

Summary of comments received on the Draft RTS Re-fresh – Consultation from 22nd April – 31st May 2013

	Respondent	Initial summary of key comments made	Nestrans response and amendment to the strategy
1	Cllr Fiona McRae, Aberdeenshire Council	<ul style="list-style-type: none"> Request that Nestrans commit to holding an early feasibility study into re-establishing a rail link to Buchan 	The strategy highlighted that the delivery of such a project would be long term and did not intend that the feasibility study would be in the long-term. The strategy has been amended to improve clarity on this issue and make clear that a feasibility study would be carried out in the short-term.
		<ul style="list-style-type: none"> Lumping consideration of a rail link in with other transport priorities is not a sensible way to proceed. 	Scottish Transport Appraisal Guidance (adopted best practice for appraising transport schemes) stipulates that projects should be looked at and appraised in terms of the objectives that they are trying to achieve and should consider and appraise all available options to achieve those objectives. The Scottish Government will require any such study to be done in line with STAG guidance. Re-introduction of a rail link cannot therefore be looked at in isolation of other modes.
2	Cllr Anne Allan, Aberdeenshire Council	<ul style="list-style-type: none"> A feasibility study into re-establishing a rail link to Buchan should be carried out in the short term 	As 1 above
3	Cllr Stuart Pratt, Aberdeenshire Council	<ul style="list-style-type: none"> A feasibility study into re-establishing a rail link to Buchan should be carried out in the short term 	As 1 above
4	Cllr Lenny Pirie, Aberdeenshire Council	<ul style="list-style-type: none"> A feasibility study into re-establishing a rail link to Buchan should be carried out in the short term 	As 1 above
5	Cllr Jim Ingram, Aberdeenshire Council	<ul style="list-style-type: none"> A feasibility study into re-establishing a rail link to Buchan should be carried out in the short term 	As 1 above
6	Cllr Charles Buchan, Aberdeenshire	<ul style="list-style-type: none"> A feasibility study into re-establishing a rail link to Buchan should be carried out in the short term 	As 1 above

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	Council		
7	Cllr Brian Topping, Aberdeenshire Council	<ul style="list-style-type: none"> • A feasibility study into re-establishing a rail link to Buchan should be carried out in the short term 	As 1 above
8	Cllr Stephen Smith, Aberdeenshire Council	<ul style="list-style-type: none"> • A feasibility study into re-establishing a rail link to Buchan should be carried out in the short term 	As 1 above
		<ul style="list-style-type: none"> • This should not be linked to other, competing transport options. 	Scottish Transport Appraisal Guidance (adopted best practice for appraising transport schemes) stipulates that projects should be looked at and appraised in terms of the objectives that they are trying to achieve and should consider and appraise all available options to achieve those objectives. The Scottish Government will require any such study to be done in line with STAG guidance. Re-introduction of a rail link cannot therefore be looked at in isolation of other modes.
9	Dr Eilidh Whiteford, MP for Banff & Buchan	<ul style="list-style-type: none"> • A feasibility study into re-establishing a rail link to Buchan should be carried out in the short term 	As 1 above
10	Stewart Stevenson MSP	<ul style="list-style-type: none"> • A feasibility study into re-establishing a rail link to Buchan should be carried out in the short term. • Do not accept the position that this is a matter for the longer term 	As 1 above
		<ul style="list-style-type: none"> • This is an issue that should be looked at on its own and not against a range of competing priorities 	Scottish Transport Appraisal Guidance (adopted best practice for appraising transport schemes) stipulates that projects should be looked at and appraised in terms of the objectives that they are trying to achieve and should consider and appraise all available options to achieve those objectives. The Scottish Government will require any such study to be done in line with STAG guidance. Re-introduction of a rail link cannot therefore be looked at in

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			isolation of other modes.
11	Ian Houghton, MEP	<ul style="list-style-type: none"> Proposals put forward by Aberdeenshire Council for a feasibility study into the reintroduction of a rail link to Buchan deserve support and would back this to go ahead at an early opportunity. 	As 1 above
12	Ian Sandi son	<ul style="list-style-type: none"> Support the re-opening of the rail link to Buchan based on environmental impact, reducing emissions, existence of existing infrastructure, future development and benefits to the north. 	As 1 above
13	Dorothy Murray, Cruden Community Councillor	<ul style="list-style-type: none"> A feasibility study into re-establishing a rail link to Buchan should be carried out in the short term 	As 1 above
14	Linda Bogler, Peterhead Projects Limited	<ul style="list-style-type: none"> A feasibility study into re-establishing a rail link to Buchan should be carried out in the short term 	As 1 above
15	Cllr Jim Gifford, Aberdeenshire Community Planning Partnership	<ul style="list-style-type: none"> Support proposals to integrate the RTS with the Strategic Development Plan 	Noted
		<ul style="list-style-type: none"> Welcomes the extension of the timeline for the strategy to 2035. 	
		<ul style="list-style-type: none"> The RTS will support the delivery of other local and national priorities within the SOA. 	
16	Stuart McLean, Thistle Seafoods	<ul style="list-style-type: none"> Fully support the RTS, particularly in relation to “improving external connections between the north east and elsewhere” 	Noted.
		<ul style="list-style-type: none"> The objective of improvements to “rail links and services (EC1) and “Freight (IC9)” is particularly appealing. 	
		<ul style="list-style-type: none"> Desire to work with suppliers to transfer as much freight from road to rail as possible. 	
		<ul style="list-style-type: none"> Request to receive more information on and be involved in the Freight Forum. 	Contact details have been passed to the Freight Forum to ensure that information is fed through and invitations to future Freight Forum meetings are issued.

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17	Guus Glass, Cults, Bieldside and Milltimber Community Council	<ul style="list-style-type: none"> Impressed by the CTA study however in spite of this feel that strategic guidance to the local authorities emerging from the re-freshed RTS falls short of expectations. 	Noted. See below.
		<ul style="list-style-type: none"> The CTA study would be much more valuable if it were accompanied by a timeline that shows when the various transport projects and interventions will realistically be implemented. 	Work is progressing on the prioritisation of interventions identified through the CTA and estimated timescales will be a part of this process. The two Councils are key partners in this process.
		<ul style="list-style-type: none"> This timeline should also include the 'hotspots' identified in the CTA together with the developments causing the additional traffic. Only then can the timing of development aspirations be tuned to the feasibility of coping with transport requirements. 	Noted.
		<ul style="list-style-type: none"> If the above is outside the scope of the RTS, the document should at least include an instruction to local authorities to prepare a time schedule in this manner. 	See above.
		<ul style="list-style-type: none"> It is essential to maintain the balance between development and the provision of infrastructure. 	This is what the Cumulative Transport Appraisal and establishment of the Strategic Transport Fund aims to achieve.
18	Cllr Graeme Clark, Aberdeenshire Council	<ul style="list-style-type: none"> A feasibility study into re-establishing a rail link to Buchan should be carried out in the short term 	As 1 above
19	Rona Main, Scottish Enterprise	<ul style="list-style-type: none"> Growing international profile of oil and gas and the need for Aberdeen City & Shire to remain competitive in attracting skills and in providing good connections locally, nationally and internationally. 	Noted. The RTS supports and is strongly linked to ACSEF's economic development framework as well as the Strategic and Local Development Plans.
		<ul style="list-style-type: none"> GVA figures show City & Shire has experienced a 6.5% increase in GVA growth for the period 2011, the highest in the UK and retains position of 2nd highest GVA per head in UK behind inner London. 	Noted.
		<ul style="list-style-type: none"> Very encouraged by the number of transport projects and policies within the RTS budgeted and committed and pleased 	Noted

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		with the considered approach to planned improvements in rail, public transport and pedestrian/cycle connectivity.	
		<ul style="list-style-type: none"> • AWPR – real appetite from the business community for more information about the AWPR in terms of detailed timescales and the travel benefits it will bring. Would encourage the RTS to reflect and promote the AWPR and its associated benefits in a very clear and transparent way. This will encourage companies to take a longer term view and provide line of sight of the medium term benefits. SE and ACSEF happy to support Nestrans / Transport Scotland in this. 	Noted. The RTS is not a promotional document, but does reflect the importance of this scheme which is contained within the reference case scenario.
		<ul style="list-style-type: none"> • The same point as above is also made about A90 Balmedie-Tipperty, 3rd Don Crossing and Haudagain roundabout improvements. 	As above.
		<ul style="list-style-type: none"> • A96 corridor – RTS provides strong reference to aspirations to dualling the A96 between Inverurie and Inverness which is most welcome. SE endorse this strategy. 	Noted.
		<ul style="list-style-type: none"> • The RTS does not appear to reference the proposed Inverurie relief road and references to Inveramsay Bridge works could be strengthened. 	Proposals at Inverurie are being developed by Aberdeenshire Council and the A96 dualling led by Transport Scotland. Nestrans are involved in ensuring adequate strategic linkages.
		<ul style="list-style-type: none"> • SE & ACSEF happy to work with Nestrans / Aberdeenshire Council to assist articulate the economic benefits of the A96 corridor. 	Noted.
		<ul style="list-style-type: none"> • Airport access – Greater clarity on the timescales and commitment of the A96/AWPR/Airport Link Road is required. 	Greater clarity is not yet available, but will be publicised when known.
		<ul style="list-style-type: none"> • Efforts to co-ordinate an early delivery of Airport end of AWPR and associated link road and P&R is welcomed. A more detailed illustration of what this project will deliver over the next 4 years is required. This project is particularly acute given the extent of companies based in Kirkhill and Wellhead industrial estates and the growth opportunities that exist 	Noted.

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		around the Airport Development Zone.	
		<ul style="list-style-type: none"> Air cargo – Aberdeen International Airport Masterplan for Nestrans and SE to work with the airport to deliver an improved cargo strategy that opens up commercial opportunities for the Airport and efficiencies for the oil & gas sector. Reference to this in the RTS is required as well as an action for the parties to scope out and fund this project. SE happy to facilitate discussions with the Airport on this. 	A reference to this has been added to policy EC5 to state the Nestrans will support the airport in working with Scottish Enterprise, ACSEF and others to better understand the opportunities in this market.
		<ul style="list-style-type: none"> Air connectivity – Welcome Nestrans’ commitment to continued support to Aberdeen Airport in their route development work and lobbying to protect regional slot allocation access and highlights ‘Strategic Framework for International Air Connectivity’ work currently with Scottish Ministers for comment. Encourage Nestrans to reference this initiative in the RTS and continue the dialogue and market intelligence sharing carried out to date. 	Nestrans supports Aberdeen International Airport in its efforts to develop new routes.
		<ul style="list-style-type: none"> European Air Routes Conference 2015 – AECC have secured this event to be hosted in 2015 which is a huge opportunity. Would welcome reference to this in the RTS and the Action Plan, including the need to identify a lead organisation. 	Don’t feel that this is an issue for the strategy but more a means of delivery.
		<ul style="list-style-type: none"> Supporting infrastructure for Elsick – would wish clarity in the RTS on the strategic road improvements and public transport requirements to support this level of concentrated growth, including how links between Elsick and the Aberdeen employment hubs to the south will be impacted. A cumulative impact of this and other developments (including at Edzell) on the A90 and links to the south of the city should be identified. 	A cumulative transport appraisal for the region has already been carried out, including the development allocations in both the City and Shire Local Development Plans. This has informed the development of the Strategic Transport Fund which is designed to address the cumulative impacts of development through strategic transport improvements. The STF guidance commits Nestrans and the SDPA to re-refreshing this appraisal every five years. This is set out in the STF Supplementary Guidance, but has been clarified in the RTS.
		<ul style="list-style-type: none"> A944 corridor growth & impact on city traffic – There is a need for both Councils to work together on a joined up Shire / City strategy to address peak time congestion. Request that this is identified in the RTS. There is a concern that growth opportunities in this corridor will be constrained without a 	

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		<p>transparent approach.</p> <ul style="list-style-type: none"> Aberdeen City Centre - consider that a greater emphasis needs to be placed on the importance of the city centre as a major employment centre. The RTS, in conjunction with the SDP, has a role to play in providing policy direction that will allow and encourage more employment to be located in the city centre, particularly new office development. There is a need to look at innovative ways to address employers' transport requirements, particularly around parking, otherwise there is a risk office occupiers will continue to choose out of town locations and there will be missed opportunities for the city centre. 	<p>The RTS supports the vitality and viability of town and city centres and encourages local authorities to facilitate development which will support their economic performance.</p>
		<ul style="list-style-type: none"> Wish to see greater flexibility built into transportation policies (particularly parking provision) for the city centre in the short to medium term until new major transport infrastructure projects are completed. Flexibility on parking provision could be investigated or more innovative measures to accommodate access to the city centre. Ties in with the Regional Parking Strategy. 	<p>Nestrans and the local authorities have agreed a Regional Parking Strategy, which aims to balance parking provision with other policy priorities.</p>
		<ul style="list-style-type: none"> North Dee, Aberdeen City Centre – Would welcome reference to the Development Framework being proposed for the North Dee Area to create a major Central Business District. 	<p>It is not felt appropriate to reference all development frameworks in the region but rather the RTS supports the Strategic Development Plan and Local Development Plans of the two Councils from which these development frameworks stem and will work with partners to ensure the transport implications of these are fully considered.</p>
		<ul style="list-style-type: none"> Aberdeenshire towns – the RTS has a role to play in working with Aberdeenshire Council on the new LDP to provide policy direction that will allow and encourage new office development within or within walking distance of Aberdeenshire's town centres. Greater flexibility built into transport policies in the short to medium term is encouraged. 	<p>The RTS supports the vitality and viability of town and city centres and encourages local authorities to facilitate development which will support their economic performance.</p>

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		<p>SE happy to work with Nestrans on these proposals.</p> <ul style="list-style-type: none"> • Harbours and Ports – strong emphasis should be placed on the investment in and expansion of Aberdeen Harbour including impact on Harbour operations and surrounding transport infrastructure. Peterhead is also an important area to consider from wider transport infrastructure perspectives. • South Peterhead & St Fergus – A development framework is being prepared by Aberdeenshire Council and there will be impacts on strategic transport. SE would be pleased to meet with Nestrans to discuss the impact this may have on the RTS. • Public transport initiatives – Welcome the work Nestrans are engaged in to develop better information and promotion of public transport. The NE is very employee competitive and the offer of car parking places for staff is an integral part of their recruitment packages. Improving access to rail, bus and pedestrian / cycle routes is imperative to adjusting the culture of dependency on private car and providing credible choice to individuals. 	<p>EC4 has been amended to include greater emphasis on transport implications and to state that Nestrans will work with partners to ensure the transport needs and implications of these developments are fully considered.</p> <p>Noted.</p> <p>Noted. This is covered within the RTS.</p>
20	Tom Smith, ACSEF	<ul style="list-style-type: none"> • ACSEF have endorsed the response submitted by Scottish Enterprise. • Delivery of the Regional Transport Strategy will mean delivery of ACSEF’s transport priorities. 	Noted.
21	Stuart Alexander	<ul style="list-style-type: none"> • There is great oversight in not mentioning the Elsick development. Where is the strategic thinking to allow people to travel to work safely in reasonable time? • Since the 2008 RTS depressingly little has been achieved on the railways in the NE. Questions the statement that 	<p>Although this individual development is not mentioned specifically, it has been considered within the Cumulative Transport Appraisal discussed at the beginning of Chapter 5. This study fully appraised the cumulative impact of new development, including Elsick, on the transport network and formed the basis for establishing the Strategic Transport Fund.</p> <p>Disagree with this statement. A number of significant improvements have been delivered:</p>

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		<p>Aberdeen Crossrail is at an 'advanced stage of development'.</p>	<p>Laurecenkirk station opened 2008 Additional services to Inverurie in 2008, improved stopping pattern at Portlethen 2009, doubling of Sunday services to Inverurie in 2013. Work is progressing to re-open a station at Kintore All of these projects form incremental elements of the overall Crossrail project.</p>
		<ul style="list-style-type: none"> Newtonhill station isn't mentioned and there should be north and south station stops. 	<p>Newtonhill station is not mentioned specifically in the RTS but falls within policy IC1. This level of detail is dealt with in the Rail Action Plan.</p>
		<ul style="list-style-type: none"> Highlights the progress being made on the Borders railway line and this sort of ambition should come from Nestrans to demand action. 	<p>Nestrans continues to work with the Scottish Government / Transport Scotland to deliver improvements in the rail network but recognise the need to balance local stopping patterns with journey times.</p>
		<ul style="list-style-type: none"> The ageing local rolling stock is becoming increasingly unreliable. The next franchise should be made to invest in modern train stock. 	<p>This is outwith the scope of the RTS and is an issue for Transport Scotland in specifying the next ScotRail franchise .</p>
		<ul style="list-style-type: none"> Despite recent improvements, the stopping frequency of trains at Laurencekirk and Portlethen is still inadequate. Nestrans must defend local commuters. 	<p>It is a key aim of the RTS to improve local rail services and increase the stopping frequency at local stations and this is contained in policy IC1. Since the consultation, specific reference has been made to Portlethen, Stonehaven and Laurencekirk as part of aims to extend Inverness – Aberdeen trains through to Montrose.</p>
		<ul style="list-style-type: none"> Dyce station facilities are woeful and upgrade is long overdue. 	<p>Dyce station is due to be upgraded under the Scottish Government's 'Access for All' scheme which will see an overbridge with lifts, waiting room and a ticket office. This is referenced in the RTS, however further detail has been added.</p>
		<ul style="list-style-type: none"> The 80 bus between the Airport, Kirkhill and Dyce station is a valuable service and there should be guarantees of its 	<p>Policy IC7 covers Airport Surface Connections. As this is a long term strategy, the policy covers the</p>

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		<p>continuation.</p> <ul style="list-style-type: none"> • Newtonhill should be given serious consideration due to the impact that Elswick will have on the A90 • With rail passenger numbers going through the roof the justification clearly exists for a step-change in the rail strategy in the NE and things have to happen quicker. 	<p>objective to ensure access to the airport by a range of modes from across the region. An action is included to improve facilities for buses at Dyce station to help to ensure continuation of a service.</p> <p>As above.</p> <p>Delivery of improvements to the rail network in the north east are influenced by national delivery timeframes and priorities. Nestrans will continue to press for investments and work with partners to deliver improvements at the earliest opportunity.</p>
22	Eric Guthrie, Tactran	<ul style="list-style-type: none"> • The partnership will work with Nestrans to achieve the RTS vision and strategic objectives. • Welcome the reference to joint RTP working on cross-boundary connectivity and accessibility issues and will continue to work with Nestrans in support of maintaining and enhancing strategic transport connections through the Tactran region to and from the north east. • Suggest that the reference should be made specifically to the electrification of the Edinburgh/Glasgow – Aberdeen route and this should be promoted as a high Scottish Government electrification priority upon completion of the current Edinburgh Glasgow Improvement Programme proposals. • Whilst fully supportive of enhancing rail services between Aberdeen and the central belt, Tactran does not support faster journey times being achieved at the expense of existing stopping patterns at key stations along the route. • Nestrans support for the Tay Estuary Rail Strategy proposals as a means of achieving the objective of faster Aberdeen – Central Belt rail journey times while maintaining and potentially enhancing rail connectivity at intermediate rail 	<p>Noted and welcomed.</p> <p>Noted.</p> <p>This has been added to policy EC1.</p> <p>Noted.</p> <p>Nestrans will keep abreast of developments in regard to the Tay Estuary Rail Strategy and will support proposals if these improve rail services to the north east.</p>

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		halts along the route would be welcomed.	
		<ul style="list-style-type: none"> Tactran support and shares Nestrans' views on the future development of High Speed Rail and the need to prioritise HSR connections between Scotland and the south, and also the need for rail service enhancements north of the central belt, to be implemented as a complement to, and ideally ahead of HSR. 	Noted
		<ul style="list-style-type: none"> EC2 – request that references to the need to improve the A90 “through” Dundee are amended to read “through or around Dundee” 	Amended.
		<ul style="list-style-type: none"> IC3 – it is recommended that consideration should be given to future cross-boundary bus service requirements and provision between Aberdeenshire and Angus as a consequence of development proposals in the Laurencekirk area. Cross RTP co-operation will be needed in considering further development of real time information across the regional boundary. 	Noted.
		<ul style="list-style-type: none"> TB1 – Tactran notes the reference to development of Car Clubs in the Mearns area and would welcome the opportunity to work jointly on such initiatives, where appropriate. 	Noted. Nestrans will continue to work closely with Tactran on cross boundary issues and to identify new opportunities for joint working.
		<ul style="list-style-type: none"> TB2 – Tactran would welcome the opportunity to work with Nestrans in considering cross-boundary health and transport issues, particularly in relation to access from the Mearns area to Stracathro Hospital and other regional health facilities. 	Noted. This will be taken forward through the Health and Transport Action Plan.
		<ul style="list-style-type: none"> No comments on the SEA or Equalities Impact Assessment. 	Noted
23	James Bream, Aberdeen & Grampian Chamber of Commerce	<ul style="list-style-type: none"> Members broadly agreed that the stated vision to underpin the RTS objectives is consistent with the ambition to promote economic growth. 	Noted
		<ul style="list-style-type: none"> Rail Links and services (EC1) – improved rail services could play a significant role in the development of the region and 	Noted. This is reflected in the RTS policy EC1

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		<p>improve links to/from the area. Support for aspirations to reduce rail journey times to Edin, Glas & Inverness as do not believe current travel times are acceptable.</p>	
		<ul style="list-style-type: none"> Support for ambition to improve capacity, comfort and reliability. 	Noted. This is reflected in RTS policy EC1.
		<ul style="list-style-type: none"> Suggest that the inclusion of wi-fi across all ScotRail services should be included as a priority in the updated strategy. 	Understand that ScotRail are implementing wi-fi in all trains to the north east.
		<ul style="list-style-type: none"> Road improvements (IC2) – Welcome the advanced attention placed on interventions at North Aberdeen, Kingswells North, A944 corridor and the A956/A90 corridor and encourage these plans to be brought forward as soon as possible once the need becomes apparent. 	Noted. This will be taken forward through the Strategic Transport Fund.
		<ul style="list-style-type: none"> The strategy should consider how delivery risks can be mitigated, particularly focussing on the lessons we have learned from previous delays which must be avoided in the future. 	The RTS uses the best information available, but cannot foresee all eventualities, which can delay projects. Delivery risks should be considered in more detail at the project planning level, rather than in the RTS which is a strategic document.
		<ul style="list-style-type: none"> Port surface connections (IC8) – Existing access arrangements to Aberdeen Harbour have been identified as a limitation to its effective operation and future expansion. Development of the Harbour should be promoted in the updated strategy, noting that significant surface access improvements will be required if the harbour brings forward development proposals, particularly if it expands to previously undeveloped locations. 	EC4 has been amended to include greater emphasis on transport implications and to state that Nestrans will work with partners to ensure the transport needs and implications of these developments are fully considered.
24	Alyn Smith MEP	<ul style="list-style-type: none"> A feasibility study into re-establishing a rail link to Buchan should be carried out in the short term 	As 1 above
25	Aberdeen City Council	<ul style="list-style-type: none"> Prioritised maintenance (P17) – there are surfaces which are not "footways" (using a strict R(S)A 1984 interpretation of that word) which are also of importance for active travel. The addendum should consider support of further maintenance on non-motorised surfaces not associated with a carriageway if 	Noted. Policy IC2 has been updated.

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		<p>they currently play a key role for active travel or could play a more important role for active travel if there was greater maintenance than at present e.g. Deeside Way, Nigg Way.</p> <ul style="list-style-type: none"> There may be further opportunities throughout the Addendum to highlight the importance of air quality and noise issues, including for example in Figure 6.1 where <i>noise</i> should be included in Strategic Objective 3: Environment i.e. ".....effects of transport on climate change, noise and air quality." 	
26	Aberdeenshire Council	<ul style="list-style-type: none"> The term Crossrail should be retained as it summarised the long terms aspirations. Request that the re-refresh includes a specific commitment to a full investigation into the long term benefits of the provision of a rail link to Ellon, Peterhead and Fraserburgh, including a cost analysis. 	<p>Noise is included in Policy CR1 and since consultation it has also been referenced in the overarching objective for Environment.</p> <p>The term Crossrail has been re-instated into the strategy with a further explanation of how the objectives of this project will now be achieved.</p> <p>As 1 above.</p>
27	Gemma Bowes	<ul style="list-style-type: none"> A feasibility study into re-establishing a rail link to Buchan should be carried out in the short term 	As 1 above

Comments on the SEA Environmental Report from the three statutory consultees			Comment / amendment
1	Historic Scotland	<ul style="list-style-type: none"> The ER sets out clearly the scope and findings of this assessment and note the amendments which have been made in response to comments on the scoping report. Broadly content with the assessment methodology and findings. For several elements of the RTS (e.g. strategic roads) there is potential for negative effects on the historic environment, but content to agree that these are uncertain at this level due to lack of detail relating to scale, location and options. Welcome the general advice regarding mitigation of these potential effects. 	<ul style="list-style-type: none"> Noted. The importance of the setting of heritage assets is reflected in the SEA objectives and has been added to the indicator for completeness.

		<ul style="list-style-type: none"> • Would have liked to have seen more detail on how mitigation will be embedded into the detailed development of the policies and proposals which are established by the RTS. • It should be clear that adverse effects on heritage assets <i>and their settings</i> should be avoided. 	
2	SEPA	<ul style="list-style-type: none"> • Generally, no major concerns with the Environmental Report. 	<ul style="list-style-type: none"> • Noted
		<ul style="list-style-type: none"> • In relation to park and ride, while such sites may appear to provide a sustainable option, in reality they remove a very small number of cars and increase the number of buses which have been shown to emit disproportionately high levels of nitrogen dioxide in urban centres. It is therefore essential that only buses with the highest EURO specification or hybrid alternatives be used on busy commuter routes and that the location of park and ride sites be considered thoroughly for their impact on local air quality. • Section 4.2 should recognise that buses and HGVs can emit disproportionately high levels of nitrogen dioxide in urban centres, although note that HGVs and buses are mentioned in other sections. 	<ul style="list-style-type: none"> • Park and Ride remains a key part of the RTS as although the comments raised are recognised, it contributes to a number of the strategy objectives and aims to reduce the number of vehicles in the city centre and other air quality management areas. Although they may only remove a small number of cars from the overall road network they remove them from the most congested parts and help to meet a number of RTS objectives. The strategy supports the use and development of low emission vehicles and the potential for Low Emissions Zones. • Reference to reducing emissions from buses and the link to human health has been added to policy IC3 of the RTS
		<ul style="list-style-type: none"> • Table 3.1 – should contain commitment to “...<i>reduce the effects of transport on climate and air quality</i>” 	<ul style="list-style-type: none"> • This is included in the objectives.
		<ul style="list-style-type: none"> • Table 6.1 impact on human health should reference poor air quality. 	<ul style="list-style-type: none"> • Air quality has been added to Table 6.1 of the Environmental Report.
		<ul style="list-style-type: none"> • RTSs support of SUDS, habitat recreation and wildlife corridors described under the heading ‘Water’ would be equally applicable to Biodiversity, flora and fauna section. 	<ul style="list-style-type: none"> • Noted
		<ul style="list-style-type: none"> • Further consideration to the carbon emissions from the loss of soil organic matter under objectives and indicators and the 	<ul style="list-style-type: none"> • An indicator relating to loss of peat land has been added.

		<p>following points are suggested:</p> <ul style="list-style-type: none"> • Include the area of peat likely to be affected by the RTS as an environmental indicator • Identify mitigation / prevention measures to reduce carbon emissions from peat; and • Monitor the area of peat disturbed. 	
		<ul style="list-style-type: none"> • Agree with SEA objective for air quality and welcome reference to routes with higher proportion of buses and HGVs. Also welcome the link to air quality under '<i>population and human health</i>' 	<ul style="list-style-type: none"> • Noted
		<ul style="list-style-type: none"> • SEPA commends the decision to undertake a cumulative transport appraisal that has enabled a strategic overview of the impact of development plan proposals and welcome the reference to the cumulative impact of development on local air quality. Suggest this paragraph also includes a reference to the need to protect areas that are very close to exceeding air quality objectives. 	<ul style="list-style-type: none"> • Noted
		<ul style="list-style-type: none"> • The RTS policy which states that compensation for lost habitat as a result of transport developments should be seen as a last resort measure where avoidance of impact is not possible is supported and welcomed. 	<ul style="list-style-type: none"> • Noted
		<ul style="list-style-type: none"> • Clarification of references to emissions data in Table 10.1 is required. 	<ul style="list-style-type: none"> • Clarification provided.
3	Scottish Natural Heritage	<ul style="list-style-type: none"> • Pleased to note that comments on the scoping report have generally been addressed. 	<ul style="list-style-type: none"> • Noted.
		<ul style="list-style-type: none"> • Table 6.1 – Biodiversity, flora and fauna – the possible role of the RTS should be a bit more explicit. Suggest re-wording first bullet to "<i>The RTS should minimise the impact of the transport network on designated sides and semi-natural habitats, especially where the latter form part of green networks on which many species critically depend</i>". 	<ul style="list-style-type: none"> • This has been amended.
		<ul style="list-style-type: none"> • Would be worth noting that green networks are important for 	<ul style="list-style-type: none"> • This has been included under the heading

	people too.	'Human Health'.
	<ul style="list-style-type: none"> • Second bullet could then be amended adding the sentence <i>"the RTS will not promote schemes / policies likely to have an adverse impact on designated sites, including SACs and SSSIs"</i>. 	<ul style="list-style-type: none"> • An extra bullet has been added to table 6.1 under Biodiversity and the possible role of the RTS to say <i>"the RTS will seek to avoid adverse impacts on designated sites including SACs, SPAs and SSSIs"</i>.
	<ul style="list-style-type: none"> • The RTS should have a positive role in promoting schemes which could enhance the condition of designated sites and wider habitats and species, through for example reducing runoff to watercourses with well designed and integrated SUDS and the protection / enhancement of green networks. 	<ul style="list-style-type: none"> • This has been reflected in Table 6.1 under Biodiversity.
	<ul style="list-style-type: none"> • Suggest that the sentence <i>"RTS can only indirectly influence the condition of protected sites through partnership working and EIA"</i> could be expanded to recognises its responsibility in promoting best practice and more sustainable development. 	<ul style="list-style-type: none"> • Table 6.1 has been amended under Biodiversity to include reference to promoting best practice.
	<ul style="list-style-type: none"> • Landscape – suggest that the role of the RTS should be to take landscape setting and character into account. 	<ul style="list-style-type: none"> • This is already included in Table 6.1
	<ul style="list-style-type: none"> • The biodiversity objective should include reference to impacts on protected species, including EPS. 	<ul style="list-style-type: none"> • Protected species and habitats are referenced in the biodiversity objective.
	<ul style="list-style-type: none"> • Note that full EIA and Habitats Regulations Assessment will be required. 	<ul style="list-style-type: none"> • The SEA has identified that an HRA and AA will be required and the Post Adoption Statement will specify what needs to be included within this and at what stage it is required. There is insufficient detail on the project within the RTS at this stage to carry out an AA at an appropriate level of detail but this will be required as more detail on the project emerges through the STAG process.
	<ul style="list-style-type: none"> • Para 9.22 is unclear. Suggest following sentence is removed <i>"Some adverse changes might be avoided through changes to the RTS, such as adding, deleting or refining specific policies or</i> 	<ul style="list-style-type: none"> • Amended.

		<i>proposals, or by bringing forward new alternatives” and the next sentence changed to read “where impacts cannot be avoided, it may be possible to limit damage through changes to construction methods or timing. Remainder of this para could then be removed.</i>	
		<ul style="list-style-type: none"> • Para 9.24 – depending on the nature of works a licence may be required for works affecting EPS. 	<ul style="list-style-type: none"> • Noted and reference made to this in para 9.24.
		<ul style="list-style-type: none"> • Para 9.25 – suggested slight wording change for clarity. 	<ul style="list-style-type: none"> • Noted and amended.
		<ul style="list-style-type: none"> • Table 10 – emissions from air travel as well as road transport should be included. 	<ul style="list-style-type: none"> • Data is available at a local authority level for emissions from road transport, however this is more difficult to obtain for aviation. The indicator that is used ties in with the indicator used in monitoring the RTS as a whole.
		<ul style="list-style-type: none"> • Indicator for biodiversity should include number of licenses applied for disturbances to EPS. 	<ul style="list-style-type: none"> • Noted and amended.
		<ul style="list-style-type: none"> • Include indicator for number of journeys made by active travel for population and human health. 	<ul style="list-style-type: none"> • This indicator has been added.