

TAYSIDE AND CENTRAL SCOTLAND TRANSPORT PARTNERSHIP

10 SEPTEMBER 2024

DIRECTOR'S REPORT

Purpose & Summary

This report asks the Partnership to note updates on Sustainable Transport Corridor projects and rail services and initiatives. The Partnership is also asked to note a response, approved by the Executive Committee, to Perth & Kinross Council's consultation on their Mobility Strategy and to note officer responses to Dundee City Council's Draft Air Quality Action Plan; Dundee City Council's Local Development Plan 3 Evidence Report and Topic Papers and Perth & Kinross Council's Local Development Plan 3 Evidence Report and Topic Papers.

1 RECOMMENDATIONS

1.1 That the Partnership:

- (i) notes updates on Sustainable Transport Corridors projects and rail services and initiatives;
- (ii) notes the response to Perth & Kinross Council Mobility Strategy and associated Delivery Plan, as approved by Executive Committee and provided in Appendix A; and
- (iii) notes Tactran officer responses to Dundee City Council's consultation on their Draft Air Quality Action Plan; Dundee City Council's Local Development Plan (LDP 3) Evidence Report and Topic Papers consultation and Perth & Kinross Council's Local Development Plan (LDP 3) Evidence Report and Topic Papers consultation as provided in Appendices B, C and D.

2 DISCUSSION**Sustainable Transport Corridors Projects**

- 2.1 Sustainable Transport Corridors are focused on the integrated delivery of bus and active travel (AT) priority infrastructure along the same corridors as a defined and unified project. Three such corridors are identified in the Tactran region, being the Dunkeld Road, Perth; and the Lochee and Arbroath Roads in Dundee.
- 2.2 The sustainable corridors are being delivered by their local authorities, Dundee City Council, and Perth & Kinross Council, respectively, with project support provided by the Tactran Project Manager. Each authority being supported through the Sustrans Places for Everyone fund, though the separate authorities are at differing stages in the Sustrans application and support process.

- 2.3 The Dundee project has developed a project scope and are in the process of a call for consultants through Scotland Excel. The Perth project is being developed through an existing SCAPE framework to an identified consultant. Both projects are awaiting project sign off from Sustrans, who are, in turn, awaiting sign off from Transport Scotland.

Rail Services and Initiatives

ScotRail Peak Fare Removal Pilot

- 2.4 Transport Scotland published [analysis](#) of the ScotRail Peak Fares Removal Pilot on 20 August 2024.
- 2.5 The Scottish Government subsidised the temporary removal of ScotRail peak fares for twelve months in a move to encourage modal shift from private car to rail while making rail travel more affordable and accessible over the pilot period. The cost of the full year subsidy was approximately £40m.
- 2.6 The success of the pilot was measured through the published analysis, which uses daily patronage data (from April 2022 to start of July 2024) covering the period before and nine months of the pilot.
- 2.7 The Scottish Government's conclusion from the analysis is that while there has been a limited increase in the number of passengers during the pilot, it did not achieve its aims of encouraging a significant modal shift from car to rail.
- 2.8 The Scottish Government stated that, in light of the financial challenges they face and the level of additional and continuing subsidy that would be required to continue the pilot versus its contribution towards tackling climate change with modal shift from car and tackling child poverty which are key Scottish Government missions, the pilot will end on 27th September 2024.

Cross Country

- 2.9 The June to December 2024 timetable has the following number of CrossCountry services being operated in each direction north of Edinburgh:

Southbound

08:20 Aberdeen to Penzance
21:35 Aberdeen to Edinburgh

Northbound

09:27 Plymouth to Aberdeen
06:42 Dundee to Aberdeen

- 2.10 These services provide the only direct rail services between the Tactran region and English cities such as Leeds, Sheffield, Derby, Birmingham, Bristol and on towards Devon and Cornwall.
- 2.11 Tactran was informed by CrossCountry that to deal with a backlog of critical training days required by train drivers, they had decided to temporarily remove all services north of Edinburgh commencing 10 August through to 9 November 2024, along with other cutbacks in services elsewhere on the network.

- 2.12 Due to stakeholder and customer feedback as well as consultation with other rail operators, CrossCountry has subsequently reinstated the 06:42 Dundee to Aberdeen and 08:20 Aberdeen to Penzance service.
- 2.13 Tactran officers having written to CrossCountry to express our disappointment at the reduction in services, subsequently met with CrossCountry. In that meeting it was stressed that the CrossCountry services are the only direct services to some major destinations within England and as such are highly valued in the Tactran region. Tactran has been reassured these are temporary reductions in service to deal with a particular issue, with no intention to make these permanent.
- 2.14 Cross Country is keeping a review of the effect of the service reduction on customers and Tactran has arranged for a follow up meeting in October.

LNER/ScotRail

- 2.15 At its meeting on 12 March 2024, the Tactran Board approved a response to LNER consultation to remove direct Stirling – London services, which opposed the reduction in services. Following the consultation exercise LNER subsequently confirmed they will be removing the 05:34 Stirling to London and 12:00 London to Stirling services from its December 2024 timetable onwards. Both these services will either commence or terminate at Edinburgh.
- 2.16 Tactran has been liaising with ScotRail to request that an early morning ScotRail Dunblane to Edinburgh service is retimed to permit anyone travelling from Dunblane, Bridge of Allan and Stirling to arrive in Edinburgh in time to catch the 06:26 Edinburgh to London LNER service. ScotRail are confident that they will be able to retime the earlier service such that from December 2024 it will be able to connect with the early LNER and Lumo services from Edinburgh to London.

Consultations

Perth & Kinross Council Mobility Strategy and Delivery Plan

- 2.17 On 25 April 2024 Perth and Kinross Council published consultation on the Draft Perth and Kinross Mobility Strategy and Action Plan. The Mobility Strategy is the Council's local transport strategy which sets out Perth and Kinross Council's vision for managing and developing the transport and active travel network over the next 15 years. The consultation period ended on 26 July 2024.
- 2.18 At its meeting on 11 June 2024, the Partnership delegated authority to the Executive Committee to consider and approve a response to Perth and Kinross Council's Draft Mobility Strategy and Action Plan.
- 2.19 The Draft Mobility Strategy sets out the Council's vision for managing and developing the transport network. It states that it will consider all modes of transport, for the movement of goods and people, across Perth and Kinross's rural and urban settings, to help achieve national targets and local objectives.

- 2.20 The Mobility Strategy will respond to the climate change agenda and changes in how people travel. It aligns well with the priorities of both Scotland's Second National Transport Strategy and the adopted Tayside and Central Scotland Regional Transport Strategy 2024 – 2034 (RTS).
- 2.21 The strategy will also consider emerging technologies, digital services, housing, inclusion, poverty, health, climate adaption, economic growth, air quality and place making.
- 2.22 Members are reminded that the adopted Tayside and Central Scotland Regional Transport Strategy recognised that the scale of challenge means that there is need to focus activity and to prioritise those locations and populations where the most support is required to achieve the RTS's outcomes.
- 2.23 Members are also reminded that the RTS further recognised the need to provide integrated solutions to provide a realistic alternative to the car to enable access for those without a car and to encourage the required mode shift, recognising the different circumstances and opportunities as they relate to the rural and urban populations across the region.
- 2.24 Perth and Kinross Council's Mobility Strategy provides a framework for delivering the Regional Transport Strategy (RTS) at a local level. Both the Draft Mobility Strategy and Action Plan, however, remain vague in relation to the principles highlighted above.
- 2.25 The presentation of the strategic and supporting actions make it difficult to understand the full scale of interventions and what they are to achieve at which location and for whom, especially with regards to improving alternatives in rural areas.
- 2.26 Tactran is supportive of the Draft Mobility Strategy and Action but asked to further strengthen both documents to fully reflect the key principles established within the Tayside and Central Scotland Regional Transport Strategy.
- 2.27 The Partnership is asked to note the Tactran response to the consultation provided at Appendix A, as approved by the Executive Committee.

Dundee City Council Draft Air Quality Action Plan Consultation

- 2.28 On 20 June 2024 Dundee City Council published consultation on the Draft Air Quality Action Plan for Dundee City Council. It outlines the action the Council will take to improve air quality in Dundee between 2024-2029. The consultation period ended on 2 August 2024.
- 2.29 The action plan replaces the previous action plan which ran from 2011. The Environment Act 1995 requires local authorities who are revising their existing AQAPs to consult the Scottish Ministers and other statutory consultees (as outlined in Schedule 11(1)(c) of the 1995 Act) when doing so.

- 2.30 Tactran considered reducing air pollution a priority and welcomed the actions Dundee City Council will take to reduce air pollution and raise awareness of its health impacts over the next five years, as outlined in the Draft Air Quality Action Plan 2024 – 2029.
- 2.31 Tactran agreed in principle with the six priorities identified within the AQAP. The Partnership would suggest that the AQAP would benefit from raising awareness of the air pollution and respective health issues. The AQAP should empower those who are most vulnerable to pollution by providing information on health impacts and ways to reduce personal exposure, while maintaining a focus on reducing emissions across Dundee.
- 2.32 In general, Tactran supports Dundee City Council's in focussing on areas where air quality is worst, while maintaining a focus on reducing emissions across Dundee. Actions should focus on areas where vulnerable members of the community are most at risk, and where planned developments risk introducing further exposure to poor air quality, Tactran welcomes the commitment to work with strategic partners. Where air pollution is not within the City Council's direct control, Dundee needs to work with partners to take further action. Tactran offered their input to the steering group.
- 2.33 A copy of the Tactran officer response is provided for information at Appendix B, which the Partnership is asked to note.

Dundee City Council's Local Development Plan (LDP 3) Evidence Report and Topic Papers consultation

- 2.34 The Scottish Government's Local Development Planning Guidance notes that stakeholders expected to inform the preparation of LDP Evidence Reports include Regional Transport Partnerships.
- 2.35 On 3 July 2024 Dundee City Council published consultation on a suite of LDP3 topic papers, outlining the scope of the evidence base for the development of Dundee City Council's Third Local Development Plan. The consultation period ended on 14 August 2024.
- 2.36 Tactran noted that the approach that has been outlined in relation to the preparation of the Evidence Base for Dundee City Council's Local Development Plan remained rather vague, as it omitted key questions and subsequent datasets which the evidence base should seek to answer to inform a comprehensive approach towards the location of development and addressing the travel demands of development through a:
- thorough understanding of problems, opportunities, issues and constraints
 - thorough understanding of the existing and potential capacity of the transport networks
- 2.37 As such, Tactran noted that a more comprehensive review of relevant data sources was required to provide the required intelligence that will help identify

the transport and travel implications of new development within Dundee City, otherwise, Dundee City Council's Third Local Development Plan risks not fully understanding the transport and accessibility impacts of its proposals.

- 2.38 Tactran offered to provide a comprehensive list of relevant data sources to help inform the evidence base, including datasets relating to active travel. Officers also stated that they could help scoping the transport and access data requirements.
- 2.39 A copy of the Tactran officer response is provided for information at Appendix C, which the Partnership is asked to note.

Perth & Kinross Council's Local Development Plan (LDP 3) Evidence Report and Topic Papers consultation

- 2.40 On 8 July 2024 Perth and Kinross Council published consultation on a suite of LDP3 topic papers, outlining the scope of the evidence base for the development of Perth and Kinross Council's Third Local Development Plan. The consultation period ended on 18 August 2024.
- 2.41 Tactran welcomed the detail set out in the topic papers in relation to the datasets that Perth and Kinross Council will use to inform the development of the Evidence Report and, indeed, the LDP3 2027.
- 2.42 Tactran, however, noted that while the papers set out a comprehensive suite of datasets established how, where and why people and goods travel and the subsequent travel demands, supply and consequences, the focus in relation to deliverability maintained an urban focus, solely focusses on the City of Perth. As such, it omits key questions which the evidence base should seek to answer to inform a comprehensive policy approach towards the location of development and addressing the travel demands of development through a:
- thorough understanding of both rural and urban problems, opportunities, issues and constraints
 - thorough understanding of the existing and potential capacity of the transport networks.
- 2.43 As such, a comprehensive review of a relevant data sources will provide the required intelligence that will help identify both the transport and travel implications of new development both in rural and urban Perth and Kinross. Otherwise, Perth and Kinross Council's LDP3 risks not fully understanding the transport and accessibility impacts of its proposals, especially as rural populations are at the highest risk of transport poverty, with the subsequent need for new development to consider ensuring a realistic choice of travel to reduce the risk of new development increasing the scale of the problem of transport poverty.
- 2.44 A copy of the Tactran officer response is provided for information at Appendix D, which the Partnership is asked to note.

2.45 It is worth noting that Stirling Council and now Dundee City Council have approached Tactran to seek support in identifying relevant data sources to inform the evidence base for their respective Local Development Plans.

3 CONSULTATIONS

3.1 Elements of the report have been the subject of consultation with partner Councils, other RTPs, and other partners/stakeholders, as appropriate.

4 RESOURCE IMPLICATIONS

4.1 This report has no direct or additional financial or other resource implications.

5 EQUALITIES IMPLICATIONS

5.1 This report has been screened for any policy implications in respect of Equality Impact Assessment and no major issues have been identified.

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Director

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NOTE

No 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 this Report.

Perth and Kinross Council Draft Mobility Strategy and Action Plan

Tactran Response

Tactran welcomes the opportunity to respond to the consultation on Perth and Kinross Council's Draft Mobility Strategy and Action Plan. The Mobility Strategy provides a framework for delivering the Regional Transport Strategy (RTS) at a local level. The Tayside and Central Scotland RTS recognised that the scale of challenge means that there is need to focus activity and to prioritise those locations and populations where the most support is required to achieve the adopted outcomes.

The Tayside and Central Scotland RTS further established the need to provide integrated solutions to provide a realistic alternative to the car and encourage the required mode shift.

Another principle established within the RTS is the need to recognise the different circumstances and opportunities as they relate to the rural and urban populations across the region. Perth and Kinross is predominantly a rural Council, with 67.8% living in rural areas and 32.4% living in urban areas.

Both the Draft Mobility Strategy and Action Plan remain vague in relation to those established principles. The number of strategic actions (44) and supporting actions (120) make it difficult to understand what is going to be prioritised and where, especially with regards to improving alternatives in rural areas. The descriptions of the actions are quite vague and do not indicate their intended target location or audience. Neither do the illustrative maps that indicate actions under each of the eight delivery themes. The lack of clarity in the maps in terms of location of measures makes it difficult to understand what is to be delivered where?

The only map providing specific locations is the map of City Centre, visualising the aspirational transport network for Perth City. Tactran feels that there is a risk that this may give the impression that Perth and Kinross Council has a clear idea of the actions that will achieve the desired outcomes for the urban population while not being as clear about the set of interventions required to make a meaningful difference for the rural communities. A different approach to visualising the actions in line with the principle of integrated solutions along corridors and centres in the rural area may help to provide a clearer picture of the actions required in the respective locations across the entire Council area.

Tactran would further like to comment on the wording of the below two actions:

Action 49: Prioritise active and sustainable transport by ensuring that new developments are located near key services (shops, schools, parks) and easily accessible by sustainable modes of transport to reduce the need to travel and minimise the use of unsustainable modes.

- Tactran acknowledges that this will be achieved through the development management process. However, assume that this principle cannot apply to all forms of new development, and that it will only apply to development of a certain

type and over a certain size. It is suggested that this reality is acknowledged in this wording of this action.

Action 185: Improve accessibility to park and ride services for non-car owners and car owners. Suggest the wording needs to be clarified. Is it “access to” or “accessibility of” the park and ride services that is intended?

Tactran is looking forward to continuing to work with Perth and Kinross on the Mobility Strategy and Action Plan.

Dundee City Council – Air Quality Action Plan 2024 Consultation

Tactran Officer Response

Q: How important to you / your business / organization / other is the need to reduce air pollutant levels in Dundee?

Very important | Important | Neither important or not important | Not Important / Very Not Important

Q: Please add any comments that you may have in respect to the previous question.

Tactran considers reducing air pollution a priority and welcomes the actions Dundee City Council will take to reduce air pollution and raise awareness of its health impacts over the next five years, as outlined in the Draft Air Quality Action Plan 2024 – 2029.

Q: Do you consider that there is sufficient information in the draft 2024 Air Quality Action Plan for you to understand the need for the Action Plan?

Strongly Agree | Agree | **Neutral** | Disagree | Strongly Disagree

Q: Please add any comments that you may have in respect to the previous question.

Tactran notes that the levels for the relevant pollutants - NO_x and particulate matter (PM₁₀ and PM_{2.5}) - are not set into context, i.e. whether the levels of pollutants in Dundee are, for example, exceeding the recommendations of the World Health Organisation. Providing this information would help to better understand the urgency of addressing the problem when working with (strategic) partners.

Q: Do you consider that the 6 key priorities identified within the AQAP are the main actions in respect to maintaining and reducing air pollutant levels within Dundee?

Strongly Agree | **Agree** | Neutral | Disagree | Strongly Disagree

Q: Please add any comments that you may have in respect to the previous question.

Tactran agrees in principle with the six priorities identified within the AQAP. The Partnership would suggest that the AQAP would benefit from raising awareness of the air pollution and respective health issues. The AQAP should empower those who are most vulnerable to pollution by providing information on health impacts and ways to reduce personal exposure, while maintaining a focus on reducing emissions across Dundee.

Tactran would recommend consideration be given to further analysis to model the air pollutant dispersion especially in relation to sensitive receptor locations, such as residential properties, hospitals, GPs, schools, nurseries, playing fields and nursing homes.

Q: To what extent do you agree or disagree with the proposed package of actions to further improve air quality in Dundee?

Strongly agree | **Agree** | Neither agree or disagree | Disagree | Strongly disagree

Q: Please add any comments that you may have in respect to the previous question.

In general, Tactran supports Dundee City Council's in focussing on areas where air quality is worst, while maintaining a focus on reducing emissions across Dundee. Actions should focus on areas where vulnerable members of the community are most at risk, and where planned developments risk introducing further exposure to poor air quality,

Tactran welcomes the commitment to work with strategic partners. Where air pollution is not within the City Council's direct control, Dundee needs to work with partners to take further action.

Tactran would like to comment on selective actions in turn:

3. Increase the use of car clubs through promotion of existing and encouragement of expansion through planning system.

Tactran would like to note that floating car clubs, while offering a flexible alternative to private car ownership and contributing to the suite of sustainable transport options, are still an emergent model. Recent research into the effects of floating car clubs limits the promise of achieving a significant reduction in private car ownership because of their introduction. Consideration should be given to other forms of car clubs.

12. Implement key actions within the Sustainable Transport Delivery Plan and support Active Travel initiatives, improving cycling infrastructure across the city and the perception of cycling as a safe and positive mode of transport.

Tactran would like to note that while cycling is a great way to get around actively and a great way to exercise, it is not what most people choose when they take up the challenge to travel actively. In 2023, Tactran commissioned [representative market research](#). Tactran would, subsequently, caution to use active travel synonymously with cycling, leading to the perception that active travel strategies and interventions solely relate to cycling. It is important that active travel strategies contain measures that support walking (and wheeling) as well as cycling. Focussing solely on one mode (cycling) that has a higher bar to entry and is much less popular than another will do little to promote active travel.

17. Continue work promoting sustainable travel options to schools, including support for school streets.

From 2024/25, Transport Scotland are directing Active Travel Behaviour Change funding directly to Regional Transport Partnerships in Scotland. Tactran, in consultation with its constituent councils, is coordinating a comprehensive behaviour change programme in selected clusters in the region, including Dundee. The package comprises a suit of measures targeted at schools, including education and awareness campaigns on the benefits of active school travel, with incentivisation schemes to encourage uptake, including school streets (See also <https://tactran.gov.uk/active-travel-behaviour-change-and-access-to-bikes-grant>).

19. Work regionally as part of TACTRAN to provide integrated solutions for regional transport issues.

Tactran notes that the status of the Tayside and Central Scotland Regional Transport Strategy has now changed. The Strategy has received ministerial approval and has been adopted by the Tactran Board at their meeting on 11th June.

24. Develop a Communications Strategy to provide a more strategic approach to public awareness and behaviour change.

Table B.1 lists measures that have not been pursued, including freight consolidation. According to the Draft AQAP this measure is not being pursued as it was not considered to be a suitable measure for the AQAP. Reference is made to a respective feasibility study relating to freight consolidation. The study has been undertaken by Tactran and completed in 2010. Tactran notes that at this point the assessment concluded that freight consolidation was beneficial to air quality in Dundee. Freight consolidation centres remain an option in the RTS (Action 20 refers).

Q: Do you consider that there are other actions, within the remit of Dundee City Council to deliver, which could be included within the action measures proposed in Table 2 within Section 5 of the draft AQAP?

Yes | No

Q: If 'Yes', please outline the action/s below.

With regards to the reduction of particulate matter, Dundee City Council acknowledges that the AQAP needs to focus on a reduction in the number of cars and car kilometres. The measures identified within the plan, however, exclude the introduction of potential demand management measures. Tactran recognises that the successful implementation requires a strategy tailored to the specific context of the Dundee City Region. The Partnership is looking to work with Dundee City Council and the other constituent Councils to develop such a tailored and targeted strategic approach.

Q: If there are any further comments or issues that you would like to add in respect to the draft 2024 Air Quality Action Plan please do so here.

Tactran notes that the AQAP Steering Group only comprises Dundee City Council Officers. Tactran would like to offer our input to the steering group. Especially as Dundee City Council's direct control over air pollution is limited in some critical areas, beyond the council boundaries.

Dundee City Council – Local Development Plan Topic Papers

Sustainable Transport Local Development Plan Topic Paper

Tactran Officers' response (submitted via Email)

Q: Is the list of identified evidence/datasets sufficient to inform the Proposed Plan?

No, I think that additional evidence / dataset(s) should be included.

Q: If selected "No", please specifically state what other dataset(s) you think should be included and explain why you consider that evidence would be relevant.

Development plans determine the location of new development and set the parameters for how the travel demands of developments are met. They can also identify and protect sites for transport infrastructure.

Tactran, subsequently, notes that the approach that has been outlined in relation to the preparation of the Evidence Base Dundee City Council's Local Development Plan remains rather vague, as it omits key questions and subsequent datasets which the evidence base should seek to answer to inform a comprehensive approach towards the location of development and addressing the travel demands of development through a:

1. Thorough understanding of problems, opportunities, issues and constraints
2. Thorough understanding of the existing and potential capacity of the transport networks

A comprehensive review of relevant data sources will provide the required intelligence that will help identify both the transport and travel implications of new development within Dundee City.

Otherwise, Dundee City Council's Third Local Development Plan risks not fully understanding the transport and accessibility impacts of its proposals.

Tactran can help provide a comprehensive list of relevant data sources to help inform the evidence base, including datasets relating to active travel, and can help scoping the transport and access data requirements. We can email a scope outwith this survey format.

Q: Do you agree with the summary of the evidence/datasets?

No.

Q: If selected "No", please specifically state the section of the summary of evidence/datasets that you are not in agreement with and the suggested changes.

The topic paper(s) aims to summarise all evidence and data identified. The ability of sustainable travel to meet the travel demands of development (and the ability to access jobs, education and services to reduce inequalities) will be informed by distance travelled by mode share; proportion of people who walk, cycle or use public transport regularly; location of services (employment, education, healthcare, retail etc) and the ability to access these services by walking, cycling or public transport (i.e.

frequency and timing of public transport); the origins of the workforce and the destination of Dundee's working age population, and the average travel times to work.

The identified evidence and datasets remain high-level and make it difficult to understand the scale of the problem and the potential impact new development can have without knowing the baseline data in relation to traffic levels (including congestion and journey times), wider connectivity and origins and destinations of the relevant travel to work areas, for example.

In addition, the ability to meet the travel demands of development by sustainable modes will be informed by the barriers that people face to using sustainable travel such as cost; physical ability (e.g. disabilities); safety and security.

In addition, unless there is a very significant modal shift from motorised vehicles, and there is no new motorised traffic arising from growth or new development it is likely that additional demands on the City's road network will arise. Hence understanding the existing capacity and the effect of potential new demands on the City's road network is required.

In understanding the balance of meeting the travel demands of new development by walking, cycling and public transport vs motorised vehicles, it is worthwhile noting the approach contained in Transport Scotland's Development Planning and Management Transport Appraisal Guidance i.e. address travel demands in the first instance by sustainable modes, and then consider accommodating motorised traffic for the residual demand.

These issues also apply to the local living and 20 minute neighbourhood principle referenced in the Design, Quality and Place topic paper.

Q: Do you agree with the implications for the Proposed Plan?

No.

Q: If selected "No", please specifically state the section of the implications for the Proposed Plan that you are not in agreement with and the suggested changes.

It is a requirement for Councils to perform their functions as they relate to transport consistently with the respective Regional Transport Strategy (RTS). The Tayside and Central Scotland RTS has now been approved by the Cabinet Secretary for Transport and has been adopted at the Tactran Board Meeting on 11 June 2024. It is worth noting that the RTS suggests that reducing the car dependency of new developments (Action1) may be achieved by the development management process "ensuring new development is realistically accessible by a range of modes". The purpose of this principle is recognising that all developments may not be able to be accessible by all modes due to their location (and the size of the development will determine the expectations put on it in the development management process), but it is critical that there is a choice, so they are accessible by people who do not have access to a car. For example, an accessible walking/wheeling route from the development to the closest public transport opportunity is the minimum level of provision required to ensure that a development is accessible by all.

The identified evidence and datasets remain high-level and make it difficult to understand the scale of the problem and the potential impact new development can have without knowing the baseline data in relation to traffic levels (including congestion and journey times), wider connectivity and origins and destinations of the relevant travel to work areas, for example.

Q: If you suggested in the survey above that you are not in agreement with either;

- the list of evidence and/or
- the summary of evidence and/or
- the implications for the Proposed Plan

Do you wish to have your comments considered as a formal "dispute"?

Yes.

If selected "Yes", please provide a summary of the points that you wish to formally "dispute".

As above. Tactran notes to the approach that has been outlined in relation to the preparation of the Evidence Base Dundee City Council's Local Development Plan remains rather vague, as it omits key questions and subsequent datasets which the evidence base should seek to answer to inform a comprehensive policy approach towards the location of development and addressing the travel demands of development through a:

1. Thorough understanding of problems, opportunities, issues and constraints
2. Thorough understanding of the existing and potential capacity of the transport networks

A comprehensive review of a relevant data sources will provide the required intelligence that will help identify both the transport and travel implications of new development within Dundee City.

Tactran can help provide a comprehensive list of relevant data sources to help inform the evidence base, including datasets relating to active travel, and can help scoping the transport and access data requirements. We can email a scope outwith this survey format.

Perth and Kinross Council – Local Development Plan 3 Topic Papers

Tactran Officer response (submitted via email on 16/08/2024)

Tactran welcomes the opportunity to respond to Perth and Kinross Council's consultation on the suite of LDP3 2027 Topic Papers. Tactran welcomes the detail set out in the topic papers in relation to the datasets that Perth and Kinross Council will use to inform the development of the Evidence Report and, indeed, the LDP3 2027.

Please see the below for specific comments in relation to individual topic papers.

1. Paper No. 004: Tackling the Climate Crisis

Figure 1: While setting out a comprehensive suite of datasets to establish the baseline in Perth and Kinross, the introductory figure (p. 3 refers) refers to the climate related target of reducing 75% of emissions by 2030 (compared to a 1990 baseline). Back in April 2024, the Scottish government has announced the intention to withdraw this target. The final goal of reaching net-zero by 2045 remains, though.

Paragraph 2.42 refers to Perth and Kinross Council's published Draft Mobility Strategy as it helps "to achieve the [...] keys issues and action targets identified under Tactran's Draft Regional Transport Strategy 2023 – 2033." The Tayside and Central Scotland Regional Transport Strategy 2024 – 2034 has now been approved by the Cabinet Secretary for Transport and has been adopted at the Tactran Board Meeting on 11 June 2024.

Paragraph 2.43 sets out the outcomes in relation to the respective strategic objective to take climate action. As above, back in April 2024, the Scottish government has announced the intention to withdraw this target. The final goal of reaching net-zero by 2045 remains, though.

Paragraph 2.44 notes that "actions identified under the Draft RTS outcome to 'increase the levels of walking and cycling in the least affluent SIMD data zones' and 'reduce transport emissions in declared air quality management areas' will also contribute to climate change mitigation and adaptation." Tactran notes that the potential of active travel to contribute to climate change mitigation and adaptation is rather limited. It is also difficult to understand the scale of the problem and the potential impact of new development on climate change without knowing the baseline and forecast implications of existing and new transport (specifically impact of traffic on greenhouse gas emissions) e.g. existing and forecast traffic levels and ULEV adoption.

Paragraphs 2.64 to 2.66 refers to the SHS Environment Survey and the public attitudes regarding climate change. Tactran notes that Tactran, as part of the development of the Regional Transport Strategy, commissioned representative market research. The research also established a representative sample of attitudes towards climate change and the implications for transport measures.

Findings are supporting the findings of the SHS. The report is available from the [Tactran website](#).

Paragraph 2.76 refers to the lack of suitable data availability and the “lack of up to data on the % modal share attributed to public transport; the % of journeys to school by active transport; number of passengers using Park and Ride services, and the number of road closures due to flooding or other climate change impacts.”

Tactran notes that both the Census and SHS will provide mode share data, as will the RTS survey data. It is also helpful to note that the 2022 Travel to Work Census data is due to be released at the beginning of September and can, subsequently, inform the LDP.

Appendix A – Table A1 refers to Tactran’s Draft Regional Transport Strategy 2023-2033. As above. The Tayside and Central Scotland Regional Transport Strategy 2024 – 2034 has now been approved by the Cabinet Secretary for Transport and has been adopted at the Tactran Board Meeting on 11 June 2024. Tactran asked for the reference to be changed accordingly.

2. Paper No. 0014: Infrastructure

While setting out a comprehensive suite of datasets established how, where and why people and goods travel and the subsequent travel demands, supply and consequences, the focus in relation to deliverability (para 3.24 to 3.32 refer) maintains an urban focus, solely focusses on the City of Perth. As such, it omits key questions which the evidence base should seek to answer to inform a comprehensive policy approach towards the location of development and addressing the travel demands of development through a:

- i. Thorough understanding of both rural and urban problems, opportunities, issues and constraints
- ii. Thorough understanding of the existing and potential capacity of the transport networks

A comprehensive review of a relevant data sources will provide the required intelligence that will help identify both the transport and travel implications of new development both in rural and urban Perth and Kinross. Otherwise, Perth and Kinross Council’s LDP3 risks not fully understanding the transport and accessibility impacts of its proposals.

Paragraph 3.32: The paragraph refers to the vision of the Tayside and Central Scotland Regional Transport Strategy 2024 – 2034 (RTS). It is a requirement for Councils to perform their functions as they relate to transport consistently with the respective Regional Transport Strategy (RTS). The Tayside and Central Scotland RTS has now been approved by the Cabinet Secretary for

Transport and has been adopted at the Tactran Board Meeting on 11 June 2024. In terms of being realistically able to work towards the vision of the RTS, the document recognises, and continually emphasises, that the scale of the challenge means that there is need to focus activity and to prioritise those locations and populations where the most support is required to achieve the adopted outcomes.

The ability of sustainable travel to meet the travel demands of development will be informed by distance travelled by mode share (and the average journey times to work); proportion of people who walk, cycle or use public transport regularly; location of services (employment, education, healthcare, retail etc) and the ability to access these services by public transport (i.e. frequency and timing of public transport); the origins of the workforce and the destination of the working age population.

In addition, the ability to meet the travel demands of development by sustainable modes will be informed by the barriers that people face to using sustainable travel such as awareness of options and ability to plan multi-modal journeys, cost, physical ability (e.g. disabilities), safety and security.

The Tayside and Central Scotland RTS further establishes the need to provide integrated solutions to provide a realistic alternative to the car and encourage the required mode shift.

Another principle established within the RTS is the need to recognise the different circumstances and opportunities as they relate to the rural and urban populations across the region.

Tactran asks that Figure 5 (p.18 refers) is amended accordingly to better reflect the four RTS strategic objectives along with the established principles.

3. Paper No. 018: Design, Quality and Place

The paper refers to the Six Qualities of Successful Places, including connected places. Connected places are supporting well connected networks that make moving around easy and reduce car dependency.

Tactran notes that the ability of sustainable travel to meet the travel demands of development will be informed by distance travelled by mode share (and average travel times to work); proportion of people who walk, cycle or use public transport regularly; location of services (employment, education, healthcare, retail etc) and the ability to access these services by public transport (i.e. frequency and timing of public transport); the origins of the workforce and the destination of the working age population.

In addition, the ability to meet the travel demands of development by sustainable modes will be informed by the barriers that people face to using sustainable travel such as cost, physical ability (e.g. disabilities) and safety and security. A successful place is what that is accessible for everyone, irrespective of physical or learning difficulties.

4. Paper No. 19: Local Living and 20 Minute Neighbourhoods

Tactran refers to its comment in relation to sustainable travel and quality of places above and further notes that it is important to establish the risks to the viability of communities, such as risk of transport poverty. Tactran notes that the successful implementation of the local living / 20-minute neighbourhood concept depends on the provision of local facilities and services.

5. Paper No. 20: Homes

Tactran notes that it is difficult to understand the scale of the problem and the potential impact new development can have on quality homes without knowing the baseline data in relation to (traffic related) noise levels (see Scotland's Noise Mapping), air quality – especially in the declared AQMAs in Crieff and Perth - and accident statistics.

6. Paper No. 021 Blue and Green Infrastructure

Section 2.4 identifies priorities for connectivity and refers to a series of 20-minute neighbourhood and local living analysis that will be carried out to support the preparation of the LDP3 2027. Tactran refers to its comment in relation to sustainable travel and quality of places above and further notes that it is important to establish the risks to the viability of communities, such as risk of transport poverty.

Section 2.6 identifies priorities for safeguarding and promoting access to green and blue spaces and action travel. It is difficult to understand the scale of the problem and the potential impact new development can have on play, sport and recreation without knowing the baseline data, e.g. in relation the walking distance to the nearest usable green or blue space.

Tactran further notes that the Tactran Regional Active Travel Network 2024 is not subject to Ministerial approval. As such, the reference should be corrected.

Figure 3 Active Travel Routes (p.15 refers) shows the active travel routes within Perth and Kinross. The scale of the map makes it difficult to establish the relevant information for the Evidence Report, i.e. distance to the nearest blue green space.

7. Paper No. 026: Business and Industry

The paper establishes the size of marketable employment land available within Perth and Kinross. It notes that further audit work will be required to identify new LDP allocations, especially with regard to constrained sites.

Tactran notes that it is difficult to understand the scale of the problem and the potential impact new development can have on business and industry without knowing the baseline data in relation to, for example, traffic levels (including congestion and journey times), wider connectivity and origins and destinations of the relevant travel to work areas as well as average travel to work times. As such, any audit should consider those parameters.

Paragraph 2.52 states that “there was not always enough consideration of active travel links, an area of increased emphasis in national policy.” It is worth noting that the RTS suggests that reducing the car dependency of new developments (Action1) may be achieved by the development management process “ensuring new development is realistically accessible by a range of modes”. The purpose of this principle is recognising that all developments may not be able to be accessible by all modes due to their location (and the size of the development will determine the expectations put on it in the development management process), but it is critical that there is a choice, so they are accessible by people who do not have access to a car. For example, an accessible walking/wheeling route from the development to the closest public transport opportunity is the minimum level of provision required to ensure that a development is accessible by all. It is, subsequently, important to understand the potential impact new development allocations. As such, the scope of any assessment should include the aforementioned data as a starting point.

8. Paper No. 028: Rural Development and Homes

The paper makes reference to Perth and Kinross Council’s Draft Mobility Strategy and the respective transport planning objectives. Tactran notes that it is a requirement for Councils to perform their functions as they relate to transport consistently with the respective Regional Transport Strategy. It is worth noting that the RTS suggests that reducing the car dependency of new developments (Action1) may be achieved by the development management process “ensuring new development is realistically accessible by a range of modes”. Tactran further refers to its comments in relation to the principles established by the RTS, especially with regard to the need to provide integrated solutions to provide a realistic alternative to the car and encourage the required mode shift while recognising the different circumstances and opportunities as they relate to the rural and urban populations across the region.

Rural populations are at the highest risk of transport poverty. New development should consider ensuring a realistic choice of travel to reduce the risk of new development increasing the scale of the problem of transport poverty.

9. Paper No. 029: Tourism

While aware of the problems in relation to active and sustainable transport and the implications both for visitors and hospitality workers, Tactran notes that it remains difficult to understand the scale of the problem and the potential impact new development can have on tourism and culture without understanding the baseline data in relation to traffic levels (including congestion and journey times), wider connectivity and origins and destinations of the relevant travel to work areas, for example.

The data problems are

- (i) origins/destinations/length of stay/purpose of tourists
- (ii) origins/destinations of workers