's ability to access different modes of transport. Mobility problems generally have the largest impact on travel behaviour. Individuals with these conditions are less likely to be able travel by various transport options. But conditions affecting sight, cognitive abilities, dexterity and stamina, and mental health, are also linked to reduced travel or increased difficulties travelling.

Severity of disability also matters and can be a significant factor affecting transport use. For example, those with more severe disabilities (where everyday activities are reduced a lot) are less likely to use public transport than those with less severe disabilities. People may also have more than one disability and multiple disabilities compound difficulty travelling. Here, disabled people are more likely to have reduced use of transport. And those with the least access to transport are likely to have the most complex needs, often living with the effects of various different disabilities.

Therefore, if strategic transport planning is to deliver a just transition for the people of Scotland, it should consider that disabled people can often have multiple illnesses, impairments or conditions as well as their own access needs (such as using a wheelchair, or needing an assistance dog). It should also consider the intersection of disability with other personal characteristics, such as age, gender, sexuality, race, and socioeconomic status. Consequently, the heterogeneity of Scotland's disabled population means that a 'one-size-fits-all' approach is unlikely to deliver genuine improvements in transport accessibility for disabled people. Challenges and solutions for improving accessible transport are likely to vary significantly, not least due to the diverse nature of disability.





Question 7: Is there anything else you would like to see in the draft Plan for people who are more likely to face challenges accessing affordable, convenient and safe travel options?

Improving accessibility of public transport

For a successful just transition to a net zero transport system, Scottish society needs to be encouraged to make greater use of active travel and public transport. Focusing on public transport, we welcome the Scottish Government's commitment in investing £2 billion annually to support and develop a "strong, sustainable and accessible public transport system".

The Draft Plan already refers to important equity measures, not least the National Concessionary Travel Scheme. This enables eligible disabled people to use Scottish local and long-distance bus services freely, without the restrictions of peak fare regulations that are often found elsewhere in the UK. By reducing direct cost barriers, the scheme advances Outcome 11 on affordability. It also embeds fairness by making public transport accessible for those affected by transport poverty.

The Scottish Government's Smart Ticketing Delivery Strategy (2024), underpinned by the principle, "Be accessible and inclusive", is also a welcome step towards a just transition. By ensuring that journey planning systems are accessible, in logical formats and on accessible platforms, this approach should help make public transport easier, more accessible and inclusive of all, supporting Outcomes 10 (regarding accessibility) and 11 (regarding affordability) of the Draft Plan.

Access to transparent, accurate, and accessible ticketing and payment information is particularly important for disabled passengers to be able to travel confidently and independently. Without it, the progression towards a low carbon transport system risks deepening existing inequalities. Nonetheless, the Draft Plan could better recognise the role which accessible, high quality data and information plays throughout the journeys made by passengers, especially disabled users. When information is missing, inconsistent, or inaccessible, disabled passengers face significant barriers to using public transport. This can lead to exclusion, higher travel costs, and increased dependence on others.

The strategy for Smart Ticketing also states, "data that enhances the accessibility of transport should be openly available". Making data open and standardised, with codesign with disabled users, will be crucial for enabling a just transition, not just for journey planning, but throughout the journey lifecycle. Disabled people also rely on real-time updates, in-journey, to identify when their transport mode is arriving, where they are whilst enroute and when and where to alight. For example, blind and partially sighted people have identified that access to real-time information is a



"critical" barrier for travelling independently (Inclusive Journeys: Improving the accessibility of public transport for people with sight loss, by RNIB, 2023).

The variability of consistent, accurate transport information creates significant challenges for disabled people, affecting their ability to travel independently, safely, and with confidence. For example, research exploring the experiences of disabled bus passengers, across Scotland, England and Wales, found that information at bus stops was not always accurate (Why are we waiting? by Bus Users UK, 2024). Physical timetables could be out-of-date and 'live' information displays could be wrong, causing frustration and confusion. These gaps are amplified in rural and island communities, where transport connectivity can be fragile.

Travelling confidently on public transport needs a greater availability of accessible information which is accurate, consistent and up to date, backed up by investment in staff training and supported by a resilient digital network. Audible announcements should be an option for stops and information. Access to audio description, and audio visual displays enable disabled people to travel with greater confidence and independence. These features can enhance the travel experience of other groups too, such as older people, thereby broadening inclusivity. They help to improve the user experience and boost confidence. They also support the shift to low carbon mobility, not leaving anyone behind in the process.

Measuring demand responsive transport

To enable a just transition towards a "a net-zero sustainable, inclusive, safe and accessible transport system", the Draft Plan identifies shared transport interventions, such as demand responsive transport (DRT), as accessible solutions especially for rural and island communities. These are places where traditional, conventional models of public and shared transport may not be suitable or feasible.

The Motability Foundation has played a key role in enabling support services like these, to be created. One of the ways the Foundation supports disabled people to make the journeys they choose, is by funding other charities and organisations to provide disabled people everyday transport options, such as community buses and car clubs. We have extensive experience in supporting communities to run DRT solutions through our Community Transport Grant Programme. We launched this in April 2022 to help charities and organisations make an immediate impact for disabled people, by awarding funding to provide, expand and improve community transport options.

Since then, we have awarded £2.5m of grant funding to community based organisations in Scotland, including the likes of Comunn Eachdraidh Nis (Isle of Lewis), Ayrshire Cancer Support and Arran Community and Voluntary Service to



provide accessible transport, such as through Wheelchair Accessible Vehicles (WAVs). These groups provide their local communities with the means to make journeys for medical appointments, to enjoy a day trip out or go shopping, or to commute to and from airport and ferry terminals.

In the consultation and co-design process for the Draft Plan, rural and island communities spoke about the challenges of establishing DRT schemes. But equally important is the sustainability of these services. In a recent evaluation of the Foundation's programme (Evaluation of the Community Transport Grant Programme, by NPC, 2025) funding was identified as a key issue for sustainability. The funding landscape is challenging for the wider community transport sector, let alone for those providing services for people with mobility issues, often requiring expensive, adapted transport solutions. And this is a sector which typically operates in competitive circumstances, needing to secure funding from public and/or philanthropic sources.

So, having the ability to access long term funding, such as via multi-year grants provided by the Foundation, allows grant holders the security to plan ahead and build relationships to give these services the best chances of being sustainable. Therefore, it would be helpful for the Draft Plan to address funding sustainability, to understand how proposed DRT services can be delivered sustainably and ensure that the transition to zero emission transportation is a just and fair one.

Furthermore, we note the performance indicator (5.3) on shared transport uptake. Should the Draft Plan also consider a sustainability-focused indicator to measure the sustainability of these services? Only measuring uptake will provide understanding into whether people are using services, not whether they can remain operational and affordable.

Personal safety on public transport

The Draft Plan's acknowledgement of personal safety, whilst accessing and using public transport, is welcome. Recent research funded by the Motability Foundation indicates that navigating public transport can raise significant safety challenges for young disabled individuals, particularly when they are traveling alone, with such feelings of insecurity being exacerbated at nighttime. In a first of its kind, this study explored the transport experiences of young disabled people aged 15-24.

Whilst a fifth (21 per cent) of young disabled men were concerned about ensuring their safety when travelling alone, this jumped to two fifths (40 per cent) for young disabled women (Creating an Inclusive Future: Addressing accessible transport needs for young disabled people, by Savanta, 2025). This disparity highlights how the intersection of gender and disability creates distinct safety concerns for young



disabled women. For young disabled people, who also identify as LGBTQ+, over half (51 per cent) reported feeling vulnerable in crowded spaces, illustrating how gender

identity further intersects with disability when using public transport.

Possible solutions to make transport safer and more accessible, as suggested by young disabled people included: ensuring that public transport hubs are always staffed; having secured seating areas, and well-lit, supervised transport stations; and offering discounts on taxi and ride-hailing services. Crucially, they also called for reliable real-time information, so they could choose safer routes, avoid long waits on dimly lit platforms and summon help quickly if needed.

More recent research, also funded by the Foundation, paints a concerning picture, with hate incidents against disabled people on public transport being common and frequently going unchallenged. The most common type of abuse was verbal, followed by discrimination, then threatening behaviour. Furthermore, intervention was rare from bystanders, leading a "broader culture of normalisation, where disabled people often feel expected to manage abuse quietly and alone" (Journey to safety: Combating disability hate crimes on public transport, by United response, 2025).

For Scotland's transition to a net zero transport system to be truly just, disabled people must be able to travel freely, without fear, prejudice or invisibility. Giving greater prominence to their lived experiences, especially on personal safety concerns, would place the safety of disabled travellers at the heart of the Plan's fairness ambitions. Only then can the shift to low carbon mobility be truly equitable and leave no one behind.

Question 14C: Is your sector/organisation doing something others could learn from?

The Motability Foundation is a national charity set up with all party parliamentary support in 1977 and incorporated by Royal Charter. We fund, support, research and innovate so that all disabled people can make the journeys they choose. There are 1.5 million disabled people in Scotland, making up over a quarter of the population. They can often struggle to make journeys due to a lack of access to transport and accessible transport options. We work to change this by:

- funding other charities and organisations who give disabled people everyday transport options, from community buses to wheelchairs;
- awarding grants to other charities and organisations who provide different types of transport, or work towards making transport accessible;



- carrying out ongoing research, in partnership with disabled people and key stakeholders in the industry, to inspire innovations that continue to champion
- overseeing the Motability Scheme and providing grants to help people use it.

The Motability Scheme is the main way we provide access to transport for disabled people. The Scheme offers disabled people a new vehicle, Wheelchair Accessible Vehicle (WAV) or powered wheelchair through a value-for-money, all-inclusive leasing package which includes insurance, breakdown cover, maintenance, tyres and any adaptations required. It is currently used by around 84,000 customers in Scotland within an overall customer base in the UK of over 800,000. The Scheme is delivered by Motability Operations, a separate, independent company working under contract to the Motability Foundation.

Whilst the Scheme enables access to affordable electric vehicles (EVs) for disabled people, the Foundation is also driving progress to ensure that the infrastructure supporting EVs in Scotland, and throughout the rest of the UK, is equally accessible for everyone. Being able to access public chargepoints is a just transition issue for disabled EV users in particular. The rationale for this is clear. If the EV charging network is built without disabled users in mind, the shift to zero emission transport risks hardwiring new inequalities. From the outset we have taken a leading role in bringing together disabled people, chargepoint operators, industry stakeholders, and government (at national and local levels) to develop an accessible solution for this issue.

Importance of car travel for disabled people

accessible transport for all; and

Car travel is often the only realistic option for many disabled people, especially those living in Scotland's rural and island communities. Seventeen per cent of Scots live in remote or rural areas, which constitutes 98 per cent of the landmass (Rural Scotland Data Dashboard: Overview. 212 December 2023, by Scottish Government, 2023). Car travel is the most popular form of transport because it is typically the most accessible transport mode for disabled people (Disability and Transport: Findings from the Scottish Household Survey, by Transport Scotland, 2021; Understanding and identifying barriers to accessing transport: The experiences of disabled people in the UK, by ncat, 2024). Our research indicates that disabled people avoid public transport because of its lack of accessibility. This has created a 'transport accessibility gap' for disabled people. Simply put, current transport provision (in both public and private modes) does not adequately cater for their needs (The Transport Accessibility Gap, by Motability, 2022).



Affordability of public charging

As disabled drivers make the transition from petrol or diesel-fuelled vehicles to fully electric, they face challenges and barriers to refuel their vehicles in what is still an emergent infrastructure to support EV charging. The first challenge is affordability. There are financial implications to refuel EVs depending on someone's residential circumstances. Research commissioned by the Foundation estimates there will be 2.7 million disabled drivers in the UK in 2035. Of these, it is estimated that half (1.35 million) will be at least fully or partially reliant on public charging infrastructure (Electric Vehicle charging infrastructure for people living with disabilities: Report for Motability, by Ricardo, 2020).

Those reliant on public charging have to pay 20 per cent VAT to charge their EV in comparison with 5 per cent VAT for home charging. Furthermore, this is compounded for disabled people because they are less likely to own their own home. In general, they are more likely to be renting (such as through social housing). In these circumstances the possibility of off-street parking is typically more limited. And this means that having access to a domestic, residential chargepoint is less likely. Hence the importance of public charging infrastructure.

Accessibility of public charging

The second challenge faced by disabled people is based on accessibility. Our extensive research with disabled people and industry stakeholders has indicated that inadequate chargepoint infrastructure could detrimentally affect the transition to EVs for disabled people (Going Electric? Research report into the accessibility of plug-in electric vehicles, by RiDC, 2020; Accessible EV Charging: Updated Evidence Review, by Motability Foundation, 2024). There are various barriers faced by disabled people when using EV chargepoints. These include built environment issues such as kerb height, particularly the lack of dropped kerbs around chargepoints. When charging their vehicles, disabled people face difficulties around the height, weight and manoeuvrability of charging cables. The force required to attach the connector to the vehicle can also be challenging. And the poor visibility of information screens and instructions are inhibitors to access as well.

Ensuring there is high quality, accessible infrastructure must be a priority if a just transition is to be equitable for everyone. One of our key priorities is to work with disabled people, industry, other charities, the Scottish Government, and governments throughout the United Kingdom, to amplify the voices of disabled people in the transport system and create innovative solutions to the chargepoint accessibility issues they face.



An accessible public charging standard

In partnership with the UK Government (OZEV - Office for Zero Emission Vehicles) we co-sponsored the PAS 1899:2022 Accessible Public Charging Standard (PAS 1899). This is the world's first dedicated standard for accessible public EV charging. Developed by the British Standards Institution (BSI) and published in October 2022, the standard turns the principles of inclusive design into practical, auditable requirements for every stage of chargepoint installation and deployment. Thanks to sponsorship from the Motability Foundation and OZEV, PAS 1899 is free to access.

PAS 1899 provides comprehensive specifications, for example, minimum clear widths and bollard spacing, maximum connector height and cable weight, guidance on kerb gradients, tactile wayfinding, lighting and signage. It applies to all charger speeds and site types, thereby giving network operators, local authorities and investors a single, consistent yardstick for equity of access. For transport stakeholders looking to embed 'just transition' thinking, PAS 1899 offers a ready-made template for chargepoint accessibility across Scotland's cities, towns, urban and rural areas.

Since PAS 1899 was launched there are indications of a welcome shift by industry stakeholders who are taking a more proactive approach to accessibility in general. But whilst the reception from industry has been positive, there are still no chargepoints in Scotland or the UK which are fully PAS 1899 compliant. This is because of a combination of technical and commercial challenges faced by stakeholders, particularly Charge Point Operators (CPOs). For example, some minimum requirements, such as the heights of payment terminals and screens, the weight of connector cables, have proven to be very difficult to meet since the standard's launch.

In response to these obstacles, the Motability Foundation and OZEV have initiated a formal update of PAS 1899. BSI has convened a technical working group, bringing together disabled people's organisations, the Scottish and UK governments, local authorities, national transport bodies, CPOs and inclusive design specialists, to review and recalibrate the standard's minimum requirements where firsthand experience has identified impracticalities. Through co-design, a revised, more readily deployable version of PAS 1899 is scheduled for publication by early 2026.

We welcome the Scottish Government's leadership on accessible public charging, as reflected in its strategy, 'A Network Fit for the Future', and its Draft Implementation Plan that charts a route for 24,000 additional public chargepoints by 2030. Central to this is its position on PAS 1899, requiring compliance with the standard for all new off-street public sites which are in receipt of government funding. Furthermore, it also requires work towards making a reasonable proportion of chargepoints, at existing



off-street locations, PAS 1899 compliant. This approach positions Scotland to mainstream accessibility as the charging network expands. It also lays the groundwork for a just transition where disabled people can fully share the benefits of decarbonisation.

Embedding PAS 1899 within funding criteria is a welcome first step. Nonetheless, we are acutely aware that that PAS 1899 provides a minimum standard of accessibility, on the basis of voluntary compliance. Yet the current reality is that even a fully compliant PAS 1899 bay could leave disabled people, especially wheelchair users, facing considerable barriers. Unless the minimum evolves into a universal, enforceable standard, Scotland, as well as the rest of the UK, risks hardwiring inequity into the charging network as it scales towards 30,000 chargepoints. Stronger action is required and that is why the Motability Foundation has called on the UK Government to consider mandating PAS 1899.

Making EV chargepoints accessible will not just benefit those using the Motability Scheme. It will benefit every disabled user of public EV charging. What is more, it can also be of benefit to everyone else. For instance, those travelling with young children and older people can also struggle with charging their vehicles because of heavy cabling and/or the limitations of space around a vehicle. Put simply, what works for disabled people works for everyone, making an inclusive, net zero transport network both fairer and more resilient.

The Foundation believes that every chargepoint in Scotland and the rest of the UK should be accessible by 2030 so that the transition to net zero emissions is fully inclusive. We continue to champion the adoption of PAS 1899 and will continue to do all we can within our remit to remove barriers to accessibility across the public EV charging network.

Question 16B: Make a comment about a specific indicator or indicators (optional)

At the Motability Foundation, we believe that access to transport is fundamental to independent living, social inclusion, and economic participation for disabled people. Our vision is to build a future where all disabled people have the transport options to make the journeys they choose. But many disabled people are faced with significant challenges and barriers to make those journeys. They often struggle because of a lack of access to transport and a lack of accessible transport options. Consequently, this response focuses on measuring a just transition for disabled people.

The Draft Plan acknowledges the general importance of accessibility in its overall vision to have a "sustainable, inclusive, safe and accessible transport system" by 2045. It also acknowledges that accessibility is particularly important for some,



stating that "disabled people face particular challenges in accessing transport options". Specifically, Outcome 10 ('People and Equity') identifies accessibility as an important objective "especially [for] those with additional accessibility needs". Yet, whilst the concept of accessibility is central to the Draft Plan's vision, it is referred to broadly. There is no single, operational definition of 'accessibility' provided.

Nor is transport accessibility measurable in terms of disability. The indicator for 10.1 lacks specificity to ensure that the transport needs and experiences of disabled people can be fully measured. Whilst the indicator on satisfaction (10.2) disaggregates public transport satisfaction for disabled adults, this is not the case for the measurement of accessibility (10.1) - a critical transport barrier for disabled people.

The particular barriers faced by disabled people do not appear to be considered for measurement. These include the physical challenges and barriers associated with the accessibility of vehicles and infrastructure and the availability of assistance and support. We note that the draft indicator (10.1) on accessibility only focuses on public transport for buses and trains. Will other forms of public and shared transport (such as taxis, ferries, car clubs, and other types of demand responsive transport) be included for measurement? What about private transport accessibility? For example, should there be measurement of the public charging infrastructure for electric vehicles and whether or not chargepoints meet the accessibility requirements of PAS 1899?

Whilst there are indicators on transport affordability (11.1 and 11.2), as with the indicators for accessibility, they do not disaggregate measurement by disability status or other protected characteristics. Existing evidence already indicates that disabled households face higher costs than non-disabled households. For example, in research for the Monitoring and Evaluation Report 2024 (National Transport Strategy), Transport Scotland identified that "disabled people (61 per cent) were less likely than non-disabled people (73 per cent) to consider their costs affordable".

Therefore, disabled people's affordability of transport should be explicitly measured using an indicator(s) which disaggregates data by disability status and type. On this latter point, measurement should also take into account the heterogeneity of disabled people. Without this, it will not be possible to understand if disabled people's transport access is improving at the same pace as for non-disabled people.

Without designing indicators to include the measurement of the experiences of disabled people, there is a risk that their transport needs could be overlooked. To understand whether Scotland's transition to net zero is truly just, the monitoring framework should identify whether disabled people are sharing equally in the benefits of decarbonisation, not shouldering disproportionate costs.



Question 17: If you are aware of any other data being collected that could be used to monitor progress towards any of the outcomes set out in this Plan, please share details below.

Focusing on official statistics, the potential of the Scottish Household Survey (SHS) could be further explored for effectively measuring progress towards a just transition. Since its establishment in 1999, it has demonstrated flexibility in its design to include/exclude questions to accommodate the exploration of policy issues. The SHS is a generally, robust data source to support the indicators of outcomes associated with 'People and Equity' and 'Communities and Places'.

The SHS serves as an authoritative source for understanding transport behaviours in Scotland, with a focus on inclusivity. It helps understand commuting patterns, modal choices, and travel frequencies. The SHS places particular emphasis on capturing the experiences of disabled individuals regarding their transport use. This includes specific questions to identify respondents with long term physical or mental health conditions that impact daily activities, aligning with the Equality Act 2010 definition of disability.

