

29 APRIL 2008

**SCOTTISH GOVERNMENT CONSULTATIONS****REPORT BY DIRECTOR**

This report seeks the Partnership's endorsement of responses to various Scottish Government Consultations, as approved for submission by the Executive Committee.

**1 RECOMMENDATION**

- 1.1 That the Partnership endorses the responses which have been submitted to the Scottish Government's consultations on the National Planning Framework (NPF2); the Scottish Climate Change Bill; and the Scottish Road Safety Strategy.

**2 BACKGROUND**

- 2.1 At its meeting on 30 January 2008 the Partnership noted that the Scottish Government had published consultation papers on the National Planning Framework 2 (NPF2) and proposals for a Scottish Climate Change Bill, and agreed to delegate authority to the Executive Committee to consider and approve responses to these consultations (Report RTP/08/06 refers). Responses to the NPF2 were requested by 15 April 2008 and to the Climate Change Bill by 23 April 2008.
- 2.2 Subsequent to the meeting on 30 January a further consultation paper on a Scottish Road Safety Strategy was received, seeking responses by 25 April 2008. In order to enable a response to be submitted by the consultation deadline this was also reported for consideration by the Executive Committee.
- 2.3 All three consultations are available for inspection and downloading on the Scottish Government's website at [www.scotland.gov.uk/consultations](http://www.scotland.gov.uk/consultations).

**3 DISCUSSION**

- 3.1 A summary of the three consultations is given below. Copies of the submitted responses, as approved by the Executive Committee, are included in Appendices 1 – 3 and the full Executive Committee report can be viewed on the Partnership's website [www.tactran.gov.uk](http://www.tactran.gov.uk).

**National Planning Framework 2**

- 3.2 NPF2 sets out a strategy for Scotland's development over a 20 year period and helps to inform wider programmes for Government and Local Government. The first NPF was published in April 2004 and outlined a planning strategy to the year 2025. NPF2 aims to guide Scotland's spatial development to 2030, setting out strategic development priorities to support the Scottish Government's central purpose - promoting sustainable economic growth.
- 3.3 For transport infrastructure, it supports the strategic outcomes set out in the National Transport Strategy and indicates that the final document will draw on

the work currently being undertaken on the Strategic Transport Projects Review (STPR). However it is considered that there is a need for greater clarity on the relationship between NPF2 and the STPR, which is due to report later in the summer, and on how the new national strategic priorities which will emerge from STPR and identified priorities in the current NPF2 will be prioritised and implemented. It is also not clear how regional transport projects, which are also of national significance, will be addressed within the STPR/NPF2. Consequently it is felt that there should be further consultation on these relationships when the outputs from the STPR are made available.

- 3.4 In its assessment of transport, NPF2 notes that Scotland's transport system is already relatively well-developed. Congestion is identified as a problem in some areas and commuting as a significant contributor to peak congestion on the road and rail network. It comments that the efficient and competitive movement of goods through the supply chain is a key element in meeting consumer demand and supporting economic growth with the vast majority of freight being moved by road. Many of these themes are common to and are addressed by the TACTRAN RTS. However, the current focus on identified "National Developments", all of which are within the Central Belt, fails to address concerns associated with relative peripherality for areas north of the Edinburgh – Glasgow axis.
- 3.5 The document lists 9 projects which are identified as "National Developments":-
- (i) Replacement Forth Crossing
  - (ii) Edinburgh Airport enhancement
  - (iii) Glasgow Airport enhancement
  - (iv) Grangemouth freight Hub
  - (v) Rosyth International Container Terminal
  - (vi) Scapa Flow Container Transshipment facility
  - (vii) Grid reinforcements to support renewable energy developments
  - (viii) Glasgow Strategic Drainage Scheme
  - (ix) 2014 Commonwealth Games facilities
- 3.6 Although none of the listed "National Developments" are located in the TACTRAN region a number of these clearly have implications for the region's economy and transport links - e.g. Replacement Forth Crossing; Edinburgh and Glasgow Airport enhancements; Grangemouth Freight Hub; and Rosyth International Container Terminal and are, therefore, supported. A number of other strategic transport developments, which it is felt should be included, are listed in the response at Appendix A (page 6 refers).
- 3.7 An East Coast Corridor strategic route has been identified between Aberdeen and Newcastle. This provides opportunities to develop knowledge economy links based on the expertise associated with the energy and offshore industries and the universities in the corridor, including Dundee University. Reducing journey times on the route would improve connectivity of knowledge clusters on the East Coast. Strategic Freight corridors are defined that coincide with the national transport corridors, while the list of Gateway ports includes the port of Dundee. This reinforces the need to have regard to addressing existing

strategic access constraints on these freight corridors, including road and rail access to the ports of Dundee and Montrose and Perth Harbour.

- 3.8 The RTS already supports many of the actions and policies contained within the NPF. The major changes introduced in NPF2 are to place greater emphasis on commitments on sustainable economic growth and climate change. The Framework will assist TACTRAN and constituent Councils in ensuring that the aims and objectives of the RTS are integrated into planning policy and practice.
- 3.9 It is encouraging that the generality of many of the RTS aspirations are reflected in NPF2, for example providing faster rail services on the main inter-city routes complemented by services stopping at intermediate stations, as recommended by the Tay Estuary Rail Study (TERS); and the provision of new stations and more rolling stock to lengthen trains.
- 3.10 However, there are concerns that the Framework fails to make reference to the need for strategic improvements to the regional road and rail network; lack of strategic commitment to “softer measures” such as Travel Planning and the requirement to provide these measures as an integral part of consideration of new development proposals, all of which it is considered will contribute to the aims of NPF2.
- 3.11 On external connectivity, NPF2 identifies most of the measures supported by the TACTRAN RTS. However it is believed that stronger support should be given to the development of new High Speed Rail links between Scotland and London, not just improved journey times on the existing railway lines. In addition the potential for developing the role of east coast ports, including Dundee, Montrose and Perth, for more sustainable movement of freight, including timber, and the potential for expanding the role of Dundee as a Regional Airport, should also be included.

### **Scottish Climate Change Bill**

- 3.12 The consultation paper outlines the climate change context and discusses the establishment of targets, a supporting framework and a reporting and scrutiny framework. The paper proposes an ambitious target of reducing CO2 emissions in Scotland by 80% by 2050.
- 3.13 The paper specifically considers approaches to transport. International aviation and shipping emissions are not covered in the proposed Bill as many of the relevant policy measures are reserved to the UK Parliament. However, domestic aviation and shipping are included in the Greenhouse Gas Inventories statistics. As methods for apportioning aviation and shipping emissions within an international framework develop it may become possible for these to be included in Scotland’s reduction targets at a future date as well.
- 3.14 It outlines supporting measures, noting the importance of small changes such as walking, cycling and taking public transport rather than using the car. The Government comments that there are some such measures that could be included in the proposed Bill which could contribute to this effort by enabling or requiring more action to be taken in specific areas and ensuring that such action is carried out in a responsible and sustainable fashion, balancing the immediate and local impacts with the aim of reducing emissions and meeting the 2050 target.

- 3.15 In general, the Government's main aims are reflected strongly in the TACTRAN RTS, through themes such as reducing use of the private car and encouraging the switch to less polluting modes for both passenger and freight transport. TACTRAN is also playing a major role in raising awareness of transport related environmental issues, for example through providing Travel Plan guidance to public and private sector employers and planning authorities.
- 3.16 The consultation consisted of a series of 33 specific questions. The Partnership's response, addressing those questions which were considered to fall within the scope of TACTRAN, forms Appendix B.

### **Scottish Road Safety Strategy**

- 3.17 Scottish Government is planning to develop a road safety strategy to improve safety on the nation's roads over the next 10 years. This is set within the context of falling numbers of people killed or seriously injured in road traffic accidents but no corresponding fall in casualty numbers among certain groups of road user. It is recognised that innovative and effectively-targeted measures will be needed to continue the general fall in numbers and address the groups where numbers are not declining.
- 3.18 This relatively short consultation document, comprising 20 pages, sets out the key issues affecting road safety and invited comments and suggestions as to the way forward in relation to key themes of:- identifying and addressing priorities; organisation of Road Safety delivery; funding Road Safety more effectively; and learning from other countries practices and experiences.
- 3.19 For most of the themes the responsibility for road safety policy and delivery remains with constituent Councils. However, it is considered that TACTRAN and RTPs generally could play a useful role in enabling more effective and efficient coordinated regional approaches to monitoring and planning of road safety strategies and campaigns. The submitted response forms Appendix C.

## **4 CONSULTATIONS**

- 4.1 The responses which form Appendices 1 – 3 were prepared in consultation with the TACTRAN Chief Officers Liaison Group. The submitted responses reflect comments submitted by members of the Executive Committee.

## **5 RESOURCE IMPLICATIONS**

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

**Eric Guthrie**  
**Director**

Report prepared by Michael Cairns. For further information e-mail michaelcairns@tactran.gov.uk or tel 01738 475774.

### **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; (list papers concerned)

Climate Change Consultation on Proposals for a Scottish Climate Change Bill

National Planning Framework for Scotland 2 Discussion Draft

Scottish Road Safety Strategy Consultation Document

Report to Executive Committee on 4 April 2008.

National Planning Framework Team  
Scottish Government  
Planning Directorate  
Victoria Quay  
Leith  
Edinburgh  
EH6 6QQ

Dear Sir/Madam,

## **CONSULTATION ON NATIONAL PLANNING FRAMEWORK 2**

The following response to consultation on the Draft National Planning Framework 2 is submitted on behalf of the Tayside and Central Scotland Transport Partnership. This response has been compiled in consultation with TACTRAN's partner Councils, Angus, Dundee City, Perth & Kinross and Stirling.

As requested, comments are submitted under each section/paragraph of the document. Much of the generality of the document, regarding the importance of increased emphasis on integration of land-use and transport planning; greater emphasis on more sustainable transport modes; etc conforms with the aims of TACTRAN's own Regional Transport Strategy and is, therefore, supported. This response focuses on those areas where it is considered that the document should be strengthened in emphasis or amended.

### **General Comments**

The production of a statutory NPF2, which will guide Scotland's spatial development during the period to 2030, is supported. Whilst it is recognised that the strategic nature of the document requires a national focus, it is also essential that the finalised document reflects the varying economic, social and environmental needs and circumstances throughout Scotland.

The present document includes a relatively small number of defined "national developments", all of which are located in the Central Belt. Whilst it is acknowledged that a number of these will support the delivery of economic and other benefits in other parts of Scotland, NPF2 must have equality of emphasis, opportunity and relevance to the needs of the nation as a whole.

In particular, in relation to transport, it is essential that NPF2 is fully informed by the ongoing work being undertaken by Transport Scotland on the Strategic Transport Projects Review (STPR). Whilst the document contains various references to connection with the work on STPR, at this stage it is far from clear how the priorities currently identified within the Draft NPF2 and the finalised version will be influenced by and related to the outcomes of the STPR. It is, therefore, considered that there should be further consultation on the transport and connectivity aspects of NPF2 once the detailed outcomes of the STPR are available.

The currently identified "national developments" relate solely to major infrastructural initiatives. The achievement of Scottish Government's primary objective of sustainable economic growth will not be dependent solely upon the delivery of major infrastructural enhancements. There also needs to be an increased emphasis placed

upon “softer measures” which encourage more sustainable behaviour in all areas of economic activity. One key example is in the area of Travel Planning, where much work is currently being done through the Regional Transport Partnerships. NPF2 must give a strong strategic steer for the need to have increasing regard to sustainable travel options in spatial planning.

Related to the above comments, and the need to ensure that full account is taken of increasingly widely accepted projected impacts of climate change in spatial planning decisions, it is disappointing that stronger commitments to enhancing the national public transport and sustainable transport networks/modes are not included within the document.

### **SCOTLAND TODAY (Paras. 13 – 76)**

The primary aim of improving Scotland’s economic performance is fully supported. Transport will play a key role in realising this objective. As outlined above and below, there is concern that the present emphasis on a limited number of “national developments” within the Central Belt will leave other parts of Scotland disadvantaged, in terms of their relative connectivity and economic performance.

The document acknowledges that Stirling and Perth & Kinross are experiencing amongst the highest levels of population increase. NPF2 and STPR need to ensure that associated infrastructure and other transport capacity improvements support these changes.

Reference is made to projected population decline in main urban areas, including Dundee City. These projections fail to take account of the impact of recent successful and ongoing local and regional strategies for reversing projected population decline.

Of perhaps greater significance are the demographic changes associated with an ageing population, which will impact on all areas, irrespective of projected net growth or decline. Greater emphasis should be placed on planning for the longer term impacts of demographic change.

The document confirms that parts of the TACTRAN region are seeing significant growth in employment. National investment priorities need to support this. The document also identifies that there are concentrations of highly skilled people in parts of the TACTRAN region, including concentrations of university-based and medical research expertise in Dundee and Stirling. The national priorities for investment need to support the retention of these skills and opportunities.

Tourism is identified as a key sector of the national economy, and this is equally true in the TACTRAN region. Connectivity improvements to the main tourism gateways, such as at Edinburgh and Glasgow Airports, must also take account of onward connectivity needs to areas north of the Central Belt. In addition to the identified “national gateways”, there should be stronger recognition of opportunities which exist to enhance the role of “regional gateways” such as at Stirling (for access to Loch Lomond and Trossachs National Park), Perth and Dundee.

In relation to Transport, Section 56 of the document states *that “Scotland’s transport system is already relatively well-developed and some of the remaining gaps in the network are currently being addressed”*. Whilst this may be true of the transport system in the Central Belt, this broad statement overlooks a number of improvements to the strategic road and rail network which are needed elsewhere to support national

and regional economic growth, as identified in the TACTRAN RTS and outlined below.

On the Trunk Road network, a number of key improvements which support the strategic aims of reducing congestion and improving journey time reliability are required and should be addressed through the STPR. These include the A90 through/around Dundee; dualling of A9 north of Perth; safety improvements at non-grade separated junctions on A90 north of Dundee and A9 south west of Perth; and measures to improve urban network efficiency through and around the key “strategic nodes” of Dundee, Perth and Stirling.

Parts of the existing national rail network are constrained by single track or signalling capacity, such as on the route between Perth – Edinburgh; Inverness – Perth; and north of Montrose at Usan. In general the area north of the Tay has become relatively more peripheral within the UK as a result of rail connections and journey times south of Edinburgh having improved significantly in recent years, whilst journey times north of Edinburgh have remained largely unchanged. NPF2 should address these relative connectivity discrepancies.

In terms of rural transport the document acknowledges that the car remains the dominant form of transport owing to the relative lack of availability and inflexibility of conventional public transport services. The TACTRAN RTS includes a commitment to investigate the expansion of Demand Responsive Transport in rural and other areas. It is considered that NPF2 could provide a stronger commitment and emphasis to the need for development of alternative transport solutions for supporting economic and social in rural and other areas.

The efficient and competitive movement of goods is critical to maintaining and improving Scotland’s economic performance. In addition to the improvements in strategic roads infrastructure referred to above, there is a need to place greater emphasis on infrastructure which supports the development of more sustainable options for transporting freight, particularly by rail and sea. NPF2 should support the development of additional regional multi-modal facilities which will contribute to national objectives on more sustainable freight movement. Examples include the need to improve road and rail connections to key regional ports/harbours such as at Dundee, Montrose and Perth.

On a point of detail, Map 5 of the Transport System (page 18) appears to be incomplete, as it omits the existing A85 Trunk Road between Perth and Lochearnhead.

The categorisation of Dundee as a “small airport” (Map 5 and Para. 63) does not reflect its role and potential as a regional airport, as identified in the UK Air Transport White Paper. The text implies that Dundee is similar to airports which provide lifeline services to communities in the Highlands and Islands. This overlooks the potential which exists to develop the airport’s current role, including opportunities for developing existing and new connections to other key economic centres in the UK, as outlined in para. 64.

Para. 67 states that “*the 6 cities are key hubs in the transport system*”. It is assumed that this reference includes the City of Stirling, but Stirling’s status as a “key hub” in the national transport system is not reflected later in the document. Stirling should be included as a “strategic node” in both NPF2 and STPR.

## **DRIVERS OF CHANGE (Paras. 77 – 140)**

Paras. 79 – 80 discuss the importance of place to a modern knowledge economy. As indicated above, parts of the TACTRAN region currently benefit from and contribute to the national economy through a well skilled and qualified workforce. It is crucial that the physical and digital connectivity of these areas is maintained and developed through investment priorities identified within NPF2.

The need to promote sustainability in all development (para. 81 – 89) is fully supported. It is felt that NPF2 gives insufficient emphasis and priority to promoting the development of the strategic transport network to offer more sustainable options and choices for the carriage of people and freight.

Paras. 85 – 89 identify the impacts of climate change, including predicted rises in sea level, as one of the principal challenges. It is essential that full account is taken of these projected and increasingly widely accepted impacts in the spatial planning of national developments under NPF2.

Paras. 84 - 89 also refer to the combined challenges of increasing greenhouse emissions, fossil fuel availability and fuel prices. Taking on board these and the points made elsewhere in the document about the long lead times required for investment in and delivery of transport infrastructure improvements, NPF2 should look beyond it's horizon of 2030, in terms of setting out a longer-term vision for future prioritisation of investment in more economically and environmentally sustainable forms of transport for the movement of goods and people.

Scotland's relationship with Europe and the rest of the world is highlighted in paras. 106 – 114. Map 10 identifies the area north of the Central Belt, including the TACTRAN region, to be either "Peripheral" or "Very Peripheral". NPF2 should be doing more to address the relative peripherality of these regions of Scotland.

It is recognised that the amount of structural funding coming to Scotland has reduced substantially as a result of the enlargement of the EU. Looking ahead to the next round of Structural Funds, Scottish Government should work closely with UK Government to make the case for investment eligibility for areas north of the Central Belt in future re-negotiations of the EU Structural Funds Regime.

In relation to Transport and Land Use (paras. 115 – 122) the need to invest in transport enhancements which facilitate sustainable economic growth is fully supported, including the need to tackle congestion and improve public transport links in both urban and rural areas. The use of new technology in reducing the need to travel is also important. Addressing current constraints on the availability and capacity of Broadband technology should be seen as a priority within NPF2.

## **SCOTLAND 2030 (Paras. 141 – 187)**

The Key Aims of the strategy, as set out in para. 141 are supported. As indicated above it is important that the national priorities identified in the finalised NPF2 support sustainable economic growth across Scotland, and do not concentrate the benefits of national investment in the Central Belt.

The objective of raising Scotland's economic growth rate by 2017 is also supported. Improving internal and external national and international connectivity will be crucial if Government's aim of making Scotland "the best place in Europe to do business" is to be achieved.

Para. 145 reaffirms the important role that Planning and Transport policies have in promoting more sustainable patterns of development and travel. As indicated above, it is felt that NPF2 should provide a stronger emphasis on the promotion and development of sustainable transport infrastructure and facilities for movement of people and freight.

The main elements of the Development Strategy to 2030, as set out in section 150, are also supported. However, again it is felt that stronger strategic direction and commitment in relation to the objectives of supporting sustainable growth in all parts of Scotland, including rural areas; reducing Scotland's carbon footprint, particularly in relation to transport emissions; and strengthening international links, should be set out in the document.

The section on Cities and their Regions (paras. 151 – 154) identifies the key role that Cities play as drivers of the national and regional economy. Para 154 identifies the need for improved connectivity between Dundee, Aberdeen, Inverness, Edinburgh and Glasgow. The road and rail network in the TACTRAN region forms a key “hub” in the national transport network and improving inter-city connectivity will require existing bottlenecks and constraints on the strategic road and rail network in the region to be viewed as national priorities.

Reference is again made to the importance of good air links. As outlined above, the document currently underplays the potential role of Dundee Airport in terms of supporting the national and regional economy.

Para 157 makes reference to the need to improve journey times between the north east and Central Belt. This implies a commitment to improving both the road and rail infrastructure on the A90 and parallel rail corridor, which is supported.

Para. 158 confirms that Government is committed to reducing regional disparities and ensuring the economic growth benefits the whole of society. As indicated above, it is important that NPF2 “national developments” include measures and projects which overcome existing regional disparities. Examples of priorities in this area are given in response to the section on Infrastructure below.

Map 14 (page 55) on Strategic Forest Resources and Timber Transport Infrastructure focuses exclusively on the west coast of Scotland, ignoring existing and potential opportunities for timber movement through east coast ports /harbours, including Dundee, Montrose and Perth. The volume of timber extraction and related transportation within the TACTRAN region is expected to increase significantly and NPF2 should support the development of new and more sustainable timber transport infrastructure, particularly rail and maritime, on the East Coast corridor.

### **INFRASTRUCTURE (Paras. 188 – 246)**

The existing list of “national developments” listed under Para. 190 are broadly supported, particularly the Replacement Forth Crossing; Edinburgh Airport Enhancement; Glasgow Airport Enhancement; Grangemouth Freight Hub and Rosyth International Container Terminal.

However, as indicated above, other improvements to strategic transport infrastructure are needed to support regional and national economic prosperity and connectivity. Key improvements required to the strategic road and rail network in the TACTRAN

region, which will benefit other parts of Scotland including the north east and Highlands, include :-

- Improvements to A90 through/around Dundee;
- Dualling of A9 north of Perth;
- Improved rail connections and journey times between Perth – Edinburgh and Inverness – Perth;
- Improved road and rail connections to ports of Dundee and Montrose and Perth Harbour

Reflecting earlier comments and pending further definition of the outputs from STPR, it is recommended that the current list of “national developments” is extended to include the following “generic” priorities:-

- improvements to the Strategic Trunk Road network;
- improvements to Scotland’s inter-city rail network;
- expansion of electrification of the Scottish inter-city rail network;
- improving road and rail connections to ports and harbours;
- expanding operational capacity at ports and airports;
- development of a network of regional freight distribution centres;
- development of Broadband capacity throughout Scotland

It is considered that each of these examples, although generic in nature, fit with the criteria set out in Para. 189 for “national developments”. As indicated above more defined priorities are expected to emerge from STPR and the finalised list of “national developments”, including any additional projects emerging from STPR, should be the subject of further consultation in the autumn.

In relation to the sections on transport (paras. 191 – 225) breaking the link between economic growth, increasing traffic and increasing emissions will require national investment in more effective and attractive sustainable transport options such as rail, maritime and Park & Ride.

The commitment to electrifying the rail network between Edinburgh and Glasgow (Para. 194) should include a longer-term commitment to extend electrification to other key “inter-city” routes, including Aberdeen – Edinburgh; Inverness – Perth – Edinburgh/Glasgow.

As indicated above, the “strategic nodes” identified in Para. 195 and Map 15 should include Stirling, in line with the comments regarding the role of Scotland’s 6 cities in Para. 67 and Map 19 (page 85). Otherwise the definition of key land-based Strategic Transport Corridors in Map 15 is supported.

In relation to External Links (Paras. 197 – 210) the need to encourage stronger links with the EU and Baltic Region, including by development of cargo and ferry links through existing east coast ports, is supported.

In relation to Air transport, para. 200 makes reference to the UK White Paper on Air transport. The White Paper supports the case for growth not only at Scotland’s main airports, as identified on Map 16, but also at Dundee Airport, recognising it’s potential for growth as a regional airport, offering better connections to other UK destinations.

In relation to freight, future infrastructure requirements will be informed by ongoing work on STPR and the National Freight Action Plan (FAP), reinforcing the need for

further consultation on these aspects once the outputs from STPR and the FAP are known, as suggested elsewhere in this response.

The aim of making journey times, particularly by public transport, quicker and more reliable, is fully supported. However, improvements in inter-city journey times for rail should not be at the expense of opportunities to develop the role of rail for more sustainable regional and local travel demands, which also contribute to national economic and sustainability objectives.

Para. 204 highlights the importance of efficient cross-border road and rail links. Recognising that cross-border issues require to be taken forward in consultation with UK Government and the Department for Transport, there should be stronger commitment to developing the case for High Speed Rail connections between Scotland and the rest of the UK and beyond. Improvements to road and rail connections with other parts of the UK and internationally are supported, subject to the impact of any such improvements on the relative peripherality of regions north of the Central Belt being recognised and addressed.

In relation to Internal Connectivity (Paras. 211 – 218), as outlined above it is considered that a number of improvements to key strategic road, rail and maritime links within the TACTRAN region are required, in support of delivering national and regional economic objectives. In para. 213 reference is made to planning policies maximising the use of existing services, stations and terminals before considering the need for new ones. Whilst this principle is supported, the potential for new or re-opened stations etc., where these can be demonstrated to contribute to over-arching national and regional objectives, should not be unreasonably constrained.

Reference is made in para. 216 to the need to improve Trunk Road connectivity between cities. As indicated above, improvements in the Trunk Road network through the TACTRAN region, particularly the A90 through/around Dundee and the A9 north of Perth, will provide connectivity benefits to the north east and the Highlands.

### **SPATIAL PERSPECTIVES (Paras. 247 – 295)**

Paras. 264 – 269 refer to the opportunities which exist to develop knowledge-based economy links in the East Coast corridor, between Aberdeen – Newcastle. Reference is made to the Forth Crossing as being a vital strategic link in this context, which is supported. However, as identified elsewhere in this submission, enhancements to the strategic road and rail networks north of the Forth and Tay estuaries are also needed to support the economic potential which exists in Dundee (as per Para. 266) and other areas of the East Coast corridor, as implied by the reference to potential investment in reducing road and rail journey times along the corridor through STPR.

Para. 267 reinforces the role of Perth and Stirling as key strategic locations on Scotland's transport network, reinforcing earlier points regarding the need for inclusion of Stirling as a "strategic node" in STPR, and the related need to improve Trunk Road, "gateway" interchanges, and internal urban networks in both of these locations.

Reference is made in Para. 267 to the scope for developing links between Dundee – Perth and it is suggested that this should be extended to include developing Dundee – Perth – Stirling as a key communication corridor/axis within the East Coast corridor.

Reference is made in Para 268 to the importance of Montrose Port in supporting the oil and agricultural businesses, reinforcing earlier comments regarding the national importance of improving road and rail links to Montrose. Similar opportunities exist in relation to Dundee Port and Perth Harbour.

**MAKING IT HAPPEN (paras. 297 – 301)**

Para. 297 confirms that the finalised version of the NPF2 will contain an Action Programme, setting out how, when and by whom the strategy will be implemented. As indicated previously, it is considered that there should be further consultation with RTPs and others on the transport elements of the Action Plan, once the outputs from STPR are made available, and as implied in Para 298.

In relation to Development Plan Preparation, Para. 300 appears to imply a lower priority being given to taking forward discussions with the Dundee City Region SDPA, than the equivalent bodies in the Edinburgh and Aberdeen City Regions. Given that all 3 SDPA's will be in place at the time NPF2 comes into effect, it is important that equal emphasis is given within NPF2 to the strategic needs and priorities identified in each SDPA.

In terms of delivery, there is concern that the current trend of classifying priorities as "national" and "local" could result in a priority and funding gap, in terms of resources for regional priorities, which do not make it into the final NPF2 or STPR. This could include significant projects which individual Councils or partnerships are unable to resource. Whilst it is recognised that NPF2 and STPR will focus on the key national projects, there are likely to be many regional projects which contribute to achievement of Government's objectives, the funding for which is not clear. In taking forward consideration of the related resource requirements of NPF2 and STPR, Government is encouraged to give consideration to how projects of a regional nature, which contribute to national objectives, might be funded/resourced.

I hope that the above comments are of assistance in developing the finalised NPF2. As indicated above TACTRAN believes that there should be further consultation with RTPs and others during the autumn of 2008 on the relationships between the NPF2 and the outcomes of the ongoing STPR, and looks forward to engaging with Scottish Government on this.

If you require any further information or clarification of any of the points raised in this submission please contact myself or Michael Cairns (Tel. 01738 475774).

Yours faithfully,

Eric Guthrie  
Director

**RESPONSE TO CONSULTATION QUESTIONS – SCOTTISH CLIMATE CHANGE BILL**

I refer to the above consultation and submit the following response on behalf of the Tayside and Central Scotland Transport Partnership.

**Question 1: Should a Scottish target be based on carbon dioxide only or the basket of six greenhouse gases?**

Tactran believes that the Scottish target should be based on the basket of greenhouse gases, this would reflect the fact that complementary action can be taken in addressing the smaller quantities of the other greenhouse gases in line with reductions in CO<sub>2</sub>. In transport terms, for example, it is noted that cars with catalytic converters generate nitrous oxide; also nitrous oxide is sold for performance enhancement in high performance engines. Although the quantities produced are small the GWP as noted on page 14 is 310 times greater than CO<sub>2</sub>.

On a matter of general principle, targets need to be based upon robust evidence which supports credibility and deliverability. If the ambitious targets set out in the consultation paper are to be achieved they will need to be supported by statutory incentives and, where appropriate and properly resourced, duties. These will need to apply to both the public and private sectors, to encourage effective contribution towards their achievement, within the context of a national policy, with the resource implications for the public sector reflected in Government funding.

**Question 2: Should the Bill contain provisions to alter which gases are included, for example if the reliability of data for a particular gas improves or if science changes in the future about which gases cause climate change?**

This is essential to ensure that effective action is taken in addressing climate change though future changes should be subject to consultation at the appropriate time.

**Question 3: The Scottish Government wishes to ensure that the Bill gives sufficient incentives to invest in energy efficiency and renewable electricity. Should the targets be based on source emissions; an end-user inventory; or on individual targets for energy efficiency and renewable electricity? Do you have any other suggestions?**

Tactran has no view on this matter.

**Question 4: Do you agree that the Bill should allow the means of measuring the target to be changed through secondary legislation to reflect international developments or unforeseen consequences of the Bill?**

This is essential to ensure that effective action is taken in addressing climate change though future changes should be subject to consultation at the appropriate time.

**Question 5: Should the emissions reduction target take account of the abatement effort made by companies under emissions trading schemes? If so, how?**

Tactran has no view on this matter.

**Question 6: Do you agree that international credits should be counted towards Scottish targets? Should there be limits on credits counted towards Scottish targets?**

Tactran has no view on this matter.

**Question 7: Should the Bill allow the level of the 2050 target to be changed through secondary legislation? If so, should this only be allowed on the basis**

**of independent, expert advice, to reflect international developments or unforeseen consequences of the Bill? Should any changes to the target be limited to an increase in the target?**

There should be flexibility to allow for future changes. Future changes should be subject to consultation at the appropriate time.

**Question 8: What factors should be taken into account when setting the level of emissions budgets?**

Tactran has no view on this matter.

**Question 9: How long should interim budget periods be?**

Tactran has no view on this matter.

**Question 10: How many years in advance should emissions budget periods be set in order to provide sufficient time to develop infrastructure?**

This should be tied into other Government plans and reviews, for example STPR and NPF. It would enable a time scale for provision of infrastructure to be determined. Similarly the programme for schemes to be progressed through STPR, etc should be considered in the light of emissions budget periods.

**Question 11: What should be the limit (in terms of absolute quantity or as a percentage of the budget period) on the amount of emissions which the Government can borrow from a following budget period?**

Tactran has no view on this matter.

**Question 12: Should the Bill include an interim point target? If so, what year (or years) should it be for (2020, 2025, 2030, etc.)? How should the level be chosen?**

Interim targets should correspond with target dates for other Government plans and reviews and public body strategies, including the RTS. It is proposed therefore that an interim target should be established for 2021, the long term target date for the RTS. Subsequent target dates for the RTS should tie in with the climate change target years.

**Question 13: Should the Scottish Ministers be required to report on any other issues related to climate change in addition to the requirements already set out. If so, what and how often?**

It is believed that reports should be made on transport related issues in connection with implementation of the National Transport Strategy.

**Question 14: Is a process of Parliamentary scrutiny the appropriate way of holding the Scottish Government to account if targets or budgets are not met?**

Parliamentary scrutiny is considered to be appropriate as it relates to a piece of legislation. Clearly this would be undertaken in addition to the Government's own monitoring of progress.

**Question 15: What should be the primary source of advice to the Scottish Government for setting emissions targets or budgets and why? Options include: the proposed UK Committee on Climate Change, a new Scottish Committee on Climate Change, an existing public body in Scotland, or the Scottish Government itself.**

As the Bill is concerned with Scotland a Scottish Committee drawing on sufficient expertise in climate change issues would be most appropriate. However, linkages would still be needed to the proposed UK Committee reflecting the global nature of climate change.

**Question 16: If it were to be an existing Scottish public body, which public body is most suited to carrying out this task and why?**

See answer to Question 15.

**Question 17: Which organisation should be tasked with monitoring the progress of the Scottish Government on reducing emissions and why? Options include: the proposed UK Committee on Climate Change, a new Scottish Committee on Climate Change, an existing public body in Scotland, or the Scottish Government itself.**

As expertise in climate change issues will be key then the body should be the same as in Question 15,

**Question 18: If it were to be an existing Scottish public body, which public body is most suited to carrying out this task and why?**

See answer to Question 15.

**Question 19: Should additional independent mechanisms for scrutinising the effectiveness of the Scottish Government's policies in reducing emissions be created by the Bill (in addition to any scrutiny already provided by the Scottish Parliament)?**

See answer to Question 14.

**Question 20: If so, which organisation is best placed to carry out this function and why? Options include a new Scottish Committee on Climate Change or an existing public body in Scotland.**

See answer to Question 14.

**Question 21: If it were to be an existing Scottish public body, which public body is most suited to carrying out this task and why?**

See answer to Question 14.

**Question 22: Are there any other functions related to climate change, existing or new, which should be carried out at arm's length from the Scottish Government and why?**

Tactran has no view on this matter.

**Question 23: Should the Bill contain enabling powers to introduce a duty on certain parts of the public sector (i.e. local authorities and large public bodies) to take specified actions on climate change or other specified environmental issues? Why?**

Tactran has no objection to enabling powers being included in the Bill so long as resources are made available by Government to support specific actions. As indicated in answer to Question 1 above, it is essential that statutory obligations apply to both the public and private sectors. The setting of targets should be accompanied by realistic and tangible incentives to achieve these, recognising that penalties may be needed to address organisational failure to contribute meaningfully and effectively towards achievement of targets. The resource implications and requirements of statutory obligations and targets will need to be properly recognised within future funding allocations of Government funding to the public sector, to ensure that positive progress can be properly resourced.

**Question 24: What should such a duty (or duties) include?**

Specific actions on climate change and other environmental issues should be introduced as part of the role of RTPs and RTSs. See also answer to Question 23 above, regarding application of duties to both the public and private sectors and the

need to recognise the resource implications within Government funding to the public sector.

**Question 25: Should the Bill contain enabling powers to introduce statutory guidance for certain public sector bodies (i.e. local authorities and large public bodies) on specified climate change or other environmental measures? Why? Are there gaps in any existing guidance?**

The Bill should contain such powers though their future consideration should be subject to consultation at the appropriate time. See also answer to Question 23 above, regarding application to both the public and private sectors and the need to recognise the resource implications within Government funding to the public sector.

**Question 26: What should this guidance include?**

Any guidance should form part of the consultation suggested in Question 25.

**Question 27: Should the Bill contain enabling powers to create a requirement for certain public sector bodies (i.e. local authorities and large public bodies) to make regular reports on specific measures they are taking to tackle climate change (whether mitigation or adaptation) or other environmental issues? Why? What should be included in such reports?**

The Bill should contain enabling powers, for example, for RTPs to report on climate change related measures. However these should be subject to detailed consultation.

**Question 28: As a potential non-legislative measure, should current Best Value guidance be amended to take specific account of climate change mitigation and adaptation? If so, how should Best Value guidance be amended?**

The guidance should be amended to ensure that climate change is considered as part of Best Value considerations. However it must be recognised that this will require the commitment of additional resources.

**Question 29: Are there any amendments to existing legislation or any enabling powers needed to allow for variable charging (for example by local authorities) to incentivise action or eliminate perverse incentives?**

It may be appropriate to include enabling powers, subject to further consultation.

**Question 30: Are there any provisions to help Scotland adapt to the impacts of climate change which should be included in the Scottish Climate Change Bill?**

Tactran has no view on this matter.

**Question 31: Should provisions within the Environmental Assessment (Scotland) Act 2005, be amended in order to provide clearer links with emissions reduction? If so, how should this be done?**

Tactran has no view on this matter.

**Question 32: What are the equalities implications of the measures in the proposals for the Scottish Climate Change Bill?**

This is considered to be a matter for Government to determine.

**Question 33: Is there any existing legislation within the competence of the Scottish Parliament (devolved) which needs to be amended so that appropriate action on climate change can be taken by sectors in society?**

This is considered to be a matter for Government to determine.

I hope that the above comments are of assistance and will be able to be taken on board in finalising the Bill.

## PROPOSED RESPONSE TO CONSULTATION ON SCOTTISH ROAD SAFETY STRATEGY

Ian C Robertson  
Bus, Freight and Roads Division  
Area 2-F  
Scottish Government  
Victoria Quay  
Edinburgh  
EH66 6QQ

Dear Mr Robertson,

### CONSULTATION ON SCOTTISH ROAD SAFETY STRATEGY

I refer to the above consultation and submit the following response on behalf of the Tayside and Central Scotland Transport Partnership.

TACTRAN is a currently “model one” RTP. As such, transport authority responsibility for road safety planning, policy and delivery, and associated accident investigation, rests with our constituent partner Councils. Whilst improving transport safety for users of all modes is a key objective of the TACTRAN Regional Transport Strategy, detailed comment on issues raised in the consultation, particularly in relation to delivery and resourcing of priorities, will be submitted by Councils.

The following general comments on two of the key themes identified in the consultation are offered:-

#### Theme 1 – Priorities

The key categories identified as giving most concern from the point of view of road accident statistics, particularly young drivers; drivers on rural roads; and motorcyclists, are supported as requiring special attention in the proposed national strategy.

Continuing concerns over the incidence of deaths and serious injury caused by drink driving and, increasingly, through drug related incidents, points towards the need for more novel and creative approaches to road safety education in these areas.

Whilst seeking to reduce death and injury caused by road accidents must remain a key focus, the national strategy should also address real and perceived safety issues which often act barriers to modal shift in favour of more sustainable modes, such as walking, cycling and public transport, in support of other national objectives.

#### Theme 3 – Delivering More Effectively

Councils, RTPs, Police, Fire and Rescue and Health agencies should be encouraged to work collaboratively on regional approaches to accident analysis, road safety strategies, and monitoring. This has the potential to offer economies of scale, in terms of both strategy development and use of related resources. RTP boundaries coincide largely, though not exclusively, with the boundaries of Police forces, Health Boards and Fire and Rescue authority areas.

I trust that the above comments are of assistance.

Yours sincerely,

Eric Guthrie  
Director