Tactran Draft Regional Transport Strategy Refresh – Consultation

May 2015

Tactran Draft Regional Transport Strategy Refresh – Consultation

The Draft of the RTS Refresh and Interim Equality Impact Assessment were approved for consultation at the Tactran Partnership meeting on 10 March 2015. An SEA Environmental Report was published following the Board meeting. All three documents were the subject of consultation between 27 March and 8 May 2015.

Nineteen consultation responses were received, in addition to comments from the three Consultation Authorities on the Strategic Environmental Assessment (SEA) Environmental Report via the SEA Gateway as set out below.

Responses were received from the four partner Councils, Perth & Kinross Community Planning Partnership, Cairngorms National Park Authority, Transport Scotland, NHS Tayside, SEStran, three community councils, Forestry Commission Scotland, Freight Transport Association, Road Haulage Association, Port of Dundee, RNIB Scotland, SEPA and a Dundee resident.

In general the responses welcomed and supported the RTS Refresh. Detailed comments covered a range of topics as presented below. Tactran officer responses are indicated in the third column with proposed changes to the draft RTS Refresh in consequence of the consultation responses shown in the fourth column. The latter are principally changes to text with one new policy proposed to be added to the Rail Strategy – R11 Work with disabled representative groups and rail operators to identify and overcome barriers to travel.

Comments made by RNIB Scotland were added to the Evidence from research and statistics and Evidence from consultation sections of the Interim Equality Impact Assessment.

Changes to the SEA Environmental Report requested by the SEA Consultation Authorities are listed in the third column on pages 21 - 25 of this report.

Tactran Draft Regional Transport Strategy Refresh – consultation responses

Name of organisation	Comments	Response	**Changes to RTS Refresh**
Angus Council	Welcome the continued work involved in preparing and delivering the RTS, and in setting out the vision and way forward for 2015-36 recognising that the strategy needs to balance ambition with a realistic approach to deliverability of aspirations given the challenging financial situation facing all the partners as forecast for the years ahead. Would welcome an ambitious strategy and consider the blend and approach proportionate with the ability to adapt in future reviews if the financial constraints are relaxed. Section 2 gives an insight into changes experienced in the region and we wonder if other emerging internal and external issues should also be included and other relevant areas of the document to drive some other aspects of the RTS. These include;	Noted	
	- partner Council moves towards Health and Social Care integration and the changing landscape for service delivery and travel/transport needs	This was considered in the Main Issues Report (MIR).	
	- changes in care and in particular help to stay at home which will impact on the need to travel for services/for service delivery	Noted	
	- changes with the police service and in particular those which will influence road safety including the changes to the Safety Camera Partnerships	This was considered in the MIR.	
	- "Switched On Scotland" with the introduction of charging infrastructure and reducing costs of electric vehicles and potential alternative fuelled vehicles	This is covered in "Innovation in Transport Technology".	
	-the continuation and strengthening of the region as a destination for tourists/activities particularly in light of events which have put the region on the world map such as the Ryder Cup, Bannockburn 700th celebrations, Commonwealth Games at Barry Buddon and the role that transport played in making these events a success. There are future aspirations for visitors to the V&A in Dundee and the Open Golf at Carnoustie where transport will be a significant feature	The Tourism Development Framework for Scotland was considered in the MIR. The MIR recognised the importance of transport to tourism.	

Name of organisation	Comments	Response	Changes to RTS Refresh
Angus Council (continued)	- on-going work on the East Coast Mainline Authorities Consortium with regard to rail travel into the area	Additional text will be added to the Rail paragraph of Section 2 to reflect this.	**Add to Rail paragraph**
	-changes in the wider public sector working environment with agile working to reduce journeys (noting that NHS is identified in 5.2.5)	This is reflected in the Travel Planning Strategy which aims to apply a similar approach to the NHS through encouraging the development and establishment of effective Travel Plans throughout the public sector (TP2).	
	- recognise the emergence of Paths for All and Smarter Choices, Smarter Places (notably in 5.3) where this is now expanding.	The MIR considered the Cycling Action Plan for Scotland and National Walking Strategy which Paths for All and Smarter Choices, Smarter Places put into effect.	
	The above would serve to help update the RTS and contribute to the refresh by inclusion in the detailed strategies/frameworks of issues that have emerged since the original strategy.		
	Should add a new section be added to reflect alternative fuel developments with appropriate actions in regard to electric vehicles and the regional growth of charging infrastructure.	The environmental sustainability and promoting health and well-being strategic theme includes promoting the use of alternative fuels, in particular electric and hydrogen power and the use of renewable sources of energy in infrastructure.	
	2.2 The Region's Transport Network Asks that the Angus Coastal Tourist Route (Dundee to Aberdeenshire through Angus), Deeside Tourist Route (Perth to Aberdeen), the Forth Valley Tourist Route (Edinburgh to Stirling) are also recognised.	The Angus Coastal and Deeside Tourist routes are on regionally significant A roads as defined in the RTS 2008 - 2023. The A9 between Stirling and Falkirk should be added to the roads in section 2.2.	**Add A9 between Stirling and Falkirk to Section 2.2**
	3.2.1 RTS Objectives - Economy Economic growth should include tourism and exploiting the coastal and landward scenic beauty of the Tactran area - linking to 3.2.2 C.	It is considered that tourism is adequately reflected in "key business and employment sectors".	

Name of organisation	Comments	Response	Changes to RTS Refresh
Angus Council (continued)	**Page 18 seventh bullet point** Should be mention of promotion of infrastructure improvements to promote safety of active travel options of walking and cycling, in both the urban and rural environment, where possible.	Add new bullet point	**Add new bullet point**
	5.1.3 Strategic Roads Congestion and unreliable journey times on the strategic road network also cause "displacement of traffic volumes to local alternative routes" e.g. from A90 to A94 with high HGV content.	Reflect these comments in Section 2: Roads	**Add to Section 2: Roads**
	5.3.3 High Quality Infrastructure Appendix 2 shows "Aspirational Regional Cycling Routes" between some burghs where it is financially very difficult to deliver with more work needed to justify the feasibility of these links.	These are aspirational routes and are subject to feasibility and funding. It is recognised that there are financial constraints which preclude further consideration currently.	
	AT4 Improved Walking and Cycling Links to Education Facilities Perhaps also mention Park and Stride as a further means to reduce the school parking problem.	It is considered that the walking element of Park and Stride would be included in walking links to schools.	
	5.5.4 Network Performance Should be cognisance that in rural areas there is dependence on private transport for journeys at most times of day where infrequent public transport trips occur or where public transport cannot be supported/justified on many of the local network roads.	This was recognised in RTS 2008 - 2023.	
	R5 Rail Should be edited to reflect improvements/enhancements to stations to make them more attractive to users and encourage modal split. This would build on the work to Dundee station and support similar station improvements.	It is considered that the wording of R5 adequately reflects these comments.	
	Appendix 1 This records progress against the Strategic Actions but does not include work undertaken by individual Councils which has previously been reported to the Tactran Board.	Appendix 1 outlines progress in implementing Strategic Actions, irrespective of the delivery agent, as published in the Tactran Annual Report.	

Name of organisation	Comments	Response	**Changes to RTS Refresh**
Dundee City Council	As reported to and approved by City Development Committee - 18 May 2015.		
	Support the Refreshed Regional Transport Strategy as being the correct strategy for the Tactran region.	Noted	
	The Council considers that the following actions should be a priority for taking forward:	Prioritisation of interventions will be addressed in the review of the RTS Delivery Plan.	
	SC6: Work with Transport Scotland to support delivery of STPR projects to upgrade the A9 between Dunblane and Inverness; and to improve the A90 through/around Dundee.		
	SC11: Support the continuation and development of direct routes from Dundee Airport to London and other key destinations.		
	SC12: Support the further development of facilities at Dundee Airport.		
	PR2: New Bus Based Park & Ride		
	F5: Port Development		
	R1: Implement the Tay Estuary Rail Study proposals to achieve an additional hourly service between Arbroath and Glasgow stopping at appropriate local stations, complementing fast Inter City services.		
	R5: Support provision of new, relocated and enhanced stations where this will enhance access to the rail network and improve integration with the area being served.		
	The A90 upgrade through around Dundee was submitted to the Scottish Government by DCC as a project to be included in National Planning Framework 3 and considers this is still a priority. Dundee City Council considers that a rail station at Dundee West and supporting the redevelopment of Dundee rail station and its links to the Waterfront and V&A developments are also priorities for the Council.	Noted	

Name of organisation	Comments	Response	**Changes to RTS Refresh**
Dundee City Council (continued)	The Council also acknowledges the importance of the RTS refresh in supporting Community and Strategic Development Plans to ensure that it supports and is fully integrated with these other statutory documents. The Council also welcomes the fact that the RTS contributes to meeting the Climate Change Targets set down by the Scottish Government and this in in line with Council objectives as it is increasing the use of electric vehicles in its own fleet and the installation of electric charging points throughout the city to encourage the uptake in the private sector. This also contributes to improving Air Quality and supporting the Council's Air Quality Action Plan.	Noted	
Perth & Kinross CPP	The CPP welcomes the draft RTS Refresh and has no specific comments.	Noted	
Perth & Kinross Council	It is noted and supported that the general direction of the refresh is not being altered, but rather updated where relevant and now is aligned with the timescale of the Tayplan Strategic Development Plan.	Noted	
	It is noted and supported that the Draft Refresh has been informed by joint consultation with the Tayplan Main Issues Report.	Noted	
	In terms of the structure of the refresh document, whilst we appreciate why it is like this, we would comment that at times this can be confusing particularly the relationship between the plethora of policies, objectives and different elements of the strategy. I would suspect that non-transport readers would find this difficult to follow. It would be advisable if a shorter more succinct document was made available, probably in the form of a more readable, glossier Executive Summary. It is of note that other professional staff within the Service found the document confusing and difficult to follow.	It is proposed to publish the document in Easy Read format following approval by Scottish Government Ministers.	**Easy Read version to be produced**
	The inherent weakness in the refresh document, is there are lots of strong positive phrases such as ; support, promote, endorse etc. but there is no direct follow up in terms of how it is going to be done or importantly by whom, as many of these are clearly the responsibility of others.	The statutory purpose of the RTS is to provide a strategy for the Tactran region irrespective of which stakeholder(s) will or has responsibility for implementation of the policies.	

Name of organisation	Comments	Response	**Changes to RTS Refresh**
Perth & Kinross Council (continued)	It is understood this is mainly for historic reasons and work is ongoing on other aspects of the RTS but for the layman It would seem beneficial to refer to who will be delivering and where the responsibility, legislatively and financially lies on these points. In regard to the latter, as you will appreciate, Council budgets are constrained at this time and it will be for the Council to prioritise its revenue and capital programmes on areas which meet the Corporate objectives.	These aspects will be addressed in the review of the RTS Delivery Plan.	
	In essence for any future RTS, there would seem merit in producing one single document covering vision, objectives, aims and actions. There would be merit in having a format similar to the Local Development Plan with respect to an 'Action Plan' section.	The RTS Refresh reflects Scottish Government guidance on the separation of the Strategy document and Delivery Plan. It is intended to align with the region's SDP and LDPs. Any future refresh or review could give consideration to the production of a single document as suggested.	
	We endorse and fully support the work done on the rail elements of the strategy. This is the one clear area of transport that we see a truly regional dimension to and recognise a Regional body is well placed to move the rail agenda in the area forward.	Noted	
Stirling Council	A refresh of the RTS is supported. Refreshing strategies ensures that the evidence base for the identification of issues and opportunities and subsequently the case for undertaking and prioritising activity is kept strong.	Noted	
	The RTS Refresh has taken the opportunity to rationalise the suite of RTS policy documents. The policy elements of the various sub-strategies have now been included in the RTS document. It is proposed that the programme elements of the RTS sub-strategies be included in the proposed review of the RTS Delivery Plan. This approach is supported as it enables the number of RTS documents to be significantly reduced.	Noted	
	The RTS refresh has also presented the opportunity to confirm the Partnership's objectives and policies. Fundamentally these remain as they were in the original RTS, with minor amendments to improve clarity. It is suggested that the RTS objectives continue to be supported.	Noted	
	Whilst not all proposed polices / activities are relevant to the Stirling Council area, most are and the principle of most are worthy of support.	Noted.	

Name of organisation	Comments	Response	Changes to RTS Refresh
Stirling Council (continued)	It is suggested that there is an issue in terms of wording used to describe the proposed policies/activities. There are some activities that Tactran can pursue independently and there are other activities in which it seeks to encourage or support behaviour by other bodies, including the Councils. For example. Tactran cannot promise to "Provide, where possible, healthcare services in locations and at times that are readily accessible" (p22). It can however 'encourage' NHS Forth Valley or NHS Tayside to do so. Tactran cannot "Develop walking and cycling links to and within town and city centres..." (p23), but it can 'support' the Councils in doing so. All the examples are too numerous to list. The wrong terminology can lead to confusion and raised expectations of delivery, particularly amongst those who may not be aware of the respective responsibilities of the respective bodies involved. It is suggested that all relevant policies / activities are reworded accurately.	Noted. The statutory purpose of the RTS is to provide a strategy for the Tactran region irrespective of which stakeholder(s) will or has responsibility for implementation of the policies.	
	The document suggests that the RTS monitoring framework is being reviewed in parallel with the RTS Refresh. The monitoring framework is not however included in the consultation. It is suggested that the indicators used for judging the success of any strategy should be consulted on at the same time as the strategy itself. This helps ensure that the identified policies / activities are measurable.	The RTS Monitoring Framework identifies indicators that aim to measure progress against Objectives and sub-Objectives. On the end of consultation and approval of the refreshed RTS a review will be undertaken of the Monitoring Framework. This cannot be started until the Objectives and sub-Objectives for the RTS Refresh have been agreed and approved.	
Transport Scotland	The RTS may benefit from some minor adjustments to the text to help better highlight how the strategy is aligned with the NTS. Suggest adding a paragraph, under Section 4 – The Strategy, as follows:

"This refreshed strategy translates at the regional level the current National Transport Strategy key strategic outcomes of improved journey times and connections, reduced emissions, and improved quality, accessibility and affordability."

Vision and Objectives
In objective 3A, we would like to see air quality added to greenhouse gas emissions. In addition, Air Quality Strategy for England, Scotland, Wales and Northern Ireland should be added to the list of programmes etc. in table 2 on p13 of the SEA. | Noted - paragraph will be added as suggested.

Noted - Objective 4A relates to meeting or bettering statutory air quality requirements. The additional reference to SEA will be made as suggested. | **Add paragraph**

Add to SEA |

Name of organisation	Comments	Response	Changes to RTS Refresh
Transport Scotland (continued)	**_Road Safety_** Note that Table 2.4 under the Road Safety heading on page 8 uses 2007 as its start point for measuring casualty reduction. The baseline period used in the Road Safety Framework is an average of the years 2004-2008; recommend strongly using this as the comparison period. There are 4 casualty reduction targets detailed in the Framework and no overall figure of a 30% reduction. **_RTS Strategic Actions_** Recommend inclusion of car clubs in the range of smart measures. Suggested wording as follows:- "Promoting a range of SMART measures, including Travel Plans, travel awareness campaigns, high quality travel information, region-wide car-sharing schemes, car clubs, cycling and walking infrastructure and initiatives, development of tele-working etc."	Noted - table amended as requested. Text amended to reflect different road safety targets. Noted - wording substituted as suggested.	**Revise Table 2.4** **Amend text** **Amend text**
Cairngorms National Park Authority (CNPA)	CNPA supports the vision and objectives. Note that the document does not refer to either of Scotland's National Park Partnership Plans for the Cairngorms or Loch Lomond and the Trossachs National Parks. Reference to these Plans could improve the RTS. **_Strategic Connectivity_** Support the strategic connectivity proposals and particularly the upgrading of the A9 between Perth and Inverness (SC6) and improvements to the Highland main rail line (SC1). This transport corridor is essential for the National Park and wider Highland area, providing key access to, from and within a large part of the National Park for residents, business and visitors. We are working with Transport Scotland and others to make sure the new road fits well with the landscapes of the Park, provides opportunities for people to stop and enjoy the Park and that the associated paths and cycle network are high quality.	Noted. Ongoing consideration is given to National Park Partnership Plans in implementing the RTS while the implications of LDP policies and proposals were included in the Main Issues Report Noted	

Name of organisation	Comments	Response	Changes to RTS Refresh
CNPA (continued)	**Active Travel** Support the objectives on active travel. CNPA has recently reviewed and adopted a revised Core Paths Plan for the National Park and is preparing an Active Cairngorms Strategy to increase physical recreation and the associated health benefits for communities and visitors to the National Park. The Park has the most extensive core paths network in Scotland. We work with a range of partners to make sure it is extended and cared for through bodies such as the Cairngorms Outdoor Access Trust. The CNPA is working in partnership with SUSTRANS to delivery improved cycle routes and promote cycling in the National Park. The improvements to the A9 and Highland main rail line will provide further opportunities to enhance facilities for cycling in the Tactran area and National Park. The Cairngorms National Park Local Development Plan 2015 adopted in March 2015 also supports active travel and links with paths networks in new development	Noted. The RTS Main Issues Report considered the National Park LDP which at that stage (September 2014) was Proposed for consultation. Continuing regard is made to LDP and other policy developments.	
	Buses Note support of the RTS for key bus strategy destinations, including "main tourist destinations outside of the key regional centres" and hope that this includes some of the key sites within the National Park such as the Angus Glens Ranger base, Glenshee ski centre and Blair Atholl.	Noted.	
	Rail In addition to our support for the Highland main line rail improvements, we welcome the support for Community Rail Partnerships and are active participants in the new rail partnership on the Highland main line.	Noted	
	RTS Development, Delivery and Monitoring CNPA expect to contribute to development and implementation of the RTS Delivery Plan. We are preparing an Action Programme for the new LDP setting out how it will be delivered over the next five years. We will be preparing a new National Park Partnership Plan for 2017 onwards that sets the strategic context for the National Park and the next LDP. We also help to deliver the Cairngorms National Park Economic Strategy and, as noted above, play a key role in promoting and maintaining outdoor access for travel, recreation and health promotion.	Noted and welcome contribution to future RTS Delivery Plan development and implementation.	

Name of organisation	Comments	Response	Changes to RTS Refresh
NHS Tayside	**_5.2.5 NHS Staff Travel_** These are key objectives for the NHS they should also be applicable to all stakeholders.	The Health & Transport Framework has been developed together with NHS Forth Valley, NHS Tayside and Scottish Ambulance Service and hence considers travel by NHS staff. The Travel Planning Strategy aims to apply a similar approach to other employers through encouraging the development and establishment of effective Travel Plans throughout the public sector (TP2) and working with major employers in the private sector (TP3).	
Sestran	In general the strategy is concise and focussed on the important issues for the area. Question the benefits of extending the time period of the strategy to 2036. The current time period associated with Tayplan is 2024, although the new proposed SDP period is up to 2036. Until the new SDP has been fully developed, the predicted impacts of development cannot be predicted with any confidence. The Park and Ride figures indicate a considerable success in the use of the sites quoted. It would be of interest to indicate whether there is increasing use of the sites which would encourage further extensions and the development of other sites. In reference to the monitoring framework it may be worth discussing where indicators are not so favourable and will therefore be the focus of future work streams. In considering the Detailed Strategies / Frameworks in our RTS, we made a conscious effort to include the detailed development of our initial strategies within the refreshed strategy with a brief description of the strategy and stating its inclusion within the refreshed strategy. This ensures that all strategy developments since the original RTS are included in the refresh. It may be worth indicating where the refresh includes further strategy development.	Noted It is considered important to align with the SDP. TAYplan2 is relatively well advanced and has reached the Proposed Plan stage. Monitoring indicates that usage is increasing. This will be considered in the review of the Delivery Plan. Many of the detailed strategies/frameworks were previously published as separate documents following approval of the RTS 2008 - 2023. The intention in the RTS Refresh is to bring them together in a single document. Adopting the approach taken by Sestran would unduly complicate the RTS Refresh document.	

Name of organisation	Comments	Response	Changes to RTS Refresh
Sestran (continued)	There are no priorities or justification given for the strategic actions. You may wish to avoid this level of detail at this stage. The area that could do with more discussion is the strategy to promote external links both within Scotland and further beyond, in a sustainable way. A point that may be worth mentioning is working with Tayplan to ensure development is focussed in sustainable locations in B4, although it is mentioned in chapter 6. Appendix 1 is very interesting but not sure whether it is an integral part of the strategy or just a progress report.	Prioritisation of interventions will be addressed in the review of the RTS Delivery Plan. This approach has been adopted in discussions with TAYplan on SDP1 and SDP2. Section 4.1 indicates that Appendix 1 shows progress in implementing the Strategic Actions.	
Coupar Angus & Bendochy Community Council	Outlined difficulties experienced in Queen Street (A923) due to narrowness of the road. Requested implementation of previous relief road proposals. Community Council submission was supported by two letters from residents re road safety in Queen Street, Coupar Angus.	The A923 is not a regionally significant road and therefore this is a matter for Perth & Kinross Council.	
Crieff Community Council	Considered too much to review - suggested including an executive summary in any future consultation.	Noted. It is proposed to publish the document in Easy Read format following approval by Scottish Government Ministers.	
Forestry Commission Scotland	Endorse the proposed strategy and have no further comments to make.	Noted	
Freight Transport Association	RTS Refresh emphasises the "joined up thinking" that is required, in particular looking at multi-modal approach. Rail and Freight are covered and we would support this approach. The only thing not specifically mentioned is "The final mile". We have found in other regions that often the final mile that connects either railheads or ports to the main Trunk Road Network can be poor and stops or hinders a multi-modal or modal shift approach.	Noted This will be given consideration in implementing the Freight Strategy.	

Name of organisation	Comments	Response	Changes to RTS Refresh
Margaret Astin, Resident of Dundee	***Pages 10, 13, 16, 20, Section 3.2 ; 5.1.6 SC11 Airports*** It seems obvious that Dundee Airport has failed as a passenger service with passenger numbers consistently falling from year to year. I fail to see how this could be rectified compared with the variety of options serviced by Edinburgh Airport which has recently undergone further expansion. Economically it would seem logical to disinvest in Dundee Airport and provide easier access to Edinburgh Airport via the rail network which already travels along the outer boundary of the runway. Consequently the money saved could be put to better use. Perhaps an economic assessment by an independent group would provide the data needed to inform this decision, rather than the relentless push to keep it alive despite its many losses.	The UK Government with support from the Scottish Government has financially guaranteed the service between Dundee and London Stansted through the Regional Air Connectivity Fund in recognition that Dundee is a key economic hub in Scotland's economy and that the provision of the air service will ensure that its key industries remain connected to rest of the UK. Scottish Enterprise and Dundee City Council have also expressed support for the airport which plays an important role in Dundee's long term regeneration. HIAL has established an Airport Consultative Committee with the aim of developing Dundee Airport.	
	The majority of flights from Dundee Airport are by private light planes and flying clubs, hardly an appropriate use of the millions of pounds of public money that has gone towards supporting it. 5.1.6 about air travel being critical to support tourism and economic development in Dundee seems unrealistic. Most tourists arrive by coach on tours of the region stopping off at places of interest, or by rail and car if independent travellers. These modes don't support an air link in Dundee. Most foreign travellers would arrive at Glasgow, Edinburgh or Aberdeen airports.		
	For residents living nearby the facility the impact of noise generated by aircraft also has negative implications for the quality of life of residents – who are also involved in funding it indirectly through taxation.	The Scottish Government published the Dundee Airport Noise Action Plan in July 2014 though it noted that compared with other airports the numbers of people affected are extremely low.	
	5.1.5 Ports Very much support the movement of freight by sea. Especially since we live on an island freight could be transferred via most of the major ports along the coastline, thus reducing the pressure on the road and rail networks.	Noted	

Name of organisation	Comments	Response	Changes to RTS Refresh
Margaret Astin (continued)	***Environmental Report Page 4*** Apart from rail travel and some aspects of the freight strategy none of the proposed schemes is guaranteed to provide a positive effect, most effects are neutral to positive indicating a large degree of uncertainty. Millions of public money are being used to develop these schemes and it is the government, planners and developers responsibility and duty to ensure that this is not wasted on schemes that are not proven to be of benefit to the public or the environments in which people live. I would hope that the voices of local people who are affected by these plans may be involved in the development processes.	Public consultation will be undertaken as individual projects are developed.	
Port of Dundee	Port of Dundee have reviewed the documents and have nothing to add	Noted	
RNIB Scotland	Accessible transport is a key to independent living. RNIB Scotland believes that those with visual impairment should enjoy the same rights, choice and opportunities to use the whole transport network as sighted people - welcome the parameters set out in the Draft EqIA aiming "to assess policies to ensure that all groups in the population are affected equally". There is much to welcome in the commitments to accessibility made in the RTS Refresh. To ensure that the commitments move into further improvements recommend regular monitoring of developments. Comments mainly come under the accessibility objective, touching on health & well-being and safety & security - however, we would like to point out that many adaptations and practices intended to help blind and partially sighted people use public transport would make public transport easier for everyone to use. Accessibility improvements, therefore, would have wider environmental and economic benefits. Tactran consultation has already noted evidence on wider disability and transport: 　　- that disabled people experience considerable disadvantage in terms of travel and transport 　　- that experiences vary for people with different types of disability e.g. physical, sensory, chronic health conditions, mental health support needs and learning disabilities	Noted Noted – will consider adding an appropriate indicator to the RTS monitoring framework we this is reviewed. Noted Noted	**Consultation comments added to EqIA**

Name of organisation	Comments	Response	Changes to RTS Refresh
RNIB Scotland (continued)	- that data from the Scottish Household Survey suggests that around a quarter of adults in Scotland has a disability and/or long-term illness, with almost half being older people - that disabled people make fewer journeys and are more reliant on public transport for making these journeys than the general population RNIB research would confirm all of the above. Blind and partially sighted people would like to get out more - RNIB study showed that six in ten blind and partially sighted people who are not using buses may well start using them if access improvements can be made. **Physical access** Access to bus travel is one of the most common issues for blind and partially sighted people. Station accessibility and train and station announcements can affect straightforward accessibility and the ability of more confident disabled passengers to manage without physical assistance. **Information** RNIB Scotland is pleased to see that the Regional Travel Information Strategy aims to ensure people are better informed of their travel choices and are more aware of where they can access travel information when required either before or during their journey. **Communication** On services that lack automated audible announcements, ensure that on-train staff provide these in advance of and at all stops.	 Noted Policy B11 aims to identify barriers to travel and undertake detailed consultation with disabled representative groups and passenger transport operators It is recognised that policy B11 relates only to buses and that a similar approach is justified for rail travel. Noted Noted - this will be forwarded to train operators in the region.	**Add new Rail Strategy policy - Work with disabled representative groups and rail operators to identify and overcome barriers to travel.**

Name of organisation	Comments	Response	Changes to RTS Refresh
RNIB Scotland (continued)	In introducing buses with audio announcements, we recommend choosing routes in consultation with passengers with sight loss and prioritising the busiest routes and those which enable people to travel to key locations and facilities, such as hospitals or leisure centres.	Traveline Scotland has developed a talking app for visually impaired passengers which obviates the need for introducing audio announcements on buses. It is considered that requiring the fitting of audio announcement systems to buses should be the subject of national legislation.	
	Attitudes of transport staff Strongly supports the need for induction training and continuing disability awareness training for public transport staff.	Noted - the Bus Stakeholder Group is to be recommended that this is included in driver CPC training.	
	Confidence Bad public transport experiences can deter blind and partially sighted people either from venturing out again or restricting their travel to specific routes or types of transport.	Noted	
	Cost The RTS Refresh recognises that travel costs can be a barrier to travel and aims to make the best use of the various concessionary travel and multi-journey ticketing options available - agree that schemes should be available to ensure that travel costs do not restrict disabled people's full participation, wherever they live.	Noted	
Road Haulage Association	**Equality Impact Assessment** No comments	Noted	
	Environmental Report RHA recognises the need for environmental improvements and has been working with Transport Scotland and STEP to contribute to the forthcoming Low Emission Strategy for Scotland. With regard to the Environmental Report we accept the contents and note specific references to freight operations and facilities.	Noted	
	F1 Parking Welcome assistance to provide proper facilities for drivers to park and refresh; such facilities being sadly lacking throughout the UK.	Noted	

Name of organisation	Comments	Response	Changes to RTS Refresh
Road Haulage Association (continued)	**F2 Urban logistics** Provision of transhipment/consolidation centres for city deliveries needs much further study in our opinion. However, a small scale trial would be of interest. **F3 Public sector logistics** Sharing of existing private and public logistics facilities should be investigated further within the Tactran area. **F4 Timber Transport** RHA is a member of the Timber Transport Forum and is involved in efforts to reduce environmental impacts of moving round timber. **F5 Port Development** Support efforts to develop ports and multi-modal interchanges. **F6 Rail Connections** Support efforts to develop multi-modal interchanges. **F7 Improved Information for Road Freight Industry** Advance information that can reduce congestion, improve safety, the environment and efficiency make sense. **Page 37: Reference: Freight Quality Partnerships (FQP)** RHA supports FQPs in principle.	Noted Noted - this can be considered in implementation of the RTS Refresh Noted Noted Noted Noted Noted	

Name of organisation	Comments	Response	**Changes to RTS Refresh**
SEPA	We welcome the Tactran vision of "a transport system, shaped by engagement with its citizens, which helps deliver prosperity and connects communities across the region and beyond, which is socially inclusive and environmentally sustainable and which promotes the health and well-being of all." and objectives have been developed under six broad themes, including "Environment" that will "…ensure that the transport system contributes to safeguarding the environment and promotes opportunities for improvement" by (Bullet point A) "Contributing to the achievement of the Scottish national targets and obligations on greenhouse gas emissions". We believe that Regional Transport Strategies have an important role to play in reducing greenhouse gas emissions and improving urban air quality (and protecting human health), as they provide a means of tackling cross boundary issues, such as commuter traffic. Table 2.2 shows that the car is by far the most popular means of travelling to work and Table 2.3 shows that travel from the rural areas is predominately by car and there was a large increase in the number of commuters who travel from Angus to Aberdeenshire and this will add to the nation's emissions of greenhouse gas emissions from road traffic.	Noted	
	Section 6 (Page 35) considers Land-use and Transport Planning, stating "The Planning etc. (Scotland) Act 2006 places a duty on Strategic and Local Development Planning authorities to engage with RTPs and on RTPs to support Strategic and Local Development Planning processes. The importance of ensuring that strategic Land Use and Transportation policy and planning are fully aligned and integrated in a manner which supports sustainable economic growth is reflected in the designation of RTPs as "key agencies". We strongly agree with this statement. SEPA recently expressed concern that Angus Council's LDP has failed to consider how new residential development in Angus may affect air quality in Dundee. Table 2.2 shows 59% of Tactran residents travelled to work by car during 2012. Table 2.3 lists the top 20 commuter movements in the area and commuting from Angus to Dundee is by far the highest. Building residential properties in the rural areas (where there is little work) is likely to increase the number of journeys made by car and this will increase the emissions of greenhouse gases, undermining the Scottish Government's commitment to reduce Scotland's contribution to climate change.	Noted	

Name of organisation	Comments	Response	**Changes to RTS Refresh**
SEPA (continued)	**Health & Well-Being** The air quality objectives have been introduced to protect the most sensitive individuals from the harmful effects of atmospheric pollution, therefore we welcome the decision to include a reference to air quality in Section 3.2 (4A) health and Well-being: "Helping to meet or better all statutory air quality requirements in the Tactran area". We also welcome the statement in Section 5.2.3 (HT3): "Everyone in the region should be able to live without exposure to air quality or noise levels that are detrimental to health or a threat to personal safety associated with the transport network."	Noted	
	Page 17: "Scottish Planning Policy sets out a clear framework to be applied to the allocation and development of land. Individual planning applications are required to demonstrate means of mitigating impacts on the transport system, particularly through the implementation and monitoring of effective sustainable Travel Plans." Whilst we agree with this statement, there is also a need to consider the cumulative impact of development – particularly at pinch-points on the key routes to the areas of employment and the retail centres.	Noted	
	Table 2.2 shows that 2-3% of the Tactran residents travel to work by train, therefore we welcome the decision to improve rail links and services.	Noted	
	Road traffic has been identified as the main source of atmospheric pollution in the urban centres, and this has led to the designation of three AQMAs in the Tactran area. We therefore welcome the commitment to "Improve air quality within any designated Air Quality Management Area (AQMA) to a point where the AQMA is revoked" (Section 5.2.2, HT3). However, there is also a need to highlight and protect locations where the concentrations of atmospheric pollution are close to exceeding the objectives/limit values that have been introduced to protect human health. This will help to ensure that future increases in traffic do not result in the designation of more AQMAs. It is also important to ensure that the Tactran strategy does not conflict with the measures in the air quality Action Plans.	Noted	

Name of organisation	Comments	Response	**Changes to RTS Refresh**
SEPA (continued)	**Park-and-Ride** Section 5.6 considers Park-and-Ride options. Whilst SEPA is fully supportive of sustainable transport options, Park-and-Ride sites remove a relatively small number of cars (compared to the total number of vehicles that enter the city each day). Emissions from cars are generally very low, so a large number of cars would need to be removed for a noticeable change in air quality. Buses can emit a disproportionately high level of nitrogen dioxide, therefore a small increase in numbers could have a significant impact on local air quality. It is therefore essential that only buses with the highest EURO specification (or equivalent low emission technology) are permitted to operate along the busy commuter routes that pass through street canyons within the AQMAs.	Noted - this will be taken into consideration in implementing Park & Ride schemes.	
Strathfillan Community Council	***5.2 Health and Transport*** Difficulty attending appointments at hospitals in the Forth Valley area by local residents after some were refused transport by SAS - Voluntary car service is not available in the area. Scottish Government has a scheme for reimbursing travel cost for Highlands & Islands - could areas as remote as Strathfillan be included in this scheme? NHSFV and Stirling Council were involved with the 'Tactran' scheme which improves east/west transport for access to Forth Valley hospitals. Our area was not included. ***5.2.2 Promoting Active Travel*** Distances are beyond active travel ranges - on average 30 mile round trip to nearest surgery or pharmacy. As a remote rural area appreciate that public transport is difficult due to various factors not least being low population. There are three communities within Strathfillan and are spaced at 5 miles and 7 miles apart, facilities in these communities are limited with no provision for healthcare.	Policy area 5.2.4 gives consideration to enabling patients accessing healthcare by convenient, affordable transport appropriate to their needs. The detailed issues can be considered through the Stirling CPP Tackling Inequalities Partnership. As noted above Policy area 5.2.4 gives consideration to access to healthcare. Policy area 5.2.2 aims to promote active travel for local journeys of any purpose.	

Name of organisation	Comments	Response	Changes to RTS Refresh
Strathfillan Community Council (continued)	**5.2.4 Access to Healthcare** Hospitals and other services are difficult to access even by car and finding parking spaces at the facilities adds to the stress of visiting such venues. Those without personal transport have no direct access to these facilities and involve convoluted journeys which are difficult for elderly and the vulnerable in our community, cost, journey times and appointment times are also factors which need to be taken into consideration.	As noted above Policy area 5.2.4 gives consideration to access to healthcare. Car park management is the responsibility of NHS Forth Valley.	
SEA Environmental Report – responses via SEA Gateway			
Historic Scotland	The ER sets out clearly the scope and findings of this assessment, and welcome that the comments which we provided at scoping have been taken into account. I am content that the assessment findings for these sites are appropriate in relation to potential effects on the historic environment and have no detailed comments to offer on the ER.	Noted	
SEPA	The Environmental Report (ER) provides a satisfactory general assessment of the likely significant environmental effects of the Tactran RTS 2015-2036. The assessment results in an overall positive score, however we consider that some issues which have been reported as potential negative effects in the commentary have been presented as unknown effects in the assessment matrix. We are satisfied that most of our comments on the scoping report have been taken into account and welcome the summary of the actions taken by the Council in Appendix A. We however note that waste (under material assets) is not mentioned in the assessment. A considerable amount of waste can be generated as a result of transport infrastructure and we are disappointed that this was not considered. **3. Environmental Baseline** In Table 4 in relation to the aquatic environment we welcome the consideration of both surface and groundwater and the reference to the quality of waterbodies, however we note the reference to water quality only when referring to trends. In our scoping response we mentioned the importance to consider the quality of the water environment.	Noted Noted - the assessment will be revisited as interventions are considered in detail in the future. Noted - waste has been added into review of ER. Noted	

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

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

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

Name of organisation	Comments	Response	Changes to RTS Refresh
Scottish Natural Heritage (continued)	**_Active travel_** Cross-referencing relevant policies/proposals such as AT7 and PR8 demonstrates that the Park & Ride strategy is looking beyond the current approach to such provision, which is focused on driving to the interchange before switching to bus or train. The detail of these policies/proposals in Table 8 indicates that active travel networks and cycle parking will be planned into Park & Ride sites in the Tactran area. We welcome this integrated approach and suggest that this links well with policy in the emerging TAYplan Proposed Plan in addition to national policy such as A Long-Term Vision for Active Travel in Scotland.	Noted	
	Assuming that our interpretation of policies/proposals AT7 and PR8 is correct, the assessment of the Park & Ride strategy will be more positive for policies/proposals PR5, PR8 and R9 than is currently set out.	Assessment to be changed as suggested with explanatory note - note there is no PR9.	
	Policy/proposal PR2 would presumably have a positive effect on Human Health and Safety due to reductions in air pollution, vehicle miles travelled within cities and, if integrated as in AT7 and PR8, due to the health benefits of modal shift to walking and cycling. On that basis, assessment of PR8 should also be reviewed.	Assessment to be changed as suggested with explanatory note.	
	5.6 Cumulative effects of RTS refresh Table 9 presents a clear overview of cumulative effects. The 'predicted residual effects' column is a particularly useful snapshot of the assessment.	Noted	
	As discussed above, it should be noted that in the case of the Biodiversity topic, project level HRA may also be required.	Noted - text amended	
	6. Proposed mitigation The introduction to Section 6: Proposed Mitigation provides a clear link to EIA and the need for robust project level mitigation measures. Following review as discussed above, we would expect the environmental assessment of the policies/proposals to provide an initial direction for scoping EIA topics at the project level.	Noted - additional text added in Section 5.7 regarding initial direction for scoping EIA topics at the project level.	
	Mitigation measures We generally agree with the mitigation set out in Table 10 but again, reference to project level HRA is needed against the second SEA Objective under the Biodiversity topic.	Noted - text amended	