

REGIONAL TRANSPORT STRATEGY

2015-2036
REFRESH

STRATEGIC
ENVIRONMENTAL
ASSESSMENT
POST ADOPTION
STATEMENT



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1 INTRODUCTION

This document is the Post Adoption Statement (PAS) for the Strategic Environmental Assessment (SEA) of the Tactran Regional Transport Strategy (RTS) Refresh. The Finalised RTS Refresh was submitted to Scottish Government Ministers on 7 July 2015, in compliance with the requirements of the Transport (Scotland) Act 2005 and Statutory Guidance on the preparation of Regional Transport Strategies. The Minister for Transport and Islands granted approval 23 July 2015.

The RTS 2008 - 2023 was approved by Scottish Ministers in June 2008 and published in October 2008. Original guidance from the Scottish Government was that a review should be conducted every four years. Subsequent guidance has indicated that RTPs can update or refresh their strategies as they wish.

The RTS Refresh is intended to better integrate the RTS with the new TAYplan Strategic Development Plan (SDP) and Local Development Plan (LDP) system covering the whole Tactran region, and emerging Community Planning Partnership (CPP) Single Outcome Agreements (SOA); to extend the period that it covers to 2036, in line with TAYplan; and take account of the changes which have occurred since approval of the RTS in 2008.

The RTS Refresh notes that the core aims and objectives of the RTS 2008 - 2023 remain consistent and relevant, in terms of the Partnership's statutory role, functions and duties, and aligning with and supporting the achievement of national and local outcomes, as defined in the National Performance Framework and Community Planning Single Outcome Agreements (SOAs). The direction of the RTS 2008 - 2023 is not being changed though it is being extended from 2008 - 2023 to 2036, which aligns it with the TAYplan Strategic Development Plan.

A full SEA was undertaken of the RTS when it was first developed in 2006-8. The scale of refresh means that much of the appraisal work that was carried out for the SEA remains valid. The SEA Environmental Report for the RTS Refresh therefore focused on an appraisal of the proposed changes affecting the RTS since its publication in 2008. Actions and policies contained within the existing RTS for which there was no change proposed were not re-assessed.

The SEA of the RTS Refresh included the following activities:

- taking into account the views of the Consultation Authorities regarding the scope and level of detail that was appropriate for the Environmental Report
- preparing an Environmental Report on the likely significant environmental effects of the Draft RTS Refresh which included consideration of:
 - the relationship with other plans, programmes and strategies, and environmental protection objectives
 - the environmental baseline
 - existing environmental problems, issues and opportunities
 - environmental assessment of the RTS Refresh policies and proposals noting the degree to which these are positive, negative or have a neutral or uncertain effect. Assessment also considered the cumulative effect of the policies and proposals

- proposed mitigation measures
- proposed approach to monitoring the environmental effects of implementation of the RTS Refresh
- consultation on the Environmental Report in parallel with the Draft RTS Refresh.

The adopted RTS Refresh, along with the Environmental Report and Post Adoption Statement, are available on the Tactran website at: <http://www.tactran.gov.uk/strategy.html>. These documents may also be inspected free of charge during office hours at the Tactran offices at: Bordeaux House, 31 Kinnoull Street, Perth, PH1 5EN.

2 KEY FINDINGS OF THE SEA PROCESS

The environmental impact of the detailed strategies or frameworks that have been developed since approval of the RTS 2008 - 2023 are summarised as follows:

The Strategic Connectivity Strategy aims to support the delivery of economic prosperity in the region through seeking improvements to the networks and services that connect Tayside and Central Scotland to the rest of Scotland and the UK, Europe and the world. A number of proposals cover infrastructure the effect of which is uncertain. Rail and inter-city bus and coach and movement of freight by sea have the potential to reduce the environmental impact where transfer is made from road.

The Health and Transport Framework aims to ensure that health and transport provisions are considered in a coordinated manner. The impact is neutral to providing major positive effects.

The Active Travel Strategy aims to improve the active travel network across the region and to promote the most sustainable modes of transport. Its impact will be neutral to providing major positive effects.

The Travel Planning Strategy aims to use travel plans and awareness campaigns to promote more sustainable modes of travel. The impact of the Strategy generally is neutral to positive.

The Buses Strategy aims to ensure that key employment, education, retail and tourism locations are linked to the passenger transport network by a service that meets the needs of the local economy and that everyone across the region has access to a key regional centre where they can access a range of services and facilities. The impact of the Strategy generally is neutral to positive.

The Park & Ride Strategy aims to maximise the potential for enhanced Park & Ride in the region's cities, allowing for longer distance travel by bus and coach and encouraging modal shift in favour of rail through station parking provision. The effect of the Strategy will be neutral to positive in terms of promoting modal shift to bus and train.

The Rail Strategy aims to enhance connectivity within the region and between the region and the rest of Britain, and, recognising rail's efficiency in moving people and goods, contribute to the reduction of transport related environmental impacts. Consequently, the overall impact is positive though in some locations, due to increased numbers of services, some noise and vibration impacts are possible at properties close to the line.

The Freight Strategy aims to improve the efficiency and address the adverse environmental impact of freight operations in the region. The impact is broadly positive in terms of reducing the number of road freight movements in urban areas and encouraging the use of less polluting vehicles. Port and associated development has the potential to reduce environmental impact where transfer of movement is made from road but may generate potentially negative impacts on air quality and the aquatic environment.

The Travel Information Strategy addresses the need to provide travel information covering all modes, incorporating and building on existing initiatives, and promoting and maintaining a comprehensive Travel Information System. The environmental impact is broadly neutral.

Where negative impacts could arise these need to be seen in terms of the overall impacts of the preferred package as a whole, which will reduce congestion and promote sustainable modes.

Overall it is concluded that the RTS Refresh will have no major, identifiable detrimental impacts on the environment. Some negative or uncertain impacts have been identified and mitigation measures explored.

3 CONSULTATION RESPONSES

Consultation has been undertaken throughout the development of the RTS refresh and the SEA, this has been used to adapt the approach to assessment, particularly in response to comments received at the scoping stage.

Consultation on the Environmental Report (ER) was undertaken in parallel with the Draft RTS Refresh. Appendix A sets out the comments received from the SEA Consultation Authorities on the ER, the responses to any suggestions made and how these have been addressed in the updated ER.

Only two responses were received from other stakeholders on the ER, as follows:

- A Dundee resident commented regarding consultation on major projects. The Tactran response was that public consultation will be undertaken as individual projects are developed.
- The Road Haulage Association commented that they recognised the need for environmental improvements and had been working with Transport Scotland and STEP to contribute to the forthcoming Low Emission Strategy for Scotland. With regard to the ER they accepted the contents and noted specific references to freight operations and facilities. Tactran has noted these comments.

4 REASONS FOR ADOPTING THE RTS REFRESH AND ASSESSMENT OF ALTERNATIVES

Alternatives to the RTS were considered during the development of the original Strategy in 2008. As the purpose of the Refresh was not to change the direction of the RTS but rather to incorporate developments in the wider policy framework within which the RTS sits and to align it better with the TAYplan SDP, the objectives of the RTS were not changing and only small changes were made to the sub-Objectives. Consequently no further consideration was given to assessing alternatives to the RTS. Following a

request from the Consultation Authorities a summary of the alternatives considered in the original Strategy was included in Appendix 3 of the ER.

5 REQUIREMENT FOR FURTHER ASSESSMENT

The RTS Refresh identified proposals some of which are outline at this stage and have unknown physical impacts. More detailed assessment, development of clear and deliverable mitigation, and monitoring of construction works will be required for the projects that have been identified in the SEA as having the potential for significant environmental effects.

In progressing infrastructure proposals these will have to be fully considered in line with the principles of STAG (Scottish Transport Appraisal Guidance) which includes appraisal of environmental impacts, in order to identify a preferred option before they can be taken forward. Whilst the precise approach to assessment for such projects will need to be agreed between the relevant competent authority and the proponent organisation(s), it is likely that for at least some, a full Environmental Impact Assessment (EIA) would be required. As a matter of course Tactran will recommend that early consultation be held with the Consultation Authorities for any scheme that is likely to have an adverse effect on the natural and historic environment.

Section 5 of the ER provides guidance for the scoping of topics to be considered in EIAs for detailed projects. The SEA also identified the need for project level Habitat Regulations Appraisals where implementation may impact on European designated sites within the region. Policy SC8 “Support the movement of freight by sea”, in particular has the potential to impact on the Firth of Tay and Eden Estuary Special Protection Area.

6 MONITORING

The approach to monitoring the environmental effects of implementation of the RTS Refresh was outlined in Section 7 of the ER, as amended following responses from the Consultation Authorities. This comprises a series of monitoring indicators against which the predicted significant or uncertain environmental effects of the refreshed RTS can be monitored.

7 SUMMARY

This PAS document has set out the background to the SEA for the Tactran RTS Refresh. It reports on the response to consultation on the Environmental Report. It also considers the reasons for adopting the RTS Refresh and refers to the assessment of alternatives that was undertaken for the original Strategy in 2008.

The PAS outlines the key findings of the SEA process, which are that overall the RTS Refresh will have no major, identifiable detrimental impacts on the environment. Nevertheless, the requirement for further assessment is recognised in progressing detailed projects and monitoring the environmental effects of implementation of the refreshed RTS is proposed.

APPENDIX A COMMENTS FROM THE CONSULTATION AUTHORITIES AND TACTRAN RESPONSE

Name of organisation	Comments	Response
Historic Scotland	The ER sets out clearly the scope and findings of this assessment, and welcome that the comments which we provided at scoping have been taken into account. I am content that the assessment findings for these sites are appropriate in relation to potential effects on the historic environment and have no detailed comments to offer on the ER.	Noted
SEPA	<p>The Environmental Report (ER) provides a satisfactory general assessment of the likely significant environmental effects of the Tactran RTS 2015-2036.</p> <p>The assessment results in an overall positive score, however we consider that some issues which have been reported as potential negative effects in the commentary have been presented as unknown effects in the assessment matrix.</p> <p>We are satisfied that most of our comments on the scoping report have been taken into account and welcome the summary of the actions taken by the Council in Appendix A. We however note that waste (under material assets) is not mentioned in the assessment. A considerable amount of waste can be generated as a result of transport infrastructure and we are disappointed that this was not considered.</p> <p>3. Environmental Baseline</p> <p>In Table 4 in relation to the aquatic environment we welcome the consideration of both surface and groundwater and the reference to the quality of waterbodies, however we note the reference to water quality only when referring to trends. In our scoping response we mentioned the importance to consider the quality of the water environment.</p>	<p>Noted</p> <p>Noted - the assessment will be revisited as interventions are considered in detail in the future.</p> <p>Noted - waste has been added into review of ER.</p> <p>Noted</p>
SEPA (continued)	See comments on Ground Water Dependent Terrestrial Ecosystems (GWDTE) in Section 5 below.	

Name of organisation	Comments	Response
	<p>4. Environmental Issues and Problems</p> <p>Welcome the section related to opportunities in addition to the problems. It is however not clear if any of these opportunities have been identified as enhancements in the assessment. We note that waste is identified as an opportunity and we welcome this.</p> <p>5. Environmental Assessment</p> <p>Table 8 - Environmental Assessment of RTS Refresh policies and proposals provides an accurate assessment of positive effects, which are the majority. We however consider that the negative effects are often ‘hidden’ under the word ‘potential’ and reported as unknown (?) in the assessment.</p> <p>While it is clear that there are significant negative effects with issues associated with Dundee airport, other policies/proposals have potential negative effects but they have been reported as unknown effect. We would have preferred a more precautionary approach in the presentation of the negative effects with therefore more effort involved in the identification of mitigation measures for such results. This is the case for many SC policies (e.g. SC6, SC7, and SC9). We however note and welcome the comment that ‘the severity of these impacts will depend on the design and full environmental impact assessments will be required to determine mitigation requirement’.</p> <p>SC11 and SC13 - Development of Dundee airport and direct routes from Dundee to London. The commentary states: ‘Effects on local air quality from increased number of flights and traffic accessing the airport could have negative potential effects but with mitigation through a carbon offset scheme could become neutral’. We note the reference to a carbon offset scheme, however we do not consider that this can be considered a mitigation measure that can bring the effects to neutral. We would have welcomed a mitigation which directly refers to the reduction to travel (e.g. links to other forms of travel or consideration if direct flights to London from Dundee would result in less travelling from other airports).</p>	<p>Noted</p> <p>Noted - the assessment will be revisited as interventions are considered in detail in the future.</p> <p>Noted</p> <p>Noted - mitigation will be changed to reduction of travel as suggested.</p>

Name of organisation	Comments	Response
SEPA (continued)	<p>In relation to the aquatic environment we consider important the avoidance of Ground Water Dependent Terrestrial Ecosystems (GWDTE), although this is an issue that could be a problem at local level and therefore should be considered, if appropriate, at EIA level. These habitats are protected under the Water Framework Directive (WFD) and may be impacted upon by development through the excavation of soil and bedrock during construction of roads, access tracks, foundations, trenches and borrow pits. Indeed dewatering of below ground activities may cause localised disruption to groundwater flow. This can impact on GWDTEs and nearby abstractions. This is often an issue for wind farms, but it could be relevant for transport infrastructure too.</p> <p>We note that waste has been considered as part of Table 4 – Environmental Baseline, however there is not an objective related to waste in Table 6 and in general waste does not seem to have been considered in the assessment. We asked for a SEA objective for waste to be added in our scoping response.</p> <p>6. Proposed Mitigation</p> <p>Content with the mitigation measures proposed and in particular we support the reference to EIA as a mitigation measure.</p> <p>Note that there is no mitigation for flood risk, maybe this is because avoidance of flood risk is assumed? We would have expected some form of mitigation mentioned for flood risk.</p> <p>As waste has not been considered in the assessment, there is no mitigation proposed. We consider waste a significant issue to be considered for the transport strategy and mitigation measure could have been easily been taken from the opportunities mentioned in page 29.</p> <p>7. Monitoring</p> <p>Consistently with our previous comments, we would have welcomed indicators for waste generated by development and maintenance of transport infrastructure.</p>	<p>Noted - this will be incorporated into the ER.</p> <p>Noted - this will be incorporated into the ER.</p> <p>Noted</p> <p>Noted - as indicated avoidance of flood risk is assumed.</p> <p>Noted - this will be incorporated into the ER.</p> <p>Noted - this will be incorporated into the ER.</p>

Name of organisation	Comments	Response
SEPA (continued)	<p>Appendices</p> <p>We welcome the assessment of alternatives detailed in Appendix C and are satisfied with the residual effects incorporating the mitigation (which is explained in the key comments column) for the three alternatives proposed: Delivering Economic Prosperity (Table 5.15), Connecting Communities and Social Inclusion (Table 5.16) and Environmental Sustainability and Health and Well-being (Table 5.17). We are however unclear on why there are no SEA objectives for Air, Soil and Water, even though it was agreed at scoping stage that all SEA topics should be scoped in. The alternatives should be assessed at the same level as the preferred option.</p>	<p>It needs to be stressed that this SEA is being undertaken on the Refresh of the RTS. The RTS adopted in 2008 was the subject of a full SEA. Appendix C is taken from that Assessment. The current SEA is in proportion to the scale of the refresh of the strategy that is being undertaken. Objectives and Key Strategic Themes contained within the existing RTS for which there is no change proposed, have not been re-assessed, as the assessment carried out in the SEA of the RTS in 2008 remains valid.</p>
Scottish Natural Heritage	<p>5. Environmental Assessment Habitats Regulations Appraisal</p> <p>The ER refers to a shift to movement of freight by sea rather than road at several points. We agree that in terms of environmental effects arising from road transport, the assessment is correct in identifying this as generally positive. However, in reference to Table 8, policy/proposal SC9 it is not clear that the neutral assessment against the Biodiversity topic has considered the potential effect of sea freight on European designated sites. For example, growth of port facilities would need to be considered in relation to conservation objectives for Firth of Tay and Eden Estuary Special Protection Area (SPA) and Special Area of Conservation (SAC) as a minimum.</p> <p>The likelihood of proposals having an adverse effect on these sites will depend in large part on proposed changes to existing ports and frequency/type of traffic. Nevertheless, the need for project level Habitats Regulations Appraisal (HRA) as well as EIA should be clearly flagged. On that basis, we suggest that the assessment for Biodiversity under policy/proposal SC9 would more accurately be presented as unknown rather than neutral.</p>	<p>Noted the assessment will be changed as suggested and additional explanatory text added.</p> <p>Noted - this will be changed as suggested.</p>

Name of organisation	Comments	Response
Scottish Natural Heritage (continued)	<p>Active travel</p> <p>Cross-referencing relevant policies/proposals such as AT7 and PR8 demonstrates that the Park & Ride strategy is looking beyond the current approach to such provision, which is focused on driving to the interchange before switching to bus or train. The detail of these policies/proposals in Table 8 indicates that active travel networks and cycle parking will be planned into Park & Ride sites in the Tactran area. We welcome this integrated approach and suggest that this links well with policy in the emerging TAYplan Proposed Plan in addition to national policy such as A Long-Term Vision for Active Travel in Scotland.</p> <p>Assuming that our interpretation of policies/proposals AT7 and PR8 is correct, the assessment of the Park & Ride strategy will be more positive for policies/proposals PR5, PR8 and R9 than is currently set out.</p> <p>Policy/proposal PR2 would presumably have a positive effect on Human Health and Safety due to reductions in air pollution, vehicle miles travelled within cities and, if integrated as in AT7 and PR8, due to the health benefits of modal shift to walking and cycling. On that basis, assessment of PR8 should also be reviewed.</p> <p>5.6 Cumulative effects of RTS refresh</p> <p>Table 9 presents a clear overview of cumulative effects. The ‘predicted residual effects’ column is a particularly useful snapshot of the assessment.</p> <p>As discussed above, it should be noted that in the case of the Biodiversity topic, project level HRA may also be required.</p> <p>6. Proposed mitigation</p> <p>The introduction to Section 6: Proposed Mitigation provides a clear link to EIA and the need for robust project level mitigation measures. Following review as discussed above, we would expect the environmental assessment of the policies/proposals to provide an initial direction for scoping EIA topics at the project level.</p>	<p>Noted</p> <p>Assessment to be changed as suggested with explanatory note - note there is no PR9.</p> <p>Assessment to be changed as suggested with explanatory note.</p> <p>Noted</p> <p>Noted - text amended</p> <p>Noted - additional text added in Section 5.7 regarding initial direction for scoping EIA topics at the project level.</p>

Name of organisation	Comments	Response
	<i>Mitigation measures</i> We generally agree with the mitigation set out in Table 10 but again, reference to project level HRA is needed against the second SEA Objective under the Biodiversity topic.	Noted - text amended

