

HITRANS response to the Consultation on the draft second Strategic Transport Projects Review (STPR2) for Scotland

This response from HITRANS should also be reviewed alongside our previous submissions on the Draft STPR2 Case for Change Report and Options Sifting Process report, as well as other correspondence and our continuing participation through RTWG and other targeted sessions, including with our Board.

The overview for the consultation describes that “STPR2 sets out draft transport recommendations for the next 20 years. STPR2 is one of the mechanisms for delivering the Vision, Priorities and Outcomes of the second National Transport Strategy (NTS2).” HITRANS is still keen to understand how rural, remote and island areas that are and will be untouched by the STPR2 phase 1 and phase 2 aspects will be supported in terms of investment and development associated with transport to assist towards the NTS2 strategic framework?

For example, throughout the process since such time that it has been suggested that the many rural, remote and islands issues and aspects will be "out of scope," it has been suggested at RTWG that the Island Connectivity Plan will address the gaps in STPR for island communities, but now the latest information from Transport Scotland is that Island Connectivity Plans will mirror STPR2 and will only focus on Transport Scotland services, meaning the strategic road network within islands, ferry services operated by local authorities, public transport other than to connect with Transport Scotland ferry services etc. will now again be excluded from this process or any strategic approach. Similarly in mainland areas, STPR2 has failed to consider the priorities of the A890 at Stromeferry, the A83, Corran Ferry, Mallaig to Armadale ferry despite them all providing very similar functions in the area’s strategic transport network.

A key factor remains around the way in which the definition of the strategic transport systems has been formulated through STPR2, and the fact that it was only formulated some months, if not years, into the STPR2 process. Thus stakeholders such as HITRANS are left frustrated with the process which at the outset was presented as being a process for the whole of Scotland - in keeping with NTS2 being a national strategy.

The STPR2 process should include all of Scotland’s transport, rather than be limited to Transport Scotland’s responsibilities. As it stands, this does not meet the intention of NTS2 being a national strategy for all of Scotland’s transport infrastructure and networks, or indeed the NTS2 emphasis around reducing inequalities and helping to deliver inclusive economic growth.

Concluding the NTS2 sponsored review of roles and responsibilities in transport in Scotland should have been prioritised and finalised. This was of critical importance to the shaping of the STPR2 process. As things stand there are discrepancies within roles and responsibilities across Scotland, and, it is difficult to have any confidence in whether within STPR2, even with the narrow definition of “strategic”, the right transport problems and interventions have been considered.

A strategy for all of Scotland

Introducing the Strategy, Cabinet Secretary for Transport, Infrastructure and Connectivity Michael Matheson said:

“

This Strategy advocates a vision for Scotland’s transport system that will help create great places – a sustainable, inclusive, safe and accessible transport system, helping deliver a healthier, fairer and more prosperous Scotland for communities, businesses and visitors”.

[Read more from Michael Matheson](#)

This Strategy is for all of Scotland, recognising the different needs of our cities, towns, remote and rural areas and islands. It considers why we travel and how those trips are made, by including walking, wheeling, cycling, and travelling by bus, train, ferry, car, lorry and aeroplane.

As rural Scotland and the islands tend to suffer most as a consequence of the present rigid approach to responsibilities, rather than considering a more collaborative stance or element of subsidiarity, it is difficult to recognise how the STPR2 process, as has been presented, will *reduce inequalities, take climate action, deliver inclusive economic growth and / or improve our health and wellbeing* for the Highlands and Islands region, and therefore in turn the nation as a whole. What is the status of this review of roles and responsibilities. Is this available for comment and input?

In terms of the STPR2 process, HITRANS has invested many hours of officer and Board members' time during the last three years of the STPR2 development to feed into the process. HITRANS has raised many questions over the period that have not yet been answered, and which are reiterated in this response.

While HITRANS recognises the merits of a number of the projects to our region that are recommended in STPR2, it is clear that the loss or absence of several other projects that have been sifted out or that do not feature will undermine the opportunity to optimise NTS2 priorities in the Highlands and Islands context, including:

- Addressing affordability issues across active travel, behavioural change opportunities, electric vehicles and transport poverty more generally.
- Decarbonising the bus network, specifically consideration around an approach for smaller operators, particularly where these are more prevalent in remote, rural and island communities. How will these smaller and community-based operators keep up with commercial operations in urban Scotland?
- Ensuring rural public transport including Demand Responsive Transport services will be supported and developed in the absence of revenue funding through this process, or otherwise provided with targeted revenue support to achieve service-changing provision to address accessibility gaps, particularly in remote, rural and island locations. Indeed, the revenue costs of maintaining a digital demand responsive transport booking platform or Mobility as a Service (MaaS) platform do not seem to be understood or recognised through STPR2.
- Planning very long-term for all island transport connections (60+ years to align with the design life of possible *solutions*) – that is inter-island ferry, air services and other solutions such as consideration of tunnels and fixed links.
- Decarbonising of ferry and air transport beyond the CHFS and NIFS network – the expertise developed by Orkney Ferries on the use of hydrogen should be used along with international exemplars to guide strategies on the deployment of battery electric ferries. Decarbonisation of internal air services including on routes within Orkney and Argyll should be included in the options taken forward demonstrating the importance of local air services in the national transport mix, and the opportunity to make real headway decarbonisation. It is clear from international best practice that zero emission ferries can be delivered on shorter ferry crossings so it is perverse to exclude the many local authority operated ferry routes which could already support the introduction of zero emission ferries such as those which operate in Norway, while looking to a yet untested technology to decarbonise longer ferry crossings on the CHFS and NIFS networks. A pragmatic approach would be to collaborate to develop the Scottish experience on the shorter ferry crossings, and then to piggyback and develop a rollout to all Scottish ferry crossings.

Question 2 asks “to what extent do you agree or disagree that the STPR2 process reflects the NTS2 Priorities and Outcomes.” As stated above, HITRANS is still keen to understand how rural, remote and island areas that will be unaffected by the STPR2 recommendations will be supported in terms of investment and development associated with transport to assist towards the NTS2 strategic framework, and key aims around reducing inequalities and delivering inclusive economic growth?

This is crucial in the context that NTS2 sets out “an ambitious vision for Scotland’s transport system for the next 20 years. The vision is underpinned by four priorities: Reduces Inequalities, Takes Climate Action, Helps Deliver Inclusive Economic Growth and Improves our Health and Wellbeing, each with three associated outcomes.” And furthermore, the NTS2 states that its approach is around “three pillars of: collaborative working with partners, engaging with stakeholders and building an evidence base.”

The removal of projects / interventions in STPR2 that had been introduced to the process using evidence to address issues / challenges, and through a collaborative approach with partners and stakeholders, for the arbitrary reason that they are not presently the responsibility of Transport Scotland is at odds with the ambition and three pillars approach of NTS2 described above.

For example, local roads make up 94% of the total road network and carry 65% of traffic in Scotland, however the majority are out of scope of STPR2. Trunk roads currently account for 50% of the national funding for roads maintenance despite being only 6% of the network by length. Proposals to further increase funding for trunk roads only is unsustainable unless similar commitments are made for local roads.

There also appears to be a lack of consistency within STPR2 as to what local infrastructure is out of scope. For example, proposed interventions such as 20mph zones, place-making, Active Travel Freeways and Demand Responsive Transport are all reliant on local authority transport infrastructure and resources to deliver and maintain, and yet these are considered within scope, while local roads and public transport infrastructure are not – despite much of the above-noted initiatives relying upon the local roads network to aid delivery.

In summary, HITRANS believes that the STPR2 process does not reflect well the NTS2 priorities and outcomes, as it is too focussed on only Transport Scotland aspects, plus active travel. Specifically for example, STPR2 does nothing to “minimise the connectivity and cost disadvantages faced by island communities and those in remote rural and rural areas, including safeguarding of lifeline services”, as set out in NTS2.

Question 4 asks “to what extent do you agree or disagree that it was correct to take both a Regional and National approach to STPR2?” STPR2 has not adopted a Regional and National approach as far as can be observed, all transport that is included is largely national by merit of deeming anything operated other than by Transport Scotland as ‘out of scope’.

A Regional and National approach to STPR2 would have been welcomed if STPR2 had been congruous with the NTS2 vision that “we will have a sustainable, inclusive, safe and accessible transport system, helping delivery a healthier, fairer and more prosperous Scotland for communities, businesses and visitors.” STPR2 is discordant with this vision as it has neglected the many key transport issues that face communities, businesses and visitors that are not within reach of the Transport Scotland-run transport network. In so doing STPR2 will further increase inequalities, will fail to help take climate action bilaterally across Scotland, and will limit or indeed act counteractively in terms of inclusive economic growth and a just transition.

Question 6 asks “to what extent do you agree or disagree that the engagement process has allowed you to provide a contribution to STPR2?” All levels of HITRANS – officers, Board, local authority partners – have contributed to the STPR2 programme at every given opportunity; the process feels to have been neither reactive nor proactive, as at each juncture similar comments and feedback have been provided, with little or no apparent response and progress.

Furthermore, as highlighted above, HITRANS was earlier reassured that STPR 2 ‘out of scope’ interventions would be advanced through the Island Connectivity Plan (ICP), but initial consultation indicates that this will also not be the case. Once again, the ICP will focus only on Transport Scotland provided or sponsored services.

We are aware that the ICP is being progressed alongside STPR2 and will replace the Ferries Plan by the end of 2022. We seek confirmation from the Scottish Government that the ICP scope will be reframed to include transport infrastructure owned and operated by local authorities and in particular island road networks and local ferry (and air) services – all the aspects that make up collectively the lifeline assets and services for island communities.

This is particularly significant given there are no trunk roads on any of the islands nor are many served by ferries supported by Transport Scotland and are therefore out of scope of both STPR2 and the ICP. Many of the island roads have seen significant increases in vehicular traffic due to the success of RET but this is resulting in severe pressure on island infrastructure.

This question here would be more meaningfully framed, “To what extent has the STPR2 engagement process enabled involvement in and a sense of ownership around the STPR2 process and outputs?” The answer to this question would simply be that the engagement process has not supported this – the scope of STPR2 was not made clear at the outset and during the first interactions HITRANS and partners had with the programme from 2019. Since then the rationale has not been made clear as to why so much of Scotland is ‘out of scope’ if STPR2 is as stated intended to “help deliver the vision, priorities and outcomes that are set out in the second National Transport Strategy”.

This lack of clarity at the outset, the lack of a clear argument for exclusion, and the moving target as to where strategically important issues and opportunities beyond Transport Scotland’s (current) gift will be pursued, has constrained engagement and led to wholesale dissatisfaction with the process among stakeholders in the Highlands and Islands.

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STPR2 recommendations are grouped under six key themes. HITRANS does not feel that it is appropriate to determine a “key priority” from amongst these key themes. Rather, as set out in the HITRANS Regional Transport Strategy (RTS) the Partnership is confident, from an extensive catalogue of research undertaken over many years, that the transport provision and enhancement required for the region’s prosperity, for inclusive economic growth, for addressing inequalities, and for improvement in health and wellbeing, are founded on a multi-thematic and multi-modal strategic approach to transport development and delivery.

Additionally, when considering which themes should be prioritised, it would seem divisive to approach consultation on this basis, or on the basis whereby the loudest (or most populist) voice gives the strongest reading. Instead provided below are comments on the STPR2 themes and relevant projects from a more functional and applicable perspective, assessing

the value and appropriateness of projects to the HITRANS region's context, issues and the opportunities that exist.

Under the theme **improving active travel infrastructure** the following comments are highlighted.

Active travel funding models require to be revised as there is currently too much focus on lengthy, multi-stage challenge funds, which are disproportionately cumbersome for smaller local authorities. Local authorities are the key delivery agencies of active travel infrastructure on the ground. HITRANS has worked with all constituent authorities to deliver comprehensive active travel programmes successfully. However, local authorities are still required to bid via third parties and third-sector organisations who manage further active travel funds on behalf of Transport Scotland. To see the active travel network utilised and enhanced will require a substantial shift in the current funding regime. This system of local authorities having to prepare bid documents and to compete against each other for funding is time consuming and costly to resource, and takes away from improvements that could otherwise be delivered.

The majority of active travel funding should be given directly to RTPs and local authorities, including via the Cycling Walking Safer Streets grant which is ring fenced. This would free up the limited resources local authorities have to deliver active travel infrastructure, particularly for the smaller local authorities with a small team. This would also allow local authorities and RTPs to programme ahead at the start of the year (or better still develop and resource multi-year programmes), rather than wait until half the financial year has passed before finding out if a bid for a project has been successful or not.

Furthermore, many of the existing grant funding criteria for active travel infrastructure projects favour more urbanised areas (including for example, the requirement for 3m wide cycleways and segregated cycle lanes – greater than the width of many rural roads! It is therefore requested that funding for active travel infrastructure is reviewed as part of STPR2 and funds such as Cycling Walking and Safer Streets are given a greater proportion of the total funding available for active travel; and that appropriate design standards are developed on a strategic and standardised basis, perhaps with a **design guide** for different contexts rather than **design standards**.

1. Connected neighbourhoods, 3. Village-town active travel connections, 4. Connecting towns by active travel

There are opportunities to grow active travel across urban *and* rural, remote and island Scotland. It is suggested that a broader emphasis is used in reference to the 20-minute neighbourhood concept as a method of achieving connected and more accessible neighbourhoods (and communities), with the emphasis on urban areas, towns and cities removed.

The current wording of *“routes that better connect communities to services in our towns and cities”* and *“delivering connected neighbourhoods which are the transport components of 20-minute neighbourhoods within towns and cities”* appears to exclude rural communities and most islands. The right to be able to walk and cycle safely and comfortably within and between villages, localities and settlements, and to important transport nodes such as ferry terminals, without feeling that space is dominated exclusively for the benefit of cars and other vehicles, should be a Scotland-wide right. This is just as important in rural communities as it is in towns and cities – it simply needs a locality-based approach rather than a national standardised approach.

There is scope here also to have a stronger connection with improved public or demand-responsive transport, to connect centres with services—whether rural or urban—with surrounding settlements which lack those services. In rural areas this might mean creating a network of villages or houses connected by good cycle and public transport links, and would include investment in simple but vital provision such as high quality accessible waiting facilities and trip-end cycle parking or indeed focussed availability of cycles and e-bikes (recognising the higher costs of living generally in remote and island areas, which might act as a barrier to cycle and e-bike ownership, including with higher levels of self-employment that could limit availability for example of a cycle to work scheme).

2. Active freeways

The emphasis given to large urban areas and priority for the larger cities would seem again to exclude the entire regions covered by HITRANS, SWestrans, Tactran and ZetTrans, with a prospective concentration of all resources on the Central Belt. While the Central Belt contains the largest population centres, it also offers the greatest variety in sustainable travel options already (bus, train, tram) which are lacking in the more rural RTP areas. At the very least, the priority for Active Freeways should be afforded to all of Scotland's seven cities on an equal basis. The approach taken in the past to Community Links Plus afforded recognition to different active travel investment for urban areas without excluding important large towns like Elgin which has the highest levels of cycling of any town in Scotland.

5. Long distance active travel network

While HITRANS broadly support the “STPR2 Recommends” section: “*Connecting towns active travel links would be provided between settlements that are relatively close to each other, and where there is good opportunity for switching from travel by car...village-town active travel connections would be developed to support more rural journeys by active modes, encouraging a switch from short rural car trips, and allowing people to benefit from improved access to local goods and services*”, it is felt that there is still too much emphasis on travel to large urban areas. A good example are the settlements of the old A9 which are commutable from one another but lack adequate cycling infrastructure. Communities such as these would appear to not be included within Village-town Active Travel Connections or Connecting Towns by Active Travel.

It is felt that the Long Distance Active Travel Network should be separated from the inter-community recommendations, as bundling the three together gives the impression that active travel for utility journeys is seen as something only applicable to urban areas, with rural areas only useful for leisure-based journeys. This is not the case in reality, and there is a danger that the opportunity to reduce multiple car ownership in rural areas by improving local active travel connectivity will be missed. Similarly, it is of concern that whilst the recent Sustrans consultation on NCN changes proposed a reduction in the extent of the NCN across Caithness and Sutherland, STPR2 is now recommending developing a ‘Long distance active travel network’. Where will this be located, how will it be funded. There is also a need for specific design guidance applicable to rural areas, where pathwidths greater than 2.5m may be neither appropriate to the context, or deliverable due to cost, land constraints, geography, etc. Such a rural-based and location-tailored design guide should be progressed as a matter of urgency.

Under the theme of **influencing travel choices and behaviours**

HITRANS supports the accent in this theme focussing on “influencing people to make healthier, more sustainable and safer travel choices”, and the suggestion is welcomed that “*to be effective, implementation of these STPR2 recommendations would require a partnership*”

approach between the many public, private and community organisations involved in delivering changes in travel choices and behaviours.” In the interests of reducing inequalities however, and “creating a Scotland that will enable everyone to share in the benefits of a modern economy which promotes wellbeing”, this theme needs to specifically identify measures that will afford the same benefits to rural Scotland where often travel choices do not exist, and communities are *forced* into car ownership. It should be an adopted principle that all of Scotland should be afforded travel choices, enabling the ability to fully participate in life.

7. Changing Road User Behaviour

The Safety Camera Programme is a useful tool in terms of speed management and road safety which is underutilised in Rural Local Authorities due to the current criteria in place for Safety Camera site justification. A look at making the introduction of Safety Camera deployment more accessible as a road safety and behaviour change tool would be very welcome. Implementation of speed enforcement technology is welcomed but should not be restricted to the Trunk Road network only, but rather, should provide equal enforcement technology on all public roads, in a fair and equitable way, that reflects the Scottish Government commitment to making a just transition to net zero. Addressing speed enforcement must include a focus on the needs of communities, not only the strategic link road asset within or between settlements. Current enforcement policies mean that enforcement within our rural towns and villages is very limited, and the focus is on the routes between settlements.

8. Increasing Active Travel to School

We welcome integration of this recommendation with 2. Connected Neighbourhoods, and would emphasise again that this needs to include safe routes to rural schools – where pupils living within 1.5 – 2 miles are not eligible for free school transport, as well as urban ones. As already highlighted the delivery of this recommendation and other active travel ones depends on the level of resource available at a local authority level.

In most of Scotland, the trunk road network already bypasses settlements but in Highland, Argyll and Moray the major barrier to encouraging active travel is the strategic (trunk road) network where it divides smaller villages/towns. With vehicle speed and lack of pedestrian crossing facilities being the two things that are most often highlighted by stakeholders. Our strategic road network that passes through these communities heavily prioritises the movement of vehicles over people choosing active travel within these communities.

10. Expansion of 20mph limits and zones

We are pleased to see villages included in this recommendation. We note that it would be much simpler to make 20mph the default in all residential areas – e.g., where limit is currently 30mph – and allow exceptions through TRO process. This would help to make local neighbourhoods more liveable right across the country, in rural as well as urban areas.

Under the theme of **enhancing access to affordable public transport**

HITRANS supports the emphasis to “*enhance access to affordable public transport*”. However, while recognising that this “*applies to those living in rural areas as well our towns and cities*” it is important to note that many rural areas have little or no public, or community transport at

present STPR2 measures need to recognise this and set out how these gaps in provision will be addressed through a strategic approach.

From a HITRANS perspective in terms of public transport there a number of critical omissions from the recommendations that will prevent STPR2s ability to achieve the Government's commitment to 20% reduction in vehicle kilometres by 2030, make meaningful contributions to Scotland's net zero greenhouse gas emissions target by 2045, and will seriously limit the ability to address inequalities particularly, and contribute to inclusive economic growth across the whole of Scotland.

These gaps include:

- Delivery of the future phases of the STPR1 recommendations for Aberdeen-Inverness rail line with hourly services and a journey time of around 2 hours.
- West Highland Line and Far North Line reviews – examining the strategic role of these routes in serving ports that have major lifeline ferry services, and which have underutilised freight capacity. They provide the right environment for being served by hydrogen powered trains in the future.
- Rail connection to Faslane. HMNB Clyde is Scotland's biggest single employer site, and experiences severe congestion in the peaks. It is a site of national significance and offers great potential to contribute to vital targets around vehicle kilometre reductions, net zero greenhouse gas emissions and inclusive economic growth.
- Examination and roll out of last mile logistics – including breaking bulk from rail freight to E-carts for town/city centre deliveries etc.

The omissions of these four projects and initiatives means that the recommendations presented under this theme *do not* address the transport needs of the region, including our shared interest with our partner SPT in the HMNB Clyde Rail Connectivity project, which HITRANS is leading alongside SPT.

The SPT region has strong cross-regional labour markets, much of this facilitated by the dense suburban rail network which serves many of the rural, remote and coastal communities, which have over recent times been adversely affected by depopulation of younger and working age residents and increasing isolation from economic opportunities.

The HMNB Clyde Rail Connectivity project recognises the strategic role of rail in the region, and which partners believe is not sufficiently represented in STPR2. Indeed, the project is potentially undermined by the statement that future rail investment is targeted at the strongest 'city-to-city markets'. This broad statement does not recognise regional differences in rail infrastructure, usage, opportunity, and the likely agglomeration impacts of such a project.

COVID has disrupted historic patterns of rail usage, but it is anticipated that this will move to a stronger position in the coming months and years linked to maximising the role of rail in promoting modal shift, reducing transport emissions and reducing car km for everyday journeys.

The HMNB Clyde Rail Connectivity project should be further considered for inclusion in STPR2. The Maritime Change Project is a £1.3 billion development at the largest single-site employment location in Scotland. It is inconceivable that the travel demand, and a well-developed public transport solution, associated with a development of this scale has failed to

be included in STPR2, and further dialogue is required to review the details of the Phase 2 process in relation to this option.

11. Clyde Metro, 12. Edinburgh & South East Scotland Mass Transit, 13. Aberdeen Rapid Transit

It is noted that STPR2 includes interventions to develop Glasgow Metro, Edinburgh Mass Transit and Aberdeen Rapid Transit, and while HITRANS supports the emphasis to improve transport in our cities, there appears to be a lack of consistency here with local transport infrastructure (bus, tram, light rail etc.) in city regions being within scope of STPR2 and typically more rural networks considered out of scope. This will almost certainly exacerbate the urban-rural imbalance and act against NTS2 objectives around reducing inequalities and supporting the delivery of inclusive economic growth. Ultimately this results in further population drift from rural areas to city regions, due to an inconsistent approach in setting appropriate objectives for rural and urban areas.

14. Provision of strategic bus priority measures

Existing and proposed grant funding for bus enhancements, including through this measure, is targeted predominantly at congestion and bus priority measures which primarily benefit urban and city regions where congestion is an issue.

HITRANS recognises the importance of addressing congestion in urban areas, and indeed has worked together with the Highland Council, Argyll and Bute Council and bus operators on Bus Partnership projects in Inverness, Fort William and Oban.

It is however critically noted that this and measures highlighted in STPR2 will have only limited impacts on bus services in rural areas; and that it is vital that rural areas benefit from attractive public transport options to promote positive transport choices too, given the necessity of sometimes long journeys and the associated limitations of active travel options.

For example, the Young Person's Free Bus Travel Scheme for 5-21 year olds is of limited use in a rural context compared to an urban one. In rural areas local supported services are infrequent or don't exist at all, and where they do significant investment in simple measures is needed to make them more attractive. For example, there are thousands of inaccessible bus stops in Highland with bus shelters often located at road ends or verges without connecting footpaths. Recognising the discrepancy of responsibilities highlighted in this document, it is still the responsibility of local authorities to provide bus waiting facilities on trunk roads. In most of Scotland this presents no issue as local bus services don't stop on trunk roads but in rural areas, they often form the backbone of the rural bus networks with most routes operating on a hail and ride basis as well as specific stopping points.

15. Highland Mainline rail corridor enhancements

A significant element of the commitment of STPR1 to enhance the Highland Mainline Corridor has still not been delivered. Despite options appraisals and detailed work all that has been delivered is a £54m platform lengthening scheme but no journey time reductions. The issue remains of capacity for longer freight trains, as well as the need to progress with electrification of the line. Precise interventions do not require to be paused in order to commence another STPR2 compliant appraisal.

HITRANS expectation remains that this corridor will enjoy a reduction in end-to-end journey times to take the average journey from Inverness to Edinburgh / Glasgow to under 3 hours with services operating on an hourly headway.

17. Edinburgh/Glasgow – Perth/Dundee rail corridor enhancement

STPR2 recommends a programme of improvements, such as junction upgrades and permissible speed increases to achieve journey time improvements and line capacity increases for passenger and freight services. While subject to more detailed work in the business case process, potential areas for improvement could include Perth Station approaches, Tay Viaduct, Arbroath area local enhancements, and additional double-tracking in the Montrose area. In addition, opportunities will be taken to increase gauge clearance (to permit taller and wider trains) to facilitate growth in the full range of intermodal freight traffic.

It is important to note that this corridor has an obvious impact also on the Highland Main Line. Slow approach speeds at Perth are particularly problematic. Electrification of the line is required, and gauge enhancement would come with electrification.

18. Supporting integrated journeys at ferry terminals

It is essential that this recommendation is advanced and on an equal footing right across Scotland, covering all ferry and connecting public transport journeys – island to mainland, and inter-isle and local ferry journeys. The challenge of this initiative should not be overlooked – considering it comprises the need for multiple operators – commercial, supporting and community – to act in alignment and to overcome difficulties around scheduling and registering services alongside the unpredictability of the weather around Scotland and the impact that that has on ferry operations particularly. In most locations all operators work well to integrate services in challenging circumstances. HITRANS welcomes Transport Scotland's recent support for its MaaS platform GO-HI and our DRT Smartphone app which will help deliver improvements under this recommendation.

To improve integration further invariably requires increased revenue support to provide new or increased frequencies of local bus or subsidised taxi connections. In previous consultations, HITRANS has proposed that an easy step forward would be to include the onward connectivity to/from ferry services within future ferry contracts for CHFS or the Northern Isles. The performance regimes of operators contracted by Scottish Government compete rather than cooperate. For example, a passenger arriving on a delayed train in Oban may miss an onward ferry to Barra because the CHFS contract penalises the operator for a late departure.

It would be helpful if this recommendation set out further detail of the interventions that it comprises and how these will make a difference to the travelling public across the region.

19. Infrastructure to provide access for all at railway stations

STPR2 recommends implementing measures to improve the accessibility of Scotland's railway stations, which can help ensure that everyone can use the transport system with as few barriers as possible – with examples stated including step-free routes and platform access to passenger trains.

It should be noted that the Disability Discrimination Act requires this action, but that rural stations particularly struggle to provide it, for example at West Highland Line there are still island, gravelled platforms.

20. Investment in DRT and MaaS

The 'Case for Change' reports for the Highlands and Islands and Argyll and Bute regions highlight that across the region *“the lack of and limited frequency of public transport, bus services in particular, is a problem particularly in rural areas.”* The report also states that *“bus services do not operate at desired times such as early enough to make rail connections or late enough in the evenings to allow for activities to be undertaken after school / work or to access shift work.”* Although this report is focused on the Highlands and Islands specifically, the problems described are common across much of rural Scotland. Given this key need identified, which ultimately causes inequalities, leads to poorer health and wellbeing, and creates barriers to inclusive economic growth and resilience, it is disappointing and a major barrier to success that revenue support, the key barrier to service growth, is deemed out of scope for STPR2.

Local bus services across Scotland have been in sharp decline for the last 15 years or so. Bus patronage is, as expected, higher in urban areas as bus services are more frequent. Much of rural Scotland continues to rely on supported local bus services, and communities are dealing with the reduction and demise of many routes in their areas. Since the Concordat agreement of 2007, ring-fencing of Local Authority General Revenue Grant (GRG) has been removed, revenue funding has been reducing (Audit Commission estimated a real terms reduction of 7.6% since 2013/14) and focus has therefore been placed on broader statutory functions, of which, local bus services are not. Consequently, funding for local bus services has reduced significantly across Scotland and continues to do so.

Rural Scotland has been at the brunt of this decline with historically the heaviest reliance on subsidised local bus services. Between 2010 and 2019 there was loss of more than one in five subsidised bus services in Scotland, a loss of around 60 routes, which are far more likely to impact rural and remote areas.

A flexible approach between local bus services, DRT and MaaS is required, with a locality- and community-driven approach. There is no targeted funding in Scotland for rural transport, to develop and test new services and new ways of working. Intervention is needed for rural transport in a similar way to the leadership shown for urban areas through Bus Partnership Fund and Glasgow Metro. There will be revenue costs associated with the operation of mass transit in cities and a similar reflection is needed on how to ensure rural areas have an alternative to the private car. A rural transport fund is needed, and this should encompass the revenue costs needed to support software licensing for digital DRT, MaaS platforms and increased availability of bus and on demand transport services.

21. Improved public transport passenger interchange facilities

STPR2 calls for improved quality of passenger facilities at bus stations, railway stations and other transport interchanges to encourage the uptake of public transport and a switch from car use. This would include improving accessibility at bus stations and transport interchanges for people with reduced mobility. Improvements can also be made to infrastructure design and security (to and within stations), and by enhancing the quality of the infrastructure, information, signage and wayfinding for all users of the facilities.

This approach is of course a given in terms of striving always to improve the quality of passenger facilities. HITRANS over many years has supported the provision of bus stop infrastructure, shelters and public transport information right across the region. Delivering a significant capital programme of investment until the £3.5M budget was redirected to local

government block grant in 2008. HITRANS experience of delivering such a programme in partnership with local authorities offers a model of good practice in improving passenger transport infrastructure on a common basis.

This recommendation should also recognise that for many communities across Scotland, a ferry service or air service performs the function of what in other areas is provided by a local bus or rail service – and as such, the *improving public transport passenger interchange facilities* should include also ferry and air service interchanges, particularly for local transport (to nearest town / city / service centre). Without doing so, STPR2 is failing to recognise the needs and rights of island communities in terms of inequalities that presently exist, and in terms of delivering inclusive economic growth – in other words for island as well as mainland locations.

Furthermore, the described recommendation appears to favour the provision of public transport passenger services and facilities in urban areas, where these is more likely to be formalised interchanges, as well as bus stations. In more rural, remote and island areas it is far less likely that there will be such a facility and so these localities and services would be excluded from seeing any such improvement – this recommendation should be island- and rural-proofed in order to make provision for the improved public transport facilities across the whole of Scotland, so not just for bus stations, railway stations and other transport interchanges, but also to include waiting facilities for example in rural areas.

There are various opportunities in Highland to reinstate rail halts and stations, and to improve services and infrastructure for bus and rail that could all contribute to offering realistic alternatives to car-based living in rural areas that are omitted from STPR2 that should be revisited in the context of the of the 20% car km reduction target. HITRANS and THC continues to follow progress with the Highland Mainline rail corridor enhancements committed through STPR1, but remain only partially delivered. This is an important element of the strategy to reduce car dependence for strategic journeys from Highland to the rest of Scotland.

22. Framework for delivery of mobility hubs, 23. Smart, integrated public transport ticketing

In terms of **decarbonising transport**, the physical integration of shared mobility services through Hubs and digital integration of ticketing are important to encouraging modal shift and to make it more convenient for people to choose sustainable modes rather than the private car. As a partner in the North West Europe eHUBS project HITRANS are pioneering the European eMobility Hub concept to the Highlands. A Mobility Hub is a recognisable and easily accessible place which integrates different transport modes and supplements them with enhanced facilities, services and information aimed at encouraging more sustainable travel, creating sense of place and improving journeys and travel choices.

eHUBS will initially be developed at 11 locations. The enhancement of physical mobility choices through the introduction of new modes / services will be strengthened by offering booking and payment of all services through the GO-HI Mobility as a Service (MaaS) app. The GO-HI app will digitally present the range of travel choices available at each mobility hub and the app will be developed to include a new resource to allow users to find nearby mobility hubs. Mobility services will include bus, rail, ebike, eCargo Bike, EV Car Club, EV Charging and folding bikes. HITRANS can build on this work to expand the concept across the region and believe other RTPs will be similarly well placed to provide leadership in their areas.

24. Ferry vessel renewal and replacement and decarbonisation

STPR2 recommends continued investment in ferry renewals that would address the needs of rural and island communities by improving the resilience, reliability, capacity and accessibility of ferries. Progressive decarbonisation of the CHFS and NIFS ferry networks will support the 2018 – 2032 Climate Change Plan and the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. STPR2 recommends renewal and replacement of the Clyde and Hebrides Ferry Services (CHFS) and Northern Isles Ferry Services (NIFS) vessels including progressive decarbonisation by 2045.

The STPR2 commitment on ferry vessel renewal is welcomed, and this aligns with Scottish Government's commitment, as outlined in the Infrastructure Investment Plan 2022-2026, for at least £580m of investment in the Clyde and Hebrides Ferry Services (CHFS) and Northern Isles Ferry Services (NIFS) networks over the next years. With this already set out in the Infrastructure Investment Plan, from a STPR2 perspective it is then specifically reiterated that it is vital that all of Scotland's ferry renewals are progressed timeously and *collaboratively working with partners* to address the tenacious need across all networks in the HITRANS region to improve resilience, reliability, and accessibility of ferries for the benefit of all island communities that have a life-line reliance of ferry services.

Specifically, there is also a need to consider freight needs more especially the detail in terms of Islay, Lewis and Orkney. The purchase of the second-hand vessel MV Utne (now renamed MV Loch Frisa) by Transport Scotland in October last year will be valuable in providing extra capacity on the CHFS network. But despite this additional tonnage, resilience of the aging CalMac fleet remains an ongoing concern and poses a significant risk to economic recovery. For example, it is highly likely that additional tonnage will be needed to meet the needs of industry in the Outer Hebrides during the planned closure of Uig Harbour from September through to February 2023 when all traffic from Harris will be rerouted to the Stornoway-Ullapool link. Furthermore, autumn is a busy period for freight on the Northern Isles Ferry Services (NIFS) due to increased demand from the agriculture sector. In most years in recent times, the MV Arrow is chartered temporarily on the NIFS network to manage this. When the MV Arrow was instead used on Stornoway-Ullapool last autumn, industry in the Northern Isles raised concerns about the knock-on impacts with a heightening of freight capacity problems. Efforts are required to ensure that when these added pressures arrive in autumn, that there are solutions in place for both Stornoway-Ullapool and the Northern Isles. It is anticipated that these pressures may be even greater in the coming season and onwards as the full knock-on impact of the increase in costs, chiefly fertiliser costs, in farming leads to the movement of additional livestock in the backend.

The expertise developed by Orkney Ferries on the use of hydrogen should be used to guide practice along with international best practice on the deployment of battery electric ferries. Decarbonisation of internal air services including on routes within Orkney, Argyll and Highland Council's Corran Ferry should be included in the options taken forward.

In a broader sense, it is important to flag again in terms of ferry services, that no consideration has been given to any operator beyond those paid for directly or owned by the Scottish Government. CalMac as an operator features within the plan, but the wider connectivity that connects remote communities who depend on ferries operated by others are out of scope. A comprehensive plan must include all links and connectors, irrespective of ownership, especially where key lifeline services are involved.

Investment in ferries and ports should be prioritised. As highlighted in the RTS *'lifeline ferry services provide access to/from the communities of islands and peninsulas. Sailing frequency is generally increased in the summer to meet tourist demand. The communities benefit from this, but this then leaves deficiencies in frequency of service during the winter. Some ports around the region require upgrading to improve service reliability and to be able to accommodate future vessels. There can also be challenges in terms of larger freight vehicles accessing ports and harbours. An ageing ferry fleet is leading to reduced service reliability, perhaps coupled with changing weather patterns. It also contributes to vehicle capacity constraints on some routes, and ageing vessels and shore infrastructure are particularly issues for the internal Orkney ferry network.'*

'Initial Case for Change' STPR2 reports published in early 2021, recognised the major issues facing lifeline inter-island services (across the region), but this unyielding and pressing need has subsequently been deemed 'out of scope' in the case of Orkney and some services in Highland and Argyll & Bute for the purposes of STPR2, while other inter-isles services are included by merit of who provides them at present.

Both ferry and air services provide lifeline connections to many of the country's most fragile and remote communities and these services should be reviewed in tandem, on an equal basis, under the new Islands Connectivity Plan, which in keeping with the spirit of the Islands (Scotland) Act 2018 should consider measures to support and help meet the unique needs of **all of Scotland's islands** now and in the future.

25. Rail decarbonisation

HITRANS supports this recommendation and the potential for development of alternative traction (battery and/or hydrogen trains) on rural lines in the Highlands and Islands. Rail carbon emissions are already very low. Electrification further enhances this and gives gauge enhancement opportunities. There is a need to support alternative fuels for locomotives and passenger trains on the network not electrified for electrification.

26. Decarbonisation of bus network

HITRANS welcomes this recommendation to extend the existing funding criteria to include vehicles used for home to school and community transport. There should be a fair distribution of this funding across urban and rural Scotland, including on the islands. This fund should also recognise that many communities do not have public or community transport available to them, and so this fund should also link with Recommendation 20 to invest in the growth DRT and MaaS.

27. Behaviour change and modal shift for freight

STPR2 recommends the Scottish Government brings together public and private sector organisations to develop a net zero freight and logistics network for Scotland that would encourage the switch to more sustainable and efficient freight transport. It is highlighted that this will require Government funding for innovation to occur, for example to reduce track access charges and have progressive grant regimes to encourage start up flows.

In terms of increasing safety and resilience on the strategic transport network

In general terms, HITRANS continues to press the importance of the *locally significant road network* as well as the Trunk network across the region. The exclusion of the former in STPR2

is a severe limitation of STPR2 and demonstrates a lack of rural-proofing and a deficiency in terms of use of the Island Community Impact Assessment as part of the STPR2 process.

This blinkered approach has ruled out road improvements altogether for our island local authorities of Orkney and Western Isles where there are no trunk roads. The scope of STPR2 means some of the most serious road problems facing remote communities in the region cannot be addressed through the review. For example, the long-standing issue of rock falls at the Stromeferry bypass (A890) which results in drivers facing a 140-mile diversion when there are closures. This conflicts with the emphasis in the NTS2 to reduce inequalities, and particularly as NTS2 states to *“minimise the connectivity and cost disadvantages faced by island communities and those in remote rural and rural areas, including safeguarding of lifeline services.”*

29. Access to Argyll A83

It is essential that Argyll and Bute has reliable and resilient connections to Scotland’s urban centres and beyond for access to key markets, employment, tertiary education and healthcare. The region relies heavily on infrastructure owned and operated by Transport Scotland such as the trunk roads. The region also suffers with well-publicised reliability and resilience issues on a number of the key transport arteries e.g. A83 Rest and Be Thankful, A82 including Taret to Inverarnan, and other long diversion routes. Local transport failures (such as landslips) have a detrimental impact on the economy of the region. It is therefore essential that there is significant investment via STPR2 to improve resilience on our key transport arteries.

HITRANS welcomes the Scottish Government’s commitment to move beyond the mitigation strategy and to look at an alternative permanent solution to the ongoing problems at the Rest and Be Thankful. There continues to be a concern that the lack of resilience on this key trunk road overshadows the wide and varied good work undertaken locally to create a place where people choose to live, work, visit and invest. An early commitment to a timescale for its replacement would help provide much needed confidence to the local economy.

31. Trunk road and motorway network climate change adaption and resilience

In keeping with other comments around the validity of limiting this option to just the trunk road network, the question is posed as to how similar action around identifying, prioritising and implementing improvements to strengthen the resilience of the wider (including local authority) network will be pursued; and including how evidence around vulnerable locations will be shared on that wider basis.

Given the national (and global) burden of climate change effects and required measures to strengthen resilience it would seem to be at odds with logic that this recommendation focusses entirely on the trunk road network. Flows across the whole of Scotland require collective consideration, particularly in respect to key freight flows to ferry ports and other locations where there are no alternative routes.

32. Trunk Road and Motorway network renewal for reliability, resilience and safety

HITRANS welcomes the commitment under this recommendation to develop an “integrated transport plan for Fort William to increase resilience and reliability on the trunk road to improve sustainable transport and enhance the sense of place in the local community. This could potentially include improvements online and/or a new link road to enable enhanced sustainable transport provision”. There was an expectation among local stakeholders that STPR2 would have advanced the work undertaken for the 2018 STAG Case for Change so it

essential that further detail of the scope and how an ‘integrated transport plan’ will be implemented and support the FW2040 vision is outlined as soon as possible. A positive early commitment would be to recognise at the outset that the case for change had been made with owing to complete reliance on a single artery serving the needs of all the local and strategic traffic though Fort William (and by extension the West Highlands) is unsustainable.

The Technical Report supporting STPR2 also makes welcome reference to several examples of locations where road safety improvements on the trunk road and motorway network may be required including the A82 Balloch to Inverness (excluding Tarbet to Inverarnan which is already being progressed by Transport Scotland); A83 Tarbet to Campbeltown; A835 Tore Roundabout to Ullapool; A85 Perth to Oban; A87 Invergarry to Uig; A9 Kessock Bridge to Scrabster; A9 Dunblane to Perth.

HITRANS also welcomes the Transport Ministers’ recent response to the Northern Joint Collaboration Board confirming the government’s commitment to dualling the A96 and the A9 between Inverness and Perth. Local Stakeholders would welcome the inclusion of these projects and the A82 between Tarbet to Inverarnan in the main STPR2 report and NPF4 to help provide confidence to the local business and residents of the committed investment.

36. Strategy for improving rest and welfare facilities for hauliers

HITRANS welcomes this recommendation. In 2011 HITRANS published a Lorry Parking Strategy for the HITRANS region¹. The survey work presented within the strategy provided a clear picture of the overall pattern of demand for overnight lorry parking in the region and suggested the need for ongoing development of plans to provide suitable overnight lorry parking facilities in the Highland Area, particularly to the south and east of Inverness.

37. Improving active travel on trunk roads through communities

HITRANS welcomes this recommendation and integration with 1. Connected Neighbourhoods and 8. School Active Travel – critically however it is suggested this also ties in with 3. & 4 and there is an essential need to lose the urban focus in respect to these, as many communities in the HITRANS region only have trunk road as an option for travelling between them.

This clearly helps to demonstrate the diversity of communities across the HITRANS region – from communities in remote and island locations with local networks of road, rail, ferries and air services connecting them, to communities adjacent to the trunk road network that rely on that strategic road for that parallel *local* connectivity.

38. Speed management plan

STPR2 recommends a national review to establish appropriate speed limits for different road types within Scotland. The plan sets out that this would consider a range of measures such as speed management on motorways, speed limits through roadworks and rural settlements on trunk roads, and reducing speed limits in urban environments and residential areas as well as consideration of the national speed limits for Heavy Goods Vehicles over 7.5 tonnes on the trunk road network.

¹ https://www.hitrans.org.uk/documents/lorry_parking_strategy_study.pdf

Elements of this are welcome, there are prospective positive implications for cycling in rural areas, where segregated infrastructure may not be feasible or desirable to create connections between communities, but where vehicle speeds are not conducive to safe active travel.

In terms of HGV speeds, there is a need to consider the cost impact on driver hours from lower speeds.

Under the theme of **strengthening strategic connections**

41. Potential fixed links in Outer Hebrides and Mull

Consistently with Argyll and Bute Council, HITRANS would welcome further details on the proposed consideration of a fixed link to the island of Mull and where this link is proposed given the absence of this as a priority during the engagement process. Details of this proposal have not been seen in any earlier documentation – with fixed links only previously mentioned in relation to the Clyde and Hebridean Ferry Services contract and not specifically to the island of Mull. Given the detrimental impact on island infrastructure that has resulted from the introduction of RET it is anticipated that a fixed link would only compound this – an example of why there needs to be consideration of local authority infrastructure and a joined-up approach to development. Similarly, if the route of the fixed link was via Morvern then the implementation of a fixed link across the Corran Narrows should precede this as it would significantly increase traffic on this corridor.

The Outer Hebrides Local Transport Strategy 2020-30 recognised the need for a full feasibility study required to study the options for fixed links across the Sounds, with whole life costs and economic and wider impacts fully considered and assessed, and hence HITRANS welcomes this inclusion within STPR2.

42. Investment in port infrastructure

This recommendation is broadly supported by HITRANS, and there is a recognised need for major investment at a number of ports around the region. That said, as highlighted on numerous occasions it would be improper to isolate this progress to only ports served by the Clyde and Hebrides Ferry Services (CHFS) and Northern Isles Ferry Services (NIFS). A progressive and pragmatic approach to addressing deficiencies in the network and to optimally advancing decarbonisation necessitates a Scotland-wide approach, building on the progress, for example, that has been made and which can be made on some of the shorter, inter-isle crossings in the first instance.

43. Major station masterplans

HITRANS welcomes the inclusion of Inverness Station Masterplan and looks forward to engaging with Transport Scotland, Network Rail and local stakeholders to implementing improvements to the station and its surrounds including the bus station that will provide a step change for integrated travel at the busiest interchange within the Highlands and Islands.

STPR2 sets out enhancements to Perth station to complement the improvements to track and signalling on approaches to improve reliability, connectivity and enhance freight provision, and at Inverness to achieve better integration with the city centre to deliver benefits for passenger and freight service, both in the city and surrounding areas. HITRANS recognises the significance of the Perth re-signalling in shortening Inverness-Central Belt journey times, and the Inverness Station opportunity to deliver a once-in-a-generation opportunity to improve efficiency of operations and create a transformational public realm.

44. Rail freight terminals

STPR2 recommends that sufficient provision of rail freight terminals is critical to achieving a significant shift of freight from road to rail and that this would improve the competitiveness of Scotland's supply chain and help support the movement of freight from road to rail. The express / light logistics market (lighter freight carried on converted passenger trains) is a growing market and also has potential for capital grant support for freight handling infrastructure in selected locations including passenger stations.

HITRANS comments that there is a need for a network of third party or Network Rail intermodal terminals in Scotland; there is nothing in Fort William or on the West Coast or in Caithness. HITRANS also questions the omission of particularly interventions to support the movement of parcels by rail, and especially in the context of the huge growth in parcel-based distribution and retail nationally and in remote and rural Scotland particularly.

45. High speed and cross Border rail enhancements

STPR2 sets out infrastructure upgrades to permit higher speeds on cross-border routes to enable faster journey times to London and other key destinations; setting out that this would encourage a shift from air to rail on longer-distance travel, and support Scotland's net zero emission commitments. It is also suggested that these improvements would release capacity for enhanced regional passenger and freight services. HITRANS recommends avoidance of a one speed fits all railway system, unless freight is properly catered for with the provision of adequate loops and refuges etc.

Question 36 asks "to what extent do you agree or disagree that the STPR2 recommendations reflect and will contribute to the aims of government policy?"

Take action against climate change
Decarbonising transport
Reducing car use
Encouraging greater walking, wheeling and cycling
Addressing inequalities, such as:
<ul style="list-style-type: none"> • Child poverty
<ul style="list-style-type: none"> • Affordability of transport
<ul style="list-style-type: none"> • Access to transport
Transport as an enabler of inclusive economic growth
Providing a safe transport system
Providing a reliable and resilient transport system

HITRANS comments here that the STPR2 has an inconsistent approach to contributing to many of these government policies – and indeed that this is somewhat arbitrary rather than strategic. For example, if communities are based on or around trunk roads or CHFS or NIFS networks, then there is the prospect of addressing inequalities but if a community is on an island, in a rural (rather than urban location) or at location away from the trunk road network, then they will not benefit from STPR2, and even further will risk being further disadvantaged compared to communities that will see improvements through STPR2.

Equalities Impact Assessment (EqIA) - The Impact Assessment is prepared at such a high level that it is not clear what the implications are for either specific projects or

locations. It is well documented that in rural areas, transport is repeatedly highlighted as a concern by the experiences of equality groups and also in relation to socio-economic disadvantage. Many of the potential impacts identified 'will depend on the extent to which all listed interventions can be adopted' and in many cases depend on locations of interventions, and also that there will be a need for detailed assessments of individual interventions at the design stage.

An action or delivery plan that links the assessments to STPR2 would be helpful– what actions/principles would tackle which issues, e.g. accessibility and public transport, integration of transport, improving accessibility and active travel, safety, affordability.

In terms of the **Island Community Impact Assessment (ICIA)**, it is understood that this was carried out retrospectively as the report was completed in January 2022, which is not in the spirit of Islands (Scotland) Act 2018, which has led to the guidance on ICIA which sets out that an ICIA should:

- Make sure that you keep islands and their communities in mind throughout the development, implementation and delivery of your policy, strategy or service.
- Help us to support strong, resilient and vibrant island communities.
- Help us to meet the four principles of fairness, integration, environmental protection (green) and inclusiveness that underpin our work to support island communities.
- Promote the voice of island communities.
- Recognise that every person in Scotland has a right to live with dignity and to enjoy high quality public services wherever they live.

The evidence supplied in the *Island Community Impact Assessment Draft Report* reveals that the ICIA can be considered only a “tick box exercise,” undertaken subsequent to the appraisal process, rather than an exercise utilised through the STPR2 development to shape the strategy, and in addition has not included **effective and meaningful consultation throughout the process with island communities**. For these factors, **it recommended that provision should be made to review the decisions of Transport Scotland relating to the Island Communities Impact Assessments under section 8(1) of the Act.**

There is no evidence of wider direct engagement with island stakeholders in the preparation of the ICIA. At times some of the wording seems peripheral to the Islands and, in some instances, there appears to be attempts to ‘squeeze’ an Island benefit out of a clear mainland improvement e.g. integrated ticketing and rail improvements.

Specific comments in respect to the ICIA Draft Report are as follows:

- Appendix C is not included in the ICIA as published so it is impossible to comment on the quantitative part of the analysis. The ICIA commentary generally concludes that the impacts of the recommendations on islands in general are broadly positive, to varying degrees. However, ICIA requires detailed assessment of the impact of a recommendation on individual islands, including how that impact differs from the effect of the proposal on other islands. This has not been done. Even more importantly, a competent ICIA process should have assessed the impact of the projects which had been removed earlier in the process, and considered the impact on island residents,

communities and economies of their removal from the scope of STPR2. At no point throughout the exercise does this appear to have been done.

- Pg 10: *“Through depopulation and the aging of the current island population, many islands are projected to see significant decreases in the numbers of children and working-age people.”* It is vital to draw out the implications of this statement for island sustainability, and to draw out the number of islands that are particularly fragile in this regard, e.g., where there are struggles to provide care, to provide healthcare, education or to provide the ground crews and crews needed for air and ferry services. This is a key issue, which is felt differently across different islands / types of island and this must be drawn out.
- Pg 11: it should be recognised that while the Index of Multiple Deprivation is the official tool for finding the most deprived areas in Scotland, it is well recognised that the SIMD does not offer a good tool in respect to islands. The National Islands Plan Delivery Group recognises that there is currently a lack of robust disaggregated socio-economic data at island level, and that taking into consideration the amount of research that will be necessary to fill the data gaps, the Delivery Group are undertaking a gradual approach to the amalgamation of island level data, which will take course over the lifetime of the National Islands Plan. These data gaps in terms of understanding of island, and particularly deprivation, should be flagged in the ICIA here, because while *“none of the 20% most deprived areas according to the Scottish Index of Multiple Deprivation (Scottish Government, Jan 2020) are located in islands”* it is well understood that there is deprivation and there is poverty dispersed throughout island communities, rather than in discreet geographical pockets, as per IOMD.
- Pg 11 onwards: the averaging of all islands in terms of the analysis does not draw out the very different experiences across islands. For example the differences between larger islands (those with their own service centres, hospitals, secondary schools etc.) and smaller islands, particularly those that are off other islands and are located at significant distance from their nearest service centre. To understand island issues, it is first vital to consider different types of islands, their differing socio and economic context, and only then is it possible to use that context and understanding to consider properly the particular challenges around distance, geography, connectivity and demography that these islands face.
- Pg 13-14: analysis needs to go further to consider differential context of islands within these local authority areas – each local authority and the communities of the individual islands that make up the area hold a wealth of knowledge about the islands that would be beneficial here rather than using average figures for the local authority as a whole.
- Pg 15: island authorities have been involved in stakeholder engagement opportunities, but whether this has been meaningful engagement from the perspective of an Island Community Impact Assessment is less than clear. As flagged earlier in this response, the scope of STPR2 was not made clear at the outset and during the first interactions HITRANS and island partners had with the programme from 2019. Since then the logic has not been presented as to why so much of Scotland is ‘out of scope’ if STPR2 is as stated intended to *“help deliver the vision, priorities and outcomes that are set out in the second National Transport Strategy”*. This lack of clarity at the outset and lack of a clear rationale for exclusion, and the moving target as to where strategically important issues and opportunities beyond Transport Scotland’s (current) gift will be pursued, has constrained the engagement process and led to wholesale dissatisfaction with the process.

- Pg 17: HITRANS welcomes the emphasis on the key equality topic and objective through the ICIA being to increase the economic prosperity of island communities and address the unique challenges they face– but it is flagged that this can only meaningfully be understood and assessed by not generalising all islands and instead understanding the differences between islands / types of islands across Scotland.
- Pg 19: in terms of *Improving Active Travel Infrastructure* the potential impacts for island communities are overstated for a vast majority of island communities. This analysis requires to be undertaken with a more granular approach. For many islands there will be little or no active travel infrastructure and few interventions that will have any impact as distances are too long for people to cycle or walk to destinations. For some islands, particularly larger ones with key larger settlements, there will be potential benefits in terms of improving access. Given the significance of STPR2 these aspects should be drawn out, and evidence provided on the scale of impacts on island communities. The same can be said for the other considerations under active travel heading – further analysis is required to capture the true picture. For example, *the effects of enhanced strategic cycle routes around Scotland, have the potential through improved access to ferry terminals to improve wider access to the islands*, is only of benefit to islands that are connected via so-called strategic ports, and for many it is unlikely that there will be much, if any, travel via an interchange of ferry to the Scottish mainland by foot or cycle.
- Pg 20: in terms of *Influencing Travel Choices and Behaviours* the potential impacts of providing information and promoting the use of active travel modes and public transport, as well as reducing some of the cost-related barriers associated with sustainable travel is only a potential impact for island communities for islands that have any meaningful public transport or journeys that suit well to active travel. It should be recognised that for many islands this is not the case; many islands do not have any public transport offering at all. Furthermore, it is highlighted in the ICIA that “*increasing Active Travel to School would potentially provide healthier, more affordable access to education for children and their families or carers*”. However, it should be noted that in island communities, beyond those larger towns, the vast majority of children live beyond statutory home to school transport distances and so are entitled to free home to school transport. Again, the difference between islands requires to be drawn out, as the potential impacts on island communities are widely divergent.
- Pg 22: in terms of *Enhancing Access to Affordable Public Transport* as stated investment in DRT and MaaS could have a significant positive impact on island communities due to the increased bus public transport connectivity on individual islands, but from a baseline of many islands having no existing public transport connectivity, the earlier point is reiterated that there is no targeted funding in Scotland for rural transport to develop and test new services and new ways of working. Intervention is needed for rural transport in a similar way to the leadership shown for urban areas through Bus Partnership Fund and Glasgow Metro. There will be revenue costs associated with the operation of mass transit in cities and a similar reflection is needed on how to ensure rural areas have an alternative to the private car. A rural transport fund is needed. This should encompass the revenue costs needed to support software licensing for digital DRT, MaaS platforms and increased availability of bus and on demand transport services generally.
- Pg 24: it is stated that the implementation of fixed links between islands and the mainland will increase connectivity and access to services as well as potentially supporting job growth on the islands, which it is stated “*would have a significant positive impact in both Low and High scenarios by improving connectivity and*

accessibility and reducing reliance on the CHFS network.” However, it should also be flagged that there are always mixed implications of such changes in connectivity which need to be recognised, including the provision of services and island sustainability.

In the recommendations it is stated that *“detailed ICIA of individual interventions should be undertaken at detailed design stages where appropriate”*, however it is emphasised here that further work is required now to fully understand the differing impacts of interventions, rather than, as has been demonstrated in the ICIA, that all islands are the same. There is a desperate need to fully consider the differential impacts of the STPR2 on different islands – identifying where some may be progressed via STPR2, but at the cost of other islands that might as a result be set further behind, and hence then to consider what mitigation is required in this situation to ensure that STPR2 can be developed and delivered in such a manner as to improve or mitigate, the outcomes resulting from it.

Conclusions

The question remains as to where strategic planning that falls beyond the responsibility of Transport Scotland but which necessitate consideration at a national level will be progressed?

Transport Scotland’s previous position that *“it is the responsibility of each local authority to manage their own budget and to allocate the financial resources available to them on the basis of local needs and priorities”* is unsustainable given the declared aspirations of STPR2 and will fail to address the significant connectivity barriers facing the region.

For those projects that have been excluded as out of scope, where will they now be considered?

Highlighted here are projects that would benefit from national consideration, and which as they stand are having often significant adverse impacts on communities and economies across the Highlands and Islands:

- Reclassification of roads from local road to trunk road or vice versa—where will this be considered?
- Any public transport project or option that is revenue based.
- Ferry routes which do not form part of the Clyde and Hebrides Ferry Service (CHFS) or Northern Isles Ferry Service (NIFS)—how will these be considered where there is ongoing uncertainty around the ability to fund replacement vessels and infrastructure?
- Options related to air services, including operation and expansion of airports and new flights and changes to existing flights.
- Revenue funding for public transport is out of scope, including concessionary travel, free public transport, reduced public transport fares or changes to existing concessionary travel schemes and Road Equivalent Tariff (RET)—where then will such issues be considered?
- Revenue-funded routine and cyclic maintenance measures, for all modes and assets are out of scope—even though the maintenance backlog across much of the transport network across Scotland would be considered a strategic issue due to the scale of the problem.



The current transport policy landscape is increasingly complex and very difficult to identify the linkages across modes of transport connectivity: the National Transport Strategy 2, Strategic Transport Projects Review 2, the Islands Connectivity Plan (which will be the successor to the National Ferries Plan) and a separate National Review of Aviation. It is vital that transport connectivity to our remote peninsular communities and fragile islands is looked at holistically.

Given the critical importance of transport connectivity to and around the Highlands and Islands, HITRANS remains committed to working in partnership with key stakeholders such as Transport Scotland and our partner local authorities and neighbouring areas to address our connectivity barriers and challenges and to build on the progress that has been made in recent years. If Scottish Government is to make a Just Transition in decarbonising its transport network, a fairer, more responsive approach that is pragmatic, efficient and places more trust in local authorities and regional transport partnerships to deliver improvements is required. HITRANS asks the Scottish Government to ensure that future transport investment priorities take a more inclusive approach and address the current imbalance of national transport infrastructure on the Highlands and Islands. To address our wider societal challenges which are well documented in the Case for Change reporting of STPR2 a modern, fit for purpose transport system that facilitates transition to net zero is vital.

**SECOND STRATEGIC TRANSPORT PROJECTS REVIEW (STPR2)
RESPONDENT INFORMATION FORM**

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What is your address or organisations address?

Highlands and Islands Transport Partnership (HITRANS)

Please enter your address below. If you reside on a Scottish Island, please state which Island you reside on.

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info@hitrans.org.uk

Information on why we ask for your address:

A full postal address will help us to evaluate where respondents live, especially in rural and island communities where in some cases, a postcode and/or local authority area wouldn't be enough to establish where the respondent resides.

Entering your email address allows us to send you a copy of your completed questionnaire.

What is your Local Authority Area?

Orkney Islands Council, Comhairle nan Eilean Siar, Argyll & Bute Council, Moray Council, Highland Council

Can you confirm that you are authorised to respond on behalf of your Business / Organisation?

- Yes No

Transport Scotland would like your permission to publish your consultation response. Please indicate your publishing preference:

- Publish response with name/organisation
 Publish response only (without name/organisation)
 Do not publish response

We will share your response internally with other Transport Scotland policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Transport Scotland to contact you again in relation to this consultation exercise?

- Yes
 No

Information for businesses and organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.