

**TAYSIDE AND CENTRAL SCOTLAND TRANSPORT PARTNERSHIP****15 MARCH 2022****CONSULTATIONS****REPORT BY SENIOR PARTNERSHIP MANAGER**

This report asks the Partnership to agree to receive a draft Tactran response to Transport Scotland's draft Strategic Transport Projects Review 2 for comment; approve responses to consultation on 'A route map to achieve a 20 per cent reduction in car km by 2030', National Planning Framework 4 and Local development planning regulations and guidance. The Partnership is also asked to endorse an officer response to Fife Local Transport Strategy consultation, note a number of other consultation responses and to delegate approval of a response to consultation on Public Sector Equalities Duty in Scotland to the Executive Committee.

**1 RECOMMENDATIONS****1.1 That the Partnership:**

- (i) agrees to consider and comment on a draft Tactran response to Transport Scotland's draft Strategic Transport Projects Review 2 (STPR2) consultation as shown in Appendix B, thus providing all members with an opportunity to comment prior to submission by 15 April 2022 deadline;
- (ii) approves the proposed response to Transport Scotland's consultation on 'A route map to achieve a 20 per cent reduction in car kilometres by 2030' as detailed in Appendix C;
- (iii) approves the proposed response to Scottish Government's consultation on the draft Fourth National Planning Framework (Draft NPF4) as detailed in Appendix D;
- (iv) approves the proposed response to Scottish Government's consultation on 'Local development planning – regulations and guidance' as detailed in Appendix E;
- (v) endorses an officer response on Fife Council's consultation on their Local Transport Strategy Main Issues, as detailed in Appendix F;
- (vi) notes responses to the Transport Scotland's consultation on Aviation Strategy and NTS2 Delivery Plan Impact Assessment and Sustran's RTS consultation; and
- (vii) delegates authority to the Executive Committee to consider and approve a response to Scottish Government's consultation on Public Sector Equality Duty in Scotland.

## **2 BACKGROUND**

- 2.1 Transport Scotland published consultation on the [draft Strategic Transport Projects Review 2](#) on 20 January 2022, with responses to be submitted by 15 April 2022.
- 2.2 Transport Scotland and CoSLA published consultation on [A route map to achieve a 20 percent reduction in car kilometres by 2030](#) on 13 January 2022, with responses to be submitted by 6 April 2022.
- 2.3 On 10 November 2021, the Scottish Government laid the draft Fourth National Planning Framework ([Draft NPF4](#)) in the Scottish Parliament. Alongside Parliamentary scrutiny of the draft, a public consultation to invite comments on the content of the draft is being undertaken, with responses to be submitted by 31 March 2022.
- 2.4 On 17 December 2021, the Scottish Government published [draft Local Development Planning – regulations and guidance](#) for consultation, with responses to be submitted by 31 March 2022.
- 2.5 Fife Council published a new [Fife Local Transport Strategy Main Issues](#) consultation on 27 January 2022, with responses to be submitted by 7 March 2022.
- 2.6 At its meeting on 14 December 2021 the Partnership delegated authority to the Executive Committee to respond to Transport Scotland's Aviation Strategy and to the Director to respond to consultation on NTS2 Delivery Plan Impact Assessment and Sustran's RTS.
- 2.7 The Scottish Government published consultation on [Public Sector Equality Duty in Scotland](#) the on 13 December 2021, with responses to be submitted by 11 April 2022.

## **3 DISCUSSION**

### Draft Strategic Transport Projects Review 2

- 3.1 Transport Scotland launched the formal 12-week [Strategic Transport Project Review 2](#) (STPR2) consultation process on 20 January 2022.
- 3.2 Updates on the STPR progress have previously been reported to the Partnership at regular intervals during its development, most recently at the Partnership meeting on 14 December 2021 and at its meeting on 16 March 2021 when the Partnership approved a consultation response to the STPR2 National and Regional 'Case for Change' reports (Reports RTP/21/31 and RTP/21/06 respectively).

- 3.3 STPR2 sets out recommended transport interventions for the next 20 years and is one of the mechanisms for delivering the Vision, Priorities and Outcomes of the second National Transport Strategy (NTS2), covering all modes and following the sustainable transport hierarchy as set out in NTS2. STPR2 is also an important tool for achieving the Climate Change Plan Update commitment to 20% reduction in car kilometres by 2030 and contributing to Scotland's Net Zero Greenhouse Gas emissions target by 2045.
- 3.4 The recommendations are set out in a Summary Report and draft Technical Report, with other supporting documents including the Impact Assessments.
- 3.5 The draft STPR2 sets out 45 recommendations grouped under 6 themes:
- improving active travel infrastructure (1 – 5)
  - influencing travel choices and behaviours (6 – 10)
  - enhancing access to affordable public transport (11 – 23)
  - decarbonising transport (24 – 28)
  - increasing safety and resilience on the strategic transport network (29 – 38)
  - strengthening strategic connections (39 – 45)
- 3.6 Appendix A provides a summary of each recommendation. Of the 45 recommendations a number are picked out as being specific to one or two regions or have particular benefit for certain regions. The recommendations picked out for the Tay Cities Region are:
- 2 Active Freeways and Cycle Parking Hubs;
  - 15 Highland Mainline Rail Corridor Enhancements;
  - 16 Perth-Dundee-Aberdeen Rail Corridor Enhancements;
  - 17 Edinburgh/Glasgow-Perth/Dundee Rail Corridor Enhancements;
  - 43 Major Station Masterplans; and
  - 44 Rail Freight Terminals and Facilities;
- 3.7 For the Forth Valley Region the recommendations picked out are:
- 2 Active Freeways and Cycle Parking Hubs;
  - 17 Edinburgh/Glasgow-Perth/Dundee Rail Corridor Enhancements;
  - 39 Sustainable Access to Grangemouth Investment Zone; and
  - 44 Rail Freight Terminals and Facilities;
- 3.8 In addition to these recommendations three other recommendations make specific mention of interventions within the Tactran area:
- 14 Provision of strategic bus priority measures, includes A90 Forfar Road southbound at the Kingsway in Dundee;
  - 30 Trunk Road and Motorway safety improvements to progress towards 'Vision Zero', includes A9 Dunblane to Perth and A90 Perth to Aberdeen; and

- 32 Trunk Road and Motorway network renewal for reliability, resilience and safety, includes an integrated transport plan for the A90 Kingsway through Dundee to improve reliability on the trunk road and deliver improvements for local active travel and public transport journeys. This could potentially include online improvements to enable sustainable transport provision.

### 3.9 Tactran's draft response as contained in Appendix B:

- notes the document lacks transparency regarding description of recommendations and how the options from the Case for Change have either been sifted out or included in the recommendations
- welcomes with the recommendations for active travel but asks for more detail on what is proposed as a very high-level description of the recommendations is provided
- considers that behavioural change initiatives will be crucial if the public are to change their travel habits to meet transports net zero targets
- questions the lack of bus proposals in the Tactran region and the lack of recognition of the detrimental effect that trunk road traffic has on all modes within Tactran's cities
- considers that DRT and MaaS should be a priority, particularly for providing alternatives to car travel in rural and semi-rural areas
- welcomes the commitment to rail projects in the area, but questions the ambition, noting lack of a local service in the Tay Cities area and that an explanation be given for a new Perth to Edinburgh route not being included
- considers that Park & Ride/Choose has not been included, questions whether this is an omission and strongly urges that it is included in the final delivery plan
- welcomes proposals for decarbonisation of the rail and bus network
- seeks clarity on what is proposed for the trunk road network, particularly around Dundee, A9 between Dunblane and Perth and A90 Perth to Aberdeen
- welcomes the inclusion of Perth Station as major station upgrade but notes this would seem to be continuation of work underway
- welcomes the intention to work with freight industry for an updated market study for rail freight growth in Scotland
- notes that the next steps following consultation is to develop a delivery plan. Tactran strongly considers that the Regional Transport Working Groups continue to be involved in its development to provide a regional input.

### 3.10 The Partnership is asked to receive a presentation based on the draft response as shown in Appendix B, in order that further comment can be provided by Members prior to submitting to Transport Scotland by 15 April 2022.

A route map to achieve a 20 percent reduction in car kilometres by 2030

- 3.11 Transport Scotland and CoSLA jointly published '[A route map to achieve a 20 percent reduction in car kilometres by 2030](#)'.
- 3.12 The route map is published in response to the Scottish Government's Climate Change Plan update commitment to reduce car kilometres by 20 percent by 2030, to meet Scotland's statutory obligations for greenhouse gas emissions reduction by 2045. However, it also recognises the benefits that re-thinking the way we travel can have on our individual and community health and wellbeing, as well as the fairness of our society and the inclusiveness of our economy.
- 3.13 The route map builds on the vision for Scotland's transport system set out in the second National Transport Strategy, aimed at protecting our climate and improving our lives. However, it acknowledges that people's travel behaviours are shaped by the wider context in which they live and services they need to access. The route map to reduce car use therefore includes a range of non-transport policies interventions, including the provision of good connectivity and digital access to services; the way we plan and invest in our public places; where we locate key services such as healthcare; and how we support our children and young people to make healthy, fair and sustainable travel choices from an early age.
- 3.14 The route map does not aim to eliminate all car use. It is recognised that would not be realistic or fair, especially for journeys undertaken by disabled people or in rural areas where sustainable travel options may not always be available or practical. Rather, the route map encourages all of us to reduce our overreliance on cars wherever possible and identifies four key behaviours that everyone in Scotland should consider each time they plan a journey:
- make use of sustainable online options to reduce your need to travel;
  - choose local destinations to reduce the distance you travel;
  - switch to walking, wheeling, cycling or public transport where possible; and
  - combine a trip or share a journey to reduce the number of individual car trips you make, if car remains the only feasible option.
- 3.15 The Partnership is asked to consider and approve the proposed response, as shown in Appendix C.

Draft Fourth National Planning Framework (Draft NPF4)

- 3.16 On 10 November 2021, the Scottish Government laid the draft Fourth National Planning Framework ([Draft NPF4](#)) in the Scottish Parliament. Alongside Parliamentary scrutiny of the draft, a public consultation to invite comments on the content of the draft is being undertaken. The consultation on Draft NPF4 closes on 31 March 2022.

- 3.17 The National Planning Framework (NPF) is a long-term plan for Scotland that sets out where development and infrastructure is needed. Scotland's fourth National Planning Framework (NPF4) will be a long-term plan looking to 2045 that will guide spatial development, set out national planning policies, designate national developments and highlight regional spatial priorities.
- 3.18 Following the consultation and the end of the Parliamentary scrutiny process, the responses will be analysed and a final NPF4 produced. The final adoption date will depend on the approval of NPF4 by the Scottish Parliament, but the aim is to lay a finalised version for approval by summer 2022.
- 3.19 The Partnership is asked to consider and approve the proposed response, as shown in Appendix D.

#### Local development planning – regulations and guidance

- 3.20 The Scottish Government published [draft Local Development Planning – regulations and guidance](#) for consultation on 17 December 2021.
- 3.21 This consultation seeks views on the secondary legislative requirements and the draft guidance to stakeholders on implementing the future local development plan system. There are 4 parts: Part A, the Introduction; Part B, the Proposals for Development Planning Regulations; Part C, Draft Guidance on Local Development Plans; and Part D, the Interim Impact Assessments.
- 3.22 Tactran intends submitting a response to Part C, Draft Guidance on Local Development Plans and the Partnership is asked to consider and approve the proposed response, as shown in Appendix E.

#### Fife Local Transport Strategy – Main Issues consultation

- 3.23 Fife Council published a new [Fife Local Transport Strategy Main Issues](#) consultation on 27 January 2022, with submission of responses by 7 March 2022. As the date for responses was prior to the next Partnership meeting, an officer response was submitted, as shown in Appendix F, which the Partnership is asked to endorse.

#### Aviation Strategy

- 3.24 The Partnership agreed to delegate authority to the Executive Committee to consider and approve a response to Transport Scotland's consultation on Aviation Strategy on Transport Scotland's discussion document to inform the development of an [Aviation Strategy](#). The Executive subsequently approved the Tactran response and it was submitted by 21 January 2022.
- 3.25 This consultation seeks views on how to realise the vision for aviation:

*"For Scotland to have national and international connectivity that allows us to enjoy all the economic and social benefits of air travel while reducing our environmental impact."*

- 3.26 It covers the transition to low and zero emission aviation, Scotland's international connectivity, Scotland's domestic connectivity and air freight.
- 3.27 The Partnership is asked to note Tactran's response to Transport Scotland's consultation on Aviation Strategy, as shown in Appendix G.

#### NTS2 Delivery Plan – Impact Assessment Consultation

- 3.28 On 3 November 2021 published [NTS2 Delivery Plan Impact Assessments](#) for consultation, with a deadline for responses of 5 January 2022. Due to the technical nature of these assessments the Partnership delegated authority to the Director to respond to the consultation.
- 3.29 Scotland's National Transport Strategy 2 (NTS2) sets out the vision for Scotland's transport system to the year 2040. The NTS2 outlines the four priorities for the transport system:
- Reduces inequalities
  - Takes climate action
  - Helps deliver inclusive economic growth
  - Improves our health and wellbeing.
- 3.30 The first NTS2 Delivery Plan sets out strategic policies and the broad actions the Scottish Government is taking to deliver on its vision and priorities to the end of March 2022, taking account of the impact of the COVID-19 pandemic.
- 3.31 Impact assessments are being undertaken on 37 strategic policies within the NTS2 Delivery Plan and we would like to get your views on the initial screening of impacts through this consultation survey. The impact assessments are:
- Social and Equality Impact Assessment (SEQIA (incorporating an Equality Impact Assessment (EqIA), Children's Rights and Wellbeing Impact Assessment (CRWIA), Fairer Scotland Duty Assessment (FSDA).
  - Island Communities Impact Assessment (ICIA)
  - Health Inequality Impact Assessment (HIIA)
  - Business Regulatory Impact Assessment (BRIA)
- 3.32 The Partnership is asked to note the response to Transport Scotland's consultation on NTS2 Delivery Plan Impact Assessments, as shown in Appendix H.

## Sustran Draft Regional Transport Strategy to 2035

- 3.33 At its meeting on 14 December 2022 the Partnership delegated authority to the Director engage with Sustran and to respond to consultation on their draft Regional Transport Strategy to 2035, with the consultation period ending on 11 February 2022.
- 3.34 A [Virtual Engagement Hub](#) has been created and gives access to the draft RTS and all supporting documentation including the Strategic Environmental Assessment (SEA) and the Equalities Impact Assessment (EqIA). Views on the draft RTS are welcome and a short survey accessed via the Hub can be completed to make it easy to give your views and comments on the draft RTS.
- 3.35 The Partnership is asked to note the response to Sustran's Regional Transport Strategy consultation, as shown in Appendix I.

## Public Sector Equality Duty in Scotland

- 3.36 The Scottish Government is committed to reviewing the effectiveness of the [Public Sector Equality Duty \(PSED\) in Scotland](#) and have published a consultation on their proposals for change, with responses to be returned by 11 April 2022.
- 3.37 This consultation now sets out a series of detailed proposals both for legislative changes to the Scottish Specific Duties and changes to the wider implementation environment.
- 3.38 The Partnership is asked to delegate authority to the Executive Committee to consider and approve a response to Scottish Government's consultation on Public Sector Equality Duty in Scotland.

## **4 CONSULTATIONS**

- 4.1 The draft and submitted response detailed in appendices to this report, have been informed by consultation with appropriate stakeholders and partner Councils.

## **5 RESOURCE IMPLICATIONS**

- 5.1 This report has no direct resource implications.

## **6 EQUALITIES IMPLICATIONS**

- 6.1 This report has been screened for any policy implications in respect of Equality Impact Assessment.



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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/21/06, National Transport Strategy 2 and Strategic Transport Projects Review Update, 16 March 2021

Report to Partnership RTP/21/31, Directors Report, 14 December 2021

## STPR2 Recommendations

### Improving active travel infrastructure

#### (1) Connected neighbourhoods

STPR2 recommends delivering connected neighbourhoods which are the transport components of 20-minute neighbourhoods within towns and cities. This would consist of packages of improvements to active travel infrastructure in and around town and neighbourhood centres, for example, to footways, road crossings, route surfacing, lighting and street furniture.

#### (2) Active freeways

STPR2 recommends development of active freeways on high-demand corridors in Scotland's large urban areas, with priority given initially to the larger cities. Comprehensive networks of active freeways would connect outlying neighbourhoods to city or town centres and to key services and popular destinations. Improved local routes such as those provided by connected neighbourhoods, would allow people to readily access active freeways from their homes, schools and workplaces.

#### (3) Village-town active travel connections, (4) Connecting towns by active travel, (5) Long distance active travel network

STPR2 recommends developing the long-distance active travel network to connect Scotland's cities and regions. This would enhance the National Cycle Network. Connecting towns active travel links would be provided between settlements that are relatively close to each other, and where there is good opportunity for switching from travel by car (and where the connections are not made by the long-distance network). Village-town active travel connections would be developed to support more rural journeys by active modes,

### Influencing travel choices and behaviours

#### 6) Behaviour change initiatives

STPR2 recommends building on existing programmes to deliver local, regional and national initiatives that raise awareness of sustainable transport options and encourage individuals to make the most appropriate transport choices for their journeys.

#### (7) Changing road user behaviour

STPR2 recommends implementation of speed enforcement technology and national road safety behaviour change campaigns, education and training initiatives. These would reduce road casualties and help to deliver the outcomes of Scotland's Road Safety Framework to 2030.

#### (8) Increasing active travel to school

STPR2 recommends improved and safer walking, wheeling and cycling routes to primary and secondary schools, accompanied by measures to reduce traffic congestion, volumes and speeds in the vicinity of schools. Where schools are in or close to neighbourhood centres, improvements would be planned jointly with connected neighbourhoods

(1). STPR2 also recommends campaigns to promote better driver behaviour around schools, and to provide encouragement for pupils and their families to travel safely and actively.

#### (9) Improving access to bikes

STPR2 recommends building on existing successful programmes and the work of established support groups to provide bikes, accessories and training to more people across Scotland. Support would also be provided for walking and wheeling where these are more appropriate. Particular focus would be given to people living in deprived communities, many of whom could substantially benefit from the opportunities that cycling (as well as walking and wheeling) provides.

#### (10) Expansion of 20mph limits and zones

STPR2 recommends supporting the Scottish Government's 20mph Task Group by scaling up current local programmes and initiatives to provide new or expanded 20mph limits and zones on appropriate roads in cities, towns and villages across Scotland. Accompanying road safety campaigns would encourage better driver behaviour in 20mph zones.

### Enhancing access to affordable public transport

#### (11) Clyde Metro

STPR2 Recommends that Transport Scotland continues to work with Glasgow City Council, Strathclyde Partnership for Transport and other regional partners on developing the business cases and delivery plan for Clyde Metro.

(12) Edinburgh & South East Scotland Mass Transit

STPR2 recommends that Transport Scotland works with regional partners to develop and enhance the cross-boundary public transport system for the Edinburgh and South East Scotland region, potentially comprising tram and bus-based transit modes including Bus Rapid Transit (BRT). This would complement and integrate with the region's current bus, tram and heavy rail networks, to provide improved connectivity between Edinburgh and the surrounding communities in the region, as well as more direct connections between communities outside Edinburgh.

(13) Aberdeen Rapid Transit

STPR2 recommends that Transport Scotland continues to work with local partners in developing plans for Aberdeen Rapid Transit. This would prioritise buses and connect key destinations on the outskirts of Aberdeen to the city centre via busy radial corridors (including the A96, A944 and A956).

(14) Provision of strategic bus priority measures

STPR2 recommends bus priority options are implemented within Scotland's cities and towns where congestion is highest and that bus priority measures continue to be identified and implemented on the trunk road and motorway network. In the case of local networks the recommendation is to continue to use the mechanism of funding for local authorities through the Bus Partnership Fund.

(15) Highland Mainline rail corridor enhancements

STPR2 recommends a programme of enhancements, including new and longer passing loops with more flexibility, and permissible speed increases. This would achieve improvements to journey times and increases in capacity and reliability for passenger and freight services. Precise interventions would be developed following more detailed work in the business case process.

(16) Perth-Dundee-Aberdeen rail corridor enhancements

STPR2 recommends a programme of improvements, such as junction upgrades and permissible speed increases to achieve journey time improvements and line capacity increases for passenger and freight services.

(17) Edinburgh/Glasgow – Perth/Dundee rail corridor enhancements

STPR2 recommends a programme of improvements, such as junction upgrades and permissible speed increases to achieve journey time improvements and line capacity increases for passenger and freight services.

(18) Supporting integrated journeys at ferry terminals

STPR2 recommends a detailed review of key ferry terminals to consider the improvements in timetable information, signing, ticketing and facilities required to deliver a seamless journey between different types of public transport to enhance the traveller experience and accessibility at ferry terminals.

(19) Infrastructure to provide access for all at railway stations

STPR2 recommends a review of station accessibility across Scotland to identify barriers and improve access for all to the rail network, prioritising those stations that have particular problems. This would include investigating the opportunities for new technology to improve safety and access at stations for people with reduced mobility. Opportunities for improving the accessibility of onward journeys from railway stations, particularly by bus and taxi, would also be considered.

(20) Investment in DRT and MaaS

STPR2 recommends that pilot schemes involving DRT and MaaS draw on innovative solutions, international best practice and smart technologies. These schemes will help to establish whether scarce existing resources could be better utilised across the public network, home to school transport, special educational needs travel and non-emergency patient travel, either on the basis of fixed route services or through flexible routeing.

(21) Improved public transport passenger interchange facilities

STPR2 recommends building on STPR2 recommendation 19 (infrastructure to provide access for all at railway stations) by upgrading the accessibility and quality of passenger facilities at existing bus stations and other transport interchanges, to improve the overall attractiveness of public transport services.

(22) Framework for delivery of mobility hubs

STPR2 recommends a delivery framework is developed, building on best practice, to optimise the effectiveness of mobility hubs and ensure a consistent and coordinated approach is taken to assessing locations, facilities and methods of community engagement. Best practice guidance would also be produced to support development.

(23) Smart, integrated public transport ticketing

STPR2 recommends continuing with the support and ongoing delivery of fully integrated smart ticketing and payment services across all public transport, to increase demand and encourage active travel. This recommendation supports the delivery of the objectives within the 2019 Transport (Scotland) Act, and subsequent workstreams, which aims to establish a National Smart Ticketing Advisory Board and set a technological standard for smart ticketing

**Decarbonising transport**(24) Ferry vessel renewal and replacement and progressive decarbonisation

STPR2 recommends renewal and replacement of the Clyde and Hebrides Ferry Services (CHFS) and Northern Isles Ferry Services (NIFS) vessels including progressive decarbonisation by 2045.

(25) Rail decarbonisation

STPR2 recommends the priorities for decarbonising key rail routes should align with the Rail Services Decarbonisation Action Plan and focus where appropriate on routes with the most potential to switch traffic from road to rail.

(26) Decarbonisation of bus network

STPR2 recommends further investment to stimulate the commercial roll out of zero-emission buses with an extension of existing funding criteria to include vehicles used for home to school and community transport. This may involve an evolution of the Scottish Zero Emission Bus Challenge Fund (ScotZEB).

(27) Behaviour change and modal shift for freight

STPR2 recommends the Scottish Government brings together public and private sector organisations to develop a net zero freight and logistics network for Scotland that would encourage the switch to more sustainable and efficient freight transport. This involves considering road fleets, rail freight locomotives and best use of freight capacity.

(28) Zero emissions vehicles and infrastructure transition

STPR2 recommends targeted funding from Transport Scotland to accelerate investment in zero emission fleets, facilities and emerging technologies. This would also require key industries in the private sector working together to co-ordinate investment in expanding and improving the recharging and alternative fuels supply networks. Where relevant, Transport Scotland would intervene to support a just transition of a national network that provides capacity for longer distance journeys.

**Increasing safety and resilience on the strategic transport network**(29) Access to Argyll A83

STPR2 recommends work continues on developing a more reliable route. A preferred corridor has been identified at Glen Croe and five possible route options are being considered with speed of delivery a key criterion for assessment.

(30) Trunk road and motorway safety Improvements

STPR2 recommends road safety improvements are progressed across the trunk road and motorway network with a primary but not exclusive focus on rural sections where accident rates and severities are typically higher. While the location and nature of the improvements on specific routes requires further detailed study, these are likely to include one or a combination of junction improvements, carriageway widening, route realignment and provision of overtaking opportunities.

Where appropriate, these measures may be undertaken in conjunction with, and to support, the STPR2 trunk road and motorway network recommendations related to renewal (32) and climate change adaptation (31).

(31) Trunk road and motorway climate change adaptation and resilience

STPR2 recommends road safety improvements are progressed across the trunk road and motorway network with a primary but not exclusive focus on rural sections where accident rates and severities are typically higher. While the location and nature of the improvements on specific routes requires further detailed study, these are likely to include one or a combination of junction improvements, carriageway widening, route realignment and provision of overtaking opportunities.

Where appropriate, these measures may be undertaken in conjunction with, and to support, the STPR2 trunk road and motorway network recommendations related to renewal (32) and climate change adaptation (31).

(32) Trunk road and motorway renewal for reliability, resilience and safety

STPR2 recommends continued and increased investment in strengthening of the trunk road and motorway network over and above current maintenance levels. Potential measures would include carriageway and structure schemes as well as other roadside infrastructure, such as signage and safety barriers. This would also include development of integrated transport plans for Fort William and the A90 through Dundee.

Where appropriate, these measures may be undertaken in conjunction with and to support STPR2 motorway and trunk road network recommendations related to climate change adaptation (31) and safety improvements (30).

(33) Control Centre for the future (34) Incident Management System Upgrade (35) Enhancing Intelligent Transport Systems

STPR2 recommends investment to enhance the Traffic Scotland National Control Centre, upgrade IMS and expansion and renewal of ITS to ensure current and future requirements are met. This includes maximising benefits from emerging transport technologies. All passenger and freight transport data would be integrated into the TSNCC as opportunities arise.

(36) Strategy for improving rest and welfare facilities for hauliers

STPR2 recommends a detailed national audit of lorry parks. The audit would indicate which routes have gaps in provision and develop a framework to address barriers hampering their development, consider their financial stability and develop adequate standards.

(37) Improving active travel on trunk roads through communities

STPR2 recommends the delivery of packages of measures to reduce the adverse effects of trunk road traffic in communities on walking, wheeling and cycling, tailored to local circumstances and informed by detailed feasibility studies. Where appropriate, these would be planned jointly with connected neighbourhoods (1) and school active travel (8).

(38) Speed management plan

STPR2 recommends a national review to establish appropriate speed limits for different road types within Scotland. The plan would consider a range of measures such as speed management on motorways, speed limits through roadworks and rural settlements on trunk roads reducing speed limits in urban environments and residential areas as well as consideration of the national speed limits for Heavy Goods Vehicles over 7.5 tonnes on the trunk road network. These may require significant changes to engineering, enforcement and education. This recommendation would be complemented by the changing road user behaviour recommendation (7).

**Enhancing strategic connections**(39) Sustainable access to Grangemouth Investment Zone

STPR2 recommends improvements are made to transport that would enhance sustainable access to Grangemouth Investment Zone for both people and freight. This would include improved active travel and bus connections to Grangemouth from key areas, including neighbouring towns and stations, along with freight measures.

(40) Access to Stranraer and ports at Cairnryan

STPR2 recommends that safety, resilience and reliability improvements are made on the A75 and A77 strategic road corridors, in turn supporting placemaking opportunities.

(41) Potential fixed links in Outer Hebrides and Mull

STPR2 recommends that further work is undertaken on business cases to better understand the benefits, costs and challenges associated with these options. These studies would consider the feasibility of replacing existing ferry services currently delivered by CalMac as part of the Clyde and Hebrides Ferry Services (CHFS) contract. These studies would also ascertain the potential savings associated with the public sector subsidies required to operate the ferry services and involve input from communities that may potentially be affected.

(42) Investment in port infrastructure

STPR2 recommends an investment programme in port infrastructure, including power supplies, to support STPR2 recommendation (24) renewal and replacement of the Clyde and Hebrides Ferry Services (CHFS) and Northern Isles Ferry Services (NIFS) vessels including progressive decarbonisation by 2045.

(43) Major station masterplans

STPR2 recommends that station plans and masterplans are progressed to align with and support the investment priorities of Transport Scotland and Network Rail

(44) Rail freight terminals

STPR2 recommends that Transport Scotland supports industry partners in carrying out an updated market study for rail freight growth in Scotland (linked to the 2019 industry growth plan) including a review of rail freight terminals/hubs to confirm how to meet long-term mode shift requirements.

(45) High speed and cross border rail enhancements

STPR2 recommends that Transport Scotland continues to work closely with the UK Government to take forward a programme of infrastructure on-line and off-line upgrades targeted at longer-distance cross-border routes. These will provide higher speed passenger services and increased capacity and reliability for freight.

## STPR2 Consultation – Tactran Draft Response

### Overview

This consultation is on the draft second Strategic Transport Projects Review (STPR2), which sets out draft transport recommendations for the next 20 years. STPR2 is one of the mechanisms for delivering the Vision, Priorities and Outcomes of the second National Transport Strategy (NTS2). It is an important tool for achieving the Government's commitment to 20% reduction in vehicle kilometres by 2030 and contributing to Scotland's net zero greenhouse gas emissions target by 2045. Also, addressing inequalities, improving health and wellbeing and contributing to inclusive economic growth.

### Questionnaire:

#### STPR2 Process

**Q1.** Were you aware of STPR2 prior to this consultation?

Yes ☒ No ☐ Don't Know / No Opinion ☐

**Q2.** To what extent do you agree or disagree that the STPR2 process reflects the NTS2 Priorities and Outcomes?

- ☐ Strongly agree
- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know / No Opinion

**Q3.** Please provide any further comments you have in relation to the STPR2 process:

While it does reflect the outcomes of the NTS2 priorities – it is unclear what many of the recommendations within the document are, as they are very high level. The document is unclear and it does not specify the recommended interventions in a transparent way. At the Case for Change stage there were clear interventions and individual projects, these have now been aggregated into groups and it is not possible to understand how some of the interventions have been sifted out and why others are included. Tactran raised concerns at the Case for Change stage that by grouping the interventions that it would be unclear how the groups would be appraised, and this concern has now become a reality e.g Case for Change included an intervention for upgrading Broxden Junction and/or Inveralmond Junction at Perth and classified it within the road grouping – however it is not possible to know whether this is included in recommendation 30 Trunk Road and Motorway safety improvements or whether it has been sifted out. There are numerous other examples that could be given.

It is understood that the next steps are to develop the recommendations taking onboard consultation responses into a more detailed delivery plan. Tactran request that the Regional Transport Working Groups are involved in this process.

**Q4.** To what extent do you agree or disagree that it was correct to take both a Regional and National approach to STPR2?

- ☐ Strongly agree
- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know / No Opinion

**Q5.** Please provide any further comments:

Tactran agrees that a regional and national approach was correct. However, the finalised document does not really reflect the transport needs of the Forth Valley and Tay Cities. There was a clear regional input up to and including the Case for Change stage, however this has been lost during the subsequent appraisal and presentation of options. For example, the detrimental effect that trunk road traffic travelling through the Tactran region has on the functioning of all transport modes within the three cities of Stirling, Perth and Dundee has not been properly articulated, understood or addressed.

Consideration also needs to be given to the effects of trunk road on smaller towns and villages within the region, such as Callander.

**Q6.** To what extent do you agree or disagree that the engagement process has allowed you to provide a contribution to STPR2?

- ☐ Strongly agree
- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know / No Opinion

**Q7.** Please provide any further comments you have on the engagement carried out throughout STPR2.

See previous answer. There was a clear regional input up to and including the Case for Change stage, however this has been lost during the subsequent appraisal. Post Case for Change the engagement has been very process driven, rather than seeking input into the recommendations as they developed and as a result the regional aspect has been somewhat lost.



## **Key Themes**

STPR2 recommendations are grouped under six key themes:

1. Improving active travel infrastructure
2. Influencing travel choices and behaviours
3. Enhancing access to affordable public transport
4. Decarbonising transport
5. Increasing safety and resilience on the strategic transport network
6. Strengthening strategic connections

**Q8.** Which of the overall key themes is your / your organisation's **top priority**?

- ☐ 1. Improving active travel infrastructure
- ☐ 2. Influencing travel choices and behaviours
- ☐ 3. Enhancing access to affordable public transport
- ☐ 4. Decarbonising transport
- ☐ 5. Increasing safety and resilience on the strategic transport network
- ☐ 6. Strengthening strategic connections
- ☒ Don't Know / No Opinion

*Tactran is currently refreshing its Regional Transport Strategy and the 4 approved draft objectives encompass climate change, health and wellbeing, reducing inequalities and delivering sustainable inclusive economic growth, in line with the National Transport Strategy 2. All themes outlined above are important in a fully integrated and multi-modal transport strategy.*

**Q9.** Which of the overall key themes is your / your organisation's **lowest priority**?

- ☐ 1. Improving active travel infrastructure
- ☐ 2. Influencing travel choices and behaviours
- ☐ 3. Enhancing access to affordable public transport
- ☐ 4. Decarbonising transport
- ☐ 5. Increasing safety and resilience on the strategic transport network
- ☐ 6. Strengthening strategic connections
- ☒ Don't Know / No Opinion

*Tactran is currently refreshing its Regional Transport Strategy and the 4 approved draft objectives encompass climate change, health and wellbeing, reducing inequalities and delivering sustainable inclusive economic growth, in line with the National Transport Strategy 2. All themes outlined above are important in a fully integrated and multi-modal transport strategy.*

**STPR2 Key Themes and Recommendations****A. Improving Active Travel Infrastructure**

**Q10.** To what extent do you agree or disagree that the recommendations under this theme will contribute to Improving Active Travel Infrastructure?

	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Don't Know / No Opinion
Recommendations (1-5):						
1. Connected neighbourhoods		X				
2. Active freeways		X				
3. Village-town active travel connections		X				
4. Connecting towns by active travel		X				
5. Long distance active travel network			X			

**Q11.** Which of these recommendations would you prioritise to contribute to Improving Active Travel Infrastructure?

	High Priority	Medium Priority	Low Priority	Do not support this recommendation	Don't Know / No Opinion
Recommendations (1-5):					
1. Connected neighbourhoods	X				
2. Active freeways	X				
3. Village-town active travel connections	X				
4. Connecting towns by active travel	X				
5. Long distance active travel network		X			

**Q12.** Do the recommendations under this theme address the transport needs of your local or regional area or the people your organisation represents?

Yes ☐ No ☐ Don't Know / No Opinion ☒

**Q13.** Please provide any additional comments you have on the theme Improving Active Travel Infrastructure and the recommendations within it.

Agree with the principles that there needs to be better active travel provision and infrastructure. However, from the document descriptions it is difficult to comment as there is a lack of information about what is actually proposed nationally and regionally within the Tay Cities and Forth Valley areas. For example, the regional map picks out Recommendation 2 Active Freeways and cycle parking hubs as having a particular benefit for Tay Cities and Forth Valley, but then states that priority will be given to Scotland's larger cities. Priority should be given to where there is demand rather than by city category.

In terms of priorities of the 5 recommendations above, cognisance should be taken of hierarchy of mode types and trip lengths outlined on page 3 of the summary report i.e. shorter everyday trips by walking, wheeling and cycling; short to medium length trips by public transport and longer trips to be made by public transport and low emission vehicles. Therefore, priority should be given to recommendations 1-4 above.

## 2. Influencing Travel Choices and Behaviours

**Q14.** To what extent do you agree or disagree that the recommendations under this theme contribute to Influencing Travel Choices and Behaviours?

	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Don't Know / No Opinion
Recommendations (6-10):						
6. Behaviour change initiatives	X					
7. Changing road user behaviour		X				
8. Increasing active travel to school		X				
9. Improving access to bikes		X				
10. Expansion of 20mph limits and zones		X				

**Q15.** Which of these recommendations would you prioritise to contribute to Influencing Travel Choices and Behaviours?

	High Priority	Medium Priority	Low Priority	Do not support this recommendation	Don't Know / No Opinion
Recommendations (6-10):					
6. Behavioural change initiatives	X				
7. Changing road user behaviour		X			
8. Increasing active travel to school		X			
9. Improving access to bikes		X			
10. Expansion of 20mph limits and zones		X			

**Q16.** Do the recommendations under this theme address the transport needs of your local or regional area or the people your organisation represents?

Yes ☐ No ☐ Don't Know / No Opinion ☒

**Q17.** Please provide any additional comments you have on the theme Influencing Travel Choices and Behaviours and the recommendations within it.

It is considered that recommendation 6 behavioural change initiatives are the highest priority under this theme. It is clear that the climate emergency and the need to decarbonise the way we travel and access services requires a significant cultural change. The transport services offered to the public must allow them to make sustainable travel choice, but the public also need to be made aware of the need to change travel behaviour. One of the main reasons why there was general good compliance with lockdown rules during the covid pandemic was that there was an obvious and imminent danger that was understood by the public. The same clear reasoning must be made to the public if we are to meet the transport net zero targets.

Recommendations 7 to 10 are a continuation of the types of initiatives that National, Regional and Local Authorities have been undertaking for years. The document does not make it clear what is different from these past initiatives or whether a step change in commitment and resources is proposed.

It is noted that these measures will require revenue funding and an annual resource will be required.

### 3. Enhancing Access to Affordable Public Transport

**Q18.** To what extent do you agree or disagree that the recommendations under this theme contribute to Enhancing Access to Affordable Public Transport

	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Don't Know / No Opinion
Recommendations (11-23):						
11. Clyde Metro						X
12. Edinburgh & South East Scotland Mass Transit						X
13. Aberdeen Rapid Transit						X
14. Provision of strategic bus priority measures	X					
15. Highland Mainline rail corridor enhancements	X					
16. Perth-Dundee-Aberdeen rail corridor enhancement	X					
17. Edinburgh/Glasgow – Perth/Dundee rail corridor enhancement	X					
18. Supporting integrated journeys at ferry terminals						X
19. Infrastructure to provide access for all at railway stations	X					
20. Investment in DRT and MaaS	X					
21. Improved public transport passenger interchange facilities	X					
22. Framework for delivery of mobility hubs	X					
23. Smart, integrated public transport ticketing	X					

**Q19.** Which of these recommendations would you prioritise to contribute to Enhancing Access to Affordable Public Transport?

	High Priority	Medium Priority	Low Priority	Do not support this recommendation	Don't Know / No Opinion
Recommendations (11-23):					
11. Clyde Metro					X
12. Edinburgh & South East Scotland Mass Transit					X
13. Aberdeen Rapid Transit					X
14. Provision of strategic bus priority measures	X				
15. Highland Mainline rail corridor enhancements	X				
16. Perth-Dundee-Aberdeen rail corridor enhancement	X				
17. Edinburgh/Glasgow – Perth/Dundee rail corridor enhancement	X				
18. Supporting integrated journeys at ferry terminals					X
19. Infrastructure to provide access for all at railway stations	X				
20. Investment in DRT and MaaS	X				
21. Improved public transport passenger interchange facilities	X				
22. Framework for delivery of mobility hubs	X				
23. Smart, integrated public transport ticketing	X				

**Q20.** Do the recommendations under this theme address the transport needs of your local or regional area or the people your organisation represents?

Yes ☐ No ☒ Don't Know / No Opinion ☐

**Q21.** Please provide any additional comments you have on the theme Enhancing Access to Affordable Public Transport and the recommendations within it

Promotion of good, attractive, well priced public transport is crucial if we are to meet the net zero targets for transport. It is therefore disappointing that while there are clear initiatives specific to Glasgow, Edinburgh and Aberdeen city regions, there are no specific proposals or plans to develop proposals within the STPR to improve public transport for any of the 3 cities and their hinterland in the Tactran region. This is a strategic plan looking ahead 20 years, yet in terms of bus travel specific to the Tay Cities and Forth Valley regions, the only recommendation for bus travel is recommendation 14 provision for strategic bus priority which makes reference to continue to use the Bus Partnership Fund, which is a 5-year fund with a finite capital budget, that is already well allocated. Throughout the STPR process Tactran has repeatedly noted the impact that trunk road traffic has on bus services in our cities. There appears to be no recognition of this at Perth and Stirling. There is reference to an integrated plan for A90 through Dundee, but again this is unclear (see later response).

There is also very little here to provide alternatives to the car for the more rural areas of the country and the Tactran region, where public transport is very limited and we would agree that properly funded DRT and MaaS proposals should be taken forward as a priority.

In terms of the rail proposals the restating of commitment through recommendations 15, 16 and 17 to the Highland Main Line, Perth to Aberdeen and Edinburgh/Glasgow to Dundee/Perth is welcomed. However there does appear to be a lack of ambition to significantly improve rail travel in Tactran region. Tactran had asked for significant investment in the Perth to Edinburgh Rail Corridor to be considered as part of the STPR with an improved route and while this was included in the Case for Change it does not appear in the final document with no explanation why it was sifted out. Subsequently at a Tay Cities Regional Transport Working Group meeting it was confirmed that it has been sifted out mainly on cost, both capital and operating.

The rail corridor from Arbroath to Perth serves the coastal population of Arbroath, Carnoustie, Monifieth, Broughty Ferry into Dundee and through to Perth and as such is ideally placed to attract modal shift from car to rail. As far back as 2008/09 Tactran made the case for this local rail service and it was promised as part of the 'Revolution in Rail' service in 2018. However, this has not yet been provided and there is no mention of it at all in the STPR.

Tactran also seeks clarification on recommendation 22 framework for delivery of mobility hubs as to whether this includes Park & Ride/Choose sites, as this would appear to be an omission within the document. Tactran strongly recommend that Park & Choose sites are included in the finalised delivery plan.

Overall it is considered that there is an opportunity being missed to significantly improve the public transport offering in the Tactran region.

#### 4. Decarbonising Transport

**Q22.** To what extent do you agree or disagree that the recommendations under this theme contribute to Decarbonising Transport ?

	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Don't Know / No Opinion
Recommendations (24-28):						
24. Ferry vessel renewal and replacement and decarbonisation						X
25. Rail decarbonisation	X					
26. Decarbonisation of bus network	X					
27. Behaviour change and modal shift for freight	X					
28. Zero emissions vehicles and infrastructure transition	X					

**Q23.** Which of these recommendations would you prioritise to contribute to Decarbonising Transport?

	High Priority	Medium Priority	Low Priority	Do not support this recommendation	Don't Know / No Opinion
Recommendations (24-28):					
24. Ferry vessel renewal and replacement and decarbonisation					X
25. Rail decarbonisation	X				
26. Decarbonisation of bus network	X				
27. Behaviour change and modal shift for freight	X				
28. Zero emissions vehicles and infrastructure transition	X				

**Q24.** Do the recommendations under this theme address the transport needs of your local or regional area or the people your organisation represents?

Yes ☒ No ☐ Don't Know / No Opinion ☐

**Q25.** Please provide any additional comments you have on the theme Decarbonising Transport and the recommendations within it

Tactran welcomes recommendation 26 to decarbonise the rail network, including Fife – Perth – Dundee – Aberdeen – Dyce and Dunblane – Perth – Inverness – Dalcross.

We also welcome recommendation 26 decarbonisation of the bus network and the ambitious plan to remove the majority diesel buses from public transport by the end of 2023.

## 5. Increasing Safety and Resilience on the Strategic Transport Network

**Q26.** To what extent do you agree or disagree that the recommendations under this theme contribute to Increasing Safety and Resilience on the Strategic Transport Network?

	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Don't Know / No Opinion
Recommendations (29-38):						
29. Access to Argyll A83		X				
30. Trunk road and motorway safety Improvements		X				
31. Trunk road and motorway network climate change adaption and resilience		X				
32. Trunk road and motorway network renewal for reliability, resilience and safety		X				
33, 34, 35 Enhancing Intelligent Transport Systems		X				
36. Strategy for improving rest and welfare facilities for hauliers	X					
37. Improving active travel on trunk roads through communities		X				
38. Speed management plan			X			

**Q27.** Which of these recommendations would you prioritise to contribute to Increasing Safety and Resilience on the Strategic Transport Network?

	High Priority	Medium Priority	Low Priority	Do not support this recommendation	Don't Know / No Opinion
Recommendations (29-38):					
29. Access to Argyll A83					X
30. Trunk road and motorway safety Improvements	X				
31. Trunk road and motorway network climate change adaption and resilience		X			
32. Trunk road and motorway network renewal for reliability, resilience and safety	X				
33, 34, 35 Enhancing Intelligent Transport Systems		X			
36. Strategy for improving rest and welfare facilities for hauliers	X				
37. Improving active travel on trunk roads through communities	X				
38. Speed management plan			X		

**Q28.** Do the recommendations under this theme address the transport needs of your local or regional area or the people your organisation represents?

Yes ☐ No ☐ Don't Know / No Opinion ☒

**Q29.** Please provide any additional comments you have on the theme Increasing Safety and Resilience on the Strategic Transport Network and the recommendations within it

It is difficult to tell from the document what is actually proposed under this theme. Tactran welcomes the inclusion of A9 Dunblane to Perth and A90 Perth to Aberdeen within recommendation 30, but seeks clarity on what is actually proposed. The Case for Change included interventions for grade separation of junctions on the A9 from (and including) Keir Roundabout to south of Broxden Roundabout and A9 Broxden and /or Inveralmond junction capacity improvements and it is questioned whether these interventions are included in recommendation 30.

Tactran under recommendation 32 welcomes the inclusion of an integrated transport plan for the A90 Kingsway through Dundee to improve reliability on the trunk road and deliver improvements for local active travel and public transport journeys. It is also noted that this could potentially include online improvements to enable sustainable transport provision. Tactran seeks further clarity on what is proposed as it appears to rule out some possible solutions. It also does not recognise that it is the full length of the Kingsway including the A972 trunk road that causes community severance and disrupts public transport in Dundee.

Although recommendation 37 improving active travel on trunk roads through communities is agreed, there are wider impacts trunk road traffic has on these communities, including safety, severance, health and well-being and a more holistic view needs to be taken of these impacts using the place principle.



## 6. Strengthening Strategic Connections

**Q30.** To what extent do you agree or disagree that the recommendations under this theme contribute to Strengthening Strategic Connections?

	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Don't Know / No Opinion
Recommendations (39-45):						
39. Sustainable access to Grangemouth Investment Zone	X					
40. Access to Stranraer and ports at Cairnryan		X				
41. Potential fixed links in Outer Hebrides and Mull						X
42. Investment in port infrastructure	X					
43. Major station masterplans	X					
44. Rail freight terminals		X				
45. High speed and cross Border rail enhancements	X					

**Q31.** Which of these recommendations would you prioritise to contribute to Strengthening Strategic Connections?

	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Don't Know / No Opinion
Recommendations (39-45):						
39. Sustainable access to Grangemouth Investment Zone	X					
40. Access to Stranraer and ports at Cairnryan			X			
41. Potential fixed links in Outer Hebrides and Mull						X
42. Investment in port infrastructure			X			
43. Major station masterplans	X					
44. Rail freight terminals		X				
45. High speed and cross Border rail enhancements	X					

**Q32.** Do the recommendations under this theme address the transport needs of your local or regional area or the people your organisation represents?

Yes ☐ No ☐ Don't Know / No Opinion ☒

**Q33.** Please provide any additional comments you have on the theme Strengthening Strategic Connections and the recommendations within it

Tactran supports and welcomes the inclusion of Perth Station in recommendation 43 and recommendation 44 which recommends that Transport Scotland work with industry partners in carrying out an updated market study for rail freight growth in Scotland (linked to the 2019 industry growth plan) including a review of rail freight terminals/hubs to confirm how to meet long-term mode shift requirements and asks that clarity can be brought to this proposal at the earliest opportunity.

Tactran also questions why recommendation 42 investment in ports is limited to Ferry ports and considers that investment should be made to improve access to major ports, such as Dundee Port and other ports such as Montrose and Perth Harbour in the Tactran region.

## **STPR2 RECOMMENDATIONS AND OTHER SCOTTISH GOVERNMENT POLICY**

STPR2 recommendations aim to contribute to five key objectives that are consistent across Scottish Government Policy. These are:

- takes climate action
- addressing inequalities & accessibility
- improving health & wellbeing
- supporting sustainable and inclusive economic growth
- improving safety & resilience

This ensures that STPR2 recommendations:

- align with relevant Scottish Government policy, delivery and investment plans in order to help deliver their priorities
- help to deliver the priorities set out in the National Transport Strategy (NTS2) and its Delivery Plan
- meets the transport planning objectives and stated purpose of STPR2 (as identified by the STPR2 development process)

**Q34.** Prior to this consultation were you aware of the list of Scottish Government policies below, which STPR2 aligns with and supports?

	Yes	No	Don't Know / No opinion
Take action against climate change	X		
Decarbonising transport	X		
Reducing car use	X		
Encouraging greater walking, wheeling and cycling	X		
Addressing inequalities, such as:			
• Child poverty	X		
• Affordability of transport	X		
• Access to transport	X		
Transport as an enabler of inclusive economic growth	X		
Providing a safe transport system	X		
Providing a reliable and resilient transport system	X		

**Q35.** Prior to this consultation were you aware of the Scottish Government policy documents to which STPR2 aligns with and supports?

	Yes	No	Don't Know / No opinion
National Transport Strategy 2 (NTS2)	X		
National Planning Framework (NPF4)	X		
Climate Change Plan Update & Route Map	X		
Infrastructure Investment Plan	X		
Just Transition	X		

Cleaner Air for Scotland 2 & Delivery Plan	X		
National Performance Framework	X		

**Q36.** To what extent do you agree or disagree that the STPR2 recommendations reflect and will contribute to the aims of government policy?

- ☐ Strongly agree  
☒ Agree  
☐ Neither agree nor disagree  
☐ Disagree  
☐ Strongly Disagree  
☐ Don't Know / No Opinion

**Q37.** Please provide any additional comments you have on the STPR2 recommendations' contribution to Government policy?

There is considerable uncertainty concerning how these recommendations are to be prioritised and funded, both capital and revenue, particularly as a significant number relate to the functions of Local Authorities and RTPs. Transport Scotland has previously indicated that it intended to bring forward a 'Working with Partners' document to accompany the STPR2 and Tactran would welcome this and the opportunity to discuss how to best work in partnership to deliver the recommendations

The recommendations in STPR2 do little to support the Government policies of:

- Child poverty
- Affordability of transport

Nor does the document set out how it will help achieve a Just Transition

## **Strategic Environmental Assessment (SEA) & Other Impact Assessments**

A statutory Strategic Environmental Assessment (SEA) ensures the potential impact of transport projects on the environment are considered by STPR2. Other impact assessments, which have been undertaken to review how STPR2 can have a positive impact on groups in society as part of STPR2, are listed below:

- The Strategic Environmental Assessment (SEA)
- Equality Impact Assessment
- Island Communities Impact Assessment
- Fairer Scotland Duty Assessment
- Child Rights and Wellbeing Impact Assessment

### **The Strategic Environmental Assessment (SEA)**

**Q38.** To what extent do you agree or disagree with the overall findings of the SEA?

- ☐ Strongly agree
- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know / No Opinion

**Q39.** The SEA has reviewed plans, policies and programmes relevant to STPR2. Are there any others that should be considered?

Yes ☐ No ☒ Don't Know / No Opinion ☐

If Yes is selected, please provide details here:

**Q40.** The SEA sets out the current national and regional baseline environment conditions and future trends. Do you have any comments on this baseline data?

Yes ☐ No ☒ Don't Know / No Opinion ☐

If Yes is selected, please provide details here:

**Q41.** Are there any particular issues, problems or opportunities you would like to mention that have not been captured within the SEA?

Yes ☐ No ☒ Don't Know / No Opinion ☐

If Yes is selected, please provide details here:

### Other Impact Assessments

**Q42.** Please provide any comments on the findings of the **Equality Impact Assessment**

Despite having a theme titled 'Enhancing access to affordable public transport' the STPR does not consider interventions regarding the cost of public transport, which is a significant equalities issue. (see also Q37).

**Q43.** Please provide any comments on the findings of the **Island Communities Impact Assessment**

No Comment

**Q44.** Please provide any comments on the findings of the **Fairer Scotland Duty Assessment**

Despite having a theme titled 'Enhancing access to affordable public transport' the STPR does not consider interventions regarding the cost of public transport, which is a significant issue (see also Q37).

**Q45.** Please provide any comments on the **Child Rights and Wellbeing Impact Assessment**

The CRWIA assessments notes that transport costs are high for young people compared to income. STPR does not include interventions directly tackling this issue (see also Q37).

## A route map to achieve a 20 per cent reduction in car kilometres by 2030

### Tactran Response

#### Part 1 - The Route Map

The route map - 'Reducing car travel by 20% by 2030 for a healthier, fairer and greener Scotland' – is a joint publication by the Scottish Government and COSLA and sets out the actions that the Scottish Government and local authorities in Scotland are taking to make it easier for people to reduce their car kilometres through four key sustainable travel behaviours.

These behaviours are:

- to make use of sustainable online options to reduce your need to travel
- to choose local destinations to reduce the distance you travel
- switch to walk, wheel, cycle or public transport where possible
- combine a trip or share a journey to reduce the number of individual car trips you make, if car remains the only feasible option

#### **1. Do you agree with the overall behaviour change approach, and do you have any comments on the four behaviours outlined above? Please explain.**

- **Agree**
- ~~Disagree~~
- ~~Don't know~~

#### **Please explain your answer:**

It is agreed that the overall behaviour change approach outlined is appropriate, with all 4 behaviours required. It is noted that the route map proposes an infrastructure first approach, before providing softer behavioural change messaging. However, there needs to be a concerted effort in making the public aware of the need to make changes to their travel behaviours and, if we are to be successful in implementing sustainable practices and infrastructure, this messaging needs to commence now in order that the public are aware of and agree with the route map. One of the main reasons why there was general good compliance with lockdown rules during the covid pandemic was that there was an obvious and imminent danger that was understood by the public. The same clear reasoning must be made to the public if we are to meet the transport net zero targets.

There is a concern that a lot of what is proposed is repeating what has been done in the past e.g. 20mph speed limits, road safety framework and that the scale of commitment to the scale of change required is not enough. There needs to be a step change in commitment across all policy areas if the target is to be met. The document itself notes that the measures contained therein will not meet the 20% km reduction target and that other measures are needed. The step change could be positive e.g.

free bus travel for all or could be used to deter car use. It is noted that the accompanying technical annex states that there is modelled data to suggest that replacing fuel duty with road pricing could lead to a significant reduction in road traffic in the UK, without increasing overall cost to road users.

The reliance on targeting shorter journeys through greater active travel measures is also questioned. While it is agreed that it will provide benefits such as health and environment and as such is supported, it is considered that its impact on the 20% reduction in car km target is overstated. While the evidence shows that improved infrastructure for Active Travel does increase walking and cycling, it does not show that these journeys are a switch from car use. The technical annex shows that 55% of car journeys are over 5 km, with 37% being over 10km, resulting in over 70% of car mileage being over 10km. These are not journeys that people are likely to switch to active travel, these are journeys that could switch to public transport – bus or rail. The removal of one 10km car trip equates to the removal of ten 1km journeys. There needs to be a greater emphasis placed on longer trips being undertaken by public and shared transport and also on providing real alternatives to car travel for rural areas, such as MaaS and DRT.

### **2. What are the key opportunities of reducing car kilometres?**

Reducing the need to travel through flexible working and better digital connectivity.

As noted above, there needs to be a greater emphasis placed on longer trips being undertaken by public and shared transport and also on providing real alternatives to car travel for rural areas, such as MaaS and DRT.

Replacing fuel duty with road pricing could lead to a significant reduction in road traffic in the UK, without increasing overall cost to road users.

Reducing the cost of Public Transport provision and reducing fares to the public

### **3. What are the key challenges faced in reducing car kilometres?**

The key challenge is to provide the public with a clear and persuasive message that current travel habits are unsustainable and they need to change. As noted above, one of the main reasons why there was general good compliance with lockdown rules during the covid pandemic was that there was an obvious and imminent danger that was understood by the public. The same clear reasoning must be made to the public if we are to meet the transport net zero targets.

As well as targeting urban areas, there needs to be greater emphasis placed on providing alternatives for longer journeys and in rural areas. It is recognised that this is a greater challenge, but it should not just be assumed that because it is difficult it cannot be done.



### **4. Are there any further actions you would like to see included in future to support behaviour change 1) - reducing the need to travel?**

Tactran agrees with interventions proposed under this heading. Provision of digital connectivity and the ability to work flexibly has obvious car trip reduction potential. In terms of intervention 1e Work Local Challenge Programme, it is assumed that this would include having community work hubs in rural locations that would allow those living in remote locations to work locally and could be supported by shared transport, MaaS and DRT.

### **5. Are there any further actions you would like to see included in future to support behaviour change 2) - choosing local options?**

Tactran agrees with the interventions proposed under this heading, but is concerned that some of the land use planning proposals, such as 20 minute neighbourhoods will take years to implement and re-address car based developments such as out of town shopping centres.

Tactran would also question the effect of 20mph speed limits on reducing car km. However, if 20mph speed limits are to be introduced, it would be more efficient to introduce 20mph as the standard speed limit in built up areas, unless otherwise signed. This would reduce sign clutter, by only signing 30mph and higher speed limits, concentrating on core routes in urban areas.

### **6. Are there any further actions you would like to see included in future to support behaviour change 3) -switching to more sustainable modes of travel?**

Although Tactran supports the interventions proposed under this heading, the effectiveness of some of the interventions in reducing car km is questioned. The key word in this behaviour change is switching and this will help in reducing car km. As noted before the most effective interventions are those that allow people to switch longer journeys and although it is agreed that Active Travel infrastructure and initiatives are important in providing health and environmental benefits, their overall contribution to reducing car km is questioned. There needs to be greater emphasis on switching to public and shared transport, including MaaS and DRT. Another clear driver for change is cost of using public transport and the Fair Fare review and free bus travel for under 22-year-olds is welcomed, but it would be good if this could be extended further.

### **7. Are there any further actions you would like to see included in future to support behaviour change 4) -combining or sharing journeys?**

The two interventions under this heading are supported. However, Tactran would suggest that there needs to be a greater commitment to these interventions, particularly as they have potential to reduce longer car trips and assist in providing alternatives to car use in rural areas.

### **8. Do you have any comment to make on any of the specific policies contained within the route map?**

While Tactran agrees there is merit in the interventions proposed the effectiveness of some in reducing car km is questioned e.g. is the introduction of LEZ going to reduce car traffic, or just displace it; will pavement parking ban reduce car km?

Tactran welcomes the further research proposed for road pricing but would also question the timing for developing a Car Demand Management Framework. The proposed timescale of 2025 for this would only leave 5 years to implement before the 2030 target. This needs to be expedited.

### **Part 2 - Social and Equalities**

In creating the route map to reduce car kilometres, the public sector equality duty requires the Scottish Government to pay due regard to the need to the following:

- Eliminate discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010
- Advance equality opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a relevant protected characteristic

These three requirements apply across the protected characteristics of:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion and belief
- sex and sexual orientation

The Scottish Government must also include consideration of:

- children and young people (Child Rights and Wellbeing)
- socioeconomic disadvantage, low wealth, and area deprivation (Fairer Scotland Duty)

Section 8 of the Islands (Scotland) Act 2018 (Scottish Parliament, 2018) requires the Scottish Government to prepare an island communities impact assessment in relation to a policy, strategy, or service, which is likely to have an effect on an island community which is significantly different from its effect on other communities.

The current draft impact assessments have been published alongside the Route Map and are available on the Transport Scotland website.

The Scottish Government will consider the responses from the consultation process in determining any actions needed to meet its statutory obligations. Your comments will be considered in the completion of the impact assessments to determine whether any further work in this area is needed

**1. Do you think that the proposals set out in this plan could have positive or negative impacts on any particular groups of people with reference to the listed protected characteristics?**

- ☐ Yes
- ☐ No
- ☒ Don't know

Please explain your answer

Tactran considers that there is not enough information provided within the document and would expect the appropriate impact assessments to be undertaken prior to implementation

**1a. If you think the proposals will have a particular impact on certain groups due to protected characteristics, what measures would you suggest to maximise positive impacts or mitigate negative impacts?**

Tactran considers that there is not enough information provided within the document and would expect the appropriate impact assessments to be undertaken prior to implementation

**2. Do you think that the proposals set out in this plan could have a particular impact (positive or negative) on island communities?**

- ☐ Yes
- ☐ No
- ☒ Don't know

Please explain your answer

Tactran has no comment

**2a. If you think the proposals will impact on island communities, what measures would you suggest to maximise positive impacts or mitigate negative impacts?**

Tactran has no comment

**3. Do you think that the proposals set out in this plan could have a particular impact (positive or negative) on people facing socio-economic disadvantages?**

- ☐ Yes

- ☐ ~~No~~
- ☒ **Don't know**

Please explain your answer

Tactran considers that there is not enough information provided within the document and would expect the appropriate impact assessments to be undertaken prior to implementation

**3a. If you think the proposals will have a particular impact based on socio-economic factors what measures would you suggest to maximise positive impacts or mitigate negative impacts?**

Tactran considers that there is not enough information provided within the document and would expect the appropriate impact assessments to be undertaken prior to implementation

### **Part 3 - The Environment**

The Environmental Assessment (Scotland) Act 2005 ensures those public proposals that are likely to have a significant impact on the environment are assessed and measures to prevent or reduce adverse effects are sought, where possible, prior to implementation.

**1. Do you think the actions proposed in the route map are likely to have an impact on the environment? If so, in what way? Please be as specific as possible in your reasoning.**

- ☐ ~~Yes~~
- ☐ ~~No~~
- ☒ **Don't know**

Please explain your answer

Tactran considers that there is not enough information provided within the document and would expect the appropriate impact assessments to be undertaken prior to implementation

### **Part 4 - Other Comments**

**2. Do you have views you would like to express relating to parts of this consultation which do not have a specific question? If so, please elaborate**

Box for comments

Tactran has no further comment

## Part 1 – A National Spatial Strategy for Scotland 2045

<https://www.transformingplanning.scot/national-planning-framework/>

**Q1: Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?**

The Tayside and Central Scotland Transport Partnership (Tactran) welcomes NPF4 as an opportunity to raise the profile of the Tactran region, comprising the Council areas of Angus, Dundee City, Perth and Kinross and Stirling, and to recognise the region's assets and resources and the contribution the region will make to national outcomes.

However, the Spatial Strategy itself does not contain sufficient detail to ensure delivery of net zero places. The high-level principles are supported; however, it is suggested that delivery of these principles will be largely through national planning policy.

The Spatial Strategy will support work towards net zero places where the Spatial Strategy focuses its attention, namely on nationally important developments. Those nationally important developments referenced in NPF4 which support net zero places in the Tactran region include delivery of Transport Scotland's second Strategic Transport Projects Review (STPR2). It remains unclear to which extent STPR2 will help deliver future net zero places.

The Spatial Strategy indicates a strategic connectivity link between the West Coast and the Stirling area. It is not clear from NPF4 or STPR2 what this link is. If the reference is to the A83 Rest and be Thankful, the greater flow of traffic is to/from the south rather than the east.

**Q2: Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live?**

No. The Spatial Strategy itself does not contain sufficient detail to ensure delivery of better, healthier, and more vibrant places to live. The high-level principles are supported, however, it is suggested that delivery of these principles will be largely through national planning policy, rather than the Spatial Strategy.

The extent to which STPR2 enables liveable neighbourhoods will depend on its ability to support the transition to low emission vehicles for all households (that choose or need to own a car) and support public and shared transport solutions in both urban and rural areas. The 20minute / liveable neighbourhood principle is going to be very difficult to achieve in rural areas without a step change in public and/or shared transport solutions in rural areas.

**Q3: Do you agree that this approach will deliver our future places which will attract new investment, build business confidence, stimulate entrepreneurship**

### **and facilitate future ways of working – improving economic, social and environmental wellbeing?**

No. The high-level principles are supported, but the Spatial Strategy itself does not contain sufficient detail to ensure attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working. In terms of how transport issues are addressed to enable and promote economic productivity in the region, this is dependent on what is included within STPR2.

In this respect, Tactran have concerns over the absence of strategic connectivity proposals in the STPR2 that would enable and promote economic activity. In particular:

- Addressing pinch points on the trunk road network (at M9J10 Craigforth; M9J11 Keir Roundabout; A9 Auchterarder; A9 Inveralmond and Broxden roundabouts; A90 Swallow Roundabout; A90 Kingsway, Dundee)
- Rail journey times between Perth and Edinburgh
- Rail journey time reliability between Dundee and Aberdeen
- Timescales for electrification of the rail network to Perth and Dundee

### **Q4: Do you agree that this approach will deliver our future places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient?**

No. The Spatial Strategy itself does not contain sufficient detail to ensure delivery of places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient. The high-level principles are supported; however, it is suggested that delivery of these principles will be largely through national planning policy, rather than the Spatial Strategy.

If an objective is to ensure that places are “easy to move around” it would assist if the text here made explicit reference to ensuring our transport networks and public spaces (including our streets) are usable by everyone. Designing an environment for people with mobility difficulties is the best way to ensure that places are “easy to move around” for everyone.

### **Q5: Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?**

No. The Spatial Strategy itself does not contain sufficient detail to ensure delivery of sustainable, liveable, productive, and distinctive places. The high-level principles are supported; however, it is suggested that delivery of these principles will be largely through national planning policy, rather than the Spatial Strategy.

### **Q6: Do you agree that these spatial principles will enable the right choices to be made about where development should be located?**

Local living is supported, however, it is limited to the extent to which it will reduce the need to travel unsustainably. Employment, secondary and further education and

many other services and opportunities will not be able to be provided at a local level. To complement local living, we also need to make sure that development is located where it is, or could be, well served by public transport that would link these local neighbourhoods to regional and national centres.

**Q7: Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?**

No. Input to NPF4 was sought via indicative Regional Spatial Strategies. City Region and Growth Deals are based on similar geographies. As are the Regional Transport Working Groups that informed STPR2. The criteria defining these areas were travel to work areas.

The broader Spatial Strategy action areas included in NPF4 risk masking priorities in the respective regions, especially in the Central Region.

*North and West Coastal Innovation*

**Q8: Do you agree with this summary of challenges and opportunities for this action area?**

n/a

**Q9: What are your views on these strategic actions for this action area?**

n/a

*Northern Revitalisation*

**Q10: Do you agree with this summary of challenges and opportunities for this action area?**

n/a

**Q11: What are your views on these strategic actions for this action area?**

Tactran notes and supports the identification of the required improvements to the Highland Main Line.

*North East Transition*

**Q12: Do you agree with this summary of challenges and opportunities for this action area?**

n/a

**Q13: What are your views on these strategic actions for this action area?**

Tactran notes and supports the identification of the Aberdeen to the Central Belt rail project. It would also be helpful if the action of reducing the need to travel related to travel to Aberdeen given the extent to which traffic travelling to and from Aberdeen contributes towards pinch points on the trunk road network, specifically in and around Dundee.

### *Central Urban Transformation*

#### **Q14: Do you agree with this summary of challenges and opportunities for this action area?**

No. Tactran considers the NPF4 as an opportunity to build on the region's strengths and opportunities to support Scotland's journey to net zero.

Given that this action area covers most of Scotland's population, a number of iRSS areas, a number of STPR2 Regional Transport Working Group areas, a number of Growth Deal areas and a National Park, there is a lot to cover, and it is possible some regional priorities may be overlooked.

The challenges and opportunities identified for the area (p. 30 refers), and consequently the subsequent actions, ignore that the area contains significant rural populations, especially for Perth and Kinross and Stirling, Fife, Argyll and Bute

This, subsequently, means that the potential and opportunities for growth within the region is not necessarily fully captured.

#### **Q15: What are your views on these strategic actions for this action area?**

Tactran welcomes recognition of the challenges and opportunities relating to:

- Dundee Waterfront (as well as the Michelin Scotland Innovation Parc, and the Eden Project);
- Loch Lomond and the Trossachs National Park and Forth Valley Tourism;
- Tayside strategic green and active travel network and the Central Scotland Green Network;
- Dundee and Montrose Ports; and
- Research and innovation proposals in the Tay Cities Region

However, an example of how important regional priorities can be lost in the Central Region is the reflection on housing growth opportunities. NPF4 reflects that Edinburgh and South East Scotland region could accommodate 45,000 new homes (p. 36 refers). Clearly this is significant in terms of the necessary infrastructure to support the development. However, the proportion of new homes allocated in development plans in and around the Cities of Perth and Stirling is relatively greater for these particular locations, and hence the infrastructure required to support and enable these aspirations is relatively greater for these two cities.

With regards to NPF4 Action 21 'Improve Urban Accessibility', the principle of local living is supported (as above under Q6). However, it is limited to the extent to which it



will reduce the need to travel unsustainably. Employment, secondary and further education and many other services and opportunities will not be able to be provided at a local level. To complement local living, we also need to make sure that there are interventions to address those strategic trips between major centres and which make up much of the personal mileage.

### *Southern Sustainability*

**Q16: Do you agree with this summary of challenges and opportunities for this action area?**

n/a

**Q17: What are your views on these strategic actions for this action area?**

n/a

**Q18: What are your overall views on this proposed national spatial strategy?**

As above.

### Part 2 – National Developments

**Q19: Do you think that any of the classes of development described in the Statements of Need should be changed or additional classes added in order to deliver the national development described?**

Tactran welcome the inclusion of:

- Central Scotland Green Network;
- National Walking, Cycling and Wheeling Network (However, the justification for it lies elsewhere than the national target to reduce car mileage by 20% as only 27% of personal mileage is below 10km); and
- Dundee Waterfront

However:

- Tactran suggests that the Strategic Transport Projects Review 2 should be identified as a National Development.
- Tactran supports High Speed Rail (HSR) connections to Scotland. However, the package of associated measures must ensure those centres north of Glasgow and Edinburgh are also well connected to any HSR service.
- The designation of the National Walking, Cycling and Wheeling Network (NCWWN) is defined as “new/and or upgraded routes suitable for a range of users for walking, cycling and wheeling that help create a national network that facilitates short and longer distance journeys and linkages to multi-modal hubs.” This makes it a requirement that a route helps create linkages to multi modal

hubs. While Tactran supports this principal, we are concerned that the definition would exclude most of the current proposed NCWWN.

- The designation of the Dundee Waterfront includes “new and/or upgraded active and sustainable travel routes”. Sustainable transport links along this corridor integrate more than active travel infrastructure. For example, bus related infrastructure. Tactran, subsequently, suggests that the designation be reworded as “new and/or upgraded active travel and sustainable transport routes”.

**Q20: Is the level of information in the Statements of Need enough for communities, applicants and planning authorities to clearly decide when a proposal should be handled as a national development?**

No comment

**Q21: Do you think there are other developments, not already considered in supporting documents, that should be considered for national development status?**

Tactran recommends that the Strategic Transport Projects Review 2 should be identified as a National Development (as above under Q19).

Tactran would recommend reference is made to the indicative Regional Spatial Strategies for Tay Cities and Forth Valley and should take cognisance of any amendments made in the finalised Regional Spatial Strategies.

### Part 3 – National Planning Policy

**We want our places to help us tackle the climate and nature crises and ensure Scotland adapts to thrive within the planet’s sustainable limits.**

**Q22: Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions?**

No. Addressing climate change should be a primary guiding principle. But so should reducing inequalities. These are not conflicting principles, as most transport related interventions to address climate change will support social inclusion and vice versa.

### **Policy 1: Plan-led approach to sustainable development**

**Q23: Do you agree with this policy approach?**

Yes.

### **Policy 2: Climate emergency**

**Q24: Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?**

Yes.

**Policy 3: Nature crisis**

**Q25: Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis?**

Yes.

**Policy 4: Human rights and equality**

**Q26: Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality?**

No. For planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality more specific requirements are necessary, including, for example, that “it is a requirement for planning decisions to consider human rights and equality issues”. All other public sector decisions need to do this, planning authorities need to develop proportionate approaches to do this in relation to planning decisions.

**Policy 5: Community wealth building**

**Q27: Do you agree that planning policy should support community wealth building, and does this policy deliver this?**

Tactran agrees that planning policy should support community wealth building.

**Policy 6: Design, quality and place**

**Q28: Do you agree that this policy will enable the planning system to promote design, quality and place?**

This policy is critical to ensure the transport requirements and travel demands of new development are met in a way which support the National Outcomes relating to climate change, air quality, reducing inequalities and promoting inclusive economic growth.

Placemaking and design guidance for streets, such as the Designing Streets, should be at the forefront of promoting good public realm design and creating and maintaining people-focused places and streets, helping to deliver improvements for pedestrians and cyclists.

It is welcomed that developments be required to demonstrate how they have incorporated the Six Qualities of Successful Places. The requirement for developments to incorporate the principles of Designing Streets, will help achieve this.

However, it is recommended that the definition of “well connected and easy to move around” within the Six Qualities be extended. Effectively the policy only seeks to ensure developments are accessible by those walking, cycling, or wheeling. Many developments within our rural areas will reasonably argue that they cannot be accessed from other locations by foot (or bike). It is suggested that the guidance be strengthened by adding “All development must demonstrate that it is reasonably accessible by a choice of modes of travel other than the private car”.

A complementary or alternative approach could be adding the sentence “All development must demonstrate how its travel demands have been met in accordance with the National Transport Strategy’s mode hierarchy”.

### **Policy 7: Local living**

#### **Q29: Do you agree that this policy sufficiently addresses the need to support local living?**

Yes. In so far as Development Plans can contribute to the principle of liveable neighbourhoods and 20 Minute Neighbourhoods respectively. Tactran recommends the policy be strengthened by adding in “Public sector development which is not consistent with the principles of 20 Minute Neighbourhoods and increases the need to travel will not be supported.”

### **Policy 8: Infrastructure First**

#### **Q30: Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure first approach to planning?**

Tactran support the principle of development decisions being informed by the constraints and opportunities for infrastructure. Transport Scotland have issued guidance (Development Planning and Management Transport Appraisal Guidance) for how planning authorities should undertake this task when they prepare their Development Plans. It is recommended that this policy (in addition to Policy 10) references Development Planning and Management Transport Appraisal Guidance.

To support the infrastructure first approach, higher density development around transport infrastructure could help maximise the existing infrastructure, subject to its capacity (also cp. Transit Oriented Development (TOD) which aims wherever practical to provide sufficient population density to make high quality, regular public transport services viable).

### **Policy 9: Quality homes**

#### **Q31: Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives?**

n/a

### Policy 10: Sustainable transport

#### **Q32: Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and active travel choices?**

The policy presents a comprehensive approach to address the transport requirements and travel demands of development in a safe, inclusive, and sustainable manner and is supported. However:

In relation to criteria (a) and (c):

- to help ensure that the principle of promoting sustainable transport modes to meet the travel demands is delivered, it is recommended that Development Plans and major new development be measured against the extent to which they achieve this.

Tactran suggests that Development Plans should be judged on their emissions-reducing credentials as much as on housing supply. Cutting carbon emissions should be a basic criterion for (major) new projects to be considered, thus preventing new car dependent developments. Development Plans should be required to identify the extent to which their policies impacting on transport and travel reduce carbon emissions or improve access to jobs, education, and local services. For major new developments, they should be required to demonstrate the extent to which travel demands will be met by sustainable modes.

In relation to criterion (e)

- Reference to ensuring the operation and safety of the strategic transport network in a document by Scottish Government is understandable. However, as NPF4 does form part of the development plan applicable in all localities, the reference should not be restricted to just the strategic transport network, the operation and safety of all local transport networks are equally important.

In relation to criterion (g)

- The requirement of putting people and place before unsustainable modes of travel is essentially the application of the sustainable travel hierarchy. Tactran recommends that the first sentence of this criterion be reworded to “Development proposals should put people and place before unsustainable travel through the application of the sustainable travel hierarchy.”

In relation to criterion (k)

- Tactran recommends that this criterion be widened from considering the “needs of users or all ages and abilities” to the “needs of users of all people with a protected characteristic.”

### Policy 11: Heat and cooling

**Q33: Do you agree that this policy will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures?**

n/a

**Policy 12: Blue and green infrastructure, play and sport**

**Q34: Do you agree that this policy will help to make our places greener, healthier, and more resilient to climate change by supporting and enhancing blue and green infrastructure and providing good quality local opportunities for play and sport?**

Tactran welcomes this policy that looks to implement measures that deliver net gain in blue-green infrastructure.

**Policy 13: Sustainable flood risk and water management**

**Q35: Do you agree that this policy will help to ensure places are resilient to future flood risk and make efficient and sustainable use of water resources?**

n/a

**Policies 14 and 15: Health, wellbeing and safety**

**Q36: Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities?**

Yes.

**Policy 16: Land and premises for business and employment**

**Q37: Do you agree that this policy ensures places support new and expanded businesses and investment, stimulate entrepreneurship and promote alternative ways of working in order to achieve a green recovery and build a wellbeing economy?**

Yes.

**Policy 17: Sustainable tourism**

**Q38: Do you agree that this policy will help to inspire people to visit Scotland, and support sustainable tourism which benefits local people and is consistent with our net zero and nature commitments?**

Yes.

**Policy 18: Culture and creativity**

**Q39: Do you agree that this policy supports our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity?**

n/a

**Policy 19: Green energy**

**Q40: Do you agree that this policy will ensure our places support continued expansion of low-carbon and net zero energy technologies as a key contributor to net zero emissions by 2045?**

By 2030, it is estimated that the number of EVs in the UK will be between 2.7 and 10.6million and rising as high as 36 million by 2040<sup>3</sup>. Even the lower end of forecasts, if reached, will place substantial demands on the UK's electricity networks.

Similarly, electricity demand as a result of charging fleets of EVs at depots, en route and at home (for those fleets that rely on home-start capacity), will increase significantly, though this will be highly dependent on how businesses choose to charge their vehicles.

These factors will impact generation and demand on both transmission and distribution networks, with the focus shifting to the dynamic management of local systems to meet changing needs.

It is important to both anticipate these impacts and invest over the short to medium term to ensure the grid is future-proofed. That is, dynamic and resilient to cope with the rising demand. Tactran suggest for the Local Development Plans to not only include information on projected EV infrastructure requirements but also encourages an ongoing dialog between the Planning Authorities and providers, as this would help the regulator, Ofgem, to provide a clear and supportive framework for investment and delivery in every community.

**Policy 20: Zero waste**

**Q41: Do you agree that this policy will help our places to be more resource efficient, and to be supported by services and facilities that help to achieve a circular economy?**

n/a

**Policy 21: Aquaculture**

**Q42: Do you agree that this policy will support investment in aquaculture and minimise its potential impacts on the environment?**

n/a

**Policy 22: Minerals**

**Q43: Do you agree that this policy will support the sustainable management of resources and minimise the impacts of extraction of minerals on communities and the environment?**

n/a

**Policy 23: Digital infrastructure**

**Q44: Do you agree that this policy ensures all of our places will be digitally connected?**

n/a

**Policies 24 to 27: Distinctive places**

**Q45: Do you agree that these policies will ensure Scotland's places will support low carbon urban living?**

No. Tactran is concerned that this policy encourages drive-throughs in town centres. Does the policy really intend to locate (by definition) car orientated development to those locations where we are trying to reduce access by the car?

**Policy 28: Historic assets and places**

**Q46: Do you agree that this policy will protect and enhance our historic environment, and support the reuse of redundant or neglected historic buildings?**

n/a

**Policy 29: Urban edges and the green belt**

**Q47: Do you agree that this policy will increase the density of our settlements, restore nature and promote local living by limiting urban expansion and using the land around our towns and cities wisely?**

As above under Q45.

**Policy 30: Vacant and derelict land**

**Q48: Do you agree that this policy will help to proactively enable the reuse of vacant and derelict land and buildings?**

Tactran supports focussing development on brownfield sites. Reusing suitable brownfield land, or land which has already been developed, avoids harm to nature and biodiversity, and reduces the need for new infrastructure. Many brownfield sites are located near jobs and amenities, reducing the need to travel. They also enable the use of existing infrastructure meaning less energy is required for construction and



maintenance. This also reduces the costs associated with infrastructure and is potentially one of the reasons why brownfield sites are delivered much quicker than greenfield sites once they have been granted planning permission.

### **Policy 31: Rural places**

**Q49: Do you agree that this policy will ensure that rural places can be vibrant and sustainable?**

The policy states that “other than in accessible areas, or areas of pressure identified in local development plans, proposals for new homes in rural areas outwith existing rural settlements should be supported, where the proposal:...”. Tactran would welcome clarification on this policy as the policy can be read that development outside existing settlements would be only permitted if it met certain criteria, but not if it was in an accessible location. Is this correct?

### **Policy 32: Natural places**

**Q50: Do you agree that this policy will protect and restore natural places?**

n/a

### **Policy 33: Peat and carbon rich soils**

**Q51: Do you agree that this policy protects carbon rich soils and supports the preservation and restoration of peatlands?**

n/a

### **Policy 34: Trees, woodland and forestry**

**Q52: Do you agree that this policy will expand woodland cover and protect existing woodland?**

n/a

### **Policy 35: Coasts**

**Q53: Do you agree that this policy will help our coastal areas adapt to climate change and support the sustainable development of coastal communities?**

*Part 4 – Delivering Our Spatial Strategy*

**Q54: Do you agree with our proposed priorities for the delivery of the spatial strategy?**

No comment

**Q55: Do you have any other comments on the delivery of the spatial strategy?**

*.Part 5 – Annexes*

**Q56: Do you agree that the development measures identified will contribute to each of the outcomes identified in Section 3A(3)(c) of the Town and Country Planning (Scotland) Act 1997?**

With the bias in the Spatial Strategy and the national developments towards supporting Scotland's main urban areas, the draft National Planning Framework 2045 leaves both the rural and smaller urban areas within the Tactran region in a less certain and less supported position, for example with regards to addressing inequalities and ensuring equitable access to services and opportunities.

There, subsequently, remains a lack of detail on how the priorities for Scotland's rural areas will be addressed. This includes the national ambition for regenerating rural areas across Scotland and increasing the population of rural areas of Scotland.

**Q57: Do you agree with the Minimum All-Tenure Housing Land Requirement (MATHLR) numbers identified above?**

n/a

**Q58: Do you agree with the definitions set out above? Are there any other terms it would be useful to include in the glossary?**

Tactran agrees with the definitions set out in the glossary. As we referred to the principle of Transit Orientated Development (TOD), we suggest including TOD in the glossary, should the Scottish Government follow our suggestion and include the respective references in the final NPF4 document.

## Scottish Government Local Development Planning Regulations & Guidance Consultation

### Part B - Proposals for Development Planning Regulations

**Question 13: Do you agree with the proposals for regulations relating to the meaning of 'key agency'?**

Yes / ~~No~~ / ~~No View~~

**Please explain why you agree or disagree**

Tactran support the continued recognition of regional Transport Partnerships as key agencies in the development plan process

### Part C - Local Development Planning - [draft guidance](#)

**Question 15 Do you agree with the general guidance on Local Development Plans?**

Yes / ~~No~~ / ~~No View~~

**Please explain why you agree or disagree.**

**Question 16 Do you agree with the guidance on Development Plan Schemes?**

Yes / ~~No~~ / ~~No View~~

**Please explain why you agree or disagree.**

Tactran support the requirement that consideration must be paid in a Development Plan scheme to both regional and local transport strategies that apply to the area (para 36)

Tactran support the recognition of Regional Transport Partnerships as a key agency (para 47)

**Question 17 Do you agree with the guidance on the Delivery Programme?**

Yes / ~~No~~ / ~~No View~~

**Please explain why you agree or disagree.**

Tactran support the requirement that key agencies have a duty to cooperate with the planning authority in the preparation of the Delivery Programme

**Question 18 Do you agree with the guidance on Local Place Plans?**

~~Yes / No /~~ No View

**Please explain why you agree or disagree.**

**Question 19 Do you agree with the guidance on the Evidence Report?**

~~Yes / No /~~ No View

**Please explain why you agree or disagree.**

Tactran support that Evidence Reports should consider regional strategies in the preparation of evidence reports, and the specific identification of regional transport strategies. RTSs can assist the Evidence Report assessing existing and planned travel and transport infrastructure and services available in the plan area for movement of people and freight across all modes of transport (para 107)

**Question 21 Do you agree with the guidance on the Proposed Plan?**

~~Yes / No /~~ No View

**Please explain why you agree or disagree.**

Tactran support the requirement to prepare a Transport Appraisal to inform the Proposed Plan (para 151)

Tactran support the guidance that connections and efficiencies can be made with other plans and strategies, such as Regional and Local Transport Strategies (para 158).

**Question 22 Do you agree with the guidance on Local Development Plan Examinations?**

~~Yes / No /~~ No View

**Please explain why you agree or disagree.**

**Question 23 Do you agree with the guidance on Adoption and Delivery?**

~~Yes / No /~~ No View

**Please explain why you agree or disagree.**

**Question 24 Do you agree with the proposed guidance on the Evidence Report in relation to the section on Sustainable Places (paragraphs 240 – 247)?**

~~Yes / No /~~ No View

**Please explain why you agree or disagree.**

Tactran support the identification of Regional and Local Transport Strategies as sources of information to support the Evidence Report

**Question 25 Do you agree with the proposed guidance on the Evidence Report in relation to the section on Liveable Places (paragraphs 248 – 283)?**

~~Yes / No / No View~~

**Please explain why you agree or disagree.**

Tactran note and support the principles of 20Minute / Liveable Neighbourhoods but suggest that in identifying such in a Proposed Plan, authorities should consult all service providers providing a public service at a local level. A starting point for the 20minute neighbourhood principle to work is all agencies working to agreed geographies. This cannot be conducted by a Planning Authority alone.

Tactran support that the Evidence Report is expected to be informed by baseline transport information and data but recommend that the examples of sources listed (para 271) present a better balance of national, regional and local sources. The current list of examples may lead to over reference to information of national relevance, rather than seeking out data of a regional or local nature which may be more relevant to a Local Development Plan.

Tactran support the guidance on Evidence Reports including

- Reports to include an audit of existing and planned transport infrastructure and services – their availability, accessibility and capacity in line with the NTS2 sustainable travel and investment hierarchies, including consideration of freight (para 255)
- Reports to assess how existing capacity has been used, as far as possible, in line with the Investment Hierarchies set out in the Infrastructure Investment Plan and National Transport Strategy (para 257)
- That Regional Transport Partnerships would be expected to be engaged with in the preparation of Evidence reports (para 269)

**Question 26 Do you agree with the proposed guidance on the Evidence Report in relation to the section on Productive Places (paragraphs 284 – 296)?**

~~Yes / No / No View~~

**Please explain why you agree or disagree.**

**Question 27 Do you agree with the proposed guidance on the Evidence Report in relation to the section on Distinctive Places (paragraphs 297 – 310)?**

~~Yes / No / No View~~

**Please explain why you agree or disagree.**

**Question 28 Do you agree with the proposed guidance on the Proposed Plan in relation to the section on Sustainable Places (paragraphs 317 – 328)?**

~~Yes / No / No View~~

**Please explain why you agree or disagree.**

Tactran support the principle of liveable neighbourhoods, but suggest that they can only achieve so much in reducing the need to travel. Many services (hospitals, secondary and further education) and employment cannot be provided at a local level for everyone. Tactran therefore recommend that guidance on sustainable places also includes an emphasis on ensuring that development be directed in locations where there is, or would be, good public transport accessibility to nearby towns and cities.

**Question 29 Do you agree with the proposed guidance on the Proposed Plan in relation to the section on Liveable Places (paragraphs 329 – 400)?**

~~Yes / No / No View~~

**Please explain why you agree or disagree.**

Tactran support the principle of liveable neighbourhoods (para 331), but suggest that they can only achieve so much in reducing the need to travel. Many services (hospitals, secondary and further education) and employment can not be provided at a local level for everyone. Tactran therefore recommend that guidance on sustainable places also includes an emphasis on ensuring that development be directed in locations where there is, or would be, good public transport accessibility to nearby towns and cities.

Tactran therefore support prioritising accessible locations for future development to help reduce the need to travel. Tactran recommend that para 376 be expanded to require Proposed Plans to designate those areas / corridors where there is good accessibility, including identifying the most accessible locations where there is potential for developments with low or no car parking.

Para 373: Tactran recommend that the final sentence of para 373 “Land should only be safeguarded for new road and rail purposes where approved by Transport Scotland and where it has a clear delivery pathway” be clarified to make it clear that it refers only to trunk road and rail proposals

**Question 30 Do you agree with the proposed guidance on the Proposed Plan in relation to the section on Productive Places (paragraphs 401 – 424)?**

~~Yes / No / No View~~

**Please explain why you agree or disagree.**

Tactran support that the identification of land for new business and industrial development consider accessibility to transport networks by walking, wheeling, cycling and public transport and their integration with and access to existing transport networks (para 405)

**Question 31 Do you agree with the proposed guidance on the Proposed Plan in relation to the section on Distinctive Places (paragraphs 425 – 466)?**

~~Yes / No / No View~~

**Please explain why you agree or disagree.**

Para 454 suggests that The Spatial Strategies “should seek to manage rural development in accessible or pressured rural areas, where there is a danger of unsustainable growth in long distance car-based commuting”. Tactran support the principle of development not encouraging a growth in long distance car commuting. However, there may be an unintended consequence of this approach. To support the vitality and viability of rural settlements, development in our rural areas should be encouraged where there is public transport accessibility. Tactran recommend that the wording reflects that development in settlements with public transport services (including demand-responsive public transport and small-scale park and ride facilities at nodes on rural bus corridors) be supported.

**Question 32 Do you agree with the proposed thematic guidance on the Delivery Programme (paragraphs 467 – 482)?**

~~Yes / No / No View~~

**Please explain why you agree or disagree.**

Tactran support the guidance on Sustainable Transport and Travel in Delivery Plans (paras 477- 482)

### **Fife Local Transport Strategy – Main Issues consultation**

#### **Tactran Response**

The Tayside and Central Scotland Regional Transport Partnership (Tactran) welcomes the opportunity to respond to the consultation on the main issues identified during the development of the Fife Local Transport Strategy (LTS).

From our reading of the StoryMap, the development of the emerging LTS focusses on addressing issues and opportunities pertinent within the Fife Council area with little reference to any cross boundary travel. Tactran considers this to be a missed opportunity as we feel that the portfolio of interventions might not draw together the schemes required to fully address the challenges ahead. This is because the portfolio will have been developed on evidence limited to within Fife and does not consider cross boundary evidence.

The latter is particularly relevant in relation to the commitment by the Scottish Government to reduce car kilometres by 20% by 2030.

As a local authority area with numerous issues relating to cross boundary travel for people within the wider region accessing essential services such as health care, employment, training and further education, Tactran encourages Fife Council to base the development of the portfolio of interventions both on local and interregional evidence and consider cross boundary origin-destination data, including travel through Fife.

Cross-boundary issues are very relevant to the further development of the Fife Local Transport Strategy. Examples are as follows:

- The cross-boundary nature of health care, particularly in the North East of Fife.
- Other health care issues relating to cross boundary travel for people in North East Fife accessing health services at Ninewells Hospital in Dundee.

Other transport issues relating to cross boundary travel are linked to the importance of the surrounding conurbations of three of Scotland's Seven Cities to the local economy, namely Dundee, Perth, and Stirling.

Tactran, subsequently, recommends to consider the cross-boundary issues which the Transport Partnership believe are very relevant to the further development of the Fife Local Transport Strategy.

Specifically, Tactran recommends recognising the following corridors:



- Tay Bridges: the corridor is based on the rail connections and road links between East Fife and Dundee. Tactran recommends recognising the significance of Perth within the wider a corridor (also cp. ONS 2011 Travel to Work Areas Dundee and Perth).
- Tactran further recommends recognising the significance of the Kinross area (Corridor Perth – Kinross – Dunfermline – Edinburgh) and the subsequent travel linkages between Central and North East Fife Perth and Kinross.
- Fife West: Connects the Dunfermline area with Kincardine  
It is recommended to reflect on this as the Dunfermline to Stirling (via Alloa) corridor to recognise the vital corridor for Clackmannanshire residents accessing Fife and Stirling and investigating the potential of improving the linkages between Dunfermline and Stirling, two of Scottish largest towns which are only approximately 20miles apart.

We thank Fife Council for the opportunity to respond to the consultation on the identified main issues and are looking forward to further working with you on the interregional cross-boundary aspects.

# Discussion Document to inform the development of an Aviation Strategy

## Tactran Response

### **1. What more, if anything, should the Scottish Government and industry do to accelerate the transition to low/zero emission aviation?**

The Tactran region comprises Angus, Dundee City, Perth & Kinross and Stirling Council areas and lies at the heart of Scotland, stretching from Montrose and Pitlochry in the north to Stirling in the south. The vast majority of its businesses and its 500,000 residents rely on access to Edinburgh, Glasgow and Aberdeen airports, outside the region, to provide air connectivity to the rest of the UK, Europe and the World.

Dundee Airport is the only airport providing direct access to the region, currently operating flights to London, Belfast and soon to be Sumburgh (May 2022). Work undertaken by York Aviation in preparation for the Tay Cities Deal identified that although Dundee Airport caters for a small percentage of the estimated 2.8 million air passengers per annum (pre-covid) travelling to or from the Tay Cities area, it is an important part of the regional economy. The Tay Cities Deal includes a £9.5m investment in Dundee Airport to grow the number of passengers per year to 150,000, recognising its importance to the regional economy – with key sectors such as tourism, life sciences, creative industries and academia relying on good connectivity. It is estimated that this will provide an additional £6.1million GVA and 320 jobs.

The quickest equivalent rail journey between the Tactran area and London is between 5hrs 15min and 6hrs 20min depending upon which station in the region the journey commences/ends. It is therefore essential that air connections are maintained to provide the opportunity for a day trip to London, especially for business travel. Hence, it is imperative that aviation continues to be part of the overall transport offering providing good connectivity to the Tactran region and is not seen as a stand-alone method of travel. It needs to be part of an integrated transport system that together aims to decarbonise transport. Therefore, good surface access to airports by public transport, ground operations at the airport and decarbonising the flights themselves should all be considered in decarbonising air travel.

### **2. What can the Scottish Government do to help increase the use of sustainable aviation fuels?**

The Scottish Government can help to create and grow the market by supporting the use of sustainable aviation fuel through the HIAL network and through Scottish

Government led Public Sector Obligations (PSO) support. The Scottish Government should also seek to influence the UK Government to deliver a progressive taxation environment for the most sustainable fuels.

**3. What do you think the Scottish Government can do to help ensure a just transition to net-zero for the Scottish aviation sector?**

As noted at question 1 aviation needs to be considered as part of an integrated transport system and net zero for ground access and support services should be achieved as soon as possible at all Scottish airports.

The commitment to decarbonise all flights within Scotland by 2040 and development of low and zero-emission aircraft supported by HIAL by creating a sustainable aviation test environment on Orkney is welcomed and supported. The progress in technology is unpredictable however and may provide earlier opportunities than 2040 and, if possible, the 2040 target should be brought forward to coincide with decarbonisation of the Scottish rail network by 2035. In addition, the above proposals should also be extended to include all UK domestic and short haul flights as soon as feasible.

**4. Considering the future challenges and opportunities, what changes, if any, should we make to our approach to help achieve our aim for international connectivity?**

Good international connectivity is crucial for the economy of Scotland's cities, with Edinburgh and Glasgow providing direct flights to a significant range of international destinations, including hub airports such as London Heathrow and Amsterdam Schiphol. Connections to these hub airports are particularly important to smaller regional airports providing a gateway to long haul destinations.

Priority	Short haul	Long haul
1	Germany	USA
2	France	China
3	Netherlands	Canada
4	Italy	Australia
5	Norway	Japan
6	Spain	
7	Switzerland	
8	Belgium	
9	Sweden	
10	Ireland	

**5. Do you agree with the priority countries for short haul and long haul set out in the table above?**

a. Yes

- b. No**
- c. Don't know**

a) Yes

The destinations in the table are agreed although in a post pandemic and Brexit world the list in the table should remain flexible.

For long haul, a strategy of connecting to global hub airports such as London Heathrow and Amsterdam Schiphol as well as further major hub airports of Paris, Madrid, Frankfurt, Copenhagen and Istanbul should be pursued, alongside targeted direct flights, rather than ever increasing direct flights, if the number of international flights is to be reduced.

**6. Which other countries should we focus on in the:**

- a. Short term (next 2 years)**
- b. Medium term (2-5 years)**
- c. Long term ( 5 years plus)**

See answer to Question 5.

**7. How do we incentivise the use of more efficient aircraft, whilst still ensuring that we secure the routes Scotland needs?**

This is dependent upon international and commercial arrangements. However, utilising a favourable taxation and licensing regime for use of efficient aircraft could assist.

**8. What do you think about the idea of the Scottish Government purchasing new zero emission aircraft to lease to any airline operating routes in the Highlands and Islands?**

It is expected that private sector aircraft leasing companies would do this more effectively. These companies operate at a larger scale than the Scottish Government, giving airlines greater flexibility to continually up-grade aircraft as technology develops. However, in the event of market failure to invest in new zero emission aircraft it may be an appropriate option to consider, adopting a similar approach to that undertaken by Government a few years ago providing the infrastructure for EV cars, while the technology and market was in its infancy.

**9. What else can the Scottish Government do to achieve its aim of decarbonising scheduled flights within Scotland by 2040?**

This needs to be seen within the wider context of overall connectivity and managing demand for flights by improving digital connectivity and promoting alternative green modes where feasible. In terms of sustainable air travel there is a need to ensure that the supporting infrastructure for the new types of aircraft is provided at airports and through the wider energy system. There is also the need to develop the skills required for maintaining and using these aircraft.

Again drawing on previous experience, there are parallels with the bus industry, where Government contributed to difference in cost from a conventional vehicle to a zero emission vehicle. This could be repeated for aircraft, particularly for domestic flights.

As noted above, progress in technology is unpredictable and may provide earlier opportunities than 2040 and, if possible, the 2040 target should be brought forward to coincide with decarbonisation of the Scottish rail network by 2035. In addition, the proposals to decarbonise all flights within Scotland should also be extended to include all UK domestic and short haul flights as soon as feasible.

Less Demand for air services	Same level of demand for air services	More demand for air services
<ul style="list-style-type: none"> <li>• Greater use of video-conferencing and other technology</li> <li>• Telemedicine</li> <li>• Focus on higher spending tourists rather than volume</li> <li>• Improved facilities on islands</li> <li>• High speed rail</li> <li>• Medical supplies and post delivered by drone</li> <li>• Improvement in ferry provision and/or fixed links</li> </ul>	<ul style="list-style-type: none"> <li>• Around the same number of people living and working in the Highland and Islands</li> <li>• No changes to current travel patterns</li> <li>• No changes to how goods are transported</li> </ul>	<ul style="list-style-type: none"> <li>• More people living and working in the Highlands and Islands (e.g. because of growth of the energy sector, more home and remote working, more small business start-ups etc.)</li> <li>• More tourists</li> <li>• Lower costs as a result of using electric/hydrogen aircraft</li> <li>• Modal shift from ferry to plane</li> <li>• More goods transported in belly hold/ dedicated air freight</li> </ul>

- 10. What air services do you think are needed to meet the needs of people living in and visiting the Highland and Islands in the scenarios set out above:**
- a. less demand for air services**
  - b. same level of demand for air services**
  - c. more demand for air services?**

It is difficult to predict with any certainty given current travel patterns as result of Covid. However, airports provide connectivity that is crucial to the economy, social and wellbeing of the communities they serve and can provide lifeline services. The Dundee to Sumburgh service will provide a route between the Shetlands and London City Airport via Dundee.

- 11. Most air services in the Highlands and Islands are delivered on a commercial basis. How can the Scottish Government best work with the private sector to deliver the air services you think are needed?**

Public Service Obligations (PSO) are required in some circumstances to support regional services and, although appreciated, a system that better incentivises air operators to improve and grow passenger demand is needed. A review of existing support mechanisms to ensure spend is used optimally to provide services that communities need would be welcomed.

- 12. How effective do you think the Air Discount Scheme has been at addressing high airfares?**

Tactran has no specific comment.

- 13. How can the Scottish Government improve the Air Discount Scheme?**

Tactran has no specific comment.

- 14. What do you think about complementing the current operating model with an on demand service, such as air taxi?**

On-demand services could undermine the viability of scheduled services and/or make these more expensive. There would be equality issues regarding affordability of an on-demand service.

- 15. What do you think about an open charter service?**

Tactran has no specific comment.

**16. In addition to on demand and open charter services are there any operational models you think could be used? If so, what?**

. Tactran has no specific comment.

Operator	HIAL	Shetland Islands Council	Orkney Islands Council	Argyll & Bute Council
<b>Airports</b>	Barra	Fair Isle	Eday	Coll
	Benbecula	Foula	North Ronaldsay	Colonsay
	Campbeltown	Out Skerries	Papa Westray	Oban
	Dundee	Papa Stour	Sanday	
	Inverness	Tingwall	Stronsay	
	Islay	Whalsay	Westray	
	Kirkwall			
	Stornoway			
	Sumburgh			
	Tiree			
	Wick John O' Groats			

**17. What are the strengths and weaknesses of the operational model set out in the table above?**

The experience brought to Dundee Airport, and other airports, by being part of the HIAL group is very welcomed and collectively assists in ensuring required skills are available by providing central expertise and sharing of resources across the HIAL network; supporting resilience in remote communities and ensuring efficient and effective use of resources. All of which support Scotland's economic, health and social wellbeing.

**18. What changes, if any, do you think should be made to these governance arrangements to improve services?**

See response to 16

**19. What changes, if any, do you think should be made to these governance arrangements to reduce running costs?**

Many of the costs of running a regional airport, such as Dundee, are fixed – it is therefore essential that resources are made available to attract commercial operators and more destinations, particularly hub airports. The Tay Cities Deal as outlined earlier in this questionnaire recognises the importance of Dundee Airport as a driver not only for economic growth and providing jobs, but also for social wellbeing and fairness.

**20. Do you think the Scottish Government should encourage airlines to offer plane-plus train tickets?**

- a) Yes
- b) No
- c) Don't know

a) Yes

Yes, but should also include bus/coach as this has proven to be a popular way of accessing the major airports of Edinburgh, Glasgow and Aberdeen from the Tactran area, particularly noting that Glasgow Airport is not accessible by rail.

**21. If yes, how do you think the Scottish Government could best do this?**

Scottish Government could draw on existing experience with the train plus bus tickets used for onward travel.

**22. What more, if anything, do you think the Scottish Government can do to help promote efficient and sustainable airfreight transport?**

Airfreight is likely to be high value items and dictated by on time delivery. Other modes such as rail and sea should be considered if time constraints are not an issue aiming to ensure the most sustainable modes are utilised. As most airfreight is transported in the hold of passenger flights it is difficult to separate the two.

**23. What else do you think the Aviation Strategy should try to achieve?**

It is important to ensure that for regional airports such as Dundee, slots are reserved at key hub airports. Therefore, the MoU between Scottish Government and Heathrow Airport, for slots to be reserved at Heathrow for Dundee air services is a significant and important factor for the future growth of Dundee Airport.



## Social and Equality Impact Assessment Consultation

We would like to get your views on the Social and Equality Impact Assessment (SEQIA) screening which was undertaken for the strategic policies included in the NTS2 Delivery Plan. The SEQIA encompasses:

- An Equality Impact Assessment;
- A Fairer Scotland Duty Assessment; and
- A Child Rights and Wellbeing Impact Assessment

We have developed a SEQIA screening report identifying key potential impacts on the groups covered under the above assessments impacts and associated with the 2020-22 Delivery Plan. This includes a provisional SEQIA score which has been assigned to each of the strategic policies. We are seeking your views on these impacts and also what should be included in next year's Delivery Plan.

**S1) Taking into account the SEQIA screening, do you think there are any impacts we have not identified for those living in poverty or facing socio-economic disadvantage? This includes both positive and negative impacts.**

Yes / **No** / Don't Know

Please provide detail on the impacts:

Tactran believes that most impacts – both positive and negative – have been covered within the assessment. However, the report would have benefitted from the use of tables to present the assessment in a clear and concise manner without having to provide the lengthy explanation in the text. This would have been particularly helpful in presenting the assessments for each of the strategic policies and the subsequent set of actions.

As a consequence, it is not always clear that the actions are specific enough to achieve the set objectives. If they are, then Transport Scotland needs to be clearer about the evidence that supports the assessment.

The lengthy text makes the assessment less clear and less concise which, subsequently, impacts on the readability of the document.

With regard to the impacts identified for older people, additional consideration should be given to the relationship between mobility and quality of life, particularly for the older people, rather than focussing on accessibility issues alone.

Mobility, wellbeing, and independence are 'intricately connected with each another in many ways, especially in later life as mobility allows older people to engage in everyday activities outside the home that are meaningful and enhance wellbeing, whilst independent living gives older people control over the times and places in which activities are carried out.

Loss of mobility, such as from age-related disability or the inability to continue driving a car safely, is subsequently viewed as significantly diminishing wellbeing for the elderly. Loss of mobility will not only compromise physical mobility, but adversely

affect such fundamental psychological elements as life-satisfaction, happiness, and sense of self.

We would, therefore, suggest that the assessment of the social impacts of transport could benefit from a more nuanced understanding of what constitutes mobility rather than applying the conventional understanding of mobility that emphasises movement in physical space.

**S2) Taking into account the SEQIA screening report, do you think the strategic policies within the NTS2 Delivery Plan 2020-2022 will support efforts to reduce child poverty for the priority groups most at risk\*?**

\*priority groups include lone-parent families, a household where someone is disabled, families with three or more children, minority ethnic families, families with a child under one year old and families where the mother is under 25 years of age

**Yes / No / Don't Know**

Please explain the reasons for your answer:

Transport plays a considerable role in addressing child poverty, through its impact on household income by improving access to employment, education and after school activities, goods and services for parents and carers and on living costs with transport costs making up a significant component of household expenditure.

Most extracurricular activities are after school, in the evening and at weekends when public transport opportunities are at the weakest. Only children in car owning households (and whose parents work M-F 9-5) can access such opportunities with an adequate alternative transport offer.

A main issue, therefore, is the lack of affordable transport in disadvantaged communities and rural areas mean that children and young people do not have adequate access to training and (further) education, particularly if they rely on the bus networks for travelling around. AUDIT SCOTLAND (2015) stated that students living in remote areas are likely to have journeys of well over one hour, at a median cost of £10 return.

Furthermore, socially disadvantaged individuals have been found to often struggle to understand the complexities of the public transport system, particularly within large cities and rural areas, and may lack the necessary literacy and numeracy and ICT skills to access information about transport services.

Evidence also suggests that the early cognitive experiences of children may affect the way in which they perceive their future transport choices and serve to instil in them positive or negative social learning about travel which remain with them into later life, generating longer-term implications.

The strategic policies – if supported by tailored and targeted sets of actions – seem appropriate to support the delivery of the child poverty targets set out in the Child Poverty Act and assist in addressing inequality.

**S3) Taking into account the SEQIA screening report, do you think there are any impacts we have not identified for children and young people? This includes both positive and negative impacts.**

Yes / **No** / Don't Know

Please provide detail on the impacts:

Tactran believes that the main impacts for children and young people – both positive and negative – have been covered within the assessment.

Furthermore, socially disadvantaged individuals have been found to often struggle to understand the complexities of the public transport system, particularly within large cities, and may lack the necessary literacy and numeracy and ICT skills to access information about transport services. Evidence also suggests that the early cognitive experiences of children may affect the way in which they perceive their future transport choices and serve to instil in them positive or negative social learning about travel which remain with them into later life (IBID), generating longer-term implications as commonly thought.

The report would have benefitted from the use of tables to present the assessment in a clear and concise manner without having to provide the lengthy explanation in the text. This would have been particularly helpful in presenting the assessments for each of the strategic policies and the subsequent set of actions.

The lengthy text makes the assessment less clear and less concise which, subsequently, impacts on the readability of the document.

It is not always clear that the actions are specific enough to achieve the set objectives. If they are, then Transport Scotland needs to be clearer about the evidence that supports the assessment. Again, presenting such evidence in a clearer and more concise manner without having to provide an explanation in the text would have helped.

**S4) Taking into account the SEQIA screening report, do you think there are there any impacts we have not identified on the protected characteristic groups (e.g. age, disability, race, sex, pregnancy and maternity, sexual orientation, gender reassignment or religion or belief?) This includes both positive and negative impacts.**

Yes / **No** / Don't Know

Please provide detail on the impacts:

See above under S1 in relation to the suggestion that the assessment of the social impacts of transport, particularly for older people, could benefit from a more nuanced understanding of what constitutes mobility rather than simply considering ability to access services.

It is also worth noting that hidden disabilities remain an issue. For example, moving bus stops (both temporarily due to roadworks and permanently) can cause significant distress to people with learning difficulties.

Furthermore, we would like to question whether a reliance on walking or cycling for transport offers only benefits. BOSTOCK (2001)<sup>1</sup>, for example, in her research with single-mothers in the Midlands, recognises the disadvantages associated with walking. For some segments of the population, walking is compulsory and a source of both physical fatigue and psycho-social stress. At best, it could be said to have contradictory health effects for such groups: positive features include exercise while negative effects create fatigue and stress. At worst, walking may be health damaging.

The extent to which walking may provide health benefits or dis-benefits relates to the degree of choice of travel mode, with those individuals who walk or cycle for pleasure experiencing the former whilst those without alternatives experiencing the latter. As access to private transport is necessarily related to socioeconomic status, there are clear class dimensions to the health benefits of active travel. BOSTOCK identifies three main negative health effects associated with compulsory active travel, including psycho-social pressures associated with managing the demands of children whilst walking; physical fatigue as a result of long journeys; and limited access to health care and retail services, including hospitals and food shops. Her research thus is indicative of one of the major tensions observed within current transport planning, between sustainability (which ultimately seeks to secure modal shift and discourage car use) and social exclusion (which recognises the social and health benefits of car use).

On the subject of measures to reducing the negative impacts which transport has on the health and wellbeing of people and pollution impacts on the environment, it is worth noting that there are social impacts of road-based transport of hazardous materials, particularly for residents of poor and disadvantaged communities. Those individuals are more at risk of exposure to hazardous materials spills due to their greater likelihood of residing near a hazardous material route; and/or near industrial land uses, including the cargo's origin and / or destination.

### **S5) What further actions do you think should be included in future NTS2 Delivery Plans?**

Please add details here:

Tactran welcomes the ambitious objectives and targets set out in both Scotland's National Transport Strategy 2 (NTS2) and the 2018 – 2032 Climate Change Plan

<sup>1</sup> BOSTOCK, L. (2001) Pathways of disadvantage? Walking as a mode of transport among low-income mothers. In: Health and Social Care in the Community. 9(1), pp. 11-18.

(CCP) to address climate change including the commitment to reduce car kilometres by 20% by 2030.

It is considered that Transport Scotland should set out and describe in more detail what they consider is required by regional and local partners. This therefore gives Transport Scotland the responsibility to be clearer about where they expect more action as appropriate to deliver against the ambitious objectives, in particular regarding the commitment of the Scottish Government to reduce car kilometres by 20% by 2030. We look forward to Transport Scotland setting out their views on this in the route map and next NTS Delivery Plan(s) as well as welcoming input from their regional and local partners.

A key question that requires to be addressed is how to ensure that demand management measures in line with the 20% car kilometres reduction target do not disadvantage the poorest in society.

The accessibility of the public realm and visual quality and aesthetics is another form of social impact. There are two aspects to this:

i. Vehicle aesthetics and their impact on the pedestrian environment

Whilst there are few empirical studies available in this area for comparison, Bayley et al. (2004) research on the impact of vehicles on the pedestrian environment is important, in that it revealed that the size of motorcar has an adverse impact, with large vehicles with high roof-lines (such as the increasingly popular SUVs), being notable in this regard. Agglomerations of vehicles, such as lines of stationary/parked vehicles and lines of moving traffic, were also found to be 'visually claustrophobic' to research participants.

ii. Transport-related streetscape features, including street furniture, and their impact on active travel and safety

Wright and Curtis (2002) similarly emphasise the size and design of vehicles in the contribution to a positive aesthetic environment for pedestrians, but further cite a number of other transport related features that contribute to 'aesthetic degradation', including wide junctions, road markings, and street furniture. A more positive aesthetic environment for pedestrians would be achieved by removing car traffic from areas heavily used by pedestrians (such as City Centres); removing street clutter and integrating street furniture into the existing fabric of the town / city, and more creative design of pedestrian environments.

Similar findings were revealed in Mullan's (2003) research with 11-16 year olds in Wales, in which high levels of traffic and car parking were cited as factors negatively affecting young people's views of their local area as a good place to grow up.

**S6) Would you like to comment on any of the specific policies contained within the NTS2 Delivery Plan 2020-2022?** *Please see the breakdown of policies and their provisional scores in the 'References and Scoring' document.*

Please write the reference numbers of each policy to help us identify which one you are referring to. (If you wish to comment on scoring, please respond at Question S6a)

Please see above under S1 and S4 in relation to additional thoughts / comments on Strategic Policies:

- RI-1 We will ensure active, public and sustainable travel access to employment, education and training locations, continuing to engage with those who have lived experience of transport inequalities, including delivering of our commitment to engage with young people on the future of transport.
- RI-3 We will ensure transport in Scotland is accessible for all. We will support the implementation, review and development of Scotland's Accessible Travel Framework. We will also continue to support Local Authorities deliver and improve the Blue Badge Scheme.
- RI-4 We will remove barriers to public transport connectivity and accessibility within Scotland.
- RI-7 We will take forward an ambitious improvement project to enhance the impact and accessibility of the Scottish Transport Statistics, and Transport Scotland's Social and Economic Research publications.
- RI-8 The Scottish Government will improve sustainable access to healthcare facilities for staff, patients and visitors.
  
- HW-1 We will fund active travel partners, including local authorities and Regional Transport Partnerships to deliver active travel infrastructure projects, and sustainable and active behaviour change work, through our grant funded programmes and where the projects are clearly aligned to the active travel outcomes framework.
- HW-4 We will take measures to reduce the negative impacts which transport has on the health and wellbeing of people and pollution impacts on the environment.

**S6a) Do you agree with the provisional SEQIA score assigned to the policy (or policies) that you have commented on?**

SEQIA screening scoring criteria:

- **Major Positive Effect (++):** The action contributes significantly to meeting the requirements of Public Sector Equality, Fairer Scotland Duty and Children and Young People's Act.
- **Minor Positive Effect (+):** The action contributes to meeting the requirements of Public Sector Equality, Fairer Scotland Duty and Children and Young People's Act, but not significantly

- **Neutral/ Negligible Effect (0):** There is no clear relationship between the action and the Public Sector Equality, Fairer Scotland Duty and Children and Young People's Act or the relationship is negligible
- **Minor Negative Effect (-):** The action detracts from meeting the requirements of Public Sector Equality, Fairer Scotland Duty and Children and Young People's Act., but not significantly
- **Major Negative Effect (- -):** The action detracts significantly from meeting the requirements of Public Sector Equality, Fairer Scotland Duty and Children and Young People's Act. Mitigation is therefore required
- **Uncertain Effect (?):** The action has an uncertain relationship to the Public Sector Equality, Fairer Scotland Duty and Children and Young People's Act, or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an assessment to be made.

Please include the reference number for each policy you wish to comment on:

Policy Reference	Agree with provisional scoring? (Yes/No/Don't Know)
RI-1, RI-3, RI-4, RI8	Yes
RI-7	No (currently classed as Minor Positive Impact under SEQIA)
HW1, HW-4	Yes

**S6b) In your opinion, what should the SEQIA score be for the policy (or policies) that you have commented on?**

Please include the reference number for each policy you wish to comment on:

Policy Reference	Score in your opinion
RI-7	<p>Major Positive Impact. We believe that the unprecedented challenges transport planning and policies are facing, require current and valid data of different kinds.</p> <p>The question on what the emergence of new digital big data sources may mean for transport planning and for the analytical research and modelling that supports will be crucial.</p> <p>The potential of big data for transport planning lies in the question whether we just think about more how big data can make it easier to pursue existing approaches, such as to derive a demand pattern in the form of an origin to destination matrix, or to correlate trip rates to trip lengths, or rather, whether we engage in a fundamental reassessment of what data can</p>

	<p>actually tell us about the prevalent transport systems to help us better understand how they function and what we can do to influence them in positive ways. Examples include:</p> <ul style="list-style-type: none"> <li>- Where and when does the general population travel?</li> <li>- How and when do the most vulnerable in society travel?</li> <li>- Also, given the national targets mean there is a significant step change in behaviour change required, we also need to track why people make the decisions they do?</li> </ul> <p>Big data is a means to an end, not an end in themselves but if the ambitious improvement project by Transport Scotland opens up thinking on what the emergence of new digital big data sources may mean for transport planning and for the analytical research and modelling that supports it, we would consider the action contributing significantly to meeting the requirements of Public Sector Equality, Fairer Scotland Duty and Children and Young People's Act.</p>
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**S7) Please leave any additional comments on the assessment for the policy (or policies) that you have commented on.** Include whether you think the policy could be improved, adjusted or if an alternative approach could be taken.

Please include all reference numbers with your comments:

Policy Reference	Comments



## Health Inequalities Impact Assessment Consultation

A screening of impacts on health inequalities has been undertaken and provides a high-level assessment informed by a consideration of the key issues and evidence as well as feedback from Transport Scotland and other Scottish Government officers. The HIIA screening report considers how each strategic policy has the potential to impact on health inequalities. A provisional HIIA score has been assigned to each of the strategic policies. The HIIA screening report identifies key potential impacts associated with the 2020-22 Delivery Plan. We are seeking your views on these impacts as well what actions should be included in next year's Delivery Plan.

**H1) Taking into account the HIIA screening, do you think there are any health inequality impacts we have not identified?** For example, do you think there are any impacts on any of the particular groups below?

Those vulnerable to falling into poverty including:

- Unemployed
- People on benefits
- Single parents
- At risk families e.g. young mothers, people experiencing domestic abuse, children at risk of statutory measures
- Looked after children and young people
- Those leaving care settings (including children and young people and those with illness)
- Homeless people
- Carers (including young carers and carers with protected characteristics)
- Those involved in the criminal justice system
- People with low literacy/numeracy
- People misusing substances
- Others e.g. veterans and students

Geographical Communities including:

- Rural/semi-rural communities
- Urban Communities
- Coastal communities
- Island communities

Business Communities and staff including:

- Full-time and part-time workers
- Shift workers
- Staff with protected characteristics
- Staff vulnerable to falling into poverty

**Yes / No / Don't Know**

Please provide detail on the impacts:

Tactran welcomes the understanding of health and health inequalities by Transport Scotland that this consultation document clearly demonstrates. The broad areas the assessment focuses on do justice to the complexity of the various factors that influence the health of demographic groups and communities across Scotland and that also lead to avoidable inequalities in health between demographic groups and communities across Scotland whether defined by geography, gender or other personal and socio-demographic characteristics.

We believe, however, that the respective strategic policies and subsequent set of actions will require a tighter focus on realising the potential of transport in tackling health inequalities across Scotland than it currently has.

While we value the commitment to maintain or provide opportunities to improve human health for all demographic groups and communities across Scotland by encouraging more people to travel more actively more often and minimise health inequalities, we believe that there is a risk that the actions do inadvertently contribute to widening inequalities in health across Scotland.

For example, evidence suggests that many broad public health campaigns, including various active travel initiatives, have higher take-up among already healthier people, hence improving overall public health but widening inequalities between groups. There is a clear danger that respective interventions contained within NTS2 Delivery Plan and the associated set of actions and its proposed dual aims of tackling inequalities and promoting the health of all demographic groups and communities across Scotland by encouraging more people to travel more actively more often could fall into this trap which is why we believe it needs a much stronger and focused set of actions on reducing health inequalities.

For example, on mental health, we support the statement that “access to active travel and transport systems that encourage active living and regular physical activity is [...] having beneficial impacts on mental health and wellbeing” (p. 13). However, as stated above it is likely that it's mainly healthier people taking up the active travel offer while those suffering from mental health problems are less likely to engage. As such, NTS2 needs to be more specific, challenging and ambitious about narrowing gaps in the inequalities to accessing appropriate support and healthcare.

The strategic policies need, therefore, to be more specific, challenging and ambitious about narrowing gaps with regards health inequalities. We want all to travel healthily, but there is a strong need to put more focus on some communities than others. It is not clear that the set of actions in the strategy are specific enough to achieve this.

The report would have benefitted from the use of tables to present the assessment in a clear and concise manner without having to provide the lengthy explanation in the text. This would have been particularly helpful in presenting the assessments for each of the strategic policies and the subsequent set of actions.

The lengthy text makes the assessment less clear and less concise which, subsequently, impacts on the readability of the document.

It is not always clear that the actions are specific enough to achieve the set objectives. If they are, then Transport Scotland needs to be clearer about the evidence that supports the assessment. Again, presenting such evidence in a clearer and more concise manner without having to provide an explanation in the text would have helped.

**H2) Taking into account the HIIA screening, do you think there are any vulnerable groups we have not identified?**

**Yes / No / Don't Know**

Please provide detail on the impacts:

As indicated above, the delivery plan needs to be more focused on reducing health inequalities. As such, we believe that there is insufficient attention to the increasingly ageing population across Scotland within the Health Inequality Impact Assessment – especially when compared with children and young people.

With regard to the impacts identified for older people, additional consideration should be given to the relationship between mobility and quality of life, particularly for older people, rather than focussing on accessibility issues alone.

Mobility, wellbeing, and independence are 'intricately connected with each another in many ways, especially in later life mobility allows older people to engage in everyday activities outside the home that are meaningful and enhance wellbeing, whilst independent living gives older people control over the times and places in which activities are carried out.

Loss of mobility, such as derived from age-related disability or the inability to continue driving a car safely, is thus viewed as significantly diminishing wellbeing for the elderly. Loss of mobility will not only compromise physical mobility, but adversely affect such fundamental psychological elements as life-satisfaction, happiness, and sense of self. We would, therefore, suggest that the assessment of the social impacts of transport could benefit from a more nuanced understanding of what constitutes mobility rather than applying the conventional understanding of mobility that emphasises movement in physical space.

**H3) Taking into account the HIIA screening report, to what extent do you think the strategic policies within the NTS2 Delivery Plan 2020-2022 will impact on access to healthcare, in particular in relation to the protected characteristics? (e.g. age, disability, race, sex, gender reassignment, or religion or belief or those from other vulnerable groups).**

**Yes / No / Don't Know**

Please give reasons for your response:

It has been shown that there is a great disparity in opportunity across Scotland between mobility rich and mobility poor communities.

The report would have benefitted from the use of tables to present the assessment in a clear and concise manner without having to provide the lengthy explanation in the text. This would have been particularly helpful in presenting the assessments for each of the strategic policies and the subsequent set of actions.

The lengthy text makes the assessment less clear and less concise which, subsequently, impacts on the readability of the document.

It is not always clear that the actions are specific enough to achieve the set objectives. If they are, then Transport Scotland needs to be clearer about the evidence that supports the assessment. Again, presenting such evidence in a clearer and more concise manner without having to provide an explanation in the text would have helped.

However, the strategic policies – if supported by tailored and targeted sets of actions – seem appropriate to improve access to access to healthcare.

See also the response to Question H2 with regards to the suggestions that the assessment of the social impacts of transport could benefit from a more nuanced understanding of what actually constitutes mobility rather than applying the conventional understanding of mobility that emphasises the movement in physical space.

**H4) Taking into account the HIIA screening report, do the strategic policies have a significant impact on air quality, particularly for those where air quality is poorer, for example in deprived communities?**

As well as causing adverse impacts on climate change, our transport system has negative impacts on our air quality. Transport generates just over one-sixth of Scotland's total particulate matter (PM10) and over one-third of the total emissions of nitrogen oxides (NOx). The majority of these emissions are caused by road transport.

Emissions of NOx from road transport are reducing but not at the anticipated rate. Between 2006 and 2016, transport emissions of NOx52, PM1053, and PM2.554 declined by 37%, 48%, and 54% respectively.

Despite these falls, transport, and road transport in particular, remains a significant contributor to poor air quality. Air pollution increases the risks of diseases such as asthma, respiratory and heart disease, particularly for those who are more vulnerable such as the very young and the elderly or those with existing health conditions. In addition, air quality is often worse in areas of deprivation and is a health inequality issue. In 2010, fine particulate matter was associated with around 2,000 premature deaths in Scotland and around 22,500 lost life-years across the population

<b>Yes / No / Don't Know</b>
<p>Please give reasons for your response:</p> <p>The relationship between distribution of pollutant concentrations and areas of social deprivation is complex. It depends on the pollutant in question and differs in different cities and regions of Scotland. Consequently, it is difficult to draw general conclusions that apply everywhere.</p> <p>As intimated above, the delivery plan needs to be more focused on inequality reduction and should be clearer on the evidence base against which the relative scale and impact on health inequalities of the proposed individual commitments and interventions has been assessed in order to fully understand and quantify their potential to significantly improve air quality impacts on local communities.</p> <p>However, the strategic policies – if supported by tailored and targeted sets of actions – seem appropriate to positively impact on air quality.</p>

**H5) Do strategic policies within the NTS2 Delivery Plan impact positively or negatively on access to a healthy diet, for example, through increasing access to shops, markets and supermarkets with greater availability and affordability of healthier foods?**

<b>Yes / No / Don't Know</b>
<p>Please give reasons for your response:</p> <p>Reduced accessibility to essential services has become an increasingly important area within the transport policy and planning, including:</p> <ul style="list-style-type: none"> <li>- A physical component (availability and physical access to transport facilities);</li> <li>- The level of service provided by the system (in terms of travel time, cost, and comfort); and</li> <li>- The spatial distribution of transport services and activities and their constraints</li> </ul> <p>Tactran welcomes the concept of the 20 minutes neighbourhoods, as land use planning and locational choice are critical to providing everybody with equity of opportunity and to be able to access jobs, education but also fresh food supplies.</p> <p>It has been shown that there is a great disparity in opportunity across Scotland between mobility rich and mobility poor communities.</p> <p>Please also see above under Question S5 for further comments on the accessibility and visual quality and aesthetics of the public realm.</p> <p>As intimated above, the delivery plan needs to be more focused on inequality reduction and should be clearer on the evidence base against which the relative scale and impact on health inequalities of the proposed individual commitments and interventions has been assessed.</p>

However, the strategic policies – if supported by tailored and targeted sets of actions – seem appropriate to improve access to fresh food.

**H6) Do you think that the strategic policies within the NTS2 Delivery Plan will positively or negatively impact on the social environment?**

For example, what impact does it have on:

- Social status
- Employment (paid or unpaid)
- Income & income inequality
- Crime & fear of crime
- Family support and social networks
- Stress, resilience & community assets
- Participation & social interaction
- Influence & sense of control
- Identity and belonging

**Yes / No / Don't Know**

Please give reasons for your response:

A paradox of transport planning manifests with regard to transport for marginalised groups within society: on the one hand they are more likely to experience disadvantage as a result of lack of access to transport (both public and private); yet when access increases at an individual level (such as in the case of car ownership), or at an aggregate level (such as when low income communities are in close proximity to major transport hubs and facilities), they are on the other hand disproportionately more likely to experience disadvantage by being affected by the varied negative social and distributional impacts of transport .

Recognition of this paradox can help transport policy and strategy to move towards more equitable transport planning. Yet, it is only through better understanding of the complex and nuanced nature of the social and distributional impacts of transport that these wider equity objectives will be achieved.

As intimated above, the delivery plan needs to be more focused on inequality reduction and should be clearer on the evidence base against which the relative scale and impact on inequalities of the proposed individual commitments and interventions has been assessed.

However, Tactran believes that a focus on the social and distributional impacts of transport – as shown by Transport Scotland in NTS2 - presents an important opportunity to ensure a more socially just system of transport spending and delivery during the NTS2 period and beyond.

**H7) What further actions would you like to see included in future NTS2 Delivery Plans?**

Please add details here:

On the subject of measures to reduce the negative impacts which transport has on the health and wellbeing of people and pollution impacts on the environment, it is worth noting that there are social impacts of road-based transport of hazardous materials, particularly for residents of poor and disadvantaged communities. Those individuals are more at risk of exposure to hazardous materials spills due to their greater likelihood of residing near a hazardous material route; and/or near industrial land uses, including the cargo's origin and / or destination.

**H8) Would you like to comment on any of the specific policies contained within the NTS2 Delivery Plan 2020-2022? Please see the breakdown of policies and their provisional scores in the 'References and Scores' document.**

Please write the reference numbers of each policy to help us identify which one you are referring to. (If you wish to comment on scoring, please respond at Question H8a.)

As above under S6.

**H8a) Do you agree with the provisional HIIA score assigned to the policy (or policies) that you have commented on?**

HIIA screening scoring criteria:

- **Major Positive Effect (++):** The policy has the potential to contribute significantly to reducing health inequalities
- **Minor Positive Effect (+):** The policy has the potential to contribute to reducing health inequalities, but not significantly
- **Neutral/ Negligible Effect (0):** There is no clear relationship between the policy and reducing health inequalities, or the relationship is negligible
- **Minor Negative Effect (-):** The policy has the potential to detract from reducing health inequalities, but not significantly
- **Major Negative Effect (- -):** The policy has the potential to detract from reducing health inequalities. Mitigation is therefore required
- **Uncertain Effect (?):** The policy has an uncertain relationship to health inequalities / the relationship is dependent on the way in which the aspect is managed / insufficient information is available to enable an assessment to be made.

Please include all reference numbers with your comments:

Policy Reference	Agree with provisional scoring? (Yes/No/Don't Know)
RI-1, RI-3, RI-4, RI-8	Yes
RI-7	No (currently classed as Neutral / Negligible under HIIA)
HW1, HW-4, HW-5	Yes

**H8b) In your opinion, what should the HIIA score be for the policy (or policies) that you have commented on?**

Please include all reference numbers with your comments:

Policy Reference	Score in your opinion
RI-7	As above under S6b.

**H9) Please leave any additional comments on the assessment for the policy (or policies) that you have commented on.** Include whether you think the policy could be improved, adjusted or if an alternative approach could be taken.

Please include all reference numbers with your comments:

Policy Reference	Comments



## Island Communities Impact Assessment Consultation

An Island Communities Impact Assessment (ICIA) assesses the impacts of policies, programmes and projects on island communities.

A screening of impacts on island communities has been undertaken and provides a high-level assessment informed by a consideration of the key issues and evidence as well as feedback from Transport Scotland and Scottish Government officers.

The ICIA screening report considers how each strategic policy has potential to impact island communities. A provisional ICIA score has been assigned to each of the strategic policies. The ICIA screening report identifies key potential impacts associated with the 2020-22 Delivery Plan. We are seeking your views on these impacts as well what actions should be included in next year's Delivery Plan.

**I1) Taking into account the ICIA screening, do you think there are any impacts we have not identified for island communities? This includes both positive and negative impacts.**

Yes / No / Don't Know
Please provide detail on the impacts: n/a

**I2) Taking into account the ICIA screening report, do the strategic policies within the NTS2 Delivery Plan 2020-2022 effectively address the unique transport challenges faced by island communities?**

Yes / No / Don't Know
Please give explanations for your response. n/a

**I3) What further actions would you like to see included in future NTS2 Delivery Plans?**

n/a
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**I4) Would you like to comment on any of the specific policies contained within the NTS2 Delivery Plan 2020-2022?** *Please see the breakdown of policies and their provisional scores in the 'References and Scores' document.*

Please write the reference numbers of each policy to help us identify which one you are referring to. (If you wish to comment on scoring, please respond at Question I4a.)

n/a

**I4a) Do you agree with the provisional ICIA score assigned to the policy (or policies) that you have commented on?**

ICIA screening scoring guide:

- **Major Positive Effect (++):** The policy has the potential to significantly support island communities, taking into account the National Islands Plan's principles of fairness, integration, environmental protection (green) and inclusiveness
- **Minor Positive Effect (+):** The policy has the potential to support island communities, taking into account the National Islands Plan's principles of fairness, integration, environmental protection (green) and inclusiveness, but not significantly
- **Neutral/ Negligible Effect (0):** The policy has no clear relationship with island communities or the relationship is negligible
- **Minor Negative Effect (-):** The policy may impede principles of fairness, integration, environmental protection (green) and inclusiveness for island communities and requires mitigation measures be put in place
- **Major Negative Effect (- -):** The policy significantly affects principles of fairness, integration, environmental protection (green) and inclusiveness. Mitigation is therefore required.
- **Uncertain Effect (?):** The action has an uncertain relationship to the Islands (Scotland) Act 2018 requirements. In addition, insufficient information may be available to enable an assessment to be made.

Please include all reference numbers with your comments:

Policy Reference	Agree with provisional scoring? (Yes/No/Don't Know)

**I4b) In your opinion, what should the ICIA score be for the policy (or policies) that you have commented on?**

Please include all reference numbers with your comments:

Policy Reference	Score in your opinion

**I5) Please leave any additional comments on the assessment for the policy (or policies) that you have commented on.**

Please include all reference numbers with your comments:

Policy Reference	Comments

## Business and Regulatory Impact Assessment Consultation

A BRIA helps to assess the likely costs, benefits and risks of any proposed primary or secondary legislation, voluntary regulation, codes of practice, guidance, or policy changes that may have an impact on the public, private or third sector.

A screening of impacts on businesses and regulators has been undertaken and provides a high-level assessment informed by evidence from Transport Scotland and other Scottish Government officers.

The BRIA screening report considers how each strategic policy has potential to impact on the public, private and third sector as well as consumers. The BRIA screening report identifies key potential impacts associated with the 2020-22 Delivery Plan. We are seeking your views on these impacts as well what actions should be included in next year's Delivery Plan.

More information on the BRIA process can be found in the [BRIA toolkit](#).

### **B1) Do you think that the NTS2 Delivery Plan 2020-22 will impact (positively or negatively) on individual businesses operating in Scotland?**

<b>Yes / No / Don't Know</b>
If 'Yes', please explain how businesses could be (positively or negatively) impacted:  There are several start-ups who aim to supply innovative charging infrastructure solutions to the UK and global market. Founded in Scotland those businesses are committed to developing technology that ensures the benefits of clean and alternative fuels are realised by all segments of society, ensuring a fair price and efficient, convenient charging infrastructure (cp. EG-10).  On the other hand, there is a need for Government to takes businesses with it and help and enable businesses to transform their transport and travel practices in line with the requirements of NTS2. Those business that do not adapt with the principles of reducing need to travel and encouraging sustainable carbon-neutral transport and travel are likely to suffer as a consequence of NTS2 and will be negatively impacted upon.

### **B2) Do you think that the NTS2 Delivery Plan 2020-22 will impact on micro and small firms specifically?**

<b>Yes / No / Don't Know</b>
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If 'Yes', please explain how micro and small businesses could be (positively or negatively) impacted:

Please see above under B1. Most of the respective start-ups (as well as those to come forward during the NTS2 period and beyond) usually progress niche innovations as part of the overall arena of technology development activities.

**B3) Do you think that the NTS2 Delivery Plan 2020-22 is likely to change the level of competition for businesses?**

Yes / No / **Don't Know**

If 'Yes', please explain how the level of competition could be (positively or negatively) impacted:

As above under B1. For those businesses that are better able (and this could, for example, be as a consequence of their location (i.e. urban as opposed to rural or based on the mainland as opposed to operating from an island location etc.) to adapt their transport requirements and patterns in accord with NTS2 principles will likely gain an advantage.

**B4) Do you think that the NTS2 Delivery Plan 2020-22 will impact (positively or negatively) on consumers?** We would be looking to capture impacts around, for example, the availability of legal aid or the potential for increased opportunities for third parties to take advantage of vulnerable consumers.

**Yes** / No / Don't Know

If 'Yes', please explain how consumers could be (positively or negatively) impacted:

In response to the climate emergency, Scotland is committed to reducing carbon emissions by 75% by 2030 and to a legally binding target of net-zero by 2045. Transport, in particular diesel and petrol cars, are the largest source of carbon emissions.

By 2030, Scottish Government will phase out the need to buy new petrol and diesel cars and vans.

For this to happen, however, it is essential that there is a comprehensive and competitive charging network in place.

While some parts of the sector are developing relatively well (such as rapid charging at destinations like shopping centres and charging at home or work), other parts are lagging behind. The Competition Markets Authority found greater challenges in rolling-out charging along motorways, remote locations and on-street. Therefore, targeted interventions are required to kickstart more investment and unlock competition, particularly:

- In remote areas, where the commercial case for investment is weak, which means there's a risk these will be left unserved; and
- In on-street charging where roll-out is slow and local monopolies could arise if the market is left unchecked

Constraints on electricity grid capacity may prevent entry by competitors at some sites. The Government should, subsequently, commit to funding grid upgrades where required as this provides an important opportunity to open up competition, as well as putting in many more chargepoints.

The respective strategic policies provide a sound basis (cp. CA-9 and CA-10) if we ensure a Just Transition and take into account how we will do this for disadvantaged communities.

**B5) Do you think that the NTS2 Delivery Plan 2020-22 will impact (positively or negatively) on regulators?**

Yes / No / **Don't Know**

If 'Yes', please explain how regulators could be (positively or negatively) impacted:

**B6) Do you think that the NTS2 Delivery Plan 2020-22 will impact (positively or negatively) on local authorities?**

**Yes** / No / Don't Know

If 'Yes', please explain how local authorities could be (positively or negatively) impacted:

Further to the potential to accessing additional funding and grant schemes, Local Authorities may be able to tender concession contracts for the installation, operation and maintenance of EV charge points at the cost of the operator. Thus, generating additional income streams to the Local Authorities.

Transport Scotland should be working with the Local Authorities and invest to unlock potential sites, including the upgrading of the power supply.

On a more general note, the delivery of NTS2 at regional and local level will require significant additional resources, staff included. This will significantly impact the Local Authorities and their Regional partners. Without additional resources, it remains uncertain whether Local Authorities and their Regional partners will have the ability to adequately resource the delivery of NTS2.

**B7) Do you think that the NTS2 Delivery Plan 2020-22 will impact organisations in the third sector?**

**Yes** / No / Don't Know

If 'Yes', please explain how organisation in the third sector could be (positively or negatively) impacted:

The Third Sector will play a role in delivering NTS2 (cp. RI-3, RI-4 and RI-8)

It will be necessary to better integrate the Third Sector services into wider transport policy at national and regional level, supporting the development of a viable Third Sector within Scotland which meets the needs of local communities, in particular within the distinctively remote areas of Scotland, and deliver wider social benefits by developing a range of services including shared-mode alternatives such as car clubs and community transport schemes.

**B8) Do you think that the NTS2 Delivery Plan 2020-22 will impact any 'other' organisations?**

Yes / **No** / Don't Know

If 'Yes', please specify which other groups will be impacted:

If 'Yes', please explain how this other group will be impacted:

**B9) Are there any implications from changing digital technologies and markets that should be taken into account by the NTS2?**

Changes to policy, regulation or legislation can often have unintended consequences, should the Scottish Government fail to consider advances in technology and the impact this may have on future delivery. Consideration is needed as to whether any changes being made from the implementation of the strategic policies can still be applied effectively should business or government processes change – such as services moving online. We would like to know your views on the following:

- Does the strategic policy take account of changing digital technologies and markets?
- Will the strategic policy be applicable in a digital/online context?
- Is there a possibility the strategic policy could be circumvented by digital / online transactions?
- Alternatively, will the strategic only be applicable in a digital context and therefore may have an adverse impact on traditional or offline businesses?
- If the strategic policy can be applied in an offline and online environment will this in itself have any adverse impact on incumbent operators?

More information on the BRIA process can be found in the [BRIA toolkit](#)



**Yes / No / Don't Know**

If 'Yes', please explain your answer:

While the market success of autonomous vehicle technology, how widely it may be deployed, and the purpose it may serve, is currently not certain, a reported \$100bn<sup>2</sup> has already been directed to CAV development worldwide, based on the potential benefits of the associated safety (HW-2), health (HW-4), accessibility (RI-1, RI-3, RI-4, RI-8) and economic opportunities.

In the UK, the Government has awarded more than £200m since 2014 for research, development and demonstration projects to further the UK's capability in this field.

Scotland sees its future as a global testbed for innovation. It is therefore right that Transport Scotland should engage with all new technologies that could affect transport in Scotland in the future and promote user-centred design of any new services so that these are open to everyone and meet the highest standards for all demographic groups and communities across Scotland, from customer and user experience to cyber security.

The number of vehicles with internet connectivity is growing, and trials of highly autonomous vehicles are taking place in Scotland. It is vital that Transport Scotland is operationally ready for these developments.

Trials to date are already helping to understand the capabilities of autonomous vehicles and their potential impact on Scotland's Cities and their rural hinterland as well as the network infrastructure.

However, it is equally important that we consider our future policies, so that if such vehicles are ever deployed on Scotland's roads in greater numbers, they are used in a way that aligns with the vision of NTS2 for a sustainable, inclusive, safe and accessible transport system helping deliver a healthier, fairer and more prosperous Scotland for communities, businesses and visitors.

With regard to the above but also other strategic policies contained with NTS2, digital inclusion (related to the amount of people who are able to access a certain digital application / service offer) remains key.

<sup>2</sup> Compelo (2019): Five of the biggest Investments in Driverless Cars Made in 2019  
<https://www.compelo.com/investments-driverless-cars>

**B10) Would you like to comment on any of the specific policies contained within the NTS2 Delivery Plan 2020-2022?**

Please write the reference numbers of each policy to help us identify which one you are referring to.

As above under Question S6b.

RI-7

We will take forward an ambitious improvement project to enhance the impact and accessibility of the Scottish Transport Statistics, and Transport Scotland's Social and Economic Research publications.

**B11) As part of the full BRIA there is a need to quantify impacts on businesses. Do you have any applicable information or evidence to support the quantification of impacts?**

Yes / No

If 'Yes', please provide a comment and submit any evidence to [nts2impactassessments@aeacom.com](mailto:nts2impactassessments@aeacom.com):

## **Sustran RTS Consultation – Tactran Response**

### **Transport Challenges and Problems**

According to Section 3.2 RTS Constraints (p.19 refers) Sustran considers the current regional governance arrangements as a barrier to the delivery of interregional interventions emerging from the RTS. Sustran's emerging RTS, subsequently, focusses on addressing issues and opportunities pertinent to the Sustran region with little reference to any interregional aspects. Tactran considers this to be a missed opportunity as we feel that the portfolio of interventions might not draw together the schemes required to fully address the challenges ahead. This is because the portfolio has been developed on an evidence base limited to within the region and does not consider interregional evidence. The lack of interregional evidence is all the more relevant as the draft RTS makes reference to the requirements of interregional interventions in the context of the further development of both the active travel network and public transport network.

Another issue is that there seems to be a focus on new developments. The identified challenges, however, also impact on established communities. According to Sustran, most areas which are at high risk of transport poverty in Scotland were located in accessible rural areas (30%) and accessible small towns (28%). Twenty per cent were located in remote rural/very remote rural areas, 13% in remote small towns/very remote small towns, and 9% in large/other urban areas.

### **Mobility Themes**

#### **Integration between Modes (Chapter 11)**

Reference is made to the Mobility as a Service (MaaS) concept. Tactran believes that this is one of the proposed interventions which success is highly dependent on interregional cooperation. This is to ensure the seamless interoperability of MaaS across RTP boundaries.

#### **Facilitating efficient freight movement and passenger travel (Chapter 13)**

The draft RTS only makes little reference to Grangemouth. Given the implications of the designation of the Falkirk and Grangemouth Investment Zone, Tactran believes that the implications both in terms of interregional freight movements as well as commuting patterns out with the Sustran area should be addressed more clearly within Sustran's emerging RTS.

#### **Reducing car kilometres (Chapter 15)**

As above. According to Section 3.2 RTS Constraints (p.19 refers) Sustran considers the current regional governance arrangements as a barrier to the delivery of interregional interventions emerging from the RTS. Sustran's emerging RTS, subsequently, focusses on addressing issues and opportunities pertinent to the Sustran region with little reference to any interregional aspects. Tactran considers this to be a missed opportunity as we feel that the portfolio of interventions might not draw together the schemes required to fully address the challenges ahead. This is because the portfolio has been developed on a limited evidence base.

### Spatial strategy (Chapter 17)

Tactran disagrees that these themes provide an appropriate focus for interventions emerging from the new RTS.

The identified regional corridors (pp. 79 refer) were developed on evidence that did not take into account any interregional origin-destination data. Tactran recommends extending the corridors and, for example overlay them with current ONS data on the Travel to Work Areas of Falkirk and Stirling, Perth, and Dundee. The latter data clearly highlights interregional movements out of the Sestran region. The same pattern applies to residents within the Sestran region wanting to attend healthcare (cp. the area covered by NHS Forth Valley) or, further education (cp. the locations of Forth Valley College). Tactran, subsequently, recommends broadening the evidence base underlying the portfolio of interventions and to include the relevant interregional origin-destination data.

Specifically, Tactran recommends extending/ recognising the following corridors:

- Fife West: Connects the Dunfermline area with Kincardine  
It is recommended to reflect on this as the Dunfermline to Stirling (via Alloa) corridor to recognise the vital corridor for Clackmannanshire residents to/from Stirling. This will also help to address the poor connectivity between two of Scottish largest towns and will not only benefit both Dunblane and Stirling but most significantly Clackmannanshire.
- Falkirk Central: this corridor provides external connections to Stirling and North Lanarkshire as well as Kincardine and West Lothian. Tactran recommends broadening the corridor to include Falkirk to Stirling but also Stirling to Denny.
- Tay Bridges: the corridor is based on the rail connections and road links between East Fife and Dundee. Tactran recommends recognising the significance of Perth within the wider a corridor (also cp. ONS 2011 Travel to Work Areas Dundee and Perth).
- Tactran further recommends recognising the significance of the Kinross area (Corridor Perth – Kinross – Dunfermline – Edinburgh) and the subsequent travel linkages between Central and North East Fife Perth and Kinross.