

TAYSIDE AND CENTRAL SCOTLAND TRANSPORT PARTNERSHIP

17 MARCH 2020

GENERAL CONSULTATIONS

REPORT BY STRATEGY OFFICER (STRATEGIC CONNECTIVITY)

This report asks the Partnership: to note responses to Transport Scotland's 'Scotland's Low Emission Zones: Consultation on Regulations and Guidance', Loch Lomond and the Trossachs National Park Authority 'Outdoor Recreation Strategy', NHS Tayside 'Public Health Strategy'. Finally, the report notes the intention to submit officer comments on the Scottish Government's early engagement on National Planning Framework 4 (NPF4)

1 RECOMMENDATIONS

1.1 That the Partnership:

- (i) notes the response approved by the Tactran Executive Committee on 'Scotland's Low Emission Zones: Consultation on Regulations and Guidance';
- (ii) notes the officer comments made in relation to the Loch Lomond and the Trossachs National Park Authority (LLTNPA) Outdoor Recreation Strategy;
- (iii) notes the officer comments made in relation to the NHS Tayside Public Health Strategy consultation.
- (iv) notes the intention to submit officer comments on the Scottish Government's early engagement on National Planning Framework 4 (NPF4)

2 BACKGROUND

- 2.1 The Scottish Government published the consultation document ['Scotland's Low Emission Zones: Consultation on Regulations and Guidance'](#) on 13 December 2019, asking for responses to be submitted by 24 February 2020.
- 2.2 The Loch Lomond & The Trossachs National Park Authority published their [Active Park, Healthy People: Outdoor Recreation Delivery Plan](#) for consultation on the 16 January 2020 with comments to be received by 31 January 2020.
- 2.3 NHS Tayside issued to Community Planning Partnerships a Draft Public Health Strategy with comments to be received by 28 February 2020.
- 2.4 As part of a programme for engagement, the Scottish Government issues a 'Call for Ideas' which opened on 9 January 2020 running until 31 March 2020.

3 DISCUSSION

Scotland's Low Emission Zones: Consultation on Regulations and Guidance

- 3.1 [Scotland's Low Emission Zones: Consultation on Regulations and Guidance](#) provided an opportunity to seek opinions on issues that underpin the operation and delivery of Low Emission Zones (LEZs), including the substantive issues of emission standards, exemptions and penalty charges. A LEZ is defined as a designated area from which a vehicle is prohibited unless it meets the emission standard or is exempt.
- 3.2 In 2018 Scottish Government through its Programme for Government set out the intention to implement LEZs in Scotland 4 main cities of Aberdeen, Dundee, Edinburgh and Glasgow by 2020 and in all Air Quality Management Areas (AQMAs) by 2023. As a result, there has been significant scrutiny of LEZs and air quality in recent years and this has led to the inclusion of LEZs into the Transport (Scotland) Act 2019 in order to provide the legislative framework to design, establish, and operate nationally consistent LEZs. This consultation provided an opportunity to offer views on the key aspects of LEZ Regulations that derive from the Transport (Scotland) Act 2019.
- 3.3 The purpose of this consultation was to set out the proposed arrangements and options related to the nationally consistent LEZ standards which will be set out in regulations in tandem with guidance. The regulations are vital in delivering successful, fair and equitable LEZs.
- 3.4 Chapters 8 and 9 of the consultation document set the scene for LEZs and outline the scope of the consultation. Chapters 10 and 11 outline the proposals for LEZ regulations and guidance, seeking views on a selection of issues such as the emission standards, penalty charge rate, enforcement and exemptions.
- 3.5 Tactran in general is supportive of the implementation of LEZ's and is a member of Dundee Low Emission Zone Delivery Group. The main points of the Tactran response to the consultation are:
- Generally agree with the present-day emission standards proposed for LEZs;
 - Considers that the primary purpose of LEZs is to improve Air Quality and this should include a phased improvement towards zero emissions. This will also contribute to a reduction in greenhouse gas emissions;
 - Considers that a shift to zero or ultra-low emission city centres by 2030 is laudable but is concerned that the challenging timescale brings issues of equity and also for required investment in public transport and road haulage vehicles. It is considered that the date should be more aligned with Scottish Government's Climate Change Plan commitment to phase out the need to buy petrol and diesel engine cars and vans by 2032;
 - Exemptions proposed are agreed and consideration should also be given to emergency voluntary sector vehicles and could also be given to utility emergency repair and accident and breakdown vehicles;

- Penalty charge notices should be consistent across Scotland and charges set to be in line with parking and bus lane enforcement penalty charges;
 - Surcharges should not be imposed for repeat offenders, as it is considered that the surcharge system proposed is overly complex, punitive and complicated to administer;
 - Supports the wide range of consultation and in particular neighbouring Local Authorities and Regional Transport Partnerships as an LEZs influence is regional. For this reason, it is also considered that public consultation should include residents in neighbouring Local Authorities;
 - Agrees with the topical areas for secondary objectives and considers that they need to align with Economic Development Plans, Local and Strategic Development Plans, Local and Regional Transport Strategies, as well as forming an integrated solution with other traffic demand management measures;
 - Considers that penalty charge notice should be used to fund complementary measures to support the objectives of the LEZ and this need not be confined to be within the Local Authority area, but could be used in neighbouring Local Authority areas where there is a direct positive impact on the LEZ objectives;
 - Notes that lower socio-economic groups could be adversely affected as they may not have the means to afford compliant vehicles and may not always have access to alternative travel modes, particularly in rural areas.
- 3.6 The date of submission to Transport Scotland was prior to the next full Partnership meeting and therefore, as provided in the Tactran Scheme of Delegation, the Executive Committee was asked to consider and approve a proposed response to the Transport Scotland consultation.
- 3.7 The Executive Committee approved the response shown in Appendix A which the Partnership Board is now asked to note.
- Loch Lomond & Trossachs National Park Authority – Outdoor Recreation Delivery Plan
- 3.8 The Loch Lomond & The Trossachs National Park Authority published their [Active Park, Healthy People: Outdoor Recreation Delivery Plan](#) for consultation on the 16 December 2019 with comments to be received by 31 January 2020.
- 3.9 The draft Active Park, Healthy People: Outdoor Recreation Delivery Plan sets out the ambitions of Loch Lomond & The Trossachs National Park Authority and its partners for getting more people, more active, more often.
- 3.10 While much of the Delivery Plan focuses on non-transport related subjects, officer comments were made in relation to areas with a direct transport implication.
- 3.11 The Delivery Plan is split into key themes:
- Key theme 1 – A Park for All
 - Key theme 2 – Active and Vibrant Places

- Key theme 3 – Happy and Healthy People
 - Key theme 4 – Connecting Places
 - Key theme 5 – Exploring Further
 - Key theme 6 – Coasts and Water
- 3.12 The consultation questions focused on each key theme within the draft plan and asked if the consultee agrees with the 'Vision' and the key focus areas and delivery principles outlined for each theme.
- 3.13 Tactran in general is supportive of the vision, key focus area and delivery principles within the plan with the following key points highlighted:
- Better recognition of other local and regional transport plans that seek to achieve similar aims in terms of active travel
 - Reference should be made to the Regional and National Walking and Cycle Network.
 - Recognition that active travel should be an option for utility journeys for residents within the National Park and not just focused on visitor provision
 - It is noted that the draft delivery plan does not include details of actions expected from the delivery partners with future action plans still to be developed. No timescale for the development of these future action plans is provided.
 - Development of activity hubs could increase trips to/from the Park and efforts should be made to ensure that these can be made sustainably.
- 3.14 The consultation response was submitted as officer comments on 31 January 2020 and the full response is provided in Appendix B.

NHS Tayside – Draft Public Health Strategy

- 3.15 NHS Tayside issued to Community Planning Partnerships a Draft Public Health Strategy with comments to be received by 28 February 2020.
- 3.16 The Draft Public Health Strategy sets out NHS Tayside's aspiration to deliver a co-ordinated approach to achieving public health ambitions over the next 10 years with the overarching aim for people in Tayside to live healthier for longer, to reduce inequalities and increase life expectancy.
- 3.17 This is based around the six national public health priorities:
- Live in vibrant, healthy and safe places and communities
 - Flourish in our early years
 - Have a good mental wellbeing
 - Reduce the use of and harm from alcohol, tobacco and other drugs
 - Have a sustainable, inclusive economy with equality of outcomes for all
 - Eat well, have a healthy weight and are physically active
- 3.18 These priorities also commit to six key principles of:
- Reducing Inequalities

- Prevention and early intervention
- Fairness, Equity and Equality
- Collaboration and Engagement
- Empowering People and Communities
- Intelligence, evidence and innovation

3.19 The strategy also notes the various roles that NHS Tayside has as a public health system:

- Partner
- Procurer
- Advocate
- Service Provider
- Employer
- Enables
- Active Participant

3.20 This highlights the key, cross cutting role that NHS Tayside has across a number of sectors, including transport.

3.21 There are six core public health elements, or programmes underpinning this Strategy, all of which require cross sector collaboration:

- Understanding the needs, experiences and assets of the population, how these vary by sub-group and change over time.
- Tackling the fundamental causes of poor health and of health inequalities - these causes are the basis on which inequalities are formed - and mitigate their effects.
- Applying a life course approach, recognising the importance of a healthy start in life and the need to maximise opportunities for health and wellbeing at all life stages.
- Intervening on the intermediate causes of poor health and health inequalities: these are the wider environmental influences on health, including access to services, equality and human rights and other aspects of society.
- Improving health services by ensuring effectiveness, accessibility, equity and best value, and strengthening the health impact of other services across Tayside.
- Protecting the public's health from environmental, communicable and other potential risks.

3.22 The strategy notes the key role that the Community Planning Partnerships will play in the delivery of the strategy and the role that the various partners will play.

3.23 A consultation response from Tactran was submitted as officer comments on 28 February 2020. While the response is broadly supportive of the Draft Strategy, a number of key points were noted:

- Air Quality in the cities of Perth and Dundee should be identified as a public health issue
- It notes that a number of the 'Elements' within the strategy provide adequate scope to ensure that issues related to active travel, air quality and access to health services are considered.
- More detailed action plans would assist partners with delivery of specific actions and assist in identifying how NHS Tayside will work with all relevant partners

3.24 The full consultation response is provided in Appendix C.

National Planning Framework 4: A Plan For Scotland 2050

3.25 As part of a programme for engagement for the fourth National Planning Framework (NPF4), the Scottish Government issues a 'Call for Ideas' which opened on 9 January 2020.

3.26 This engagement exercise is inviting written comments to be submitted at this early stage with the intention of gathering ideas for what Scotland will be like in 2050 and the changes that are required to achieve that.

3.27 The following key issues have been highlighted for consideration:

- What development will we need to address climate change?
- How can planning best support our quality of life, health and wellbeing in the future?
- What does planning need to do to enable an economy that benefits everyone?
- How can planning improve, protect and strengthen the special character of our places?
- What infrastructure do we need to plan and build to realise our long term aspirations?

3.28 For the first time, Scottish Planning Policy will be incorporated into the National Planning Framework. Background information notes on the policy topics that will need to be addressed when preparing draft NPF4 have been published and views on these notes can also be submitted as part of the 'Call for Ideas'.

3.29 The Planning Act allows the Scottish Ministers to identify national developments to include in NPF4. This could include single, large-scale projects or several smaller scale developments combined. Once designated, the question of whether a national development is needed does not have to be debated in later consenting processes.

3.30 Suggestions for projects to be considered for 'National Development' status in the draft NPF4 are invited within the 'Call for Ideas' Process.

3.31 Given the deadline for submissions of 31 March 2020 the Partnership Board is asked to note the intention to submit officer comments on the Scottish Government's early engagement on National Planning Framework 4 (NPF4).

3.32 The Scottish Government intend to issue a draft of NPF4 for consultation in September 2020.

4 CONSULTATIONS

4.1 The draft and submitted responses detailed in the 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 Executive Committee RTP/20/01, Scotland's Low Emission Zones: Regulations and Guidance Consultation Response, 3 February 2020

The Loch Lomond & The Trossachs National Park Authority. [Active Park, Healthy People: Outdoor Recreation Delivery Plan](#), 16 December 2019

Transport Scotland, [Scotland's Low Emission Zones: Consultation on Regulations and Guidance](#), 13 December 2019

NHS Tayside, Working Together for the Common Weal: Improving Wellbeing – a Public Health Strategy for NHS Tayside 2020-2030, January 2020

Scottish Government, [Have your say on a new National Planning Framework for Scotland](#), January 2020

Transport Scotland

Scotland's Low Emission Zones

Consultation on Regulations and Guidance

Tactran Response

- 1a Do you agree with the proposed present-day emission standards for Scottish LEZs?
If not, why not?**

Tactran agrees with the present-day emission standards proposed. However, the proposal to scope out motorcycles, mopeds, motorised tricycles and quadricycles is not supported. Although these vehicles take up less road space than other motorised vehicles they do contribute to the overall air pollution and should be subject to an equivalent engine standard.

- 1b What are your views on Scotland making a transformative shift to zero or ultra-low emission city centres by 2030? Please be as specific as possible in your reasoning.**

While this is a laudable ambition, the timescale of 2030 for zero to ultra-low is particularly challenging.

There are two related outcomes here. One is to improve the air quality for health benefits for people living, working or visiting Scotland's city centres and this is the primary purpose of LEZs. This is area specific and provides benefits to the specific LEZ area.

The second desired outcome is the decarbonisation of transport to assist in reducing CO₂ emissions and benefit global climate change. While the LEZ area can contribute to this outcome, its benefits are not directly related to the LEZ area. Therefore, to concentrate solely on city centres and LEZs, is only dealing with a part of the overall CO₂ emissions generated throughout the road network in Scotland, which also have a wider impact on CO₂ emissions.

There needs to be a balanced approach recognising that LEZs are one option in delivering air quality improvements, with other options such as traffic management, bus priority, and park & ride/choose, active travel, etc. also required to remove traffic and provide alternatives to driving in city centres.

The 2030 target is 2 years in advance of the Scottish Government's Climate Change Plan 2018-2032 commitment to phase out the need to buy petrol and diesel engine cars and vans by 2032. This timescale brings issues of equity, with poorer in society being not being able to afford new vehicles and also issues for public transport providers in being able to invest in required bus stock and similarly for road haulage

companies' investment.

It is agreed that LEZs focused on city centres should move towards zero emissions from the present-day emission standards on a phased basis, but it is considered that the date should be more aligned with the 2032 target, with appropriate investment made in achieving this target.

2a Which of the proposed national LEZ exemptions do you agree with? Please be as specific as possible in your reasoning.

Proposed exemptions for emergency vehicles, military vehicles, historic vehicles, vehicles for disabled persons and showman vehicles are all agreed.

Historic Vehicles should be exempt only if they are being used commercially e.g. vintage bus tour, wedding vehicles, etc.

It is agreed that 'blue badge holders' should be exempt as the person's mobility and ability to use alternative modes is limited. However, the difficulty in enforcing this, as blue badges are assigned to the person rather than vehicle, is recognised and will need to be addressed.

2b Are there any other LEZ exemptions you would propose? If so, what should these exemptions be and why?

Consideration should be given to exempting emergency voluntary sector organisations to give them the same status as other emergency vehicles to allow them to act swiftly without punitive fines.

Utility emergency repair vehicles and accident and breakdown vehicles could be made exempt, as disruption to traffic caused by utility malfunctions and breakdowns may cause increased congestion and worsen air quality within the LEZ, so swift ameliorative action is required to ensure air quality is maintained. For these types of vehicles, it may be that a time limited exemption is given, rather than a full exemption.

3a Do you agree with the proposed base level and subsequent tiers of penalty charges for each vehicle type as outlined in Table 5? Please explain your answer.

It is agreed that penalty charges should be nationally consistent and that the proposed base level of penalty charge should be in line with parking and bus lane enforcement penalty charges, currently £60 for cars and vans, reduced by 50% if paid within 14 days. It is also agreed that larger vehicles should have a higher penalty charge.

However, it is not agreed that there should be sequential surcharges and surcharges leading to fines up to £5,000 is excessive. The penalty charge must be seen as acceptable to the public and commensurate with the offence, otherwise it will be considered a money-making exercise. It also needs to be easy to understand and to administer. It

is considered that the surcharge system proposed is overly complex and punitive and complicated to administer.

It is therefore considered that a surcharge should not be imposed. Instead, a base level for each offence is set with the discount for prompt payment available for the first penalty notice, but not for subsequent penalties.

3b Which surcharge ‘curve’ in Figure 1 represents the best approach to designing a surcharge?

Tactran does not agree that a surcharge should be imposed. See 3a.

3c How should the surcharge approach be applied in order to discourage non-compliant vehicles from driving within a LEZ?

Tactran does not agree that a surcharge should be imposed. See 3a.

3d How many days should lapse before a registered keeper of a vehicle returns to the base tier of the penalty charge?

Tactran does not agree that a surcharge should be imposed. See 3a.

4 Do you agree with the general principles of the LEZ enforcement regime?

If not, why not?

The general principles are agreed and as set out in previous section this should be consistent throughout Scotland.

A properly designed and implemented LEZ should not generate much income through penalty charges i.e. LEZ restrictions are generally met. However, the cost of installing, maintaining and administering the scheme, is likely to be onerous.

5 What are your views on the proposed list of ‘other persons’ that local authorities must consult with on their LEZ plans?

Tactran in general supports the wide range of ‘other persons’ whom Local Authorities must consult with. In particular we welcome RTPs and neighbouring Local Authorities being included as mandatory consultees, as a LEZ influence is a regional influence and it is correct that a LEZ is considered in this context. Given its regional influence, the National Transport Strategy transport governance review, may wish to consider which tier of governance is most suitable to implement and administer a LEZ.

The prior consultation section of the consultation document makes mention of drivers affected being consulted, but only mentions residents living within a LEZ being consulted. It is considered that

public consultation should be wider than this and include all residents living within the local authority and neighbouring local authorities to take account of the regional influence.

6 If a LEZ scheme review was undertaken, what elements would you expect the review to investigate and how would the review ensure transparency and accountability?

A review should focus on how the scheme is meeting its stated objectives. As part of designing and implementing the LEZ scheme the Local Authority, as well as setting objectives for the LEZ, should also state how they intend to measure progress towards meeting the objectives.

In order to achieve transparency and accountability the review should be taken to the relevant Local Authority Committee for approval and thereafter made available prominently on their website. Once approved by the Local Authority the review could be taken to the relevant RTP(s) Partnership meeting for noting and thus bringing awareness on a regional level and displayed on the RTP website.

All LEZ reviews should be submitted to Scottish Government to be able to assess and learn which aspects of each LEZ have been particularly successful and less successful. This would assist in issuing future guidance. It would also be useful to keep all LEZ reviews on a Scottish Government national website for ease of use and comparison.

Any amendments to a LEZ as a result of the review must follow the same process as the introduction of a new LEZ, and in particular be subject to the same level of consultation prior to the amendment being introduced.

7 What secondary objectives should be created for LEZ schemes? Please be as specific as possible in your reasoning

The overall objective should be the betterment of quality of life for all people living, working, and visiting cities, of which supporting the achievement of Scottish Air Quality objectives is a primary objective.

Improving air quality must be the primary objective of a LEZ as the choice of location and area to be covered is largely defined by the Air Quality Management Area (AQMA) and the benefits of a LEZ largely occur within the area. Therefore, the design and implementation should be focussed on this. This may also assist in the second mandatory objective, contributing to achieving climate change emission reduction targets, but the primary focus must be on local air quality.

Only 14 of Scotland's 32 Local Authorities have currently declared AQMAs within their area and these must concentrate on air quality, rather than reduction in greenhouse gases. Measures to reduce CO₂ emissions need to be more universal and should cover all road traffic

in Scotland, including trunk road traffic.

It is important that LEZs are not introduced in isolation and are aligned with Economic Development Plans, Local and Strategic Development Plans, Local and Regional Transport Strategies and take cognisance of the review National Transport Strategy, as well as forming an integrated solution which could include such measures as traffic management, bus priority, park & ride/choose, active travel, etc. for any given LEZ and AQMA.

Tactran agrees with the topical areas and the examples of secondary objectives given.

It is also considered the use of penalty charge monies should not be limited to be within the Local Authority area, as the measures available to reduce emissions within a LEZ can include measures in neighbouring authorities e.g. a Park & Choose site at the south side of the Tay Road Bridge in Fife will assist in meeting the Dundee LEZ objectives. RTPs could play a useful role in this.

The review of the objectives referenced in Question 6 could provide a good opportunity to review the scheme objectives, if they have been met and consider whether the objectives should be amended or renewed to the betterment of the LEZ, before consideration is given to repayment of any grants by Scottish Ministers.

8 Do you agree with the steps outlined in Figure 2 for enabling a LEZ scheme to come into effect? If not, why not?

Tactran considers the steps outlined in Figure 2 generally provide a robust process. However, Tactran is concerned at the proposed consultation outlined. Step 2 in Figure 2 only mentions Public consultation, and it is considered both Mandatory and Public consultation is required at Step 2, to assist in developing the design of the LEZ. There should also be consultation between Steps 3 and 4 where the preferred final design is open to consultation by both the Public and Mandatory consultees.

It is recognised that the timescale to complete the process, particularly with the 2020 timescale for the first 4 LEZs, is challenging.

9 How can local authorities maximise the technological opportunities available from the deployment of approved devices?

There may be opportunities to integrate ANPR technology with other enforcement aspects such as parking and bus lane enforcement and other aspects of the Transport Act such as pavement parking.

Local Authorities could also work with technology providers to assess capabilities of the system and consider how information can be utilised. For example, ANPR could be used to provide information on where vehicles accessing the city centre are originating and help design,

implement and target promotion of alternative transport modes and options in these areas, thereby assisting achieving in the objectives of the LEZ.

10 What positive or negative impacts do you think the LEZ proposals outlined within this consultation may have on:

- (a) particular groups of people, with particular reference to 'protected characteristics' listed above**
- (b) the very young and old**
- (c) people facing socioeconomic disadvantages**

LEZs are likely to have beneficial health effects on people who reside within LEZ zones, particularly the young and old benefiting from better air quality.

People with disabilities may be negatively affected if disabled registered vehicles and blue badge holders are not exempted.

There is also concern that LEZs will impact disproportionately on the less affluent in society, as those more affluent are able to afford vehicles which meet LEZ Euro engine standards.

Lower socio-economic groups may not be able to afford LEZ compliant vehicles and will therefore need alternative transport arrangements to access employment, health, social and leisure requirements. In general, but not always, in urban areas buses provide this alternative. However, in many rural hinterlands, people who rely on access to cities do not have access (availability, frequency and possibly financial) to a suitable bus service to provide alternative transport and could therefore be excluded from accessing employment, training, health, social, leisure and other opportunities. Other measures such as park & ride/choose need to be introduced and funded.

11 Do you think the LEZ proposals outlined within this consultation are likely to increase, reduce or maintain the costs and burdens placed on business sectors? Please be as specific as possible in your reasoning

There is likely to be an increase in business costs particularly to bus operators and road haulage companies, if they are required to renew vehicles in advance of scheduled renewals.

It will also be interesting to consider whether city centre businesses within a LEZ suffer a reduction, increase or no change in business due to a LEZ being implemented. This is likely rest on whether the general public think the LEZ makes the city centre less accessible or whether they are attracted to the city centre as a result of the improved environment. Scottish Government should commission a business/economic survey in all LEZ areas prior to their implementation to give an economic baseline to measure against and provide further

evidence of a LEZ impact.

12 What impacts do you think the LEZ proposals outlined within this consultation may have on the personal data and privacy of individuals?

A properly designed LEZ should have no impact on personal data and privacy. However, it is important to gather data to help assess the effectiveness of the LEZ, and possible improvements and complementary measures. This could be achieved by ensuring data is kept for a limited period and is suitably anonymised to comply with GDPR.

13 Do you think the LEZ proposals outlined within this consultation are likely to have an impact on the environment? If so, which ones and how? Please be as specific as possible in your reasoning.

Air quality should improve within the LEZ and possibly over a wider area. However, there is a need to guard against making air quality worse in other adjoining areas due to displacement of traffic.

Greenhouse gas emissions should lower by achieving cleaner vehicles, modal shift and maybe reducing the need to travel.

There could be an adverse visual impact due to signage, road markings and ANPR equipment – these need to be highly visible to ensure proper enforcement but also need to be designed to fit in with the surrounding streetscape.

14 Do you have any other comments that you would like to add on the Scottish Government's LEZ proposals outlined within this consultation?

No Comment

Active Park, Healthy People

Outdoor Recreation Delivery Plan

Q1. Do you agree with the overall direction of the plan?

Yes

Policy context

Q2. Is the policy context found on pages 5 – 9 clear?

Yes

Q3. Is there anything you would change/add? Please specify.

The policy context outlined is clear and it is useful to see where this document fits within the wider strategy and policy context. However, reference should be made to other key strategies, both existing and emerging, that will have a significant impact on the delivery of active travel and mode shift. This includes Local Transport Strategies, Regional Transport Strategies and the National Transport Strategy.

From the context provided, it also appears that this “delivery plan” is more akin to a strategy as no specific projects or deliverables are included. On page 9, it states that “Specific action plans will be developed by partners to deliver on the ambitions set out in this plan”. It would be useful if more detail was included in what was expected from these action plans and how they fit within this delivery plan. It would also be useful if the timescales for these to be produced were included and what engagement and consultation will be undertaken.

Overview

Q4. Is the strategic overview map found on page 11 clear?

No

Q5. Is there anything you feel would improve this element of the plan?

While the arrows on the map show potential desire lines, it would be beneficial if these were shown in the context of the key active travel routes (both existing and aspirational). This would allow for a strategic overview to be taken on what gaps exist and allow potential projects to be highlighted and developed.

The routes indicated should include the NCN, NWCN and the RWCN along with any additional routes that the Park aspires to achieve.

A Park for All

Q6. Do you agree with the vision for A Park for All found on page 13?

No

Q7. If 'no', please explain why and provide alternative wording.

While Tactran supports the vision outlined in terms of access within the National Park, this should also reflect the challenges that exist in ensuring inclusive access to the park from by sustainable modes.

Q8. Do you agree with the key focus areas and delivery principles outlined under A Park for All on pages 14 – 17?

No

Q9. If 'no', please explain why or suggest alternatives.

Tactran supports the key focus areas and delivery principles, however reference should be made to supporting active travel modes for utility journeys (eg access to employment, training, education, health etc) within the Park and not solely focus on leisure activity.

Q10. Do you think the right delivery partners for A Park for All have been highlighted on pages 14 – 17?

No

Q11. If 'no', please explain why and recommend alternative partners.

Cycling Scotland should be included as a delivery partner in section 1 as they undertake significant work delivering accessible cycling projects. Tactran should be included as a delivery partner within section 4 due to the role Tactran has in providing and promoting active travel infrastructure.

Active and Vibrant Places

Q12. Do you agree with the vision for Active and Vibrant Places found on pages 18 – 19?

Yes

Q14. Do you agree with the key focus areas and delivery principles outlined under Active and Vibrant Places on pages 20 – 23?

No

Q15. If 'no', please explain why or suggest alternatives.

Tactran supports the key focus areas and delivery principles within this section, however the section relating to the development of activity hubs should also reflect that this will have the potential to increase the number of trips generated to/from the hub location and this needs to be managed and mitigated appropriately to ensure that sustainable travel options are available.

Q16. Do you think the right delivery partners have been highlighted for Active and Vibrant Places on pages 20 – 23?

No

Q17. If 'no', please explain why and recommend alternative partners.

Within section 7, reference should be made to "Local Roads Authorities", not "Local Highway Authorities" to reflect the Scottish legal context.

Happy and Healthy People

Q18. Do you agree with the vision for Happy and Healthy People found on pages 24 – 25?

Yes

Q20. Do you agree with the key focus areas and delivery principles outlined under Happy and Healthy People on pages 26 – 29?

Yes

Q22. Do you think the right delivery partners have been highlighted for Happy and Healthy People on pages 26 – 28?

Yes

Connecting Places

Q24. Do you agree with the vision for Connecting Places found on pages 30 – 31?

No

Q25. If 'no', please explain why and provide alternative wording.

Tactran supports the vision for Connecting Places, in particular the focus on providing sustainable travel option to/from the Park. The vision should also reference the aspirations of the Tactran regional walking and cycle network (RCWN) along with the NWCN. It would also be useful if this section outlined the routes that the Park aspires to achieve and the key projects that will deliver the vision outlined.

Q26. Do you agree with the key focus areas and delivery principles outlined under Connecting Places on pages 32 – 35?

No

Q27. If 'no', please explain why or suggest alternatives.

Section 13 should include reference to developing the Tactran regional walking and cycle network (RCWN) along with the NWCN. Section 14 notes the potential for creating transport hubs and this could be expanded to include reference to creating low carbon travel hubs that could not only provide interchange between sustainable modes but also promote other low carbon transport options such as electric vehicles and shared mobility solutions.

Q28. Do you think the right delivery partners have been highlighted for Connecting Places on pages 32 – 34?

No

Q29. If 'no', please explain why and recommend alternative partners.

For sections 13 and 14, Tactran should be noted as a partner alongside SPT, or alternatively they could both be covered under "Regional Transport Partnerships" as in other sections. Within section 16, "Strathclyde Passenger Transport" should read "Strathclyde Partnership for Transport".

Exploring Further

Q30. Do you agree with the vision for Exploring Further found on pages 36 – 37?

Yes

Q32. Do you agree with the key focus areas and delivery principles outlined under Exploring Further on pages 38 – 41?

No

Q33. If 'no', please explain why or suggest alternatives.

Tactran supports the delivery principles outlined, in particular the focus on providing itineraries that link to public transport services. This principle could be expanded within the key focus areas to link to the previously noted desire to create transport 'hubs' providing multi modal transport options for travel to and within the Park. This section could also reference the pilot MaaS project being developed for the Park.

Q34. Do you think the right delivery partners have been highlighted for Exploring Further on pages 38 – 40?

No

Q35. If 'no', please explain why and recommend alternative partners.

Within section 19, Tactran and SPT should be noted as delivery partners to reflect the potential of the MaaS project to facilitate the creation of sustainable travel itineraries.

Coasts and Water

Q36. Do you agree with the vision for Coasts and Water found on pages 42 – 43?

This isn't relevant to me

Q38. Do you agree with the key focus areas and delivery principles outlined under Coasts and Water on pages 44 – 47?

This isn't relevant to me

Q40. Do you think the right delivery partners have been highlighted for Coasts and Water on pages 44 – 46?

This isn't relevant to me

How will we measure success?

Q42. Do you have any comments on the indicators for success, or suggestions on how we can measure our success?

Tactran supports the proposed indicators and welcomes the integration with other monitoring frameworks such as the national Active Travel Framework. It would be beneficial if a commitment to make collected data available on an open data basis (where possible) so that other partners can make use of the data. The data collected could also be expanded to capture origin and destination information and consideration given to travel diary type data collection for people that are making multiple trips within the Park.

Other comments

Q43. Are there any other comments you wish to make on the draft Active Park, Healthy People: Outdoor Recreation Delivery Plan?

While Tactran is broadly supportive of the content presented within the outdoor recreation delivery plan, the content seems to reflect what would be expected of an outdoor recreation strategy. As presented, there are no defined projects within the plan that would normally be expected to be included in a delivery plan. There is reference to an expectation that “specific action plans will be developed by partners to deliver on the ambitions set out in this plan” without any detail on what these action plans might contain and what the expectations are being placed on partners.

It may be that there is an intention for a more detailed delivery programme (or similar) to be produced to accompany the published plan and if so Tactran would wish to be consulted on that also to ensure that there is broad alignment at local, regional and national levels.

Your details

Q44. Full name:

Niall Moran

Email address:

niallmoran@tactran.gov.uk

Q45. Post code

PH1 5EN

Organisation (please only list if you are responding on behalf of the organisation as a body):

Tactran

Q46. Do you provide your consent for us to process your personal information?

I consent to the National Park Authority processing my personal information in accordance with the Data Protection Act 2018; specifically its storage and use by members of staff working on the Active Park, Healthy People: Outdoor Recreation Delivery Plan, who may contact me regarding my response or to update me on the progress of the strategy.

Working Together for the Common Weal: Improving Wellbeing - A Public Health Strategy for NHS Tayside

Response from the Tayside and Central Scotland Regional Transport Partnership (Tactran)

Key Areas	Response
Do you agree that the issues included in the Strategy are the main concerns?	Public Health is a broad subject, and the strategy presents a reasonable summary of the issues. Nonetheless, suggest that given the Air Quality Management Areas declared in Perth and Dundee (for health reasons), suggest that the PHS should identify air quality in the two cities as a public health issue.
Do you agree with the priorities and key elements set out in the Strategy? (See page 8 and section 8 of Strategy)	The key elements provide an adequate framework to identify the transport issues which need to be considered as part of a public health strategy
Does the Strategy clearly define the contribution that the Tayside Specialist Public Health Service (the Directorate of Public Health) should make?	<p>Whilst the strategy does not clearly define the role that the Tayside Specialist Public Health Service should make in terms of transport issues, the strategy does give sufficient commitment to priorities and principles which will allow partner agencies to challenge TPHS if their contribution is not as hoped.</p> <p>For example:</p> <p>Element 1: Understanding the needs of the population: provides scope for active travel, air quality and access to health services information to be collected to inform approaches</p> <p>Element 4 Intervening on the intermediate causes of poor health and health inequalities: provides scope for investigating the complementary roles for all partners on active travel</p> <p>Element 5: Improving the quality of services: provides scope to consider the complementary roles for all partners on ensuring access (ie getting) to healthcare</p>

Key Areas	Response
	Element 6: Protecting the public's health: provides scope for investigating the complementary roles for all partners on improving air quality
How could the Tayside Specialist Public Health Service (the Directorate of Public Health) work more effectively with you to meet the shared aim of people in Tayside living healthier for longer?	More detailed action plans are required to be developed between appropriate partners. Tactran, as the Regional Transport Partnership covering the Tayside area, is more than happy to initiate work on any transport focused action plan with yourselves and appropriate partners.
Does the strategy clearly define the contribution that NHS Tayside's operational services should make?	The strategy does not clearly define the role that NHS Tayside should make in terms of considering activity to address transport related issues
Are the 'conditions for success' the right ones? (Sections 5 and 9)	The language used throughout the document "whole systems approach" / "once for Scotland" recognises that addressing public health issues requires a multi-agency approach. It is therefore suggested that the conditions for success should also reflect on how the NHS in Tayside is going to work with all relevant partners (which is admittedly, a fairly long list, and hence could be a challenge in itself)
Do you see any potential difficulties in implementing the Strategy?	The difficulties in addressing the transport issues (e.g. resources and the challenges involved in changing behaviour) remain as they always have. A PHS which commits NHS Tayside to working with partners to ensure all relevant public sector /CPP activity is co-ordinated and targeted at agreed priorities will help us all address these difficulties as best we can by ensuring our collective resources are used as efficiently and effectively as possible.
If you have described potential difficulties in the previous question, how might these difficulties be overcome?	
What do you think would be potentially helpful to implement the Strategy?	

Jonathan Padmore, Senior Strategy Officer
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