

Consultation on the Draft Regional Transport Strategy 2024 - 2034: Summary of comments received on the Impact Assessments

Draft Integrated Impact Assessment

General Comments

Comment	Response
<p>Respondents supported the “<i>detailed, integrated approach taken</i>” and welcomed the ambition of the document but questioned whether they will be acted upon. The proposed actions were considered effective but only if they are achieved rapidly and at scale.</p> <p>Respondents noted that all actions outlined by the strategy are dependent on other bodies.</p>	Noted
<p>They asked whether “<i>Tactran have any authority to insist on the changes required</i>” and whether “<i>the Council[s] have any funds to ensure the required changes are made?</i>” Respondents remained sceptical as to whether there is “<i>really any prospect of partnership working between the various councils?</i>” (Public response)</p>	Noted
<p>They noted that the assessment indicated that negative impacts can be mitigated and that they are “<i>confident that the potential negative impacts can be mitigated through the proposed mitigation mechanisms.</i>” (Perth and Kinross Council)</p>	Noted
<p>It was noted that “<i>Local Authorities should be encouraged to take up the granular mitigating actions within their local mobility strategies and associated action plans. Many of the required actions lie within the local authority mandate and the RTS and the integrated regional partnership should act as a key informant/insight for the development of the respective action plans.</i>” (Perth and Kinross Council)</p>	Noted. This can also be encouraged within the RTS Delivery Plan

Children and Young People

Comment	Response
<p>Perth and Kinross Council welcomed the Children's Rights and Wellbeing Impact Assessment. It agreed with the assessment that <i>“most interventions that will be actioned as part of the RTS will have a positive impact on children and young people in terms of access, wellbeing, and opportunity.”</i></p> <p>However, Perth and Kinross Council noted that <i>“although the Regional Transport Strategy is not in itself expected to have any negative impact on any area of rights or any group of children and young people, potential negative impacts from construction of infrastructure should be mitigated with the necessary safety standards, and where air quality concerns arise, action should be taken to support the uptake of renewable energy for public transport vehicles to ensure that children and young people are not adversely affected.”</i></p>	<p>Noted</p> <p><i>NB it is assumed that the comment relates to low/zero emission vehicles, albeit with a preference for these to be powered by renewable energy)</i></p>
<p>Perth and Kinross Council noted that <i>“children and young people have not widely been involved in the development of the Draft RTS.”</i> They suggested that there may be potential to use the Big Place Conversation [and similar engagements across the region] or the Youth Parliament to elicit responses from children and young people.</p>	<p>Members of the Scottish Youth Parliament arranged and facilitated youth engagement events.</p> <p>Earlier events were also held with Stirling Councils Youth Services</p>
<p>Perth and Kinross Council support the focus on protecting the mental and physical health of children within the region.</p>	<p>Noted. As an outcome of the more recent young people engagement, the issues of anxiety and security as a consequence of late or cancelled public transport will be added</p>

Fairer Scotland

Comment	Response
<p>Perth and Kinross Council welcomed the population estimates and population dynamics discussed in the integrated impact assessment as they “<i>provide valuable insight into how people travel across the region.</i>”</p> <p>The Council noted that Perth and Kinross is predominantly rural and that acknowledged “<i>the challenges of providing frequent and regular services in rural areas that serve a high proportion of the population</i>” and noted that “<i>a strengthened focus on rural transportation solutions should be advanced.</i>”</p> <p>It further recommended that “<i>differentiated (charging scheme and levy) tariffs are implemented to protect at-risk groups from being unfairly impacted. Many drivers are not affluent and may merely be car-captive travellers. The intention to conduct further analysis on an appropriate road user charge is thus supported.</i>”</p>	<p>Noted</p>
<p>Perth and Kinross Council concluded that “<i>the Regional Transport Strategy sufficiently accounts for equality, human rights, and socioeconomic disadvantage (poverty) implications in the planning and the decision-making process.</i>”</p>	<p>Noted</p>

Equality Impact Assessment

Comment	Response
<p>Respondents raised concerns that the Draft RTS does not accommodate the bold actions that will be required to meet the Scottish Government's set climate change ambitions and commitments.</p> <p>They also noted that the Draft RTS will <i>"neither [...] support resilient communities and sustainable transport infrastructure that will serve the public well into the future."</i> (Climate Action Strathearn) They felt that <i>"more could be included to mitigate further damage and restore the damage done to date."</i> (ibid)</p>	<p>This comment appears in contradiction to other comments received, which while noting the 'bold actions' proposed are sceptical of them being delivered.</p> <p>The strategy supports sustainable transport, which will support resilient communities. It is assumed the respondent simply wishes to see more done?</p>
<p>It was stressed that there was <i>"a need to ensure that the actions outlined by this strategy are able to be rolled out quickly."</i> The response extended this point: <i>"If TACTRAN is to remain a model 1 RTP then this is all dependent on other bodies being able to this up. Currently the strategy is unclear on who is going to be responsible for the actions suggested and how. This is another reason why we cannot emphasize enough that we want to see a commitment from TACTRAN to immediately upgrade to a level 3 RTP and begin to assume the role we need you to play – and let communities support you in doing so."</i> (Climate Action Strathearn)</p> <p>The response expanded on this subject, noting that <i>"we need more bus services throughout and particularly in rural areas. We need to ensure that all communities have some access to public transport to key destinations for work, health and leisure. We particularly need evening services to ensure that people can use free bus passes to travel for leisure – and access cultural venues, bars, restaurants and community and leisure centres, and to allow young people to travel independently – preventing double return car journeys for parent drop-offs and pick-ups."</i></p> <p><i>"A publicly regulated [public] transport system would be far more resilient. Busy routes can subsidise rural routes and quieter times of day, while ensuring great network coverage. The fact that private bus companies are required to give very little notice to LA's when they decide</i></p>	<p>Noted</p>

Comment	Response
<p><i>to cut routes, makes our transport system very vulnerable to market forces, when it needs to provide a service to sustain our economy while addressing climate targets.” (ibid)</i></p> <p>A publicly regulated [public] transport system was also considered key in allowing for affordable through-ticketing.</p>	
<p>Sustrans noted that <i>“as well as increased access to sustainable and active travel infrastructure there is also an opportunity to use targeted projects such as increasing access to bikes and storage.”</i></p>	Noted
<p>One respondent asked for the Partnership to <i>“engage people from disabled backgrounds more. Especially those who live outside of towns. Ask them how restricted they feel when they want to access healthcare or leisure.”</i> They noted that they <i>“cannot live a normal healthy life relying on public transport here.” (Public response)</i></p>	Noted. Invites for all stages of engagement were sent to all the groups representing people with disabilities in the region. Limited responses were received

Draft Strategic Environmental Impact Assessment	
Comment	Response
Respondents supported the approach taken including the assessment against a scenario without the Regional Transport Strategy.	Noted
Perth and Kinross Council agreed <i>“that the RTS Strategic Environmental Assessment has been prepared in accordance with the Environmental Assessment (Scotland) Act 2005 and in accordance with the published guidance.”</i> It noted that <i>“the assessment outcomes point to a largely positive impact on all SEA themes. Where potential negative impacts exist, these are largely temporary in nature and are largely related to disruptions during the construction phases of implementation. Where the potential for permanent or longer-term negative impacts exist, PKC supports the proposed mitigating actions.”</i>	Noted
Perth and Kinross Council noted, however, that the sufficiency of the proposed mitigating actions <i>“might only become clear during implementation. Issues [direct and indirect] that may have been overlooked during the assessment phase may come to light during implementation. Monitoring and evaluating the complexities around how implementation unfolds, and the agility to make adjustments quickly and effectively will be important. Through an iterative process of monitoring, consulting, and responding, the proposed actions may serve to successfully mitigate any adverse impacts.”</i>	Noted. Suggest issue be expanded on in the RTS Delivery Plan
Individual responses from the public welcomed the ambition of the document but raised concerns about the responsibilities of delivering the actions. It was stressed again that political leadership will be key. They asked if <i>“anyone have responsibility for delivering the great ideas in the document?”</i> (Public response) and questioned whether <i>“Tactran [has] any power to ensure that local councils implement any of the things listed.”</i> (Public response) Respondents were concerned that the set ambitions were unrealistic for the set timescales and feared that the local Councils will excuse inaction with financial constraints, lack of resources and a lack of community support.	Noted
It was questioned again whether the Partnership’s ambition would override any concerns of the relevant councils when it comes to delivering against the strategy objectives. The proposed actions will only be sufficient <i>“if actually implemented.”</i> (Public response)	Noted

Draft Strategic Environmental Impact Assessment	
Comment	Response
<p><i>"[...] We are not convinced that the proposed actions will deliver unless within a regulated public transport system."</i> (Climate Action Strathearn)</p>	
<p>Given that there is a twin crises of climate change and biodiversity loss, and that these are intertwined, respondents recommend amending the respective strategic objective to take climate action to also take action against biodiversity loss. They noted that they would like to see the RTS be more ambitious in tackling the twin crisis and that biodiversity enhancement should feature more strongly throughout the document, including in the main issues, outcomes, and actions.</p> <p>It was recommended that the Environmental Report should go further in identifying opportunities for biodiversity enhancement. This should then directly inform the RTS itself. This was echoed by Perth and Kinross Council. They noted that <i>"enhancements to existing infrastructure should be highlighted as a key action."</i></p> <p>It was noted that the RTS should go beyond limiting negative effects by setting out the need to enhance biodiversity through its delivery and interventions.</p> <p>Respondents considered the RTS an excellent opportunity to enhance habitat connectivity and connecting people with nature. As such, they considered it important that the RTS better aligns with NPF4 and the evolution in thinking on biodiversity and climate change.</p> <p>They noted that <i>"in order to have a truly successful RTS [...] greater emphasis needs to be placed on biodiversity and the opportunities presented by the RTS to deliver biodiversity enhancement throughout the Environmental Report and RTS itself."</i> (Nature Scotland)</p> <p>Whilst the intention to minimise the impact of transport on biodiversity was welcomed, it was noted that the RTS needed to be more ambitious in line with the emerging NPF4. It was recommended to amend the Environment Report to also identify specific enhancement measures to have this level of detail on the enhancement measures proposed, for example in relation to biodiversity.</p>	<p>The objectives of any strategy must focus on those issues which the strategy can play a major role in addressing. This does not stop the strategy supporting other policy objectives, including promoting enhancing bio-diversity when opportunities allow.</p> <p>Note:</p> <ul style="list-style-type: none"> • The strategic objective is the same as is included in the National Transport Strategy • There is no action in the Scottish Government draft strategic framework for biodiversity that references any specific transport related activities other than respecting protected areas.

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<p>The importance for climate resilience was noted by other respondents and the need for the strategy to detail how it will plan for adverse weather events.</p> <p>Climate resilience is an important part of the future of transport as the affects of climate change become more obvious. Sustrans would like <i>“this section (to) include winter maintenance of cycle tracks, as mentioned by Cycling by Design, but also how the strategy will plan for flooding, heatwaves and adverse weather conditions.”</i></p>	<p>Noted. However, as RTSs do not have any remit with regard to maintenance and asset management, the extent to which it can provide the strategic framework for addressing these issues is limited.</p>
<p>Respondents noted that the Environmental Report could be clear about mitigation measures that are proposed as a result of the assessment by following the mitigation hierarchy of avoid, reduce, remedy or compensate.</p>	<p>Noted</p>
<p>One of the most important ways to mitigate significant environmental effects identified through the assessment is to make changes to the strategy itself so that significant impacts are avoided.</p> <p>It was, subsequently, recommended that the Environmental Report should also identify any changes made to the plan as a result of the SEA.</p>	<p>Noted</p>
<p>Where the mitigation proposed does not relate to modification to the Strategy itself then it was recommended to set out the proposed mitigation measures in a way that clearly identify (1) the measures required, (2) when they would be required and (3) who will be required to implement them. The inclusion of a summary table in the Environmental Report will help to track progress on mitigation through the monitoring process and was recommended.</p> <p>Where it is expected that other plans, programmes or strategies are better placed to undertake more detailed assessment of environmental effects this should be clearly set out in the Environmental Report.</p>	<p>Noted. This detail would perhaps also be reflected in the RTS Delivery Plan</p>
<p>It was also noted that all aspects of the Strategy should be assessed, including the four strategic objectives as well as the proposals themselves. This was echoed by SEPA.</p>	<p>Noted. Impact Assessment reports to include explicit assessment of the strategic objectives</p>
<p>Given the rich and cultural heritage and outstanding natural beauty of the region and the fact that this attracts</p>	<p>It is the role of the tourism strategy to</p>

Draft Strategic Environmental Impact Assessment	
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tourism to the region, Climate Action Strathearn <i>“want to see support for sustainable tourism in the region – this could include, for example, off-road active travel tourist routes and encouraging bus travel to destinations.”</i>	promote tourism initiatives. It is the role of a transport strategy to identify and promote the transport initiatives that support the tourism strategies
Transforming Audience Travel through Art would like <i>“to see ‘Cultural Heritage’ to include the cultural institutions of the area, which depend on travel and transport networks.”</i>	Noted
SEPA recommends that the Air Quality theme is expanded to consider impact of AQMAs and LEZs as mentioned.	<p>Fig 3.36 in the RTS highlights how the different outcomes (inc air quality) will be delivered by relevant delivery themes. Nonetheless, the comment does reflect that the RTS and Impact Assessments reflect (i) problems (inc. air quality) (ii) objectives and outcomes (inc. air quality) and (iii) actions to work towards the objectives/outcomes.</p> <p>It does not specifically state the Plans / Programmes through which particular actions may be packaged and delivered (e.g. Air Quality Management Plans). These can be referenced in the RTS Delivery Plan</p>
<i>“The same can be said for flood risk in relation to water. The question should also refer to flood risk more specifically.”</i> (SEPA)	It is reasonable for the RTS to reflect on how interventions proposed in the RTS contribute / support

Draft Strategic Environmental Impact Assessment

Comment	Response
	flood risk objectives and plans. It is not however the role of an RTS to promote solutions to specifically address flood risks