

# Scottish Executive Draft Guidance on Regional Transport Strategies NESTRANS' Consultation Response

#### Introduction

NESTRANS, the voluntary regional transport partnership for north east Scotland, welcomes the opportunity to comment on the draft guidance on Regional Transport Strategies (RTS). Regional Transport Strategies will be landmark documents for the new Regional Transport Partnerships – but will also be developed through a process which needs to combine vision, realism, consultation, environmental assessment and coherence with other strategy processes. The role of the Scottish Executive guidance is therefore very important in providing a framework for that work and communicating key issues which the strategies will need to address. The statutory nature of RTS and the requirement for Ministerial approval also means the guidance plays an important role in setting out what the Scottish Ministers require strategies to contain and the process they need to follow. The commitment in paragraph 41 to an assurance process, enabling feedback to be provided to RTPs during the process, is welcomed. In general NESTRANS regards the guidance as a comprehensive and useful document, but provides specific comments on how it could be revised or strengthened grouped under the topics below.

#### **Time Horizon**

Paragraph 26 sets out the proposed time horizon for Regional Transport Strategies and their subsidiary plans. NESTRANS thinks it is important that the horizon of the strategy ties in with a meaningful date, such as the horizon for the National Transport Strategy or for other strategies or modelling exercises, which the RTS relates to. It may be desirable for all RTPs to work to a common time horizon.

NESTRANS would suggest a horizon of 2021, essentially a fifteen year period from 2006.

The guidance suggests that the RTS be "reviewed, revised and refreshed every 4 years in line with the local government electoral cycle". Further explanation of the intention here would be welcomed.

## Inputs

Paragraphs 29 to 39 discuss key inputs to the RTS process. However an important omission are the current transport strategies developed by the four voluntary RTPs. These will be an important starting point and will include projects and currently being developed or delivered.

Paragraph 35 makes a fleeting reference to Local Transport Strategies (LTS), however in reality the LTSs, currently being produced by local authorities, will be important inputs to the RTS process – both in terms of the underlying data collection and analysis work undertaken by councils as well as the strategy documents, once completed. More detail on the relationship with Local Transport Strategies would be helpful. In addition, specific guidance is perhaps required on the linkage between RTS and LTS in single-authority RTP areas.

Similarly, in paragraph 36 it would be useful for the guidance to contain more detail on relationship with the National Transport Strategy, currently under development, and its input to RTS.

This section contains a fair amount of discussion on the linkage with land-use planning, however it should recognise that the new system of local and city-region development plans will not be introduced prior to the development of RTS and therefore RTPs will be referring to the existing framework of Structure and Local Plans.

#### **Appraising the Options**

Paragraphs 61 to 63 concern option appraisal and the linkage with STAG. This is a very important aspect of the strategy development process and one which requires further discussion in the guidance.

It would be useful for the guidance to provide a steer on the level of detailed work required to be undertaken for option appraisal in the context of STAG. The guidance on local transport strategies (published in February 2005) discusses the link with STAG in some detail and it would be useful for the guidance on RTS to elaborate further on this point. For RTPs there is clearly a balance between conducting extensive appraisal work on particular options, or packages of options, and completing the strategy within the timescale set out in Annex G.

The guidance also provides relatively little detail on the role of Strategic Environmental Assessment (SEA). This is a new area of work and further guidance would be useful on how to integrate SEA into the strategy process. In particular, the guidance might wish to emphasise the principles of proportionality and relevance in conducting an SEA, which were highlighted at the RTS seminar on 22 November. The draft guidance refers to STAG being updated to reflect SEA, however we are not aware that this has happened yet.

#### **Prioritisation**

Prioritisation of transport projects within a package of measures is covered in paragraphs 64 to 66. The ability to prioritise projects effectively will in part depend on the level and quality of information arising from appraisal of these projects. It would be useful for the guidance to provide some further indication of what the Scottish Executive is expecting in terms of the detail required to inform prioritisation.

#### Annex G - Model Timetable

The model timetable helpfully sets out how a strategy could be produced within the statutory timescale. However it is noted that this timescale will still present challenges for RTPs, particularly as they will be in their first year of operation.

### Annex J - Detail on meeting the provisions of the Transport (Scotland) 2005 Act

#### Section 5, 2d

# vi) To facilitate access to hospitals, clinics, surgeries and other places where a health service is provided

While NESTRANS appreciates the significance attached by the Scottish Executive and Parliament to developing linkages between transport and health, we suggest that this section of the guidance be revised. The guidance states:

"It will be important for RTPs ...to ensure that transport provision is planned and developed alongside healthcare provision"

However, this does not appear to recognise that RTPs' remit to do so is limited, particularly for Model 1 partnerships. It is also up to NHS Boards to engage with RTPs and local

authorities regarding transport provision and it would be better if the guidance reflected this shared responsibility.

The guidance goes on to say:

"We expect Health Boards to be represented on all regional transport partnerships or if not for other arrangements to be put in place...."

This suggests that Health Boards must be represented on RTPs, implying that those which are not will be the exception to the rule. Is this the policy intention? It seems overly prescriptive and does not accord with the Guidance on Membership of Regional Transport Partnerships, which lists NHS Boards as one of a number of organisations that may be represented. It should be recognised that there may be equally effective alternative means of meeting the requirement of the legislation.

#### **Targets**

The guidance makes no mention of any nationally-set targets which the RTPs would be expected to work towards, specifically stemming from the Road Traffic Reduction Act 1997. The guidance should provide further information on what is likely to be required of RTPs under the terms of this legislation. Furthermore, it is hoped that if any targets are set for RTPs at a later date (following the publication of the National Transport Strategy for instance) that RTPs would be fully consulted.

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