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## General - 6b Publications and Consultations

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- Purpose of Report

The purpose of this report is to inform members of recent publications and consultation papers of interest and to agree a response where appropriate.

- High Speed Rail

### HS2

HS2, working on behalf of Department for Transport and Transport Scotland, has published its findings on future development of High Speed Rail, entitled “[Broad options for upgraded and high speed railways to the North of England and Scotland](#)”. The findings have only been developed to an early stage of feasibility assessment and do not set out a preferred option or route.

The Department for Transport (DfT) commissioned High Speed Two (HS2) Ltd to undertake a feasibility study to explore broad options for improving rail capacity and journey times to the North of England and Scotland. The study investigated the feasibility of delivering journey times of 3 hours or less between London and Central Scotland, by looking in to upgrade options to the existing West Coast Main Line (WCML) and East Coast Main Line (ECML), and options for high speed routes extending from HS2 Phase Two.

A copy of the study is available from the DfT website at:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/506022/NES\\_Report.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/506022/NES_Report.pdf)

Currently the typical journey time between London and Glasgow is 4 hours 31 minutes, and between London and Edinburgh 4 hours 23 minutes. HS2 will significantly improve connections from London to Edinburgh and Glasgow. Following the completion of the first Phase of High Speed Rail in 2026, Glasgow will benefit from a reduction in journey times to London to 3 hours 56 minutes.

In November 2015, it was announced that delivery of the route between the West Midlands and Crewe would be completed by 2027. This will spread the expected benefits to the North West of England and Scotland sooner by delivering a London- Glasgow journey time of 3 hours 43 minutes. Services on the full Phase Two route will commence by the end of 2033, with journey times between London and Edinburgh reduced to 3 hours 39 minutes, and London to Glasgow further reduced to 3 hours 38 minutes.

The current study looks into broad options for reducing journey times and improving rail capacity to the North of England and Scotland further. Upgrading the existing network on the west, either through an extensive package of interventions using new high speed sections or a new route, could deliver comparable journey time improvements from London to both Edinburgh and Glasgow, including 3-hour journeys between both cities and London. Upgrades would cost less than a new line and would allow benefits to be delivered in stages, but would not bring the same capacity benefits nor provide the resilience of a new line. On

the east, only a full high speed route could deliver such a journey time saving to both Edinburgh and Glasgow.

## **High Speed Scotland**

Also on 21 March 2016, Transport Scotland published their findings into High Speed Rail in Scotland – the appraisal of a high speed rail connection between Edinburgh and Glasgow.

A copy of the Summary Report into the appraisal is available from the Transport Scotland website at:

<http://www.transport.gov.scot/system/files/RAIL%20-%20High%20Speed%20Rail%20Scotland%20-%20Summary%20Report%20-%20Web%20Version%20March%202016.pdf>

The original appraisal of a high speed rail connection between Glasgow and Edinburgh was presented to ministers in May 2014, but at that time there was no certainty that the HS2 would be extended into Scotland nor an identification of potential routes for it to do so, it was therefore not possible at that time to reach a conclusion on options for Edinburgh-Glasgow links.

Recent appraisal has found that if high speed rail into Scotland is implemented on a western alignment, a small piece of link infrastructure could also enable Edinburgh-Glasgow services and this was the best performing high speed rail option. However, the appraisal identified that whilst there could be a business case for an advance build of these high speed routes between Glasgow and Edinburgh, as part of a wider high speed rail network, they would be unlikely to offer good value for money as a free standing scheme. A direct Glasgow to Edinburgh high speed rail link was only likely to be effective if considered as an add-on to a cross-border route extending to Glasgow and Edinburgh.

With the publication of HS2 Ltd's report 'Broad options for upgraded and high speed railways to the North of England and Scotland' study, the possibility of constructing a high speed Glasgow to Edinburgh link as an "advanced build" of part of a cross-border high speed network is again being considered. However, since the HS2 report does not set out a preferred option or cross-border route and the options identified have only been developed to an early stage for future feasibility assessment, this might be premature.

Transport Scotland believe that if high speed rail were to be extended to Scotland on a west coast alignment, then there is a business case for adding the small additional piece of infrastructure required to provide a high speed link between Glasgow and Edinburgh. The Broad options study has not altered the conclusion of Transport Scotland's appraisal that the benefits of a high speed rail route between Glasgow and Edinburgh are not considered to be sufficient in themselves to cover the very high cost of building a high speed link between Glasgow and Edinburgh as a free standing scheme. This is illustrated by Table 4.10 in the report, which provides estimated costs and benefits of various scenarios.

Only Scenario D1 at a capital cost of £2.4billion, provides a Benefit:Cost Ratio of more than 1 (at 1.14) and then only once Wider Economic Benefits are included. This can be compared to a BCR of 1.79 for Edinburgh-Glasgow Rail Improvement Phase 2 for a cost of just under £0.5billion.

**Table 4.10 - Economic performance of high speed rail Package (£ million)**

Heading	Scenario						
	HS2 not extended into Scotland Scenarios		Advanced Build of an HS2 extension into Scotland Scenarios			Integral Part of HS2 extension into Scotland Scenarios	
	A HS2Phase 1&2 only	B No HS2	C1 HS2 extends to Scotland via west coast	C2 HS2 extended into Scotland via east coast	C3 HS2 extended into Scotland via east coast, No Carstairs Link	D1 HS2 extended into Scotland via west coast	D2 HS2 extended into Scotland via east coast
<b>Transport Economic Efficiency</b>							
Present Value of Benefits £	2,619	2,468	2,397	636	593	2,142	210
Present Value of Costs £	(9,916)	(10,267)	(4,058)	(5,289)	(1,550)	(2,336)	(3,568)
Net Present Value (NPV) £	(7,297)	(7,800)	(1,661)	(4,654)	(957)	(194)	(3,357)
Benefit to Cost Ratio (BCR)	0.26	0.24	0.59	0.12	0.38	0.92	0.06
<b>Wider Economic Benefits (WEBs)</b>							
Present Value of WEBs £	909	819	664	266	214	532	136
NPV (with WEBs) £	(6,388)	(6,981)	(997)	(4,388)	(743)	338	(3,221)
BCR (with WEBs)	0.36	0.32	0.75	0.17	0.52	1.14	0.10

Note: negative values in brackets

- The Future Shape and Financing of Network Rail (The Shaw Report)

The Department for Transport has published a report into the ways in which the rail industry can better deliver for customers, publishing the findings of a report by Nicola Shaw, chief executive of HS1. A copy of the report is available from the DfT website at:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/510179/shaw-report-the-future-shape-and-financing-of-network-rail.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/510179/shaw-report-the-future-shape-and-financing-of-network-rail.pdf)

The report advises against the wholesale privatisation and breakup of Network Rail, arguing for more devolution in the running of the railways rather than full-scale reform. However, it also leaves open the possibility of bringing more private finance into the running of the railways, at local level or for specific projects.

The report indicates that there should be a greater focus on the “needs of the customer” – train operators and passengers – with the railways currently lacking the “local flexibility and autonomy” required. This could be done by further changes to the flow of funding, with train firms paying for devolved routes to use the tracks, and having a bigger say in how the railways are run.

- Delivering the Goods: Scotland's Rail Freight Strategy

On Tuesday 22 March 2016, Transport Minister, Derek Mackay launched the Scottish Government's new rail freight strategy for Scotland at an event at Aberdeen Craiginchies Freight Terminal.

The document, 'Delivering the Goods' outlines a new vision for a competitive and sustainable rail freight sector that will meet the demands of modern markets, provide a boost to the industry and support economic and environmental targets. The strategy supports the rail freight sector to tap into new and growing markets through four key levers of:

- innovation,
- facilitation,
- promotion, and
- investment.

It has a range of actions to inform its delivery and critical success factors against which progress can be tracked and measured. The strategy follows a consultation process that sought the views of the rail freight industry, businesses, trade unions and other stakeholders including Regional Transport Partnerships.

Tarmac's depot at Aberdeen Craiginchies rail freight terminal will be used to transport concrete from Dunbar to Aberdeen for use in the construction of the Aberdeen Western Peripheral Route.

The rail freight strategy can be found at: [www.transport.gov.scot/rail/rail-freight](http://www.transport.gov.scot/rail/rail-freight)

- Air Passenger Duty

### **Background**

On 14 March 2016, the Scottish Government announced a consultation on a Scottish replacement to Air Passenger Duty. This can be found at:

<https://consult.scotland.gov.uk/fiscal-responsibility/air-passenger-duty>

Closing date for representations is 3 June 2016. Alongside this consultation is a consultation on a Strategic Environmental Assessment Screening and Scoping Report. This is found at the same web address.

An extract from the Ministerial Foreword to the consultation provides a background to the consultation. It says:

*"In the modern global economy international connectivity is vital to economic growth and plays an important role in facilitating trade, tourism and investment. Scotland is already an attractive destination for business and inbound tourism, and remains the most successful part of the UK outside London in attracting foreign direct investment. It is important for the Scottish economy and her people that we continue to open Scotland up to key and emerging markets in order to further capitalise on the opportunities that exist.*

*One way in which we will achieve this is by using the expected devolution of Air Passenger Duty (APD) to the Scottish Parliament to put in place new arrangements which better support our objective, as set out in Scotland's Economic Strategy<sup>1</sup>, to boost Scotland's international air connectivity and generate new direct routes to strategically important destinations.*

*UK APD is one of the most expensive taxes of its kind in the world. It continues to act as a barrier to Scotland's ability to secure new direct international routes and maintain existing ones. Our plan to begin reducing a Scottish replacement by 50% from April 2018, implement that reduction in full by the end of the next Scottish Parliament and then abolish it entirely when public finances allow is a fundamental component to improving Scotland's international air connectivity.*

*This consultation paper seeks your views and suggestions on how a Scottish replacement to APD should be structured and operate, in accordance with the Scottish approach to taxation, in order to help achieve our international connectivity objective.*

*In recognition of the important environmental issues that need to be considered we have also published a Strategic Environmental Assessment Screening and Scoping Report. This provides an early opportunity to seek views on the likely environmental issues that may arise and the approach to the proposed assessment of these. An Environmental Report setting out the results of this assessment, including mitigation, will subsequently be available for further consultation."*

From this and from further discussion within the consultation document there are two points that seem to arise. First, this appears to be a consultation how the replacement tax should be structured and operated within the context of reducing APD by 50% rather than whether the tax should be reduced. Secondly, there is an emphasis on boosting Scotland's international connectivity and generating new routes to strategically important destinations.

Given the inaccessibility of Edinburgh and particularly Glasgow Airports for passengers whose "home" airport is Aberdeen or Inverness the view of what constitutes good international connectivity from the north is somewhat different to that from the central belt. Direct international connections from the central belt are welcome for that region and given the size of population and runway lengths, supportable by that population. However for Aberdeen and Inverness this means access to the UK and international hubs. This point is not strong enough in the consultation.

Further, the discussion on international travel is fine but there is no discussion on UK domestic travel. Due to geography and distances involved this domestic travel is more important for the north than for the central belt. This is discussed later in this paper.

### **Consultation questions**

The consultation document is set out in a series of chapters with associated consultation questions. The first few chapters are related to the introduction, strategic and policy objectives, the scope and structure of the duty and exemptions. Later chapters are more related to the fiscal nature of tax and tax collection. This paper therefore concentrates on the early chapters of the consultation.

## Introduction

The introduction notes that the Government are influenced by the Adam Smith four principles for taxation of certainty, convenience, efficiency and proportionate to the ability to pay. They also note their consultation to date through the establishment of a Scottish APD stakeholder forum. Membership of the forum is given at Annex D of the document.

## Improving Scotland's Air Connectivity – Strategic and Policy Objectives

Para 2.6 says:

*“The Scottish Government has set an ambitious but pragmatic approach to growing Scotland’s international air connectivity. Our objective is to enhance Scotland’s connections to new point-to-point destinations as well as enhancing services to key global hubs. This dual approach recognises that Scotland needs a strong mix of direct services combined with access to world hubs which open up a vast range of secondary destinations where a direct service with Scotland may not be sustainable. There are three key areas in which we can take action to achieve this objective.”*

The recognition of the need for direct and through hub services in this paragraph is welcome. However the paragraph and indeed the whole document seems to concentrate on international connections. The Scottish Government are striving to extend high speed rail to central Scotland to have a journey time between there and London of under three hours. This is perceived as the target to reach to maximise the change from air travel to surface travel. It should be recognised that this same time factor exists for passengers in the north of Scotland and that travel between the north and most parts of England is more than this 3 hour threshold. Therefore the further north you are the more important UK domestic air travel will be. This should be recognised.

The next three paragraphs cover the three key areas and perhaps require some comment from the Board. These are:

Para 2.7 says:

*“Firstly, we need to continue to be alive to the constant and fast pace of change in the aviation industry. The evolution of the Middle-East market is changing how the global industry operates and the emerging economies of China and India have yet to fully mobilise in response. The long-haul opportunities westwards are also a fluid picture. Evolving aircraft technologies mean that very little remains off-limits for direct air connectivity from Scotland in distance terms. The cost of long-haul travel is also likely to become increasingly subject to downward pressure from the emergence of a low-cost long-haul model. Change is happening in short-haul markets too, with traditional low-cost carriers increasingly seeing the benefits of mixed business models with movement toward primary airports.”*

The comment “very little remains off-limits for direct air connectivity from Scotland in distance terms.” Is applicable to the central belt airports but does not apply to Aberdeen or Inverness (as discussed above). The term “from Scotland” gives the impression that the whole of Scotland is covered by this statement. The geography of the country and distances involved in travel within the country could be better reflected in this statement.

Para 2.8 says:

*“Secondly, we will continue working with Scotland’s airports fairly and equitably to ensure that the new competitive spirit amongst the airports is maximised and focussed for the benefit of the airports and for Scotland. We believe that there are exciting new opportunities which would be of strategic benefit to Scotland and we are committed to working with Scottish airports in order to achieve our shared objective of boosting Scotland’s international air connectivity. As with our current approach to route development, the decision about which Scottish airport to fly to remains one for the airline and we will not seek to influence that.”*

This paragraph seems fair enough when considering an Edinburgh or Glasgow situation. It is not however applicable to all our airports. In the Competition Commissions review of Aberdeen Airport a few years ago it highlighted that Aberdeen Airport wasn’t competing with any other airport (due to the distances between airports) and stated that the airport was operating in a monopoly situation. It produced remedy rules for the airport to operate under. This paragraph therefore seems to suit only one part of the country. It is as important for the north passengers (albeit fewer of them) to have good international access as it is for the central belt passengers and this could be recognised in this paragraph.

Para 2.9 says:

*“Thirdly, we need to make the financial conditions right for airlines to come to Scotland. We will strive collectively to put the best offers on the table for airlines and seek to influence their business planning decisions by demonstrating our long-term commitment to growing Scotland’s international air connectivity. The devolution of APD to the Scottish Parliament is a significant step forward in this area, but more needs to be done to give Scotland a competitive edge on the global stage.”*

Again the “commitment to growing Scotland’s international air connectivity” misses the important issue of UK domestic connectivity which is more important the further north your starting point is located.

## **QUESTIONS 1 AND 2 – IMPROVING SCOTLAND’S AIR CONNECTIVITY**

**Q1:**

*(a) Do you agree with our strategic and policy objectives for improving Scotland’s air connectivity? Please answer yes or no.*

*(b) Please explain your answer to Q1(a).*

**Q2:** *How could a Scottish replacement to APD help achieve these objectives?*

Recommendation:

It is suggested that the Director formulates a response to be agreed by the Chair based on comments above, if agreed, and Board comments.

## Scope and Structure of Duty

This section discusses how APD is currently applied (chargeable passenger with exemptions being carried by a chargeable aircraft), to whom (the airline) and alternatives (per plane). It notes that the Scottish Government won't have the power to charge for freight. It notes the advice from the stakeholder group that a similar tax to that applied by the UK Government was the preferable option.

### **QUESTIONS 3 AND 4 – SCOPE OF APD**

#### **Q3:**

*(a) Taking into account the scope of the powers proposed to be devolved to the Scottish Parliament, should the UK APD definitions of “chargeable passenger” and “chargeable aircraft” be retained under a Scottish replacement tax? Please answer yes or no.*

*(b) If you answered no to Q3(a), please explain your answer.*

#### **Q4:**

*(a) Do you think that the current UK APD per-passenger charging model should be retained under a Scottish replacement tax? Please answer yes or no.*

*(b) If you answered no to Q4(a), please explain your answer. Subject to compliance with State Aid rules and current aviation agreements, what alternative charging model(s) should be considered?*

Recommendation:

Given the principles of taxation listed above and the stakeholders recommendation it would seem reasonable to answer yes to these questions but the Boards view is sought. It is suggested that the Director formulates a response to be agreed by the Chair based on the Boards comments.

On tax banding the consultation document says:

*Under UK APD, destinations are split into different bands based on the distance of the destination country's capital city from London. The exception is the Russian Federation, which is split east and west of the Urals.*

3.9 *Since 1 April 2015 a two band structure has operated:*

- Band A destinations - countries whose capital city is 2,000 miles or less from London (see [Annex A](#) for all Band A destinations) – this includes Europe and most of Northern African, but not Egypt or the Republic of the Sudan; and*
- Band B destinations - countries whose capital city is more than 2,000 miles from London.*

3.10 *Destination based alternatives to the current UK APD model for a Scottish replacement tax could involve:*

- *banding based on the distance between the departure and destination airports, with tax amounts being progressively higher the further the distance and more in proportion to the distance travelled;*
  - *banding based on a geographical or „bloc“/“federation“ basis, for example a lower charge band for all flights where the destination is within the UK, European Union, European Economic Area, European Free Trade Association or European Common Aviation Area, and one or more higher charge bands for flights to all other destinations; or*
  - *having a similar banding system as UK APD, but based on the distance of the destination country’s capital city from Edinburgh instead of London, and a possible modification to the 2,000 miles threshold to take into account this change.*
- 3.11 *The majority of our stakeholder forum members expressed a preference for a Scottish tax having the same two-band capital city model as UK APD, on the basis that it is relatively transparent and simple to understand and enables efficient administration of the tax.*
- 3.12 *We would welcome your views on what banding model (destination based or non-destination based) you think is most appropriate for a Scottish replacement tax.*

#### **QUESTION 5 – TAX BANDS**

**Q5:**

**(a):** *Do you think that the current UK APD destination based banding system should be retained under a Scottish replacement tax? Please answer yes or no.*

**(b):**

- *If you answered yes to Q5(a), should destination bands be defined by distance to capital cities or what alternative measures could be considered? What would be the optimum number and definition of bands to support the achievement of the Scottish Government’s strategic objectives for a Scottish replacement tax, as outlined in Chapter 2?*

- *If you answered no to Q5(a), please explain your answer. What system do you think should be used instead?*

In considering a response to this question the Board may wish to give consideration to an alteration to the criteria applied to Band A. The purpose of this amendment would be to reduce the impact of distance and geography with its resulting peripherality in a similar way to the intention behind the current Scottish Highlands and Islands exemption.

Originally the APD tax was introduced as an environmental tax. Over time the rate of tax applied has resulted in significant returns to the Treasury which it could be argued have reduced the impact of the environmental nature of the original intention. It may be possible to reinforce the environmental element of the tax by reintroducing an element for short distances where a journey time of under a specified time was encouraged by the system to use surface transport rather than flying.

Earlier discussion on surface travel highlighted a 3 hour threshold at which significant numbers of passengers choose to transfer to surface travel. Such surface travel for these shorter journeys has a reduced carbon impact and therefore should be encouraged. However for journeys from Scottish airports where the notional surface travel journey time is greater than 3 hours the Board may take the view that a tax on air travel is inequitable to the passengers using this mode since passengers using surface travel do not have to pay the tax (and indeed those using the train are subsidised).

The Board may wish to consider a system where air travel between airports with a notional surface travel time of say up to 3½ hours (unless such a journey includes an over sea element\*) would be subject to APD at a band A rate. Given the small number of Scottish Airports and small number of other airports within a surface travel time of under 3½ hours this shouldn't be a difficult table to draw up. For journeys with a surface travel time of over 3½ hours and up to the Band A distance limit, APD could be exempt. Consideration could be given to splitting Band A into two Bands, leaving the 2000 mile limit for an upper limit but introducing a lower distance of say 500 miles above which the exemption would not apply.

\*This permits inter island flights and flights to islands to be exempt from the tax

By this method a few example journeys and the rates that would apply:

Start	End	Distance (As crow flies) miles	Notional surface journey time (City to City)	Band rate	Explanation
Aberdeen	Wick	96	>5 hours	Exempt	Journey time over threshold
Aberdeen	Glasgow	121	2 hours 40 mins	A	Journey time below threshold
Aberdeen	Manchester	254	6 hours	Exempt	Journey time over threshold
Glasgow	Manchester	183	3 hours 20 mins	A	Journey time under threshold
Aberdeen	Birmingham	323	7 hours	Exempt	Journey time over threshold
Glasgow	Birmingham	252	4 hours	Exempt	Journey time over threshold
Aberdeen	London	398	7 ½ hours	Exempt	Journey time over threshold
Glasgow	London	345	4 hrs 40 mins	Exempt	Journey time over threshold
Aberdeen	Amsterdam	432	> day	Exempt	Journey time over threshold
Glasgow	Amsterdam	442	> day	Exempt	Journey time over threshold
Aberdeen	Paris	602	> day	A	Over distance limit for exemption
Glasgow	Paris	559	> day	A	Over distance limit for exemption
Aberdeen	Dubai	3563	days	B	Long haul
Glasgow	Dubai	3625	days	B	Long haul

If such a system were thought viable and equitable it could replace the exemptions from UK APD currently in place for flights departing from an airport in the Scottish Highlands and Islands region with possible further consideration for flights from Campbeltown.

Recommendation:

The Board are asked to consider this issue and advise on an appropriate response. It is suggested that the Director formulates a response to be agreed by the Chair based on the Board's comments.

There then follows questions on the tax rates and on reducing the tax burden. These questions are more tax based than transport based so have not been addressed here.

### Exemptions

Chapter 4 considers the issue of exemptions from the tax.

It should be noted that the tax only applies to fixed wing aircraft therefore helicopter flights are exempt.

There are certain types of passenger where exemptions currently exist. These include rules for connecting passengers (discussed in more detail in the next chapter), children, transit passengers, persons carrying out certain duties and passengers carried under a statutory obligation. The questions relate to whether the Scottish tax should mirror the UK tax. These questions have not been addressed.

Certain flights (as opposed to passenger) exemptions also exist. These include emergency & public service flights, short pleasure flights, circumstances beyond the control of the airline and Nato flights. Again the questions relate to whether the Scottish tax should mirror the UK tax. These questions have not been addressed.

Flights departing from an airport in the Scottish Highlands and Islands region are not chargeable for UK APD. This is in recognition of the reliance on air travel by many people living in the Highlands and Islands region. The exemption is provided for by a legislative power allowing an exemption based on low regional population densities of 12.5 or fewer people per square kilometre.

The Highlands and Islands region is defined as:

- The Highland Region, Western Isles Area, Orkney Islands Area, Shetland Islands Area, Argyll and Bute District, Arran, Great Cumbrae and Little Cumbrae; and
- In the Moray district, the parishes of Aberlour, Cabrach, Dallas, Dyke, Edinkillie, Forres, Inveravon, Kinloss, Kirkmichael, Knockando, Mortlach, Rafford and Rothes

Should the Board be minded to pursue a change in the band rate as proposed above then this exemption could be considerably reduced in scope. However, if the Board is minded to propose continuing with the UK band rates then the Board may be minded to consider the scope of this exemption.

The basis for consideration of the defined area based on population gives rise to a number of anomalies. For example it is difficult to see the justification for an exemption for areas in the west of Moray including Forres and Kinloss (or indeed Nairn or Inverness in the Highland area), given their ease of access to Inverness Airport which will shortly have access to both Heathrow and Amsterdam, whilst areas in rural parts of Aberdeenshire further from Aberdeen Airport, Portsoy, Gardenstown, Whitehills, Braemar and Crathie etc are not exempted.

Perhaps a more equitable arrangement could be parishes with a surface journey time to a defined urban centre (the seven cities + some of our larger towns?) of greater than say 2 hours would be exempt from the tax.

Recommendation:

The Board are asked to consider this issue and advise on an appropriate response. It is suggested that the Director formulates a response to be agreed by the Chair based on the Boards comments.

### **QUESTIONS 11 AND 12 – SCOTTISH HIGHLANDS AND ISLANDS EXEMPTION**

**Q11:** *What are the benefits to the local economy and residents of the Scottish Highlands and Islands region from the current UK APD exemption for passengers departing from airports in the region?*

**Q12:**

**(a)** *Do you think the current exemption for outbound flights from the Highlands and Islands region should be retained or modified under a Scottish replacement tax? Please answer „retained“ or „modified“.*

**(b)** *If you answered „modified“ to Q12(a), please explain your answer. In what way should it be modified?*

#### Connected Flights

The principle applied for the collection of the tax is that the tax should be applied for the journey start point and end point regardless of the number of flights taken to reach that end point. Therefore the UK APD includes rules for connecting flights.

There are a number of rules which define a connecting flight and passengers must meet these rules to qualify for connected flight status. These are generally timing and ticketing rules. In general the rules are applied as per the table below:

<b>Type of connection</b>	<b>Case A or Case B rules</b>	<b>APD Liability</b>
<i>Domestic (UK flight) to domestic (UK flight)</i>	Case A	<i>APD is due at the relevant Band A rate for the whole journey, depending on the class of travel</i>
<i>International flight to domestic (UK flight)</i>	Case A	<i>No APD due</i>
<i>Domestic (UK flight) to international flight</i>	Case B	<i>Rate of APD due dependent on the final destination and class of</i>

		<i>travel</i>
<i>International flight to international flight</i>	<i>Case B</i>	<i>No APD due</i>

**QUESTION 13 – CONNECTED FLIGHT RULES**

**Q13:**

**(a)** *Do you think that the current UK APD rules relating to connected flights should form a baseline position for a Scottish replacement tax? Please answer yes or no.*

**(b)** *If you answered no to Q13(a), please explain your answer. What rules do you think should be considered instead?*

Should either the proposed amendment to Band A in this paper or the current exemptions for Scottish Highlands and Islands areas be taken forward then the answer to this questions is suggested should be yes.

Recommendation:

The Board are asked to consider this issue and advise on an appropriate response. It is suggested that the Director formulates a response to be agreed by the Chair based on the Boards comments.

The document goes on to say:

*It is important that, as far as possible, the connected flights rules for both UK APD and a Scottish replacement tax do not result in double taxation where that is not the policy intention. The Scottish Government will work with the UK Government to ensure that passengers travelling on connected flights from airports in both Scotland and the rest of the UK are only chargeable passengers under one of the taxes, where that is consistent with the policy intention.*

*We would be grateful for your views on what situations may result in double taxation, as well as your suggestions on how double taxation could be avoided.*

**QUESTION 14 – AVOIDING DOUBLE TAXATION**

**Q14:**

*What situations do you think could result in double taxation after a Scottish replacement to APD is introduced, and how might double taxation in such situations be avoided?*

Provided the Scottish Government is able to agree with the UK Government that the principle of one (connected) flight applies to all flights originating from Scotland, even if passing through other UK airports then this issue shouldn't apply.

Recommendation:

The Board are asked to consider this issue and advise on an appropriate response. It is suggested that the Director formulates a response to be agreed by the Chair based on the Boards comments.

Subsequent chapters in the consultation discuss fiscal matters relating to the tax and its collection. These are:

- Registration
- Fiscal and Administrative representatives
- Tax returns and payment
- Record keeping
- Tax avoidance and tax evasion
- Investigatory and enforcement powers
- Penalties
- Interest
- Dispute resolution

As such it is suggested that the Board makes no comment on these issues.

### **Strategic Environmental Assessment Screening and Scoping Report**

This document accompanies the consultation and sets out a proposal for an environmental assessment of the APD reduction proposal. It covers;

- A proposed methodology
- Alternatives
- Evidence baseline and
- provides some initial findings

#### Proposed Methodology

This section sets out key assumptions and questions that have been developed to explore the likely significant effects. The consultation isn't looking for the answers to the questions, rather it is consulting on whether the assumptions and questions are those that should be made and asked.

**Question 1:** *Do you agree with the key assumptions and questions as discussed on pages 12-13?*

**Question 2:** *Is it appropriate for the assessment to consider effects at differing geographical scales as discussed on page 18?*

The key assumptions and questions referred to above are:

*The proposal to reduce and eventually abolish APD in Scotland will lead to an increase in the overall number of flights and could potentially create opportunities for new routes to be created.*

***What are the likely environmental effects that will arise from an increase in the number of flights?***

*An increase in flight numbers will lead to an increase in overall GHG emissions (CO2 and non-CO2 emissions), even with advances in technology.*

### **What are the likely impacts that may arise from increased GHG emissions?**

*An increase in flight numbers will result in a rise in passenger numbers, both of which will place increased pressure on existing airport and interconnecting infrastructure.*

### **What are the likely impacts that may arise from increased pressure on existing infrastructure?**

Question 2 above refers to this section of the document:

*...it is likely that many of the potential environmental impacts that arise will impact on differing geographical scales. This is a result of a combination of factors; such as the type of effect, the nature of the environmental receptor and whether the impacts are likely to occur only in certain locations. For example, some of the environmental effects that arise from the aviation sector occur at altitude and, as such, will likely be of consideration at a larger geographical scale in terms of potential impact and significance. Other environmental effects may be associated with airport infrastructure and, whilst potentially still significant in nature, are likely to be experienced at a smaller geographical scale.*

#### Alternatives

Consideration of three alternatives is proposed in the assessment. These are:

**Alternative 1:** *The introduction of a Scottish replacement tax with the same design, structure and tax rates as UK APD. This would represent a „like for like“ approach.*

□ **Alternative 2:** *The introduction of a Scottish replacement tax with the overall tax burden in Scotland (compared to UK APD) being reduced by 50% by the end of the next Scottish Parliament. The Scottish Government will consult on how the replacement tax should be designed and structured, exploring options such as changes in the method of charging (for example passenger or flight-based) and the methodology for determining rates and bands.*

□ **Alternative 3:** *The Scottish Parliament does not legislate for a Scottish replacement tax. Once powers over APD had been devolved this would mean that there would be no tax on the carriage of air passengers from Scottish airports.*

#### Evidence Baseline

The document then sets out how it will determine the baseline for assessment providing links to a number of documents it will draw evidence from.

Within this consideration is given to the following:

- Climatic Factors
- Population and Human Health
- Air Quality
- Biodiversity, Flora and Fauna
- Soil
- Water
- Landscape, Cultural Heritage and the Historic Environment
- Material Assets

It is suggested that the proposed scope and methodology for the Strategic Environmental Assessment meet the requirements of the legislation and will provide the necessary background information for an informed decision to be made by the Scottish Government.

Recommendation:

The Board are asked to consider this issue and advise on an appropriate response. It is suggested that the Director formulates a response to be agreed by the Chair based on the Board's comments.

- Draft Planning Delivery Advice on Housing & Infrastructure

Members will recall that, at the last meeting of the Board, it was noted that the Scottish Government has published Draft Planning Delivery Advice on Housing and Infrastructure. This can be viewed on their website at:

<http://www.gov.scot/Topics/Built-Environment/planning/Roles/Scottish-Government/Guidance/Other-Publications/Housing-Infrastructure>

Because comments were sought by 31 March 2016, the Board agreed that Nestrans should liaise with the SDPA to ensure a consistency of approach and that the Director prepare a submission for approval by the Chairman before responding to the Scottish Government by the deadline date.

A copy of the detailed comments which form the response as submitted is attached as Appendix 1 to this report for members' information.

- Cycling Scotland - Cycling Action Plan (CAPS) Stakeholder Consultation

Cycling Scotland recently invited all stakeholder members of the CAPs forum to respond to a consultation questionnaire, this questionnaire was made up of two parts. Part A examined the progress made to date on the themes and actions within the CAPs 2013 document. Part B was an opportunity to influence the next CAPs document and feed in themes and actions, with future opportunity to discuss as part of a future consultation process on CAPS.

Not all questions were answered by Nestrans, as in some cases it was felt a more appropriate response would be provided from the Local Authorities.

Because the questionnaire had a return date of the 24<sup>th</sup> of March this consultation is being brought to the board retrospectively.

- Recommendation

It is recommended that the Board:

- a) Agree that the Director formulates a response to the Air Passenger Duty consultation to be agreed by the Chair and based on the Board's comments;
- b) homologate the response on the Draft Planning Delivery Advice on Housing and Infrastructure, as submitted after approval by the Chairman; and

- c) Note the content of this report and approve the attached Appendix 2 as Nestrans' response to the consultation questionnaire from Cycling Scotland.

DM/RD/KM 11 April 2016

# Detailed Response to Consultation

## Introduction

This is the first time Scottish Planning Policy (2014) has been referred to as SPP2. It is not clear whether this was intentional or not but it does represent a change from using the year of publication to refer to the specific version.

## Development Plans that Deliver

While the new 'Place Standard' (p1) is a potentially useful tool, it is disappointing that its name wasn't changed prior to its launch to more accurately reflect what it actually is – a tool for assessing a place, not determining whether a particular standard has been met. However, the reference to it in the box on page 1 looks misplaced and a location after para 11 would appear to be more appropriate.

Figure 1, while attempting to set out the different stages in the process, illustrates some of the challenges created by this draft advice. The timeframe for plan preparation is limited and it is not possible to carry out all the steps sequentially as suggested. Indeed, appraisal of cumulative impacts for example is a time consuming and expensive process which does not neatly fit into the development plan timescales at all and probably has to follow after plan preparation in terms of outputs.

## Planning to Deliver Homes

It is welcome that para 12 recognises that delivery of housing has been challenging over recent years. However, it should also be noted that it remains challenging. House building levels are still significantly below pre-2008 levels in most of the country, with even Homes for Scotland optimistically targeting a return to 25,000pa by 2021 (homes built in Scotland in the year to September 2015 increased by only 2% on the previous year). In this context the text should be amended to reflect this - "...delivery has been (and remains) challenging."

Also welcome in para 12 is the recognition of the need to move away from a focus on numbers. However, this is the obsession of the private sector and they need to change their behaviours to enable this to happen. Amended wording would be - "It is critical that all parties in the planning process move beyond a focus on numbers...". However, this can only happen if the development industry focuses on delivering the land they already have rather than the constant quest for more.

Paragraph 18 is particularly welcome in this context. The value of SDPs is significantly enhanced when they provide significant certainty to LDPs, enabling LDPs to focus on matters of detail rather than enabling objectors to re-open matters already determined. This is also reflected in para 33.

Paragraph 22 provides welcome clarity in relation to the use of the Housing Supply Target in the determination of the extent of the effective land supply. However, further clarity would be provided by clearly identifying that the Housing Supply Target is found in the development plan - "The baseline for determining whether there is a 5 year supply of effective housing land is the Housing Supply Target (HST) set out in the development plan."

Table 1 provides welcome clarity. However, there are three matters which would benefit from further consideration. These points of clarity are the most significant points made in this consultation response and are critical to the implementation of the advice.

Firstly, the geography at which the effective land supply calculation is carried out is a very important consideration and lack of clarity at this point could lead to extensive debates and arguments during plan preparation as well as the determination of applications and appeals – with potentially significant consequences. The current Aberdeen City and Shire SDP enables the land supply to be measured on the basis of Housing Market Areas, of which there are two. This has been the case for all previous strategic plans in the north east. However, the requirements of SPP and Table 2 of this draft guidance requires the HST to be provided for each local authority area as well as the plan area as a whole – and that separate HSTs are provided for each geography for market and affordable housing. The SDPA objected to this previously (during consultation on the SPP) because it requires a significant level of unnecessary and unhelpful prescription. The plan will now be required to provide 10 HSTs instead of 3 for each time period. As a consequence of geography, it would be possible to calculate a further area, making a total of 12. It is strongly suggested that the advice is clear that the geography for determining the adequacy of the land supply is the Housing Market Area. Short of this, we would suggest that the advice makes it clear that the geography used should be set out in the SDP (or LDP outwith the city regions). To some limited extent, the first paragraph of para 30 hints that the Scottish Government agree with the above, but this is inferred rather than explicitly (which is what is required).

Secondly, it is still not clear what we are counting – whether the available land or the expected completions over a 5-year period. This is a fundamental issue which requires clarity by this advice. This has a clear connection with the issue of ‘marketability’ below.

Thirdly, calculating your land supply over a longer than 5-year period (ie 7-years) requires both the numerator, denominator and multiplier in Table 1 to be changed accordingly. This needs to be made clear or there will continue to be dispute as to the correct figure coming out of the calculation.

The SDPA previously objected to the inclusion of the “presumption” (paras 24-26) when consulted upon in the context of SPP. It is assumed that para 25 refers to the situation where less than a 5-year supply of housing land can be demonstrated. However, it is not clear that sufficient thought has been given to the issue of geography in para 25. A housing land supply of less than 5 years could be demonstrated in one small part of a local authority area. However, it is assumed that this ‘deficiency’ does not contaminate the whole of the local authority area or potentially the whole of the SDP area. This is not clear from para 25 but has potentially significant consequences. Spatial strategies are predicated on HMAs, not council areas – as a consequence, whether targets are being met should also be at the same geography.

Planning Authorities (strategic or local) do not build houses. The first sentence of para 29 is misleading in this context. The HST is a policy view of the number of homes that the authority has agreed should be delivered, not ‘will’ be delivered as stated in para 30 as this is outwith their control. It is interesting to note that the Scottish Government’s response to the recommendations of the Commission on Housing and Wellbeing claims that it cannot set a target for house building at a national level because “this depends heavily on the activities of the development and house building industries and is largely out-with Scottish Government control” (para 16(2) - <http://www.gov.scot/Publications/2016/02/4621>).

It is welcomed that the Housing Need and Demand Assessment (HNDA) is given its correct status in para 30 as part of the evidence base for the plan for which a policy response is

required, reflecting a whole range of factors which include but extend beyond the content of the HNDA itself.

There is no case for having 'generosity' as a separate heading (paras 34-37). The text should be covered under 'Housing Land Requirement' as that is where it is included in practical terms. The text as it currently stands just confuses the issue.

There is a case for including a box under para 38 which would read:

Housing Land Requirement = Housing Supply Target + Generosity
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The first sentence of para 39 is confusing. The established land supply includes sites which are already allocated and with planning permission so there is no value to be gained from mentioning them separately. As a consequence, the first sentence can be shortened to "The HLR can be met from a range of sources, including the established land supply."

Para 39/40 – These two paragraphs seem to confuse the established and effective supply, with the box making this explicit by not mentioning constrained sites. However, there also needs to be a recognition of the time periods for plans and the respective phasing (eg years 1-12, 13-20 etc)

The meaning of para 41 is unclear and as currently drafted doesn't make sense. It may be that it refers to the housing land supply rather than the housing land requirement but this is not what is said.

Table 2 – it is assumed that the time periods referenced under the HLR also apply to the HST.

The use of the term "Build to Rent" (paras 50-54) is a welcome change from the previous references to 'Private Rented Sector'. This makes it clear that the product is designed and built with the specific purpose of it being let out rather than sold.

Marketability (paras 60 & 61) is an important issue. While it is welcome that it has been removed from the list of identified constraints, it is not clear how it should be addressed. In essence, the issue boils down to an unresolved issue in the draft advice which carries over from the previous advice – what exactly is being measured in the effective land supply? Is it the availability of land or is it expected house completion levels. Planning authorities have a degree of control over the former but none over the latter. Considering the marketability of the land supply as a whole is a fairly meaningless statement and needs to be clarified.

Paras 58-61 would more naturally fit within the section on Housing Land Audits (paras 69-78)

Paras 64-68 – The text is currently schizophrenic in relation to costing and viability of individual site allocations. This is extremely unhelpful. It is not clear any assessment has been made of the time and cost implications of this on planning authorities.

Para 75 – This is a welcome and important paragraph. However, further clarity is required because it actually has wider applicability and is lost in its current location.

Para 76 – it is the LDP which can remove sites, not the Audit. If they are removed from the Audit the site is 'lost' for monitoring purposes, which would not be helpful if an attempt was made to de-allocate it.

Reference to the good practice example of the Aberdeen City and Shire Housing Land Audit on p17 is welcome. However, an additional clause should be added to the end of the text relating to the Homes for Scotland procedures example "...and can help planning authorities understand the perspective of Homes for Scotland".

Para 83 – "provide aggregated or estimated figures in the audit".

Para 84 – The issue of tenure is very difficult to pick up in the audit because it is often not known until quite late in the development process. It is particularly problematic where heavy reliance is placed on securing land through the s75 route, as is the case in this area.

### **Planning for Infrastructure**

References to good practice by Aberdeen City Council, Aberdeenshire Council and the SDPA in planning for infrastructure are welcome, particularly in relation to the Strategic Transport Fund (p31).

Para 86 – "Infrastructure is required to make our cities, towns, villages and individual buildings work, supports..."

The role of development plans in 'making the case for new or enhanced infrastructure' (para 87) is very challenging. This is particularly the case for transport infrastructure where national priorities often conflict with regional ones. A significant case of this relates to the rail network and new stations in particular which are extremely challenging to take through the planning system. The final sentence of para 87 is too emphatic because the extent to which a strategy can be based on making use of existing infrastructure will vary from place to place. A wide range of other considerations need to be taken into account when developing a strategy and in some cases the stated approach may not be the most sustainable or deliverable one. This needs to be reflected in the text.

While Figure 2 (p20) is helpful, it would be useful if the text recognised that there is a level of strategic national / regional infrastructure which is relevant to development plans but maybe not to specific development sites. Examples include electricity transmission, high pressure pipelines and carbon capture, transmission and storage. These merit a reference before going on to consider site-specific infrastructure.

Circular 3/2012 (Planning Obligations and Good Neighbour Agreements) needs to be reviewed to take into account the findings of the research published last year and to be focused on facilitating development and the provision of infrastructure. Paras 128-136 are welcome but at the current time the Circular's reference to such matters is unclear and potentially unhelpful.

### PART A: LOOKING BACK ON CAPS

## Cycling Scotland

### CAPS 2016 PROGRESS REPORT: CONSULTATION QUESTIONNAIRE

Please read the following instructions before starting:

- You do not have to answer all of the questions. You can answer the questions which you consider most relevant or important to you in terms of achieving the 10% vision.
- Your responses can be made anonymously or in the name of your organisation or organisation type. Responses will not be attributed to named individuals or organisations unless requested specifically.
- The questionnaire has two parts. **Part A** examines progress to date in terms of achievement against CAPS 2013 themes/actions and tackling known barriers. **Part B** is an opportunity to influence the next CAPS. It is about telling us what you think needs to change if we are to meet the shared vision and what our priorities and milestones should be.
- Responses should be brief and no more than 250 words for each one. If you can, please provide specific examples. This will make it easier for us to formulate future recommendations and/or milestones.

#### RESPONDENT PROFILE\*

**NAME:** *(can be left blank):*

**ORGANISATION:** *(can be left blank):* Nestrans

**My involvement with cycling promotion is mostly at the following level:** (please click on relevant box)

Local/city       Regional       National

\* This will tell us about the coverage achieved through this consultation and help plan future engagement.

## PART A: LOOKING BACK ON CAPS

### Question 1: IMPACT of CAPS

What has been the impact of the [Cycling Action Plan for Scotland 2010](#), the [CAPS 2012 Progress Report](#) and [Cycling Action Plan for Scotland 2013](#) on everyday cycling in your locality or area of interest?

[Click here to enter text.](#)

### Question 2: PROGRESS AGAINST CAPS 2013 ACTIONS

What progress has been made against each of the 19 actions within CAPS 2013? You do not have to comment on all the actions provided below – only those which are most relevant or important to you. To indicate where you think there has been the most/least progress, please provide a score of 1-5 for each CAPS action (*1 is no progress; 3 some progress; and 5 significant progress*).

CAPS Actions	Comment on Progress	Score (1-5)
Establish an annual <b>national cycling summit</b> involving the Minister for Transport and local authority Heads of Transportation and relevant Committee Convenors, to lead delivery and gauge progress.	<p>Nestrans are supportive of local authority heads of Transportation and councillors attending such events in order to promote active travel, share best practice and lead delivery.</p> <p>Work needs to be carried out around engagement of Heads of Service, Committee Convenor in attending such events.</p> <p>There is a need for a broader look at how transport influences other sectors, planning, education and health might encourage those who have a wider interest to attend.</p>	
Develop for each local area the <b>strategic approach</b> to supporting functional cycling (and active travel more broadly), mapping the appropriate infrastructure	<p>Nestrans are supportive of this action; however the definition of an action plan and a strategy is blurred.</p> <p>Nestrans feel that the strategic approach</p>	

improvements required along with supporting promotional work to achieve tangible changes in travel choices.	should be something that is looked at regionally, with functionality of cycling infrastructure being developed at a local level.	
Continue to promote a national training programme on cycling-integration design and best practice to planners, designers and engineers, through the delivery of accredited modules such as Making Cycling Mainstream, and promote the use of <b>planning</b> policy - Designing Streets, Cycling by Design cycle guidance and Smarter Choices, Smarter Places good practice.	Nestrans are supportive of additional training opportunities. One way to maximise the coverage of these course could be to look at RTP areas and in conjunction with RTP's and arrange regional course for authorities to attend.	
Continue to develop and maintain community links – i.e., <b>high quality, local infrastructure</b> to support active travel (routes and public realm improvements) particularly in urban areas where high levels of cycling can be achieved, along with associated infrastructure such as cycle parking facilities at key destinations including schools, bus and rail stations, shopping areas and workplaces.	Nestrans will continue to support this aim in conjunction with partners in both local authorities.	
Continue to develop and maintain the <b>National Cycle Network</b> to provide long distance cycling routes, connecting rural communities and promoting tourism.	Nestrans are supportive of the NCN routes and are keen to work with Sustrans to develop the NCN in areas where there are currently limited connections or existing paths.	
Develop better <b>integration with public transport</b> , through partnership working with interests such as rail and bus/coach operators and RTPs.	Nestrans will continue to work with local authorities and other organisations in this area to promote and develop integrated cycling and public transport. As a targeted area this is one that needs further work on.	
Establish the <b>Cycle Hub</b> at Stirling Station as a pilot and evaluate it pilot for potential wider roll-out at other railway stations.	It would appear that the Cycle Hub in Stirling has been a success. And Nestrans cautiously welcomes the roll out of similar projects across the country. It is not clear however, how these will be run and supported, in terms of public/private or third sector involvement and the reliance on such may result in areas not having the same support as others.	
Promote the implementation of <b>20 mph schemes</b> in all residential areas and share best practice across the country.	Reducing speed limits and 20mph zones and limits should be encouraged and considered where appropriate. Design features that influence driver behaviour	

	should be implemented and they should be self-enforcing to minimise the need for Police enforcement.	
Develop and deliver a <b>‘Mutual Respect’ Campaign</b> for all road users (complementing the ‘Give Me Cycle Space’ campaign aimed at drivers).	These campaigns are supported by Nestrans and Local Partners and have been rolled out in the regional area. Would like to see robust evaluation of the campaigns to understand the value and effectiveness.	
Continue the roll-out of Bikeability Scotland <b>cycle training through schools</b> , steadily expanding participation, particularly in on-road training (Bikeability level 2). Develop and promote support for this, including volunteer-led delivery and parental involvement.	Nestrans will continue to support the development of the bikeability programme within the regional area.	
Develop <b>Adult Cycle Training</b> resources, building on Bikeability Scotland standards, including an essential skills module as a pilot for potential roll-out nationwide.		
Promote and support <b>community-led cycling initiatives</b> , through signposting resources and providing support for projects that will promote cycling participation in an inclusive, accessible way. Evaluate the delivery of the Cycle Friendly Communities Fund programme to date and promote the learning to further develop approaches to supporting communities.	Coordination to understand what is being delivered where and what projects in areas may have overlap – how can organisations like local authorities / RTPs support this work	
Continue to promote <b>projects which encourage primary school pupils to continue cycling when progressing to secondary schools</b> , such as I-Bike and delivery of Bikeability Scotland level 3.	<a href="#">Click here to enter text.</a>	
Promote <b>cycling for young people</b> more broadly, for leisure or travel, for fun, health and sport, through the promotion of cycling activities, events and led cycle rides.		
Develop approaches to promoting <b>access to bikes</b> – e.g., develop Bike Library schemes for schools and communities to promote access to bikes in areas of low cycle use or deprivation, as taster cycling sessions.	<a href="#">Click here to enter text.</a>	

Encourage all employers across all sectors to become Cycle Friendly (e.g., by offering support for <b>workplace cycling</b> facilities and promotional resources, active travel champions, travel planning).	A positive target for schools and business to aim for.	
Develop follow-up work from the <b>Smarter Choices, Smarter Places</b> evaluation report, applying learning to encourage active travel as part of community-based sustainable transport promotion.	Click here to enter text.	
Report annually on an appropriate suite of <b>national indicators</b> to inform the national picture of cycling participation.	Important to monitor and evaluate in order to inform the national picture of cycling. A review of the indicators and the data collected could be beneficial to understanding what could be done better and what data is missing or needs a different method of collection.	
Develop <b>local monitoring</b> , using data from local cycle counts and surveys etc., with support from national delivery bodies to develop a coordinated approach to data collection.	Continue to develop this, however also looking at how regional monitoring and how regional monitoring collection through RTP's can support and enhance this.	

### QUESTION 3: Progress tackling key barriers

What progress has been made in your locality or sector on tackling **safety, practicality, and culture**, identified in the [CAPS Public and Stakeholder Survey](#) as key barriers?

Policy documents have been developed at a regional and local level to provide a structured approach to tackling these key areas.

Regionally Nestrans have developed the Active Travel Action Plan, which contains regional objectives tackling pedestrian and cycle safety as well as increasing mode shift to active travel and towards the achieving the national vision.

It is hoped that these objectives will be met by carrying out the actions outlined in the Active Travel Action Plan document and working alongside local authorities to make sure these compliment actions which may form part of individual local authority cycle action/active travel plans.

## **PART B: LOOKING FORWARD**

### **Question 4: Meeting the shared 10% vision**

What do you think needs to change in order to achieve the vision of 10% of everyday journeys undertaken by bike by 2020?

Nestrans are supportive of such a vision, as a region Nestrans are looking to promote active and sustainable travel and mode shift towards public transport and walking and cycling from private car use.

It is recognised that whilst increasing cycling plays an important role it should be integrated vision to encourage people to move away from car use for journeys which can be easily undertaken via another mode of transport.

[Click here to enter text.](#)

### **Question 5: Key priorities for action in the next CAPS**

What are the key actions to be included and prioritised in the next CAPS? If possible, please provide specific examples of where these actions have already happened in Scotland and the results achieved.

To review national indicators and reporting of cycling/ active travel measures to ensure a clear picture across the country and consistent and robust data.

To encourage and facilitate cross border regional work with RTPs through embedded Sustrans officers in order to create a consistent long distance network which can connect in with local networks and public transport facilities.

### **Question 6: Additional outcomes and milestones in the next CAPs**

What, if any, additional outcomes and milestones should be included in a revised CAPS? What actions should be prioritised to achieve these? Can you provide specific examples of where these actions have already happened in Scotland and the results achieved?

To set targets for organisations working towards the promotion and development of active travel, 10% of employees cycling or using active travel as a part of their journey to work. Looking to lead change by example.

### **Question 7: Local outcomes and milestones**

Do you have, or do you intend to have, any cycling outcomes and milestones in your locality, region or area of interest?

Within the Regional Active Travel Plan (2014 -2035)

Nestrans has two objectives –

To increase active travel mode share and work towards achieving the national vision for cycling by 2020.

To improve safety for pedestrians and cyclists by reducing the total number of pedestrian and cycle casualties, the percentage of total accidents and rate per 1000 population.

As well as this Nestrans will continue to support local authority targets for active travel and cycling as well as promote regional cross boundary active travel networks.

[Click here to enter text](#)

### **Question 8: Local monitoring**

What methods do you currently use to assess levels of everyday cycling in your area, and what might you use in the future?

Nestrans currently regionally monitor walking and cycling in the area through a number of indicators which are published annually through the Nestrans Monitoring report.

This is collected through a number of sources including national survey data in the form of the Sustrans Hands up survey, as well as cycle counter data from Aberdeenshire Council and a snap shot survey carried out by the Aberdeen Cycle Forum each year for Aberdeen City Council.

Nestrans are currently working with Aberdeen City Council to install cycle counters at 13 locations throughout the city to provide a robust data on cycle and walking figures.

Thank you once again for the time taken in completing this questionnaire. Please return the completed questionnaire to Mark Hughes at Cycling Scotland by **24 March latest**. Mark's email address is [mark@cyclingscotland.org](mailto:mark@cyclingscotland.org).

All the responses will be summarised and included within the second CAPS Progress Report.