

TAYSIDE AND CENTRAL SCOTLAND TRANSPORT PARTNERSHIP**EXECUTIVE COMMITTEE****31 MARCH 2020****STRATEGIC TRANSPORT PROJECTS REVIEW 2: CASE FOR CHANGE
REPORTS****REPORT BY SENIOR PARTNERSHIP MANAGER AND SENIOR STRATEGY
OFFICER**

This report seeks the Executive Committee approval of proposed responses to the Transport Scotland consultation on the second Strategic Transport Projects Review: Case for Change reports.

1 RECOMMENDATIONS

- 1.1 That the Executive Committee considers and approves responses to Transport Scotland consultation on the second Strategic Transport Projects Review Case for Change National report and reports for Tay Cities Region and Forth Valley Region.

2 BACKGROUND

- 2.1 In September 2016, the Minister for Transport and the Islands confirmed a planned review of the National Transport Strategy (NTS2) and Strategic Transport Projects Review (STPR2) in alignment with the National Planning Framework (NPF4) (Report RTP/16/33 refers).
- 2.2 Transport Scotland commenced a review of the National Transport Strategy in 2017 and published the finalised NTS2 on 5 February 2020. Transport Scotland has commenced work with the partners involved in developing the Strategy to publish a Delivery Plan that will set out how the Strategy will be delivered. It is understood that the aim was to have the Delivery Plan published in Summer 2020, however this may now be delayed due to Covid-19 lockdown.
- 2.3 Work commenced on the second Strategic Transport Projects Review (STPR2) in early 2019, with the Partnership thereafter receiving regular updates at its Partnership meetings. A detailed update was provided at the Partnership meeting on 17 December 2019 (Report RTP/19/47 refers).
- 2.4 Transport Scotland published [Strategic Transport Project Review: Case for Change reports](#) for consultation on the Transport Scotland website on 27 February 2020 with a deadline of 8 April 2020. The Partnership subsequently delegated authority to the Executive Committee to consider and approve proposed responses to Strategic Transport Projects Review Case for Change National report and reports for Tay Cities Region and Forth Valley Region (Report RTP/20/16 refers)

- 2.5 This second Strategic Transport Projects Review (STPR2) will also inform the National Planning Framework (NPF4), work on which has commenced. Scottish Government advise that the aim is for a draft of [NPF4](#) to be issued for consultation in September 2020.

3 DISCUSSION

- 3.1 The second Strategic Transport Projects Review (STPR2) will inform transport investment in Scotland and will help to deliver the vision, priorities and outcomes for transport set out in the NTS2.
- 3.2 The development of STPR2 is following the Strategic Transport Appraisal Guidance (STAG) process by developing a Case for Change, followed by an initial appraisal and a final detailed appraisal.

Regional Transport Working Groups

- 3.3 A number of Regional Transport Working Groups covering the whole of Scotland have been set up to inform the development of STPR2 and Transport Scotland is progressing STPR2 through engaging with local stakeholders at this regional level and also with national stakeholders at a national level. Tactran is actively involved with two Regional Transport Working Groups:
- Tay Cities Region (Angus, Dundee, Perth & Kinross and North East Fife)
 - Forth Valley Region (Clackmannanshire, Falkirk and Stirling)
- 3.4 In both cases the 'regions' reflect economic and planning geographies and cover the predominant travel to work areas for those populations.
- 3.5 In addition, national groups have provided input into the consideration of issues, opportunities, problems and constraints relating to national transport networks.
- 3.6 Work has been ongoing through these Regional and National Groups to assist in developing Case for Change reports and these were published by Transport Scotland for consultation on the Transport Scotland website on 27 February 2020 with a deadline of 8 April 2020. This deadline has subsequently been extended to 30 April 2020. Tactran officers have provided input to the development of both the Tay Cities and Forth Valley Case for Change reports, through the respective working groups.
- 3.7 Each of the Case for Change reports set out evidence and context for case for change; provide a description of the problems and opportunities; state the Transport Planning Objectives and sets out the approach that will be taken to option generation and sifting.
- 3.8 It should be noted that these Case for Change reports were developed and issued for consultation prior to the Covid-19 lockdown. Therefore, the Tactran responses are made assuming the same conditions will exist post lockdown. In reality the world will have changed significantly as a whole post lockdown and

the overall circumstances for transport is likely to be considerably different to that anticipated in the reports, with different priorities and requirements. At this time, it is not possible to clearly anticipate what these circumstances may be. Therefore, Tactran's response to the three reports will be caveated as such.

National Case for Change

3.9 The [National Case for Change](#) report outlines and reiterates the 27 challenges for transport identified in the National Transport Strategy published in February 2020 under the NTS2 themes of:

- Reduces Inequalities
- Takes Climate Action
- Helps to Deliver Inclusive Economic Growth
- Improves our Health and Wellbeing

3.10 It also identifies three other challenges of Lack of ownership / governance / collaboration; Service capacity and Vessel and vehicle quality and outlines key trends and forecast for transport in Scotland. There is also a section on cross border and international connectivity.

3.11 The 10 key challenges are then outlined as:

- (i) There is a need to reduce travel and deliver modal shift towards walking, cycling and public transport.
- (ii) STPR2 should prioritise interventions that increase the modal share of shorter everyday trips by walking, wheeling and cycling; short to medium length trips by public transport and longer trips by rail and low emission vehicles.
- (iii) Land use planning and digital connectivity are two areas not within the scope of STPR2 that will both have a significant part to play in meeting our net zero targets.
- (iv) significant ongoing commitment to active travel investment is necessary, to not only deliver improved infrastructure and systems but to encourage the change needed in travel behaviours.
- (v) STPR2 should prioritise interventions that increase the modal share of journeys by bus over the next decade and beyond.
- (vi) there will continue to be strong demand for rail services particularly within the key corridors to, from and between Edinburgh and Glasgow. This will further heighten the current terminal station capacity issues within Scotland's two largest cities.
- (vii) STPR2 will explore further opportunities to increase rail freight and reduce the level of goods transported by road.
- (viii) Over the coming years, Scotland's economic success will be increasingly realised through its ability to connect with and compete within a global market.

- (ix) The sustainable investment hierarchy outlined within NTS2 makes clear that interventions should be prioritised firstly by their ability to reduce the need to travel and secondly their ability to help maintain and safely operate existing assets. This investment hierarchy will be imbedded within the STPR2 appraisal process.
- (x) There is a requirement to support and accelerate the just transition to low emission vehicles.
- 3.12 The report then proceeds to define the Transport Planning Objectives (TPO) against which projects and interventions will be assessed. There are 5 TPOs underpinned by a further 20 sub-objectives. The 5 TPOs are as follows:
- A sustainable strategic transport system that contributes significantly to the Scottish Government's net-zero emissions target
 - An inclusive strategic transport system that improves the affordability and accessibility of public transport
 - A cohesive strategic transport system that enhances communities as places, supporting health and wellbeing
 - An integrated strategic transport system that contributes towards sustainable inclusive growth in Scotland
 - A reliable and resilient strategic transport system that is safe and secure for users
- 3.13 The report finishes by outlining the next steps and the sifting process to be undertaken to identify suitable projects and interventions to be taken forward for further appraisal.
- 3.14 The Tactran response outlined in Appendix A considers that the report does not add much to what was already known as part of the National Transport Strategy and the opportunity to further define problems and opportunities for Transport in Scotland has not been fully taken.
- 3.15 Tactran agrees with the 10 key challenges identified and in particular welcomes the clarification of the travel mode hierarchy at challenge (ii) and the recognition of the challenge faced in decarbonising transport at challenge (x), as outlined in paragraph 3.11 above. However, concern is expressed regarding the Glasgow/Edinburgh focus of (vi) to the omission of the rail challenges faced to the north of the Central Belt.
- 3.16 Overall the case for change report does not present a strong link between Problems, Opportunities and the TPOs and sub-objectives and reads more like a policy document than a case for change report which should consider all evidence, problems and opportunities and link this to the Transport Planning Objectives to appraise interventions. There is also concern at the volume of objectives, 5 main TPOs supported by 20 sub-objectives.
- 3.17 The Executive Committee is asked to consider and approve the proposed response as shown in Appendix A.

Tay Cities Region Case for Change

- 3.18 The [Tay Cities Case for Change](#) report firstly sets the context for Transport in the region providing evidence and outlining relevant policies and geographical, socio-economic, environmental and transport context. This is followed by a description of the key problems and opportunities derived from the evidence gathered. The problems and opportunities are outlined under the following themes:

Problems	Opportunities
Deprivation	Technological opportunities
Transport exclusion	Behavioural change
Physical activity and health	Development of the Active Travel network
Limited transport choice	Supporting economic change
Active travel facilities/safety	Public transport growth
Air pollution	Tourism growth
Carbon emissions	
Public transport availability and competitiveness	
Freight movements	
Inter and cross-regional connectivity	
Road capacity constraints and congestion	
Rail capacity and access constraints	

- 3.19 The report then sets out 19 Tay Cities Region sub-objectives grouped under the 5 National TPO's, as provided in paragraph 3.12 above. The 19 sub-objectives are intended to sit within the National TPOs but with a focus on the specific evidence-based problems and opportunities for the Tay Cities Region.
- 3.20 The report finishes by describing the next steps; the approach that will be taken to generating a long list of project options and the sifting process to be undertaken to identify suitable projects and interventions to be taken forward for further appraisal.
- 3.21 The Tactran response outlined in Appendix B considers that while there are clear linkages between the Tay Cities Transport Planning Objectives (TPO) and Sub-objectives and the National Transport Strategy's 4 priorities and 12 outcomes, it is less clear how these linkages tie in with the Tay Cities Region Context, Problems and Opportunities. This may be as a result of the summary of the problems and opportunities not being defined particularly well.
- 3.22 In terms of context, evidence, problems and opportunities it is considered that the adverse effect of strategic traffic on trunk road routes around Perth and through Dundee is not fully captured, neither is the lack of choice of public transport to access key employment and health facilities, particularly in the more rural areas of the region. Mention of high rail fares is welcomed, but the poor journey times from Dundee and Perth to Edinburgh needs to be better articulated, particularly the circuitous route through Fife, the single line

constraints between Perth and Ladybank and also on the Highland Mainline. The need for better road connections to Montrose and the aspiration for a rail freight head at Montrose should be highlighted.

- 3.23 Overall there is a concern at the number of objectives, 5 National and 19 Sub-regional, and at how targeted these objectives are to the region.
- 3.24 The Executive Committee is asked to consider and approve the proposed response as shown in Appendix B.

Forth Valley Region Case for Change

- 3.25 The [Forth Valley Case for Change](#) report firstly sets the context for Transport in the region providing evidence and outlining relevant policies and geographical, socio-economic, environmental and transport context. This is followed by a description of the key problems and opportunities derived from the evidence gathered. The problems and opportunities are outlined under the following themes:

Problems	Opportunities
Poor accessibility and connectivity	Public Transport Interchange, Accessibility and Connectivity
Poor road user experience	Active and Sustainable Travel
High cost of public transport fares	Climate Change Emergency
Barriers to active travel	Technology
Limited digital connectivity	

- 3.26 The report then sets out 19 Forth Valley Region sub-objectives grouped under the 5 National TPO's, as provided in paragraph 3.12 above. The 19 sub-objectives are intended to sit within the National TPOs but with a focus on the specific evidence-based problems and opportunities for the Forth Valley Region.
- 3.27 The report finishes by describing the next steps; the approach that will be taken to generating a long list of project options and the sifting process to be undertaken to identify suitable projects and interventions to be taken forward for further appraisal.
- 3.28 The Tactran response outlined in Appendix C considers that (much like the Tay Cities Case for Change) whilst the document presents a reasonable framework, the evidence presented is not considered in sufficient detail (e.g. use of region wide averages / little analysis of what the data is potentially telling us etc) with the consequence that:
 - Potential issues are overlooked, and
 - The description of problems and opportunities could be more specific.
- 3.29 It is considered that the following potential issues have been overlooked:

- **Pinch Points on Strategic Transport Networks:** Identification of specific pinch points will strengthen the document, such as M9 Junction 10 (Craigforth).
- **Poor Road User Experience:** During the consultation and the Forth Valley Regional Transport Working Group discussions a broader range of issues were grouped under the poor road user experience than those presented. This included the lack of co-ordinated management of two of the main bus corridors in the region (Falkirk – Stirling and Alloa – Stirling).
- **Connectivity to surrounding areas (Fife/West Lothian/North Lanarkshire):** a number of data sets are presented, but not sufficiently analysed. These combine to suggest a problem of public transport connectivity to/from major towns (Dunfermline / Cumbernauld / Bathgate / Linlithgow) around the region. For the report to predominately focus on trips to/from Glasgow and Edinburgh is to focus on the problems experienced by those conurbations, it is not a fair reflection of the issues faced by Forth Valley residents or settlements.

3.30 It is also suggested that:

- the definition of one of the problems as ‘High Cost of Public Transport’ perhaps does not fully reflect the broader issue, as was discussed throughout the consultation, of ‘Transport Poverty’ in both urban and rural communities across the ‘region’.
- the report does not acknowledge the opportunity for strategic park and ride around Stirling City, as presented in the Case for Change report for the Stirling Strategic Park & Ride Study, and as accepted by Transport Scotland in February prior to the publication of these STPR2 Case for Change reports.

3.31 The Executive Committee is asked to consider and approve the proposed response as shown in Appendix C.

Next Steps

3.32 Following the Case for Change reports, a long list of interventions will be identified and sifted against the National and Regional objectives, before undertaking detailed appraisal. This will include consideration of interventions identified at the Members workshops held on 17 January 2020 (Tay Cities) and 29 January 2020 (Forth Valley). Transport Scotland’s intention is to have the full appraisal completed and interventions identified for reporting by early 2021.

4 CONSULTATIONS

4.1 The report has been prepared in consultation with the Transportation Officers Liaison Group and Public Transport Officers Liaison Group

5 RESOURCE IMPLICATIONS

5.1 There are no resource implications arising directly from this report.

6 EQUALITIES IMPLICATIONS

6.1 This report has been screened for any policy implications in respect of Equality Impact Assessment and no major 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 Partnership, RTP/16/33, Director's Report, 13 September 2016

Report to Partnership, RTP/19/47, Director's Report, 17 December 2019

Report to Partnership, RTP/20/16, National Transport Strategy and Strategic Transport Projects Review, 17 March 2020

**Strategic Transport Projects Review 2
Case for Change Comments Form**

National Case for Change

Tactran Response

Note: Questions 1 – 4 relate to name and type of organisation responding.

Strategic Problems and Opportunities

Q5. How effectively have the strategic transport problems and opportunities been captured in the report? *Please tick one only*

~~Very well~~

~~Well~~

Poorly

~~Very Poorly~~

Q6. Are there any strategic problems which you feel have not been effectively captured in the report?

Please tick one only

Yes

~~No~~

Q7. Please describe the strategic problems which you feel have not been effectively captured in the report in the space below

Chapter 2: National Case for Change

Section 2.1 Approach to Problems and Opportunities

This section summarises the 27 key challenges for Transport as set out in the recently published National Transport Strategy (NTS2). Tactran considered that the NTS2 clearly sets out the Priorities and Outcomes for Scotland's transport system over the next 20 years and there are clear linkages between these and the challenges that need to be met and the policies that will be pursued to the achieve the Vision.

Section 2.2 Regional Themes

Reference is made to an analysis of the regional problems which identified a strong alignment with the key national challenges and related trends identified in Section 2.1. However, as this analysis has not been shared it is difficult to comment on this.

Overall it is felt that this section adds very little to the case for change and is a lost opportunity to aid in identifying regional differences and priorities.

Section 2.3 Current and Future Land Use and Transport Network Issues

This section provides a review of current trends and makes use of one forecast scenario over the next 20 years. However it does not really analyse the data to bring out key problems and opportunities. Some detailed comments:

Bus – use of these large regions does not pick out the regional changes – for example North East, Tayside and Central region – it is stated that demand for buses has been in decline since 2014/15, but the Tay Cities Region Case for Change notes that bus use is stable in the region in comparison to other regions.

Rail – It is suggested that analysis shows the key challenges to occur at the key city and related interurban stations and gives an including list of stations. This should list all stations where absolute change is over 300 to be consistent with Fig. 16, not just a random list.

Road – it is noted that ‘there are several areas of capacity constraint across the Central Belt and the other Scottish Cities’. Please name the other cities and the other areas where there is capacity constraint – a look at Figures 21 and 22 would suggest Dundee and Perth cities should be included and also show constraints between Perth and Dundee, and around Stirling. This emphasises the need to address these issues in these localities not just for these locations, but for access between Glasgow/Edinburgh and all points north of Stirling/Perth/Dundee

Similarly Figures 24 and 25 show the importance of M80/M90/A9/A90 as freight corridors for the country (elsewhere, report notes most HGV trips remain internal to Scotland)

Section 2.4 Summary

It is agreed that work is required to increase the number of short trips undertaken by active travel modes, to address declining bus patronage and encourage the use of public transport for medium-distance trips and to encourage longer-distance trips by rail or by low emission vehicle when travelling by road,

Chapter 3: Scotland’s External Links

This Chapter provides a lot of data regarding cross boundary and international travel, which is very interesting but does not make a lot of analysis that feeds into the problems and opportunities. Further detailed comment:

Figure 32 - Unsure about the conclusions drawn from the UK rail origins/destinations. ‘London is the largest source of forecast demand’ as North East, North West and London are shown to be pretty much equal. This is an important debate to be had, do we primarily focus on connections to London or NE/NW England.

The Summary (Section 3.6) summarises all of the information, but does not outline the key challenges.

Chapter 4 Key Challenges for Transport and Infrastructure

This chapter provides a good summary and attempts to identify the key challenges stating that this includes 10 key challenges. It would be good to have a list of all the key challenges faced, rather than an example of 10 key challenges. Some detailed comments:

It is agreed that *'there is a need to reduce travel and deliver modal shift towards walking.'* However, it would be interesting to know whether the Committee on Climate change quoted in setting the need for a 10% reduction in car mileage was considering combustion engines or whether this included a shift to electric vehicles.

Tactran welcomes the further clarification of the travel mode hierarchy and supports the statement that the *'STPR2 should prioritise interventions that increase the modal share of shorter everyday trips by walking, wheeling and cycling; short to medium length trips by public transport and longer trips by rail and low emission vehicles.'*

Tactran questions and seek clarification on the statement; *'Based on current forecasts for future housing and employment land uses there will continue to be strong demand for rail services particularly within the key corridors to, from and between Edinburgh and Glasgow. This will further heighten the current terminal station capacity issues within Scotland's two largest cities.'* What is meant by corridors to, from and between Edinburgh and Glasgow. Five of Scotland's seven cities are north of Edinburgh and Glasgow and rail connections between these cities and also between these cities and Edinburgh and Glasgow are considered to be a key challenge. The importance of Glasgow and Edinburgh is recognised, but the STPR should not concentrate the key rail challenge on these two cities while omitting recognition of the significant challenges for rail to the north of the Central Belt.

Tactran welcomes the recognition for *'the requirement to support and accelerate the just transition to low emission vehicles'* and considers this may well be the greatest transport challenge over the next 5 to 10 years.

Q8. Are there any strategic opportunities which you feel have not been effectively captured in the report?

Please tick one only

Yes

No

Q9. Please describe the strategic opportunities which you feel have not been effectively captured in the report in the space below

See answer to Q7.

Transport Planning Objectives

Q10a. How well do the five Transport Planning Objectives (TPOs) capture what needs to be done to improve strategic transport across the country? (National Case for Change Question only)

Very well

Well

Poorly

Very Poorly

Q11. Please use the space below to provide any other comments that you wish to make on the Transport Planning Objectives (TPOs) for this study.

There are clear linkages between the Transport Planning Objectives (TPO) and Sub-objectives and the National Transport Strategy's 4 priorities and 12 outcomes, but the case for change does not present a strong link between Problems, Opportunities and the TPOs and sub-objectives.

There is concern at the amount of TPOs (5 main TPOs and 20 Sub TPOs). How will these TPOs relate to the 3 Advance Study Regions Case for Change Reports for Scottish Borders, North East Scotland and South West Scotland regions which have substantially less TPOs, between 4 and 6 each.

Any other comments

Q12. Please use the space below to provide any other comments that you wish to make on the report.

Overall this report reads more like a policy document than a case for change report which should consider all evidence, problems and opportunities and link this to the Transport Planning Objectives to appraise interventions. If there has been extensive data analysis and stakeholder engagement, then there is little of it on show here that adds to what was known from the National Transport Strategy.

The members of the Regional Transport Working Groups for Tay Cities and Forth Valley regions had been promised access to the national STPR discussions (rail / active travel etc) to understand how they would impact on the regions, and hence to inform regional responses. It was expected that such information would be included in this National Case for Change report, however, it is not.

Section 6. Option Development and Approach to Sifting

Option Generation and Sifting Figure 36 – not sure why extant STPR 1 projects would not be considered also by the Regional Sifting Process, particularly as many of these also feature in Regional and Local Transport Strategies.

6.2 Option Sifting Approach

The option sifting approach in general seems sensible. However, there is concern at the first pass suggestion that a candidate option would be sifted out if it contributed negatively to more than one objective. This seems an excessively low figure given there are 5 TPOs and 20 sub-objectives. Also, the possibility of packaging candidate options together should be considered before sifting out.

Caveat

It should be noted that this Case for Change report was developed and issued for consultation prior to the Covid-19 lockdown. Therefore, the Tactran response is made assuming the same conditions will exist post lockdown. In reality the world will have changed significantly as a whole post lockdown and the overall circumstances for transport is likely to be considerably different to that anticipated in the reports, with different priorities and requirements. At this time, it is not possible to clearly anticipate what these circumstances may be.

**Strategic Transport Projects Review 2
Case for Change Comments Form**

Tay Cities Region

Tactran Response

Note: Questions 1 – 4 relate to name and type of organisation responding.

Strategic Problems and Opportunities

Q5. How effectively have the strategic transport problems and opportunities been captured in the report? *Please tick one only*

~~Very well~~

~~Well~~

Poorly

~~Very Poorly~~

Q6. Are there any strategic problems which you feel have not been effectively captured in the report?

Please tick one only

Yes

~~No~~

Q7. Please describe the strategic problems which you feel have not been effectively captured in the report in the space below

3.2 The introduction to this section notes that it will provide evidence of Problems and Opportunities on a number of themes and then goes on to list 11 themes – these are 11 of the 12 problems identified in the section (Rail Capacity and Access Constraints is missing from list) and does not list any of the 6 Opportunity themes identified in the section.

3.2.1 Problems

In general, it is agreed that the 12 themes identified as a problem are a problem for the region. Further detailed comments on some of the problems identified are given below:

Limited Transport Choice: Particularly in rural areas and hinterland surrounding urban areas, as well as health facilities, accessing employment can be difficult by public transport. This means that those identified in the deprivation and transport exclusion sections have a limited choice in accessing employment opportunities. Also, although access to health facilities in general is highlighted, some have no way of accessing Hospital appointments by public transport.

Air Pollution: While traffic on trunk roads is mentioned, it does not really explain the full extent of the effect of this. Strategic through traffic on the A9 around Perth and the A90

through Dundee, causes congestion on these routes and displacement of more regional and local traffic onto routes through the respective city centres instead and therefore exacerbates air quality in Perth and Dundee city centres.

Carbon Emissions: Although this is mentioned in the opportunities section under Technology heading, it would be useful to highlight that Dundee City Council has led the way in promoting EVs in Scotland and that Tactran and our Constituent Councils are actively pursuing increasing EVs through a regional EV strategy, delivery plan and forum.

Public Transport Availability and Competitiveness: See comments regarding on Section 2.5.4 regarding Journey times and average rail speeds between Perth/Dundee to Edinburgh – average speeds of 28mph and 29mph respectively show how poor journey times are between Edinburgh and the Tay Cities Region and highlight the circuitous rail route through Fife as well as the capacity constraints, which are significant problems (Note the only reason rail journey times are competitive to car journey times between Dundee and Edinburgh is that the main strategic road, A90/M90, is indirect as it heads 20 miles west from Dundee towards Perth before heading south to Edinburgh). Mention of the high rail fares is welcomed. Regarding bus use being relatively stable in recent years, this was starting from a lower base than other areas in Scotland and although use is stable the network in rural areas is shrinking.

Inter and Cross Regional Connectivity: it is welcomed that road and rail connectivity is a recognised as a problem for some towns. It may be worthwhile highlighting that Forfar and Brechin have good road connections, but poor rail, whereas Montrose has good rail connections but not road. The need for better road connections to Montrose ties in with the aspiration for a inter-modal freight facility at Montrose. Also although there are bus park & ride facilities at Broxden, Perth and at Kinross, there is no mention of lack of such facilities either for rail or bus at Dundee and other routes into Perth.

Freight Movements: It would be worthwhile noting that there is an aspiration for rail freight head at Montrose.

Road Capacity Constraints and Congestions: the recognition that the trunk road network around Perth and through Dundee causes problems of congestion and delays is welcomed. However, it should be made clear that it also causes congestion in the city centres as local and regional traffic is displaced through the city centres from the A9 and A90 routes respectively. The A90 through Dundee causes the following problems:

- Nationally – traffic travelling between Aberdeen/Angus and Central Belt delayed by congestion. Even without congestion the A90 through Dundee has become a more urban road over recent years with several at-grade roundabouts, traffic signal junctions and signalised pedestrian/cycle crossings and the speed limit reduced to 40mph and 50mph.
- City Wide – Regional traffic displaced onto other roads including city centre route. This exacerbates the air quality in the city centre and also reduces the opportunities to introduce further shorter distance walking and cycling infrastructure and facilities in the city centre.
- Locally – causes community severance and a barrier to buses crossing the Kingsway causing delays.

Another problem is the poor links between St Andrews and Dundee, both for public and private transport. The A919/A914 route is single carriageway and the road characteristics means the speed limit is reduced to 40mph for a significant length along the route. This means that both buses and private vehicle journey times are poor. The importance of the connection between the Universities in Dundee and St Andrews was highlighted as part of the Tay Cities Deal.

Rail Capacity and Access Constraints: It would be worthwhile mentioning particular constraints in the region, there is work being undertaken through the 7 Cities and Aberdeen to Central Belt projects that will improve services between Aberdeen and Dundee/Perth and Glasgow that should take into consideration of the Usan Single line and Barnhill single line and other infrastructure constraints on this route. However, as noted above the Dundee to Edinburgh and Perth to Edinburgh routes have significant constraints through Fife due to circuitous route, capacity and track alignments, in particular the single line between Perth and Ladybank is a significant constraint. The Highland Main Line (HML) has seen some improvements over the past few years but the long lengths of single track continue to act as a constraint.

Q8. Are there any strategic opportunities which you feel have not been effectively captured in the report?

Please tick one only

Yes

~~No~~

Q9. Please describe the strategic opportunities which you feel have not been effectively captured in the report in the space below

3.2.2 Opportunities

Technological Opportunities: the recognition for the potential and appetite to embrace technology is welcomed. Just a few minor points:

- Travelknowhow Scotland is a nationwide facility managed by Tactran on behalf of Transport Scotland and the 7 RTPs.
- Dundee – Edinburgh electric coach service – is the company Ember?
- Worthwhile mentioning Perth West Mobility Hub and Innovation Highway, being developed as part of Tay Cities Deal.

Development of the Active Travel Network: In addition to NCN aspirations, Tactran RTS contains an aspirational Regional Walking and Cycling Network, with sections being developed by Tactran and our Constituent Councils.

Supporting Economic Growth: Mention of the Tay Cities Deal is welcomed, however, there is an updated version of the Tay Cities Economic Strategy published in September last year – cognisance should be taken of the opportunities this identifies. In addition Tay Cities Deal includes projects better integrating Perth Rail and Bus Station with the city centre; Low

Carbon Hubs at Perth and Dundee Airport Investment aimed at increasing patronage and destinations for the airport. In addition plans for Cross Tay Link Road are being taken forward for implementation. All of these should be seen as opportunities. The rail opportunities provided by Aberdeen to Central Belt and seven cities projects are welcome. There could be other opportunities through electrification of the rail network and also the LRDF projects considering Park & Choose opportunities on the Montrose to Perth Corridor at a new station at Oudenarde/Bridge of Earn.

Public Transport Growth: Not sure this is an opportunity or a problem. There is predicted growth in rail use, but a steeper decline in bus use.

3.2.3 Future Conditions

This section is very limited, but very important – the National Case for Change report highlights forecasts to 2037 and includes maps and graphics identifying where there may be constraints on the road and rail network e.g. it shows significant road capacity constraints at Dundee and between Perth and Dundee, also high number of freight movements on A90 around the Montrose area. This is all shown at a national scale, but should be brought in to the Regional Case for Change.

3.3 Summary

This is more a list rather than a summary and it does not really summarise or describe the problems and opportunities in the region.

Transport Planning Objectives

Q10b. How well do the five Transport Planning Objectives (TPOs) capture what needs to be done to improve strategic transport across the region?

~~Very well~~

Well

~~Poorly~~

~~Very Poorly~~

Q11. Please use the space below to provide any other comments that you wish to make on the Transport Planning Objectives (TPOs) for this study.

There are clear linkages between the Transport Planning Objectives (TPO) and Sub-objectives in Table 3 and the National Transport Strategy's 4 priorities and 12 outcomes, but it is less clear how these linkages tie in with the Tay Cities Region Context, Problems and Opportunities. This may be as a result of the summary not particularly defining the problems and opportunities well. Table 4 mapping problems and opportunity themes to Regional Sub-objectives gives some indication but is very high level. Possibly some narrative against each objective noting why it is relevant particularly to the region may be helpful?

In addition, a few detailed comments on the Table 3 TPOs:

Sub objective:

'Reduce demand for unsustainable travel and the adverse impacts of transport on people and places/communities by supporting and embedding the place principle changes to the strategic transport system across the region.'

The second part of this objective '*...by supporting and embedding the place principle changes to the strategic transport system across the region*' is a solution rather than an objective.

'Reduce emissions from transport that are harmful to people's health.'

It is assumed that this means reduce emissions where people actually live and work and not just a general reduce emissions. Perhaps the objective should be '*Reduce emissions from transport where they are harmful to people's health.*' To give a more targeted objective.

'Increase access for the region's population to education, training, employment and tourism, and expand labour market catchments.'

Generally agree with this objective, however, in relation to tourism it is wider than the region's population and includes visitors to the region with the objective being to provide sustainable transport to tourist accommodation and attractions.

'Reduce transport related casualties in line with reduction targets'

Given that greater reduction in road casualties has been achieved to date against the national road casualty reduction targets, should this not be '*...in line or better than*'.

Overall there is a concern at the number of objectives, 5 National and 19 Sub-regional, and at how targeted these objectives are to the region. It is notable that the three Initial Appraisals that had already been undertaken, Borders Corridor Study, South West Scotland Transport Study, Aberdeen City Region Strategic Transport Appraisal, have between 4 and 6 TPO's each.

Any other comments

Q12. Please use the space below to provide any other comments that you wish to make on the report.

Section 2: Context

2.3 Socio-Economic Context

2.3.3 Travel to work – Mode Share - there does not appear to be any mention of number of households with access to a car. This is considered to be an important socio-economic factor in regard to transport i.e. Arbroath, Montrose, Perth and Dundee all have a higher percentage of households without access to a car than the Scottish average. Particularly noticeable is Dundee where almost 45% of households do not have access to a car, but text in 2.3.3 and Figure 7 shows the travel to work car mode share in Dundee being at 60% - these seem counterintuitive.

2.3.5 – Travel to School mode share – information only given for percentage of Active Travel (walking, cycling, scooting). No figure is given for those that travel by bus to school and this may account for low level of active travel in Perth & Kinross and Fife, given catchment distances for schools.

2.3.8 – access to key employment sites – while this illustrates access to key employment areas it does not indicate choice of employment (i.e. the number of key employment areas/opportunities accessible).

Figure 17 – although this illustrates access to Hospitals and GPs, it should be noted that when considering access to Hospitals only, there are large areas of the region that are unable to access Hospitals by public transport.

While the information provided is generally good, it is difficult to get an overall picture of the socio-economic context of the area due to the volume of information given. This section could do with an overall summary of the context pulling together all the various strands and providing an overall picture of what is significant e.g. the majority of people both live and work within the region; over a quarter of Angus work age residents work in Dundee; there are low income issues within both urban and rural areas; in rural areas transport costs are higher and also public transport less likely to be available; access to employment opportunities, education and health facilities is difficult out with the urban areas; etc. – what is the important context?

2.4 Environmental Context

2.4.2 Carbon Emissions – comment - transport carbon emissions increasing by 2% more than Scottish average – how much of this is due to road traffic passing through the region between Central Belt and North East/Highlands?

2.5 Transport Context

2.5.1 Active Travel Network – it would be useful to have the cycle network illustrated visually on a map/plan.

2.5.3 Bus and Coach Network - it would be useful to have the bus and coach network illustrated visually on a map/plan.

2.5.4 Rail Network – it would be useful to give passenger usage figures for each of the 20 rail stations in the region to provide context. In addition for the busiest of the stations; Dundee, Perth, Leuchars, Montrose, Arbroath it would be good to illustrate where the top 5 destinations were for passengers using these stations.

While it is useful to provide a comparison of rail and car journey times, this only tells part of the story. It would be useful to look at average rail speeds:

- Perth to Edinburgh Waverly is 39 miles as the crow flies, but average Rail Journey Time is 1hr 23min, providing an average speed of 28 miles/hour.
- Dundee to Edinburgh Waverly is 37 miles as the crow flies, but average Rail Journey Time is 1hr 17min, providing an average speed of 29 miles/hour.

It is noted that using crow fly distances between origin and destination is not overly realistic (especially from Dundee to Edinburgh with 2 estuaries to cross), but it does illustrate how circuitous the route is between Perth/Dundee and Edinburgh and how poor the track alignment and speeds are.

It would be useful to indicate the rail fares between the stations in the Tay Cities area and the major stations of Glasgow QS, Edinburgh Waverly, Aberdeen and Inverness.

2.5.5 Ports, Maritime and Aviation – information provided regarding the three sea ports in the Tactran Region seems a bit limited.

Dundee Airport only services a small proportion of air travel in the region. It would be worthwhile indicating the amount of air travel there is by passengers at Edinburgh, Glasgow and Aberdeen airports travelling from the Tay Cities Region and how accessible these airports are by car and public transport from the Region.

2.5.6 Road Network – it would be useful if Annual Average Daily Traffic (AADT) flows could be shown at significant points on the Strategic Road network in the region as this would provide some context to the traffic movements in the region (broken down to Cars, LGV, HGV if available).

Although data shows that most travel is within the region, it is important to note that traffic travelling through the region is a significant proportion of the traffic travelling on key routes i.e. A90, A9 and A92 through Fife. Due to their location in regard to the two cities in the region including through Dundee and directly around Perth the through traffic has a disproportionate impact on these cities. It may be worthwhile illustrating the amount of road traffic travelling through the region on these routes.

2.5.9 Road Safety – is it road accidents or road casualties that are referenced?

While the information provided is generally good, it is difficult to get an overall picture of the Transport context of the area due to the volume of information given. This section could do with an overall summary of the context pulling together all the various strands and providing an overall picture of what is significant e.g. there is significant Walking and Cycling infrastructure in the region with aspirations to increase; the bus network is generally good in the larger urban areas; although bus use is reasonably steady in recent years on rural services these were starting from a low base; the majority of travel is within the region; there is a large influx of road traffic into our cities in morning peak, especially a large East – West flow in Dundee; through traffic on trunk road network significantly impacts travel in our cities; etc – what is the important context?

2.6 Context Summary

This is very high level and does not really provide the context for the region, more a list of bullet points without context – which is why it is suggested that there are context summaries given at the end of each subsection – particularly sections 2.3 Socio-Economic Context and

Section 5: Approach to Option Generation and Sifting

It is noted that a strategic transport project definition is different from that given in Section 1 of the document.

Option Generation and Sifting Figure 34 – not sure why extant STPR 1 projects would not be considered also by the Regional Sifting Process, particularly as many of these also feature in Regional and Local Transport Strategies.

Appendix B: List of Policy Documents

As noted above The Tay Cities Regional Economic Strategy was updated and published in September 2019, at the same time a Tay Cities Regional Tourism Strategy was published. Both available on Tay Cities website.

Caveat

It should be noted that this Case for Change report was developed and issued for consultation prior to the Covid-19 lockdown. Therefore, the Tactran response is made assuming the same conditions will exist post lockdown. In reality the world will have changed significantly as a whole post lockdown and the overall circumstances for transport is likely to be considerably different to that anticipated in the reports, with different priorities and requirements. At this time, it is not possible to clearly anticipate what these circumstances may be.

**Strategic Transport Projects Review 2
Case for Change Comments Form**

Forth Valley Region

Tactran Response

Note: Questions 1 – 4 relate to name and type of organisation responding.

Strategic Problems and Opportunities

Q5. How effectively have the strategic transport problems and opportunities been captured in the report? *Please tick one only*

~~Very well~~

~~Well~~

Poorly

~~Very Poorly~~

Q6. Are there any strategic problems which you feel have not been effectively captured in the report?

Please tick one only

Yes

No

Q7. Please describe the strategic problems which you feel have not been effectively captured in the report in the space below

Poor Road User Experience: During the consultation and the FV RTWG discussions a number of issues were grouped under the poor road user experience. One of these (which could also be identified under a public transport heading) was the lack of co-ordinated management of the two main bus corridors in the region (Falkirk -Stirling and Alloa – Stirling), and in particular the impact of (un-cordinated) roadworks on such services.

Pinch Points on Strategic Transport Networks: The 'Poor Road User Experience' section touches on pinch points in a generic manner. As a key element of the DPMTAG process is to identify pinch points/hotspots in the transport network both now and in the future it is suggested that this issue is not covered in sufficient detail. This is concerning, especially as it has been an issue for discussion within the FV RTWG. Of particular concern in the Tactran area is:

- Forecast problems at M9 Junction 10 Craigforth (as identified in Stirling LDP DPMTAG study)
- Forecast problems along A91 between Manor Powis and Pirnhall (as identified in Stirling LDP DPMTAG study). This will impact not only on access to/from Stirling, but also between Clacks and M80 and Stirling-Falkirk buses serving Forth Valley Royal Hospital.

There will, of course, be similar issues in Falkirk and possibly Clackmannanshire.

Connectivity to surrounding areas (Fife/West Lothian/North Lanarkshire)

Suggest the problem of connectivity to surrounding areas (esp as employment destinations/workforce catchment areas) hasn't been fully captured:

- The public transport context highlights where services go to. It does not highlight areas/major towns close by which are not well connected to the region.
- The report should reflect on the changes to how the rail network is structured, prioritising transit between the main towns and Glasgow/Edinburgh, and consequently either at best introducing interchange to access intermediate stops or even reducing services.
- The report highlights that middle distance trips are almost entirely made by car. A possible reason is due to the lack of alternatives
- The report should highlight the proportion of work trips outside the region not going to Glasgow or Edinburgh (7,640 to/from North Lanarkshire; 6,827 to/from West Lothian; 5052 to/from Fife; 2393 to/from Perth. That's 21,912 compared to the 18,506 travelling between the region and Glasgow and Edinburgh (2011 Census TTW)). To predominately focus on Glasgow and Edinburgh is to focus on the problems experienced by those conurbations, it is not a fair reflection of the issues faced by Forth Valley residents or settlements.

Suggest that these sets of data combine to suggest a problem of public transport connectivity to/from major towns (Dunfermline / Cumbernauld / Bathgate / Linlithgow) around the region.

Transport Poverty

It is also suggested that the definition of one of the problems as 'High Cost of Public Transport' perhaps does not fully reflect the broader issue, as was discussed throughout the consultation, of 'Transport Poverty' in both urban and rural communities across the 'region'.

Q8. Are there any strategic opportunities which you feel have not been effectively captured in the report?

Please tick one only

Yes

No

Q9. Please describe the strategic opportunities which you feel have not been effectively captured in the report in the space below

Interchange: Reference should be made to the strategic road (M9/M80) and rail routes (Aberdeen/Inverness-Glasgow; Dunblane/Alloa-Edinburgh; Edinburgh-Glasgow) passing through the region and in close proximity to major centres of population in the region (esp Stirling and Falkirk) and hence in good position to provide strategic interchange opportunities into and out of our main settlements.

Active travel: suggest reference the fact that many of the settlements in the (urban part of) region are within approx. 7miles from each other provide a good opportunity to enable inter-urban active travel

Climate change: the climate change emergency is identified as an opportunity to get people out of their cars. The report should reflect on the scope of this opportunity, for example the scope to achieve this for different lengths of trips. Earlier in the report the predominance of middle distance trips made by the car is highlighted. For a mode shift opportunity to be realised for middle distance trips as well as for short trips (by active travel) and long distance (by rail), suitable alternatives would need to be identified. Suggest this leads to electric vehicle and bus solutions to be identified in the options stage.

Suggest a specific example that should be included under the climate change heading because of its impact on strategic networks is:

- Modelling as part of the Stirling LDP DPMTAG study has shown the need for a significant modal shift to manage congestion and its consequences (air quality / journey times etc)
- However, between 38%-46% of car trips within Stirling City are strategic in nature (ie origin or destination is outwith the Stirling City area)
- Accordingly the solutions to this problem will need to consider strategic options

Technology: The link to this section would be stronger if the significant change in home working patterns between 2001 and 2011 (in Stirling at least) had been highlighted in 'Travel to work' (2.3.3) section earlier in the report.

Other Regional Case for Change work: Transport Scotland have funded the LRDF process to identify the case for change for rail projects identified by LAs/RTPs/Communities. Tactran and Stirling Council have had the case for change for the 'Stirling Strategic Park and Ride study' accepted by Transport Scotland. Considering the purpose and scope of the FV Case for Change work, and the scope of the 'Stirling Strategic Park and Ride study', it seems strange that this is not referred to. Similar arguments could be made for the Central Scotland Green Network and National Walking and Cycling Network.

3.2.4 Summary of Problems and Opportunities

Given the above comments, some of identified problems and opportunity summaries could be strengthened, both in terms of referencing localities and:

- Referencing 'Public transport connectivity to neighbouring towns/areas' within the 'poor accessibility and connectivity' heading
- Splitting the poor road user experience into:
 - Maintenance and resilience issues
 - Pinch points resulting in journey time delays and pollution
- Including barrier to active travel within a broader heading of barriers to active and sustainable travel

The STAG process encourages us to be specific with POIC. Many of the opportunities appear to be generic. Where opportunities could be made more location specific this would strengthen the report.

Transport Planning Objectives

Q10b. How well do the five Transport Planning Objectives (TPOs) capture what needs to be done to improve strategic transport across the region?

- Very well
- Well
- Poorly
- Very Poorly

Q11. Please use the space below to provide any other comments that you wish to make on the Transport Planning Objectives (TPOs) for this study.

National and Regional TPOs

A key element of STAG Case for Change reports would normally be a flow chart highlighting the link between Problems and Opportunities and the TPOs. Including such a diagram helps tighten both the problems and opportunities, but also the TPOs. Whilst all the sub-objectives are worthy, it is necessary to see how they relate to the specific problems and opportunities in the Forth Valley. It is suggested that a more comprehensive summary of problems and opportunities may better align with the sub-objectives proposed.

STPR2 Objective	Sub-Objective	Comment
A sustainable strategic transport system that contributes significantly to the Scottish Government’s net zero emissions target	<ul style="list-style-type: none"> • Reduce the consumption of fossil fuels through managing travel demand and enabling a shift to more sustainable modes of travel alleviating pressure on and improving air quality a pinchpoints and AQMAs • Reduce emissions generated by the transport system 	<ul style="list-style-type: none"> • Suggest “net zero <u>carbon</u> emissions target” • The first bullet point seems to address the different subjects of carbon emissions and air quality. Is there therefore any need for the final bullet point. • Nonetheless, preference would be for carbon emissions to be covered under this STPR2 objective, and air quality under the STPR2 objective that relates to health

STPR2 Objective	Sub-Objective	Comment
	<ul style="list-style-type: none"> • Increase the share of public transport, with a particular focus on travel outwith the main population centres of Alloa, Falkirk and Stirling 	<ul style="list-style-type: none"> • We want to equally promote public transport in urban and rural areas. Suggest replace “with a particular focus” with “including”
<p>An inclusive strategic transport system that improves the affordability and accessibility of public transport</p>	<ul style="list-style-type: none"> • Improve mobility and inclusion, with a particular focus on interventions that improve mobility for all, particularly outwith the urban centres of Alloa, Falkirk and Stirling 	<ul style="list-style-type: none"> • We want to equally promote mobility for all in urban and rural areas. Suggest replace “with a particular focus” with “including”
<p>A cohesive strategic transport system that enhances communities as places, supporting health and wellbeing</p>	<ul style="list-style-type: none"> • Reduce demand for unsustainable travel by only promoting interventions that support and embed holistic place principles in changes to the strategic transport system 	<ul style="list-style-type: none"> • Suggest the sub-objective needs to be re-worded on plain English.
	<ul style="list-style-type: none"> • Reduce demand for unsustainable travel arising from nationally significant growth areas.... 	<ul style="list-style-type: none"> • Suggest replace “nationally” with “regionally”
<p>A reliable and resilient strategic transport system that is safe and secure for users</p>	<ul style="list-style-type: none"> • Reduce transport related casualties in line with reduction targets, with a particular focus on reduction of the number and severity of cycling collisions in Forth Valley 	<ul style="list-style-type: none"> • While safety should always be our first objective, did the evidence base identify a particular safety issue in relation to cyclists over and above other road users (including pedestrians) in Forth Valley?
	<ul style="list-style-type: none"> • Improve resilience through climate change adaptation within the management and maintenance of Forth Valley’s strategic road and rail infrastructure 	<ul style="list-style-type: none"> • While the sub-objective is supported, it does not derive from problems or opportunities identified in the case for change report
	<ul style="list-style-type: none"> • Improve perceived and actual security on Forth Valley’s strategic road and rail infrastructure 	<ul style="list-style-type: none"> • While the sub-objective is supported, it does not derive from problems or opportunities identified

STPR2 Objective	Sub-Objective	Comment
		in the case for change report

Any other comments

Q12. Please use the space below to provide any other comments that you wish to make on the report.

The report provides a reasonable framework to present the problems, issues and opportunities related to the strategic network in Forth Valley, but suggest the report could be significantly strengthened by considering the following issues:

Region-wide data: Much of the data presented is at the region-wide level. Given the huge differences between the urban and rural areas across the region, it is questionable how conclusions can be drawn from such data. Region-wide data either hides or reduces the scale of the problems in localities. Furthermore, in a STAG process which is focused on identifying location specific interventions which will address issues in localities, it is difficult to see how location specific solutions flow from region wide data.

Context information: the report includes context information in relation to local and regional policy, geography, socio-economic and environment. However, few conclusions are drawn from this data. The STAG process encourages us to identify the relevance of any data presented. Doing such is likely to strengthen the report. For example:

- Driving is identified as the predominant mode for middle distances (2.3.4). Why? Is this a result of few alternatives for trips of this distance?

Detail: Related to the above comments, the report at times lacks the detail to enable a more specific summary of problems and opportunities to be identified, which would themselves assist in the identification of more specific and TPOs relevant to the area (ie STPR2 sub-objectives)

It is considered that strategic problems and opportunities, may have been missed (or don't have as strong an evidence base as they could, which presumably may have an impact on their assessment) because of:

- much of the analysis being undertaken with region wide data
- lack of analysis of context data

Examples of the data which could have led to further problems/opportunities are referenced below:

2.3.2-2.3.4 Travel demands: text on travel to work and economic activity reflect some key travel patterns/demands. However, suggest that there are key demands missing:

- **Access to national and regional destinations:** National destinations include Grangemouth but not LLTNP or Stirling University or Stirling Castle/Helix; whilst regionally important destinations such as the Forth Valley Royal Hospital and Forth Valley College sites are missing
- **Growth areas:** Suggest the case for change should reflect on future pressures. Key growth points can be identified in the LDPs and the Growth Deals, and some could be expected to put particular pressure on strategic transport networks. Hence they should be included. Examples include:
 - Durieshill/South Stirling Gateway development around M9 junction 9
 - Grangemouth Investment Zone

2.3.3 Travel to work: The report states that 84% of residents in Stirling and 84% of residents in Falkirk work in their respective local authority areas. My understanding of the 2011 census TTW data is 55% and 52% respectively. Can we please check and clarify these numbers.

It is suggested that the % of residents living and working in the region is a useful consideration (65%). When compared against similar figures for other TTW regions this will indicate how important inter-regional transport demands/relationships are.

Suggest it would also be useful to reference average travel time to work (ONS Labour Force Survey). This shows similar average travel to work times for Falkirk and Stirling residents (28mins and 31mins respectively) but a much shorter time for Clacks residents (18mins). Is this due to lower travel horizons for Clacks residents, or the additional burden of travelling beyond Clacks is limiting realistic choices for Clacks residents? Either way, suggest it supports the transport poverty conclusions referred to later in the report.

2.3.4 Economic activity: the travel to work section (2.3.3) considers the destinations of residents, however the origins of trips into or through the area is important. This would highlight:

- The pressure put on the strategic networks in the region of trips heading north/south
- Tourism trips into the region, placing particular pressure on our networks at specific times
- The region as an important employment/education destination in itself

Bus connectivity

2.3.5 Access by public transport to at least one employment destination is used as a data set. Subject to the definition of an employment centre, suggest this is largely meaningless. To suggest that one employment location is a reasonable choice to enable people to access work is unrealistic.

2.5.3 The description of where there are bus routes doesn't give a good idea of bus accessibility. The text leaves the reader assuming that there is a good bus network across the region, I'm not sure many would agree. Suggest TRACC can do this much better. (NB there is no Crianlarich to Stirling service)

Barriers to Active Travel: Like much of the conversation over recent years, this discussion has focussed on barriers to cycling. To achieve the objectives of the NTS the discussion needs to be around barriers to active and sustainable travel, so that the barriers to walking,

bus, train, car sharing, electric vehicles etc are discussed in as much detail as that of cycling. This would enable us to recognise and address important issues such as parking policies; the relative cost of public transport vs car; the step change in EV infrastructure that is required etc

National Cycle Network

- 2.4.1 Is the NCN an environmental constraint?
- 2.5.2 NCN765 is missing (Stirling to Doune)

Fig 31&32: Poor Accessibility and Connectivity

Figures 31 (access to further and higher education) and 32 (Access to school): the figures show the ability to access these destinations by the whole population. TRACC allows you to map access by relevant age groups, which would presumably be more representative.

2.5.6 Strategic Transport Network

Suggest that the A827 (Lix Toll(A84) to Balinluig (A9) via Lock Tay) performs a strategic function given the extent of detour for the two alternatives.

Caveat

It should be noted that this Case for Change report was developed and issued for consultation prior to the Covid-19 lockdown. Therefore, the Tactran response is made assuming the same conditions will exist post lockdown. In reality the world will have changed significantly as a whole post lockdown and the overall circumstances for transport is likely to be considerably different to that anticipated in the reports, with different priorities and requirements. At this time, it is not possible to clearly anticipate what these circumstances may be.