

Consultation Response

Just Transition: A Draft Plan for Transport in Scotland

About the RTPI

The RTPI Champions the power of planning in creating sustainable, prosperous places and vibrant communities. We have over 27,000 members in the private, public, academic and voluntary sectors. Using our expertise and research we bring evidence and thought leadership to shape planning policies and thinking, putting the profession at the heart of society's big debates. We set the standards of planning education and professional behaviour that provide our members, wherever they work in the world, a unique ability to meet complex economic, social environmental and cultural challenges.

Introduction

RTPI Scotland welcomes the opportunity to comment on the Just Transition Plan for Transport in Scotland. The planning system has an important role to play in delivering a long-term strategy for reducing carbon, enhancing transport accessibility for all communities, and supporting a just transition to net zero.

RTPI Scotland broadly support the intentions of the Draft Plan. We recognise the need to support the transport sector as it makes the transition to net zero and acknowledge that part of this process involves identifying the needs of key groups that will be affected by these changes. This, in turn, will help to develop a shared understanding of the challenges and opportunities associated with bringing about a just transition for transport, as well as ensuring that a fair and equitable transition is achieved across Scotland.

National Planning Framework 4

RTPI Scotland has [previously highlighted](#) the strong linkages between achieving a just transition and the spatial principles and policies of NPF4. NPF4 sets out Scotland's spatial strategy for delivering the ambitious decarbonisation of the Scottish economy, improving climate resilience, fostering biodiversity regeneration and moving towards places for wellbeing across the country. NPF4's six spatial principles aim to foster this:

- Just Transition
- Conserving and recycling assets
- Local Living
- Compact Urban Growth
- Rebalanced Development
- Rural revitalisation

Delivering a just transition for Scotland's transport will rely upon the successful delivery of NPF4's spatial principles and policies, including Infrastructure First (Policy 18), Sustainable Transport (Policy 13), and Local Living and 20-minute neighbourhoods (Policy 15). Despite this, the draft Just Transition Plan for Transport includes very little acknowledgement of NPF4's role in delivering its objectives. Although the draft Plan contains several references to place-based solutions to incentivise sustainable travel,

NPF4 is only mentioned once in the entire document, with no mention of how these solutions will be delivered through the planning system and by who.

Delivery and integration with other policy areas

RTPI Scotland understand that the Just Transition Plan for Transport sits under and supports the National Transport Strategy, expanding on the areas relevant to achieving a just transition. What remains unclear, however, is how the plan will be delivered in practice, particularly having regard to its intersection with existing planning policies and the functions of various actors in the planning system.

The planning system in Scotland has undergone, and is still undergoing, change as we continue to navigate implementation of the Planning (Scotland) Act 2019 and objectives of NPF4. Our members have voiced the need for certainty and clarity in relation to policy implementation as well as the need for plans, policy and guidance to be clear in their intent, purpose, and function, avoiding unnecessary duplication. Many guidance documents have already been developed that support the ambitions of this Draft Just Transition Plan for Transport. Examples include, [Cycling by Design](#) (2021) and [Guidance on Inclusive Design for Town Centres and Busy Streets](#) (2025). We have also long had access to [Designing Streets](#) (2010), albeit this latter guidance document requires updating to more accurately reflect current policies around 20-minute neighbourhoods and addressing the climate crisis and nature emergency. Such existing guidance documents lay the foundations for achieving Scotland's just transition for transport and must form an integral part of any future Just Transition Plan.

In addition to the above, there is a clear opportunity to deliver the spatial benefits of a just transition for transport alongside 20-minute neighbourhoods using new place-based and infrastructure first ways of working embedded in NPF4, as well as through the operationalisation of the Place Principle. For example, NPF4 Policy 13: Sustainable Transport contains recommendations to implement place-based approaches to reduce car-dominance and provide/improve access to active travel infrastructure underpinned by an infrastructure first approach. It is encouraging that the Draft Just Transition Plan intends to make use of place-based solutions, however it fails to mention the importance of taking an infrastructure first approach (no mention is made to "infrastructure first" at all in this document). It also fails to take into consideration the current work being undertaken by local authorities in (for example) the preparation of their Local Development Plans, which will inevitably include considerations of transport infrastructure and achieving NPF4's Just Transition spatial principle and Sustainable Transport policy. The Draft Just Transition Plan refers in its People and Communities: Future Priorities to "Locating and designing new developments in a way which encourages local living, making best use of existing infrastructure and makes sustainable modes the priority for everyday travel". This is a primary and ongoing function of NPF4, but no mention is made in the Draft Just Transition Plan to this important delivery mechanism. It is, therefore, unclear how the Draft Plan dovetails this place-based approach with current planning policy, and what added value it will have for planners in their implementation of NPF4.

We understand that it is not the intention of the draft plan to "set out new, standalone policies", but instead to make "connections between existing and developing policy, and serve as a guide for people across our society, to understand what a just transition means for transport". However, whilst the Draft Just Transition Plan does clearly set out current inequities, challenges, actions and future priorities relating to transport in broad terms, it does not clearly state where responsibility lies in terms of delivering these future priorities, and through what existing and proposed future mechanisms. As such, we do not believe the "connections between existing and developing policy" are made sufficiently clear in the Draft Plan for it to act as an effective linking document. Although we do not disagree with any of the points raised or objectives set out in the Plan, without a clear understanding of how these priorities

will be delivered, by who, through what mechanisms and in what timescales, it is difficult to understand exactly what value the Plan will add to delivering a just transition for transport in Scotland.

Community Engagement

It is encouraging that the Draft Plan is clear that the journey to a Just Transition for Transport will be developed and delivered in partnership with the communities, businesses and workforces most likely to be affected, and that the drafting of this version of the Plan has involved extensive engagement with communities and other stakeholders. We take this opportunity to emphasise the importance of including children and young people in any engagement undertaken to support delivery of a just transition for transport. The Planning (Scotland) Act 2019 introduced a requirement for planning authorities to promote and facilitate the participation of children and young people in the preparation of local development plans, and to carry out play sufficiency assessments to evaluate the adequacy of play opportunities as part of the LDP evidence report. A [Climate Xchange paper published in 2022](#) makes recommendations for the inclusion of children and young people across multiple policy areas to capture their travel needs and behaviours beyond simply their travel to and from education settings, and to promote independent movement from around the age of 12. This is a key component to achieving a just transition for transport in Scotland and cannot be overlooked in any future Just Transition Plan.

RTPI Scotland have [previously advocated](#) for the closer alignment of spatial and community planning to achieve place-based outcomes and we welcome reference to this in the Draft Plan. However, in our view, the Draft Plan should more clearly set out the mechanisms (existing and new) through which communities can engage with and fully embrace their responsibilities for delivering Scotland's just transition for transport. It is also unclear how the Plan enhances and supports existing opportunities for communities to influence transport planning. For example, Local Place Plans (LPPs) introduced by the Planning (Scotland) Act 2019 are community-led spatial plans which draw together local perspectives to shape the future of a local area to address local needs, including transport needs. There is therefore a clear role for LPPs in delivering Scotland's just transition for transport, but this connection is not made within the Draft Plan.

For the Draft Plan to maximise its impact, it is important that it acknowledge what is already being undertaken to achieve the Plan's objectives. This includes understanding what other engagement activities are taking place (including through the LPP and LDP processes) in order to achieve a holistic approach, and to avoid additional (and potentially unnecessary) layers of engagement on potentially time-poor groups, thereby risking participatory fatigue.

It will also be important for the Just Transition Plan to acknowledge the multi-disciplinary and holistic approach necessary to achieve a just transition for transport. This will include the input of built environment professionals – such as planners, urban designers, architects etc. working collaboratively with a range of other sectors, individuals, businesses and communities in a unified way.

Resourcing

In order to deliver the objectives of the Just Transition Plan, it is important that it clearly addresses how the future priorities set out in the Plan will be funded (either through existing or proposed new funding mechanisms). RTPI Scotland have [previously highlighted](#) the challenges faced by the planning profession, with the expenditure and workforce in local authority planning departments continuing to fall.

Addressing the skills and resourcing constraints facing the planning sector is vital to achieving the route map to net zero transport by 2045.

Monitoring

RTPI Scotland supports the adoption of a robust monitoring approach. The Draft Just Transition Plan acknowledges the weaknesses and data gaps associated with some of the current indicators that have been identified. It is important that any future indicators to monitor our progress towards a Just Transition for transport also include indicators to assess our progress towards the creation of 20-minute neighbourhoods. In this regard, we are aware of important work being undertaken by Architecture and Design Scotland and also by the Improvement Service on how to map a 20-minute neighbourhood. This could prove to be a useful additional data source to monitor Scotland's Just Transition that also brings the Place Principle to life. In addition, Hands Up Survey Scotland is another useful data source which assesses how pupils travel to school and nursery across Scotland, providing an excellent indicator for active travel amongst Scotland's school pupils.

Notwithstanding the above, we broadly welcome the proposed development and implementation of a monitoring and evaluation framework that is embedded within and aligns with the National Transport Strategy and future Climate Change Plan monitoring framework. The Draft Plan suggests that updates will be published alongside Transport Strategy monitoring reports every three years, and that the baseline data for indicators will be ready for the next report in 2027 and form the marker for future progress. We would welcome further clarity on how the Plan will adapt, change and improve based on the outcome of these monitoring reports. We also wish to highlight here that there will be an important spatial element to consider when developing suitable indicators. The Draft Plan acknowledges that Scotland's transport system is broad and complex, identifying that the unique challenges faced by rural and island communities are distinct from urban and mainland areas. It will be important for any future monitoring and evaluation framework to take into account these regional variations to ensure a just transition is achieved across the whole of Scotland.