

TAYSIDE AND CENTRAL SCOTLAND TRANSPORT PARTNERSHIP

19 MARCH 2019

GENERAL CONSULTATIONS

REPORT BY SENIOR STRATEGY OFFICER

This report asks the Partnership to approve a response to the Scottish Government's consultation on 'Climate Ready Scotland: Scottish Climate Change Adaptation Programme 2019-2024'; to delegate authority to the Executive Committee to consider and approve responses to the Infrastructure Commission for Scotland consultation 'Initial Call for Evidence and to the Department for Transport's 'Aviation 2050 –the future of UK aviation'; to note responses submitted to Transport Scotland's 'Transportation Noise Action Plan (TNAP) 2019-2023', Office of Road and Rail's 'Improving Assisted Travel – A consultation on changes to guidance for train and station operators on Disabled People's Protection Policy' and Perth & Kinross Council's consultation on a draft 'Crieff Air Quality Action Plan'.

1 RECOMMENDATIONS

1.1 That the Partnership:

- (i) approves the response to the Scottish Government's consultation on 'Climate Ready Scotland: Scottish Climate Change Adaptation Programme 2019-2024', as detailed in Appendix A;
- (ii) delegates authority to the Executive Committee to consider and approve a response to the Infrastructure Commission for Scotland consultation 'Initial Call for Evidence and Contributions' consultation;
- (iii) delegates authority to the Executive Committee to consider and approve a response to the Department for Transport's consultation 'Aviation 2050 – the future of UK aviation';
- (iv) notes the response to Transport Scotland's 'Transportation Noise Action Plan (TNAP) 2019-2023' consultation, as detailed in Appendix B;
- (v) notes the response to the Office of Road and Rail's 'Improving Assisted Travel – A consultation on changes to guidance for train and station operators on Disabled People's Protection Policy', as detailed in Appendix C; and
- (vi) notes the response to Perth & Kinross Council's consultation on a draft 'Crieff Air Quality Action Plan', as detailed in Appendix D'.

2 BACKGROUND

- 2.1 On 12 February 2019, the Scottish Government issued '[Climate Ready Scotland: Scottish Climate Change Adaptation Programme 2019-2024: A Consultation Draft](#)' requesting responses by 9 April 2019.
- 2.2 On 6 March, the Infrastructure Commission for Scotland issued an '[Initial Call for Evidence and Contributions](#)' requesting responses by 3rd May 2019;
- 2.3 On 17 December 2018, Department of Transport issued consultation on '[Aviation 2050 – the future of aviation](#)', requesting responses by 20 June 2019.
- 2.4 Transport Scotland issued a consultation on a [Transportation Noise Action Plan](#) on 5 December 2018, with responses requested by 16 January, 2019. The Transportation Noise Action Plan covers those areas not covered by the Draft Noise Action Plans for the four largest agglomerations (including Dundee).
- 2.5 The Office of Road and Rail (ORR) issued a consultation on '[Improving Assisted Travel – A consultation on changes to guidance for train and station operators on Disabled People's Protection Policy](#)' on 14 November 2018, and have requested responses to be submitted by 18 January 2019.
- 2.6 At its meeting on 18 December 2018, the Partnership agreed to delegate authority to the Executive Committee to consider and approve the Tactran response to both of these consultations (Report RTP/18/47 refers).
- 2.7 At its meeting on 18 December 2018, the Partnership was advised orally that Perth & Kinross Council intended to undertake consultation on a [draft Crieff Air Quality Action Plan \(AQAP\)](#) and agreed to delegate authority to the Executive Committee to consider and approve Tactran's response. This consultation was issued on 7 January 2019 requesting responses by 18 February 2019.
- 2.8 Strathclyde Partnership for Transport have commenced a review of their [Regional Transport Strategy](#).

3 DISCUSSION

Scottish Government 'Climate Ready Scotland: Scottish Climate Change Adaptation Programme 2019-2024: A Consultation Draft'

- 3.1 Programme for Government 2018 committed the Scottish Government to develop a new five-year Climate Change Adaptation Programme for Scotland. The new Adaptation Programme will build on progress made under our 2009 Adaptation Framework and our first statutory Adaptation Programme in 2014. The new Programme will take into account the latest Climate Change Risk Assessment published in 2017 and assessments of the current Programme by our independent advisers, the Adaptation Sub-Committee of the Committee on Climate Change.
- 3.2 The Scottish Government wants to hear views on the draft Programme: its vision, outcomes, sub-outcomes and the policies in place to deliver these, as well as how we should monitor progress. The feedback will be used to develop the Programme for launch in autumn 2019.
- 3.3 It is recommended that, by and large, the proposed Adaptation Programme be supported. The consultation does however propose including in the programme behavioural changes that can reduce the severity of the consequences of climate change. From the transport policy perspective, it is suggested that including behaviour changes that can reduce the severity of climate change overlaps with the programmes of the Climate Change Plan to reduce greenhouse gas emissions. Hence, subject to the governance regimes of both the Climate Change Plan and the Climate Change Adaptation Programme, this could cause confusion in terms of who will be responsible for governance of these specific actions.
- 3.4 The proposed response is including as Appendix A.

Infrastructure Commission for Scotland

- 3.5 The [Infrastructure Commission for Scotland](#) was proposed as part of the Scottish Government's Programme for Government in September 2018. The remit for the Commission was set out on 11 December 2018 by the Cabinet Secretary for Transport, Infrastructure and Connectivity, and its key requirements established as:
 - The Commission is to provide an independent assessment of the long term 30-year strategy for infrastructure to meet the future economic growth and societal needs of Scotland. This will support the Scottish Government's delivery of its National Infrastructure Mission and development of the next Infrastructure Investment Plan for the five years ahead. The Commission will advise on the key strategic and early foundation investments to significantly boost economic growth and support delivery of Scotland's low carbon objectives and achievement of our climate change targets.

- Following the completion of this report, the Commission will be asked to provide advice to ministers on the delivery of infrastructure in Scotland, including the possible creation of a Scottish National Infrastructure Company.
- 3.6 As a first stage of engagement, the Commission would like to invite written contributions to inform its initial evidence gathering and analysis on the issues and challenges set out in the ‘Initial Call for Evidence and Contributions’
- 3.7 The first report of the Commission will be published in December 2019, and its second report in July 2020.

Aviation 2050 – The Future of Aviation

- 3.8 The Department for Transport is seeking feedback on its green paper which outlines proposals for a new aviation strategy. The strategy will set out the challenges and opportunities for aviation to 2050 and beyond and will emphasise the significance of aviation to the UK economy and regional growth.
- 3.9 The strategy will focus on:
- developing a partnership for sustainable growth which meets rising passenger demand, balanced with action to reduce environmental and community impacts
 - improving the passenger experience, including through technology and innovation, a new passenger charter and action to reduce delays at the border
 - building on the UK’s success to establish new connections across the world and create greater choice for consumers
- 3.10 A final white paper version of the aviation strategy will be published later in 2019.
- 3.11 Tactran’s response will be informed by the work proposed for the Tay Cities Aviation Study.

Consultation responses for noting

- 3.12 Responses to Transport Scotland’s ‘Transportation Noise Action Plan (TNAP) 2019-2023’; Office of Road and Rail’s ‘Improving Assisted Travel – A consultation on changes to guidance for train and station operators on Disabled People’s Protection Policy and Perth & Kinross Council’s consultation on a draft ‘Crieff Air Quality Action Plan’ have all being approved by the Executive Committee and submitted to the relevant organisation since the Partnership meeting on 18 December 2019 and are included as Appendix B, C and D respectively for noting.

SPT Regional Transport Strategy Review

- 3.13 Strathclyde Partnership for Transport (SPT) is preparing a new Regional Transport Strategy for the Strathclyde area. The RTS will set out a new long term vision for an improved transport system to underpin a more sustainable and growing economy, enable a healthier and more inclusive society and reduce the impact of transport on the environment. The new RTS will be developed through an objective-led process in line with Scottish Transport Appraisal Guidance (STAG), drawing upon a wide range of evidence and experiences to achieve a shared approach to delivering our transport future.
- 3.14 SPT expect to have a new RTS in place by 2021. During the two and a half years it takes to prepare the RTS, SPT will be working with partners and stakeholders and listening to members of the public in order to gather new evidence, set new regional objectives for transport and to achieve a more connected, accessible and green future for everyone.
- 3.15 It is proposed that officers keep the Partnership up to date with any progress in developing the SPT RTS which has any consequences for the Tactran region.

4 CONSULTATIONS

- 4.1 The draft and submitted responses detailed in appendices to this report have been prepared in consultation with relevant officers from constituent Councils.

5 RESOURCE IMPLICATIONS

- 5.1 This report has no direct resource implications.

6 EQUALITIES IMPLICATIONS

- 6.1 This report has been screened for any policy implications in respect of Equality Impact Assessment and no material issues have been identified.

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NOTE

The following background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973 (and not containing confidential or exempt information) were relied on to a material extent in preparing the above Report:

Report to Tactran Partnership 'General Consultations' RTP/18/47, 18 December, 2019

Report to Tactran Executive Committee 'Consultations' RTP/19/01, 8 January, 2019

Report to Tactran Executive Committee 'Crieff Air Quality Action Plan Consultation' RTP/19/02, 5 February 2019

Transport Scotland 'Transportation Noise Action Plan 2019-203: Consultation Document' December 2018

Office of Road and Rail 'Improving Assisted Travel – A consultation on changes to guidance for train and station operators on Disabled People's Protection Policy' November 2018

Perth and Kinross Council 'Draft Crieff Air Quality Action Plan'

Department for Transport 'Aviation 2050 — the future of UK aviation'

Infrastructure Commission for Scotland 'Initial Call for Evidence and Contributions' March 2019

Questionnaire Scotland's Climate Change Adaptation Programme 2019-2024

Respondents should take into consideration the information provided in this document alongside any other knowledge or personal experiences that could be relevant. All opinions are welcome. We ask that you try to answer all the questions in each section, however, if you are unable to answer any question then please feel free to move on to the next. There is a comments box below each question to allow you to set out your reasoning and provide general comments

Q1. Do you agree with our outcome-based approach to adaptation in Scotland?

Yes

Any comments: We would suggest that most programmes should be guided by an outcome-based approach

Q2. Do you agree that a National Forum on Adaptation should be established to facilitate discussion on climate change adaptation?

Yes

Any comments: We would suggest that some group takes responsibility for reviewing progress, holding those responsible for delivering the programme to account, and identifying areas for improvement. Suggest that whether this is a separate body to that which undertakes a similar role for the Climate Change Plan (i.e. The Climate Change Plan Governance Body) depends on the level of 'overlap' between the adaptation programme and the programme to reduce greenhouse gas emissions.

Q3. Do you agree that climate change adaptation behaviours should be included in the Programme?

Unsure

Any comments: The final paragraph of p10 which considers 'Climate Change Adaption Behaviour Change' makes reference to including behaviour change to "...reduce the severity of the negative consequences of climate change". We are concerned that in doing so, confusion may be introduced between managing the 'adaptation' programme and the programmes included in the Climate Change Plan to 'reduce greenhouse gas emissions'.

Accept that in terms of 'adapting' to climate change, we do want to 'adapt' behaviours to minimise the severity of the consequences of climate change, however, from a transport policy perspective, most of these changes in behaviour relate to actions to 'reduce greenhouse gas emissions'. Nonetheless, we acknowledge that society also needs learn to adapt behaviours to be responsive (e.g. be flexible) to some of the adverse consequence of climate change such as extreme weather events (e.g. not to travel when appropriate).

Q4. Do you agree that an integrated approach should be taken to monitoring and evaluation?

Yes

Any comments: The framework for Monitoring and Evaluation is supported.

Q5. Do you agree with our long term vision for adapting to climate change in Scotland?

Yes

Q6. Does the Programme identify the right outcomes for Scotland over the next five years?

Yes: Outcomes 1,2,3,4,6,7 are supported

Unsure: Outcome 5

Any Comments: As a Regional Transport Partnership, Tactran have no comment to make on Outcome 5 'Our natural environment is enjoyed, protected and enhanced and has increased resilience to climate change' i.e. whether we should intervene with the natural environment to make it resilient from (nature's responses to) climate change.

Q7. Are there any additional policies that should be included in the outcomes?

Unsure

Any comments: No comment

Q8. What are your views on the accuracy and scope of the information used to describe the SEA environmental baseline set out in the Environmental Report? (Please give details of additional relevant sources)

Any comments: No comment

Q9. What are your views on the predicted environmental effects as set out in the Environmental Report?

Any comments: no comment

Q10. What are your views on the findings of the SEA and the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?

Any comments: No comment

Proposed response to Transport Scotland's 'Transportation Noise Action Plan (TNAP) 2019 – 2023' Consultation

Question 1

The overall approach of the TNAP is as follows.

- ***Firstly to continue to ensure noise management is incorporated into all transport-related activities, across the spectrum of design, construction, maintenance, policy, and point-to-point transportation activities.***
- ***Secondly, to further seek to manage noise levels where necessary and practicable at Noise Management Areas (NMAs), and aim to preserve environmental noise quality where it is good.***

What are your views on this overall approach?

Tactran welcomes the holistic approach to the management of transport based noise and the recognition that many of the mitigation/noise reduction measures can be incorporated into existing processes and work streams. However, greater clarity should be provided on who is responsible for specific areas of work and more detail provided regarding the specific roles to be taken by the various partners and stakeholders.

Question 2

The TNAP prioritisation process, including the Building Prioritisation Score (BPS), Source Prioritisation Score (SPS), and Candidate Noise Management Areas (CNMAs), is defined in Section 4 of the TNAP.

What are your views on the prioritisation process?

In terms of the analysis, mapping, evaluation and auditing the prioritisation process is clear and comprehensive and provides a robust evidence-based decision making tool. However, there is less clarity on the "actions" part of the matrix and more details should be provided regarding the processes to be adopted for cost benefit analysis and determining the source of funding for any resultant actions associated with a NMA.

Question 3

The TNAP has 4 key objectives, with a series of actions (16 in total) ascribed to these.

What is your view on the TNAP Key Objectives and actions?

The objectives and actions within the TNAP should better reflect other, related transport strategies and action plans. For example, reflecting that increasing mode share of active and sustainable travel will reduce car usage and have a positive impact on reducing transport related noise.

Also, the investment in EV infrastructure and promotion of EV's within NMAs will help increase the uptake of quieter vehicles. Existing AQMA Action Plans and the impact that the introduction of LEZs may have on traffic volumes should be considered as part of the action plan to ensure that any synergies can be fully exploited.

Question 4

The options for managing noise within the TNAP were developed using the source, pathway, receptor model.

Do you consider there has been anything left out of the action plan using this approach? If so, what do you consider has been omitted?

The approach adopted would appear to be appropriate for the subject matter, however greater emphasis could perhaps be placed on the source by looking at the impact of mode shift and alternative vehicles technologies as noted in question 3.

Question 5

Action 1D of the TNAP is committed to establishing and operating a Noise Inspection Panel (NISP) to assess issues on Transport Noise from a source, transmission, receptor perspective to support delivery of the TNAP, and report yearly on progress.

What are the key issues you consider should be discussed at the Noise Inspection Panel?

A key issue for the NISP is to ensure that actions outlined within the TNAP are being delivered and that commitments relating to the control of noise are being realised. As part of that, any new transport scheme that has been delivered in the preceding year should be assessed to ensure that noise management has been properly considered.

While the action plan states that development control has a part to play in improving outcomes, it is important that the NISP includes a review and assessment of planning authorities policies and processes to ensure that noise mitigation measures are embedded as part of new development proposals occurring within NMAs. This should also include requesting from planning authorities an annual return detailing developments that have been approved within NMAs.

The NISP should also continually review assumptions made during the prioritisation and cost benefit processes to ensure that these remain correct and 'best value' has been achieved and appropriate outcomes have been delivered.

Question 6

There are no Quiet Areas within the TNAP, however the actions within the TNAP will take account of any defined Quiet Areas and related actions.

Do you consider enough is being done to protect Quiet Areas?

Any defined quiet areas should be highlighted within local development plans to ensure that any development or infrastructure project that has the potential to increase transport related noise takes cognisance of the QA.

Question 7

Our approach in TNAP delivery will be to work collaboratively in partnership with others. How can other stakeholders play their part in supporting delivery of the TNAP?

It is important that stakeholders and partners integrate the TNAP into other complementary strategies and plans to ensure that benefits can be maximised. However, as noted in question 1, greater clarity should be provided on who is responsible for specific areas of work and more detail provided regarding the specific roles to be taken by the various partners and stakeholders.

**ORR ‘Improving Assisted Travel – A consultation on changes to guidance for train and station operators on Disabled People’s Protection Policy’
Response from Tayside and Central Scotland Transport Partnership (Tactran)**

1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

The principle of a change in title is supported. The guidance should be clearly aimed at those that require support, which includes people who are both elderly and have temporary impairments. However, both ‘inclusive’ and ‘accessible’ can easily have broader interpretations (for example interpretations could include, respectively, ‘all sectors of society that people may identify themselves with’ and ‘cost’). It may be that using both terms helps imply the intended focus of the policy, i.e. ‘Access and Inclusion Travel Policy’.

2. What are your views on our proposal to replace the current passenger facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

(a) Is there anything you consider is missing from the required content?

The proposed required content of the information documents is supported. In addition it is suggested:

- It’s perhaps helpful to give readers an indication of who the available support is available for without being overly prescriptive. In particular, emphasising that it is not just for people with permanent physical mobility difficulties, but also those with silent/hidden difficulties. Hence giving the broader group of people who may require assistance the confidence to ask for such.
- The information to be provided includes “temporary reductions”. Whilst this principle is supported, it is suggested that the information is clear in what temporary reductions may be reasonably covered (i.e. planned work. Lifts or toilets being ‘out of order’ within x hrs (1 day?) of the malfunction
- Information regarding services which are expected to be exceptionally busy due to a major event useful may also be useful information for any passengers booking in advance
- It is clear that the information is available in different languages

(b) Is this still a meaningful title for this leaflet?

Suggest that the title ‘Making Rail Accessible: Helping older and disabled people’, whilst clear and concise, does not reflect the broader group of people who may require assistance. Suggest that the title of the leaflet should reflect the title of the policy guidance, i.e. by making reference to the title of the overarching policy document (See Q1).

3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

Support the recommendation, especially as operators are required to provide information on facilities to all passengers. However this is provided that information is publicised and available in alternative formats.

It is also vital to alert all users, especially those with learning or mobility difficulties about changes to a station. Suggest that operators and/or network rail develop communication strategies to let local users know about changes as soon as possible (see also Q13 and Q19 re stakeholder communications lists/methods of communication).

4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

Support proposed changes.

In addition, with regard to seeking feedback from local groups, suggest that operators are required to demonstrate how they have sought feedback, in addition to confirming that they have sought feedback. (There are potentially numerous groups that could be consulted, but suggest that we can only work towards having the best representative sample if we are clear as to who is being consulted and how).

5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The five grade classification of whether stations have step-free access is supported. However, step-free access does not make a station accessible. So, in line with the ethos of the exercise of giving people the right information as reasonably possible to inform their travel choice, operators should be encouraged to provide other indicators of accessibility (e.g. signage, digital access, information, staff support, as well as quantifying some of the criteria used (e.g. length of ramps)) within the station infrastructure information where reasonably possible (see Q2)(NB this may be more easily done, and may be more necessary, for smaller stations where assistance may not always be available).

6. What are your views on the proposed introduction of mandatory checks on station accessibility information at the assistance booking stage?

Proposals are supported.

However, attention should also be paid to not only what assistance may be in the station, but also for helping the passenger between the station and an onward mode of travel such as a taxi or a bus.

7. What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

Some form of passenger best practice guidance is supported. Users as well as providers have a role to play in making any system work as smoothly as possible. However, need to be very careful that there are not unreasonable expectations placed on customers that would put them off travel.

NB the examples given in the guidance in relation to 'Passengers failing to receive basic information on what to expect at stations and the actions they can take to help assistance staff' relate principally to customers trying to be as independent as possible (or accepting offered assistance from fellow passengers), which is only natural. The particular problem quoted appears to be how the system records whether assistance was delivered and the efficiency of staff time, rather than whether someone completed their trip. (Some of) This issue may be addressed in

other ways, for example, by asking passengers to notify station staff that assistance is no longer required as soon as possible after alighting from a train.

8. What are your views on the proposed introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

Proposal is supported.

9. What are your views on the proposed introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

Proposal is supported. It is also suggested that passengers are reminded at the time about what information has been forwarded, to provide additional comfort as well as reinforcing what they should be looking out for at their destination.

10. What are your views on our training proposals? Do you agree with the proposed outline content?

The training proposals are supported. It should be ensured that input from representatives of hidden/silent disabilities should be sought in developing the policy. People who fall in to this group may have more difficulty coping with change and less confidence/ability to seek assistance or support. Staff training needs to cover that.

11 Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**

Given the level of staff training and awareness that should already exist two years should be adequate, and indeed operators should be encouraged to complete the training as soon as possible.

- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

Suggest that refresher training (over and above the minimum training requirements) should be tailored to the priority areas for improvement for each individual operator. Most passengers will undertake most of their trips using their 'local' operator(s). And while consistency of service across the country is important, getting most trips right for most passengers most of the time is perhaps the first goal.

12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

Recommendations are supported. However, as noted in the consultation greater focus needs to be placed on providing information to people who assume that rail travel would not work for them being made aware of the options that do exist. As noted elsewhere, this includes getting the stakeholder communication and engagement list right, and this includes people with silent/hidden disabilities (See Q13).

13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

Proposal is supported.

However, for Passenger Assist to work the key issue is for operators to ensure that sufficient staffing is timeous and available.

As reflected in the text (para 5.10), not all operators have a group of passengers / organisations with which to discuss issues. Such a circulation list would assist with implementing the proposals included under Q13 as well as Q11 (groups to involve in training) and Q3 (i.e. changes to facilities)

14. What are your views on the proposal for more prescriptive website requirements?

Supported

15. What are your views on the three options we have identified for reducing the notice period for booked assistance?

A key objective of the proposal is to give customers greater confidence that assistance will be available compared to the customer just turning up. This has advantages for both the user and the provider.

While it is suggested that consistency should be sought around the shortest workable option for a operators, it would be wrong if the shortest notice period for operators like MerseyRail, TransPennine Express and Scotrail are extended. Again, we should remember that:

- most trips are made using a passengers 'local' operator(s) and
- the majority of rail trips are planned and booking assistance is often done well in advance of the shortest notice period.

16. How do you consider any reduction might be phased in? If so, how might this be implemented?

Given the resource issues to be faced in introducing the likely preferred option for passengers (i.e. 'Option 3: A minimum of 2hrs before travel'), it is assumed that phasing the introduction of minimum earlier booking times is the only reasonable course of action. The timescales proposed in para 6.24 remain challenging, especially as it is assumed these will result in unplanned service improvements not included in all current franchises.

Again, the ability of operators to ensure staff are available to assist is critical if the scheme is to work.

17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

As an increasing number of services and stations have fewer staff (i.e. conductor-less trains / un-manned stations) the issue regarding the availability of staff to support assisted travel is likely to increase.

The proposal seeks to provide passengers with up to date information at every stage of the journey, so they know what assistance will be given. However, where this means the journey may take significantly longer than expected (i.e. the passenger has had to travel to a station where there is assistance and then catch a taxi back to their destination) this may be considered unreasonable.

There may need to be the ability for greater flexibility of staff at manned stations to be able to attend booked assistance at stations where there is neither train or station staff. Whilst there are clearly resource implications of this, it is likely that passengers will argue that this needs to set against staff resource savings on such services and at such stations.

See also Q19 regarding the technology used to communicate with customers.

18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

Proposal is supported.

19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

Supported. In addition, it is recommended that the guidance should also note that communications technology continues to change, and whilst minimum levels of service must be prescribed and provided, operators are encouraged and given flexibility to adapt communications methods as technology habits and trends adapt. Indeed it may be useful to keep this particular element of the guidance under regular (e.g. 2 yearly) review.

20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

The Equality Act requires service providers to ensure that they have considered and taken reasonable action to ensure that the service they provide is accessible. The rail operator is still responsible for providing the service (of transport between two rail stations) even when this is a rail replacement bus service. Accordingly, it is suggested that in addition to the rail operators working with bus/coach/taxi operators to provide and improve accessible substitute and alternative transport as proposed in the guidance, they should also be required to set out the level of accessible substitute and alternative transport they seek to provide (and if and why it may not be possible to provide accessible transport).

21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

Proposal is supported.

22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

Proposal is supported. However, suggest that the name of any scooter 'permit' scheme may result in staff and passengers seeing it as a requirement for permission to use a scooter, rather than, as we hope it is intended, as a helpful guide to passengers and staff that a particular scooter proposes no issues to carriage.

As stated the ability of certain stations/services to accommodate certain scooters can be clarified in the passenger information covered under Q2.

23. What are your views on our proposals to clarify the guidance to ensure:
(a) passengers do not unknowingly purchase tickets they cannot make full use of; and
(b) operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

Proposals are supported. It may be worth noting that tools to enable delivery of these objectives (of providing accurate and up to date information) are closely related to:

- adoption of suitable communications technology (Q19)
- information on station / services (Q2)

24. Do you have any comments on the good practice areas listed? Are there other good practices that should be identified in the revised Guidance?

The guidance document seeks to raise the standard and improve the consistency of providing 'Inclusive and Accessible' Travel across the rail network. In doing so, we must be careful not to restrict examples of best practice by operators. Indeed, it is hoped that the higher expectations placed on operators by the guidance results in a greater number of best practice examples which should be shared and considered.

Crieff Air Quality Action Plan Consultation Questionnaire Response from Tactran

Section A: General

1) What is your postcode

PH1 5EN

2) What are your thoughts regarding air quality in Crieff and the surrounding areas?

Tactran note the air quality issues along a stretch of the High Street in Crieff as identified by air quality monitoring.

3) What are your thoughts regarding road traffic congestion along the high street corridor?

Crieff High Street is a relatively narrow town centre sitting on the A85 Trunk Road. Accordingly there is limited space for the street to accommodate a number of functions:

- Strategic east/west traffic between Perth and Locheearnhead, which inevitably includes freight, timber and tourist traffic, all of which are essential to Scotland's (rural) economy
- Parking and loading for the businesses on the High Street
- Bus stops and pedestrian crossings

It is therefore likely that at some periods, such high streets will suffer some degree of traffic congestion. Accordingly, if congestion is to be reduced, the extent of one or more of these functions needs to be reduced (see q4/5). It should however be noted that reducing congestion would not be the only way to improve air quality on the High Street.

Section B: Moving Traffic Away From the AQMA

4) Tell us how much you agree with the measure of rerouting some of the traffic that uses the A85 to use only local roads thus moving traffic away from the area? 1 Strongly Disagree - 5 Strongly Agree

Disagree. It is difficult to envisage that much traffic could be re-routed to local roads without a significant impact on the local road network and surrounding streets.

5) Tell us how much you agree that the AQAP should consider discouraging parking within, or in close proximity to the AQMA? 1 Strongly Disagree - 5 Strongly Agree

Agree. Some type of parking restrictions to assist the flow of traffic along the high street would appear to be a deliverable intervention that could assist as part of a package of measures. Any changes to parking would need to be adequately enforced.

Section C: Traffic Management – Optimisation of Traffic Movement through the AQMA

6) Tell us how much you agree with the possible provision of ‘SMART’ parking technology in Crieff? (SMART parking technology gives real time information about spaces to enable users to find spaces quickly and easily). 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Investigation of any measure to manage parking on the High Street whilst minimising the number of spaces lost should be an option to consider.

7) Tell us how much you agree with PKC improving the ease of movement through the AQMA to reduce local emissions and concentrations? (This would be done by improving traffic management systems). 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Investigation of any measure to improve flow on the High Street should be considered.

8) Tell us how much you agree with the possibility of action being introduced to take enforcement action against idling vehicles? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Investigation of any measure discourage idling vehicles should be considered.

9) Tell us how much you agree with a review into the locations and timings of the pedestrian crossings? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. However, recognising the road user hierarchies that should be considered in a high street, any review of the location of crossings to better reflect pedestrian desire lines (and hence reduce pedestrians crossing at ‘inappropriate’ locations) may not assist the flow of traffic.

10) Tell us how much you agree with the proposed measure of holding/gating traffic as a way of minimising congestion within the AQMA? (Holding the traffic back to allow a better flow). 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. This is a well-used technique to improve the smooth flow of traffic (admittedly on longer stretches of road), however the impacts on the overall network would need to be assessed through appropriate modelling.

11) Tell us how much you agree with the possibility of limiting or prioritising traffic turning right (onto Comrie Street) from the high street corridor? 1 Strongly Disagree - 5 Strongly Agree

Neither agree or disagree. Would defer any view until results of traffic modelling are known.

Section D: Reducing the Emissions from the Source

12) Tell us how much you agree with PKC encouraging private and public operators (such as local buses and HGVs) within/serving the Crieff area to pursue cleaner vehicles? 1 Strongly Disagree - 5 Strongly Agree

Agree. Wider legislation is aimed at encouraging the take up of cleaner vehicles. Any initiatives to support local operators who use the High Street frequently can only assist.

It is noted that PKC have installed EV charging facilities in one of the off street car parks and expanding this facility should be considered. Local incentives such as free/preferential parking could also increase the uptake in ULEVs.

13) Tell us how much you agree with the development and continuation of a local/voluntary bus quality partnership which focusses on 'best practice' in regards to lowering emissions for bus operators? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Any initiatives to support local operators to use cleaner vehicles who use the High Street frequently can only assist. There may also be more opportunities to explore partnership working with operators with the proposed changes contained within the Transport (Scotland) Bill.

14) Tell us how much you agree with the introduction of travel plans for schools to promote sustainable travel? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. It is likely that a significant proportion of the traffic at peak times on Crieff High Street is as a consequence of the 'school run'. Encouraging children that are able (i.e. within a reasonable distance) to walk or cycle to school should be encouraged, and initiatives to reduce car trips for those that are out with walking or cycling distance (and below the 3 mile school transport) should be explored.

15) Tell us how much you agree with enhancing public transport provided within Crieff to encourage the modal shift away from cars? 1 Strongly Disagree - 5 Strongly Agree

Agree. While a laudable aim, it will likely only have an impact on vehicles travelling to or through the high street, therefore:

- Enhancement of the Crieff town bus may assist;
- The extent to which enhancement of the bus service between Crieff and Perth will help the AQAP is dependent on the proportion of residents that live at the western end of Crieff.

16) Tell us how much you agree with the introduction of a Low Emission Zone or restricting access to polluting vehicles within the AQMA (Crieff High Street Corridor) ? 1 Strongly Disagree - 5 Strongly Agree

Strongly disagree. Given the fact that the A85 is a trunk road, preventing traffic from using the A85 via Crieff is likely to require significant diversions to traffic either via (a) Braco and Comrie (b) Killin, Kenmore and Aberfeldy or (c) Callander and Doune. These longer routes are likely to result in greater overall emissions and increased costs to drivers/operators, and potentially add to air quality issues in the settlements stated.

17) Tell us how much you agree with the introduction of eco schemes for HGV and bus operators to improve their fleet's environmental performance? (This will help reduce harmful emissions from HGV and bus operators' vehicles by improving the efficiency of their operations). 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Any initiatives to support local operators to use cleaner vehicles who use the High Street frequently, can only assist.

18) Tell us how much you agree with PKC staff undertaking eco-driver training to save fuel and therefore reduce emissions? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Any initiatives to support local fleet users (including the Council) to reduce emissions, can only assist.

Section E: Reducing Emissions by Reducing Demand for Traffic

19) Tell us how much you agree with the promotion of car sharing and the development of car clubs? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Any initiative to encourage locals to reduce the impact of traffic on the High Street can only assist.

20) Tell us how much you agree with the introduction of travel plans for large institutions and businesses to promote sustainable travel? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Any initiative to encourage local institutions and businesses to reduce the impact of traffic on the High Street can only assist. However as there are a limited number of 'large' institutions and businesses in the Crieff area that could be targeted, organisations that are out with the immediate area but still contribute to the Air Quality issues in Crieff could also be targeted.

21) Tell us how much you agree with the creation of a corporate travel plan for PKC in order to reduce emissions caused by PKC staff? (This will encourage more sustainable forms of travel). 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Any initiative to encourage local institutions and businesses to reduce the impact of traffic on the High Street can only assist.

22) Tell us how much you agree with PKC encouraging the Crieff community to cycle and walk as opposed to using private vehicles? This would be achieved through measures such as improving pedestrian facilities and promoting the cycling/walking networks available. 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Any initiative to encourage locals to reduce the impact of traffic on the High Street can only assist. Tactran notes the work that was undertaken by PKC through the 'Crieff on the Go' project and continues through the Tayside-wide 'Get on the Go' promotion and this should be built on and developed along with the area wide active travel strategy.

23) Tell us how much you agree with the provision of extra buses/increased bus routes both in and serving Crieff? 1 Strongly Disagree - 5 Strongly Agree

Agree. While a laudable aim, it will likely only have an impact on vehicles travelling to or through the high street, therefore:

- Enhancement of the Crieff town bus may assist;
- The extent to which enhancement of the bus service between Crieff and Perth will help the AQAP is dependent on the proportion of residents that live at the western end of Crieff.

24) Tell us how much you agree with PKC undertaking further social marketing campaigns such as 'Crieff on the Go' to promote active travel? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Any initiative to encourage locals to reduce the impact of traffic on the High Street can only assist and as noted under question 22, this should also build on the PKC Active Travel Strategy. Any active travel campaign should also be assessed for effectiveness to determine the impact on outcomes that it has had.

25) Tell us how much you agree with PKC raising awareness of local air quality and the AQMA through schools and community meetings? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Any initiative to encourage locals to reduce the impact of traffic on the High Street can only assist. Any such initiatives will only work if there is a broader understanding of why changes in behaviour may benefit not only the town but also the individual.

26) Tell us how much you agree with an audit on the cycling and walking infrastructure in Crieff being undertaken followed by the creation of a walking and cycling infrastructure action plan? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Tactran, in partnership with Perth & Kinross Council, undertook an Active Travel Audit of Crieff during 2017. This identified a potential strategic walking and cycling network for Crieff and associated action plan. Tactran would welcome further partnership working with Perth & Kinross Council to further develop measures that are in line with the aims of the AQAP for implementation.

27) Tell us how much you agree with the provision of PKC 'Champions' to promote alternatives to car transportation methods by engaging with local walking and cycling groups, encouraging active travel within Crieff? 1 Strongly Disagree - 5 Strongly Agree

Agree. Any initiative to encourage locals to reduce the impact of traffic on the High Street can only assist.

Section F: Reduction from Non-Transport Sources

28) Tell us how much you agree with minimising developments such as biomass installations to reduce pollution? (Biomass installations burn organic waste to generate heat and power which releases particulate matter and gases). 1 Strongly Disagree - 5 Strongly Agree

Neither agree or disagree. Where non-transport sources add to the air quality problem within the AQMA, appropriate initiatives should be considered.

Section G: Conclusion

29) Overall, do you feel the AQAP is relevant regarding its proposed actions and purpose?

If the AQAP is to be effective it should prioritise those individual, or packages of, interventions which will have a significant impact on the air quality. Whilst numerous interventions are supported in this questionnaire because they will assist both the objectives of the AQAP and other health and environmental objectives of Perth and Kinross Council, this is not to say that any one of them will solve the problem.

The modelling being undertaken should identify which interventions, or packages of interventions, will be sufficient to address the air quality problem.

The modelling should also identify the extent of the impact of cleaner vehicles (private and commercial) as they continue to be introduced. This will help identify the scale of additional interventions that are required.

30) Do you have any further thoughts or comments to add regarding the AQMA and the AQAP?

If the package of required interventions includes measures which include significant changes to the High Street (e.g. restrictions to on-street parking), then it is suggested that there is likely to be significant public objection. To enable a truly representative opinion from the people of Crieff to be heard to inform Council decisions on the detail and extent of potential changes to the High Street, it is suggested that a 'platform' which encourages the widest debate in Crieff is found (for example engaging people via a 'The Future of Our High Street' exercise). This could also incorporate a programme of wider urban realm improvements to maximise the benefits of any changes to Crieff High Street.