

New Regional Transport Strategy (RTS): Update Report

1 Introduction

- 1.1 This report provides SEStran Board with an update on work to develop the new RTS, as agreed by the Board on 21 June, including progress on the preliminary 'Main Issues' stage of the RTS, and clarification on the next steps for the RTS, including an updated delivery plan and timescales.
- 1.2 The report provides an update on the national context for the RTS rewrite, including legislative changes with relevance to the operation of Regional Transport Partnerships.

2 New RTS – national context

- 2.1 The report to the June 2019 Board noted the key areas of national legislation and policy development with clear significance for a new RTS. Since June 2019, the following are now concluded:-
 - The <u>Planning (Scotland) Act 2019</u> received Royal Assent in July 2019. It requires future National Planning Frameworks (NPF) to be presented to Parliament, and contains a duty for one or more planning authority areas to produce Regional Spatial Strategies (replacing Strategic Development Plans) which will form part of the NPF.
 - The <u>Climate Change (Emissions Reduction Targets)</u> (Scotland) Act <u>2019</u> received Royal Assent in October 2019. It sets targets to reduce Scotland's emissions of all greenhouse gases to net-zero (from 1990) by 2045, with interim targets specified.
 - The <u>Transport (Scotland) Act 2019</u> received Royal Assent in November 2019. It clarifies, amongst other things, the powers by which Local Authorities will introduce Low Emission Zones, and by which transport authorities may pursue integrated ticketing between public transport operators.
 - The Act establishes a number of changes and new opportunities for RTP operation, as follows:
 - With reference to Part 3 and in particular <u>s.35's</u> insertion of provisions into the <u>Transport (Scotland) Act 2001</u>, including '3L Multi-authority bus services improvement partnerships'; this will present opportunities for the RTPs and perhaps more so if there was agreement to take on functions under s.10 or s.14 of the <u>Transport (Scotland) 2005 Act</u>. Regulations are awaited before further consideration of additional functions.

- <u>s.38</u> of the new Act on local services franchises doesn't mention RTPs but does make some provision for 'multi-authority franchising.'
- The changes that directly affect SEStran and the other RTPs are in s.122. Sub section (1) amends s.3 of the 2005 Act (amended version attached at **Appendix 1**) has the effect to expressly allow carry over of both expenses and reserves. There's also provision in the new subsection 4A for an RTP to provide a budget forecast to the constituent authorities.
 - Subsection (2) amends the Local Government (Scotland) Act
 1975 to bring the RTPs into the provisions about borrowing and lending in Schedule 3 to that Act previously it was only SPT.
 - Subsection (3) similarly amends <u>s.165(6) of the Local</u> Government etc. (Scotland) Act 1994 to bring the RTPs within the ambit of that section's powers about borrowing and lending.
- The <u>National Transport Strategy</u>, (NTS2) published in February 2020. It establishes the twenty-year vision for Transport in Scotland, with four key priorities (reducing inequalities, taking climate action, delivering inclusive economic growth and improving health and wellbeing).
 - During development of the NTS2, one issue identified was the need to strengthen regional governance arrangements. Development of future options to strengthen regional transport governance will be taken forward by a "Roles and Responsibilities Working Group" led by Transport Scotland. RTPs input into this group is coordinated through SPT, a Model 3 RTP, and Hitrans, a Model 1 RTP, with distinct urban / rural perspectives.
- 2.2 The Second Strategic Transport Projects Review (STPR2) is a national process with eleven regional groupings established as part of the process to help ensure regional perspectives are takin into account. The national process, which is due to conclude in the first quarter of 2021, will identify the transport investment projects and priorities for Scotland for the next twenty years, to deliver the transport vision, priorities and outcomes set out in NTS2.
- 2.3 It is worth also noting Scotland's Programme for Government 2019/20, which announced £500M in new investment for bus priority measures in September 2019; the expectation is that RTPs will be instrumental in developing any cross-boundary partnership bids for these funds. There is clear synergy with the considerations around a new RTS.

3 New RTS – regional context update

3.1 SEStran is closely involved with all three non-statutory Regional Transport Working Groups (RTWGs) that have been established to provide a regional perspective during the national STPR2 process. There are strong synergies between STPR2 process and the development of a new RTS, therefore RTWGs will continue to have a significant role as consultee groups in the development of the RTS. The three RTWG groupings operating within the region are those of:

- Edinburgh and South East of Scotland (conforming to the Edinburgh City Region Deal area. This RTWG is chaired by SEStran),
- Forth Valley (Comprising the Stirling, Clackmannanshire Deal area and proposed Falkirk Deal area)
- Tay (conforming to the Tay Cities Deal area and taking in north Fife)
- 3.2 The draft National Planning Framework 4 (NPF4) is due to be considered by Scottish Parliament in September 2020; it is understood this will include an outline of emerging Regional Spatial Strategies (RSSs).
- 3.3 Given the requirement to ensure major land use planning decisions are strongly aligned to the development of a Regional Transport Strategy across the entire region and into adjoining RTS regions, SEStran remains involved in the conversations taking place to develop RSSs in the region.
- 3.4 The interrelationship between the statutory nature of the RTS, the policy context and various partnership arrangements that are in operation in the SEStran area is set out in **Appendix 2**.

4 New RTS – Stage one, Main Issues Report

- 4.1 The Main Issues Report (MIR) is being developed by Jacobs, and is close to completion with significant data analysis completed across a wide range of data sets relating to travel patterns, costs of travel, land use, demographics, employment areas, as agreed in the delivery plan reported to the June 2019 Board. Progress has been shared with the RTS Steering Group established by the Board in June 2019.
- 4.2 Stakeholder engagement events were held on 24 February and 5 March 2020, involving a broad range of relevant stakeholder representatives from established SEStran forums and input from these sessions has been incorporated into the refinement of draft Main Issues.
- 4.3 The summary report on Main Issues at **Appendix 3** has been prepared for this Board meeting, and input from the Board on the Main Issues summary will be collated, and a final draft of the Main Issues Report will be circulated to Board members for approval at the end of March 2020.
- 4.4 Jacobs' commission includes undertaking the identification of high level options for the RTS, in response to main issues identified and this work will be completed after the Main Issues Report is approved. Board members will be invited by Jacobs to a workshop that will help to inform potential options, with a provisional timescale of early April.

5 New RTS – next steps

- 5.1 The ensuing, full RTS rewrite process will be carried out, as required by statute, in accordance with the requirements of the Transport (Scotland) Act 2005, and Guidance from the 2005 Act on the preparation of RTSs, published in 2006. Development of the RTS will be delivered through further consultancy support services. Update detail on proposed delivery arrangements is provided at Appendix 2.
- In terms of the determination of appropriate interventions arising from the developing strategy, there is an obvious need for integration with the conveniently concurrent STPR2 development process. As stated previously, SEStran is well placed within the relevant RTWGs to ensure that this happens. There is also a clear need for Tactran and SEStran to be well coordinated where the STPR2 defined regions overlap.
- 5.3 It is also necessary to be mindful of the Planning (Scotland) Act 2019 which will require one or more local authorities or regions, however they may be defined, to produce a Regional Spatial Strategy (RSS). Allied to this, over the medium term a revised form of regional governance will be devised; ensuring that the developing RTS can be integrated within this and aligned to future RSS arrangements is a further challenge.
- 5.4 As the preliminary Main Issues stage of the RTS development concludes, officers have developed an updated delivery plan attached at **Appendix 4** that allows for sufficient time within appraisal stage to ensure adequate consideration of any interventions against the evolving regional picture described here.
- 5.5 It is anticipated that a procurement process for consultancy support services for the development of the RTS will commence early in 2020/21.
- 5.6 A preliminary meeting has been held to instigate the Equalities Impact Assessment, and discussions have commenced with Scottish Environment Protection Agency (SEPA) to set out the terms of a Strategic Environment Assessment for the RTS.

6 Recommendations

6.1 It is recommended that Committee notes the content of this report.

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Job title Senior Partnership Manager Strategy Officer

Date February 2020

Policy Implications	A new RTS will impact on future strategy development and local transport authorities' plans and strategies.	
Financial Implications	Funds are earmarked from the 2020/2021 budget, for consultancy services to develop and deliver the new Regional Transport Strategy.	
Equalities Implications	The new RTS is subject to an Equalities Impact Assessment (EQIA)	
Climate Change Implications	The new RTS will be subject to a Strategic Environmental Assessment (SEA)	
Appendices	Appendix 1: Transport (Scotland) Act 2005 as amended by 2019 Act Appendix 2: RTS and regional coordination.	
	Appendix 3: Summary Main Issues Report – Draft Appendix 4: New Regional Transport Strategy: Updated Delivery	
	Plan	

Transport (Scotland) Act 2005 as amended by 2019 Act

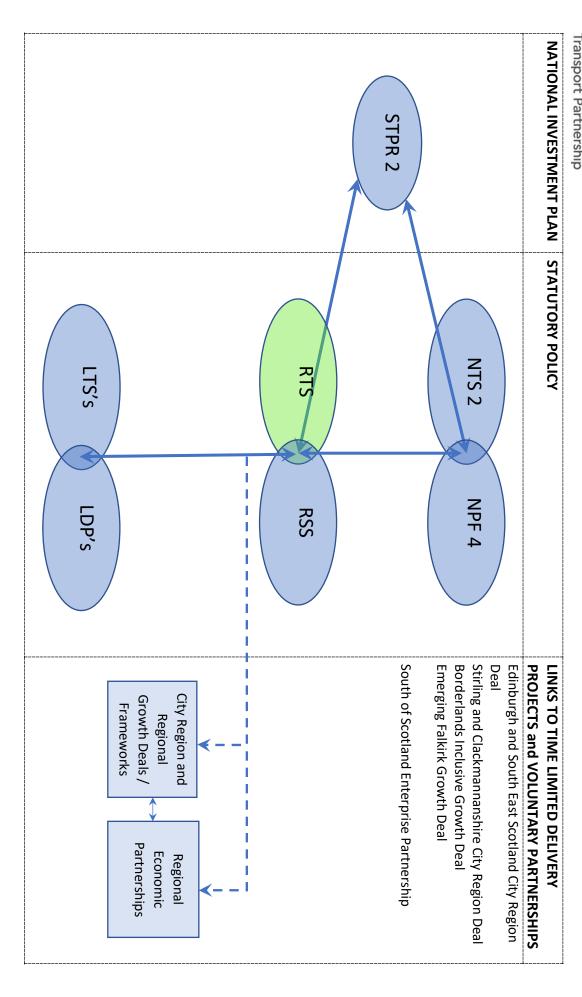
Administration

3 Regional Transport Partnerships: funding and borrowing

- (1) The net expenses of a Transport Partnership for each financial year shall be paid by—
 - (a) its constituent councils; or
 - (b) where there is only one, that council.
- (2) The share of the expenses to be paid by a constituent council under subsection (1)(a) above shall be—
 - (a) such as the Transport Partnership, having regard to its transport strategy, thinks fit; or
 - (b) where the Partnership is unable to decide, such as is determined by the Scottish Ministers by order.
- (3) The Scottish Ministers may, by order, provide as to the arrangements for the payment of amounts payable under this section.
- (4) For the purposes of this section, the net expenses of a Transport Partnership for a financial year are those of its estimated expenses for that year, and of any outstanding expenses from the financial year previous to that year, which are not met—
 - (a) by a grant made by any person which is not repayable;
 - (b) by a grant so made which is subject to a condition requiring repayment and which remains unsatisfied;
 - (c) by any other income for that year; or
 - (d) by funds held by the Transport Partnership that it allocates to meet expenses for that year.
- (4A) A Transport Partnership must, having regard to its Transport Strategy, prepare a forecast of its net expenses for each financial year and provide a copy of its forecast to
 - (a) its constituent councils, or
 - (b) where there is only one, that council.
- (5) A Transport Partnership may give grants or loans to any person for any purposes that, in its opinion, contribute to the implementation of the Partnership's transport strategy.
- (6) Such grants or loans may be given subject to such conditions (including conditions requiring repayment in specified circumstances) as the Transport Partnership decides.
- (7) A Transport Partnership may borrow money for the purpose of its capital expenditure.
- (8) In this section, "financial year" means the period of 12 months ending with 31st March.



POLICY AND PARTNERSHIP FRAMEWORKS



Jacobs

SEStran Main Issues Report

Executive summary of process and main issues

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SEStran





SEStran Main Issues Report

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1. Introduction

SEStran is working to prepare a new Regional Transport Strategy (RTS). As part of that process, SEStran has commissioned Jacobs to produce a Main Issues Report of factors relevant to the new RTS.

The commission remains underway. In the Main Issues Report, we will be seeking to identify and communicate the key factors which do or could affect travel demand in the region and the policy outcomes which transport decisions could influence.

This report provides:

- a summary of the process that Jacobs is following (in Section 2)
- a list of issues that have been identified as pertinent to the RTS (Section 3)
- a draft of the main issues for the future development of the RTS (Section 4).

2. Process

Jacobs' work to identify the Main Issues for the RTS has two main strands: an evidence review and stakeholder engagement.

2.1 Evidence review

Jacobs is reviewing a broad range of sources of evidence to identify Main Issues. In each instance, we have sought to identify the data that is most salient to a new RTS, highlight trends and collate information that can help take an informed view of future conditions.

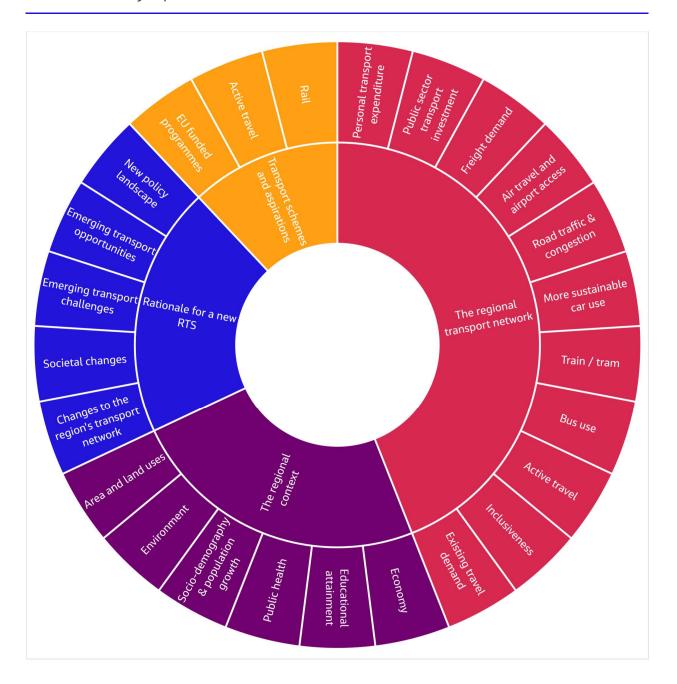
Our sources have included:

- Relevant national, regional and local policies for transport, land-use development, the environment, social inclusion, public health and economic growth
- A review of committed and proposed transport investments
- Published national and regional datasets
- Assessments that are relevant to understanding future conditions or attitudes, which may affect transport demand.

The evidence base covers the following themes and data sources shown in the figure below. Our Main Issues report is being structured around these topics, enabling evidence to be readily identified.

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2.2 Stakeholder engagement

Two engagement events have informed the development of the Main Issues:

- 1) A discussion on 19 February 2020 with key transport and planning officers from SEStran and its constituent local authorities; and
- 2) A workshop on 5 March 2020 attended by 16 representatives of organisations involved in or affected by transport delivery in the region (including local authorities, transport operators, the NHS and further education sector).

The events were facilitated by Jacobs staff, with attendees drawn from invitee lists provided by SEStran officers. Both events generated many useful suggestions for Main Issues which are included in the list below.

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The discussions also highlighted strong aspirations for transformational change to the region's transport system, to achieve more inclusive and sustainable solutions. Although not the primary topic for discussion at the events, many stakeholders were keen to identify the role that the SEStran RTS could play in delivering such change, and this desire should be taken into account in the setting of RTS objectives and actions.

3. Identified issues

The list below presents the issues that our review has identified. Our final report to SEStran, which is in production, will present the evidence base that underpins each of these issues. The ordering of the list of issues is not intended to imply any priority between them; those that are considered to be of particular importance to the new RTS are outlined in Section 4.

3.1 Issues relevant to the region's environment

- Scotland is committed to net-zero carbon emissions by 2045 (with interim targets of reductions of at least 75% (from a 1990/1995 baseline) by 2030 and 90% by 2040), but carbon emissions from transport in the region are not yet falling
- Climate models predict an increase in the number and severity of extreme weather events, especially of temperature and precipitation. Parts of the region's transport system must adapt if network reliability is to be maintained
- Air pollution from transport is harming people's health in some parts of the region; there are 13 locations in the region at which Air Quality Management Areas have been declared largely because of pollution from transport

3.2 Issues relevant to the region's people and places

- More than a quarter of the region's population (and over half of people aged 80 and over) do not travel anywhere on any given day, partly due to a lack of appropriate transport
- A lack of appropriate, affordable transport means that many of the region's people are excluded from
 accessing a full range of opportunities for education, employment, healthcare and other needs; this
 disproportionately affects people that are older, disabled, on low incomes, or live in rural areas
- The region's population is growing (by an estimated 3.8% in the ten years to 2026); increased demand for travel will result
- The region's elderly population is forecast to grow much more quickly than the total (the number of people aged 75+ is forecast to grow by 79% over the next 25 years). This is likely to create significant additional demand for door-to-door and other supported transport
- A lack of affordable housing in parts of the region (caused by increasing population and reducing average household size) is contributing to increased travel distances, and many new housing developments are relatively distant from main trip attractors
- An increase in use of sedentary travel choices over recent decades has contributed to high levels of obesity and associated health problems

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3.3 Issues relevant to transport demand in the region

- Changing employment patterns, the location at which services are provided and use of town centres are
 influencing travel demand; commuting patterns are becoming less rigid which is affecting peak demand,
 some locations are losing services such as banks and post offices, and fewer people are travelling to town
 centres for retail
- Many short journeys are made by car, adversely affecting congestion, pollution and public health
- The relative cost of car use has fallen compared to that of public transport and general cost inflation; this enables many people in the region to sustain high levels of car use
- Public transport is optimised to serve major demand flows, leaving gaps in the network away from the main corridors
- Conversely, the region's strategic road network is being used to connect a large number of diverse origin
 and destination points, often enabling connectivity for journeys for which public transport does not offer an
 attractive solution
- Many bus services are delayed by traffic congestion and urban bus speeds have been falling in recent years, undermining the competitiveness of public transport
- Bus use has been falling in many parts of the region, with the largest falls in areas with weaker service levels, which threatens the viability of parts of the region's bus network. But there are good examples within the SEStran region which illustrate that investment in bus services can increase patronage
- The region's rail network is constrained, limiting the opportunity for further expansion for passenger and freight
- Freight demand is changing, driven largely by increasing demand for home deliveries; this is creating new demand for road traffic
- Rail and shipping provide opportunities to shift some longer-distance freight movements from road
- Long journey times and journey time unreliability are affecting freight and passenger flows (by road and public transport) reducing the growth potential of the regional economy
- The number of road accidents in the region in which people have been killed or injured has been falling in recent years, but 494 people were killed or seriously injured on the region's roads in 2018, 70 (14%) of whom were children
- Passenger numbers at Edinburgh airport (the region's only airport with scheduled flights) have been growing quickly, and car/taxi remains the dominant surface access mode
- Emerging transport solutions (e.g. electric and autonomous vehicles, MaaS) are providing new opportunities but also potential challenges for governance, social inclusion and traffic congestion

3.4 Issues relevant to transport delivery in the region

- The policy context for transport and related outcomes (including for the environment, social inclusion and health) has changed substantially since SEStran's extant RTS was published in 2016, but transport investment decisions have yet to fully adjust to the changes
- Revenue expenditure is insufficient to maintain the quality of local transport infrastructure and provide services that meet the needs of all people
- Coordination between transport delivery agencies is not consistently good
- There is a lack of coordination between development planning outcomes and sustainable transport objectives
- There is a recognised need to strengthen regional governance around transport decisions to achieve better coordination across delivery agencies



4. Main Issues: draft list

From the evidence base and list of identified issues, Jacobs has developed the following list of Main Issues for a new SEStran RTS. Again, the ordering of the Main Issues is not intended to imply priority between them.

- Much of the relevant policy and legislative context for transport investment decisions has changed:
 SEStran's new RTS should respond to the need to deliver these different outcomes, and also to the new tools and opportunities that are available
- Coordination between transport delivery agencies is not consistently good. Land use planning decisions are
 not consistently supporting sustainable travel objectives and sustainable transport provision is not delivered
 early enough in the development process to support modal shift
- The region's transport network must respond to a growing and ageing population
- Current action is not delivering a reduction in carbon emissions from transport in the region and there is a need to act quickly if targets for reduction are to be met, and to minimise resilience risks
- Many of the region's people (and especially those that are older, disabled, on low incomes, or live in rural areas) lack appropriate, affordable transport to enable them to meet their needs
- The relative cost of car use has fallen compared to that of public transport and general cost inflation; this enables many people in the region to sustain high levels of car use
- There are good examples of initiatives promoting healthier and more sustainable modes, but they are yet to make a significant difference to net demand for car use
- Some parts of the region's transport network lack capacity to enable sustainable peak time growth
- The future is increasingly uncertain, due to both potential changes in technology (e.g. for autonomous vehicles) and in societal attitudes (e.g. changes in employment patterns, changes in attitudes towards single-occupancy car use); the new RTS must be able to respond to these issues and opportunities as they emerge.

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New Regional Transport Strategy Updated Delivery Plan

Background

The requirement to prepare and publish a Regional Transport Strategy (RTS) for the South East of Scotland is contained within the Transport (Scotland) Act 2005. SEStran's current RTS was first published in 2008, and refreshed in 2015.

Given the pace of change in terms of legislation, and policies at both a national and a local level, it was agreed at the June 2019 SEStran Board, that a full review of the RTS should be undertaken and a new RTS developed.

The report to the June 2019 Board, outlining the terms of reference and initial project plan and timescale, provide the basis for the new RTS development. Subject to acceptance by the Board of the Main Issues Report, the next stage of the RTS will be developed, in accordance with an updated Delivery Plan.

Requirements of the new RTS

The scope of a Regional Transport Strategy is clearly set out and established within the Transport (Scotland) Act 2005. The RTS is required to provide the transport strategy covering the whole established region, to which partner Transport authorities (those of the eight constituent member Councils) must then perform their local transport functions in a manner consistent with the RTS.

The Regional Transport Strategy must therefore include provision for the respects in which transport in the region needs to be provided, developed or improved having regard to, among other things:

- future needs including those occasioned by demographic and land use changes; and what can be done, taking account of cost, funding and practicability;
- meeting the needs of all inhabited places, in particular, those which the Partnership considers different from the remainder of the region by reason of their remoteness or the sparsity of their populations;
- meeting the need for efficient transport links between heavily populated places;

- how transport in the region will be provided, developed, improved and operated so as:-
 - (i) to enhance social and economic well-being;
 - (ii) to promote public safety, including road safety and the safety of users of public transport;
 - (iii) to be consistent with the principle of sustainable development and to conserve and enhance the environment;
 - (iv) to promote social inclusion;
 - (v) to encourage equal opportunities and, in particular, the observance of the equal opportunities requirements;
 - (vi) to facilitate access to hospitals, clinics, surgeries and other places where a health service is provided;
 - (vii) to integrate with transport elsewhere.

SEStran Delivery Aims and Objectives

The new RTS development process must, in addition to the statutory scope outlined above:-

- respond to issues identified in the Main Issues Report;
- follow a number of statutory stages and requirements (including ample consultation and appraisal), prior to completion, and be developed in accordance with Scottish Transport Appraisal Guidance;
- take into account and help inform and support local transport policy and interventions, and other regional partnership and sub-regional partnership aims;
- align to the new National Transport Strategy, and other relevant national policy and legislation covering planning, social, economy and environment / climate undertakings;
- be completed by the end of 2021 for consideration by Scottish Ministers.

Expert technical support and resourcing will be secured through competitively procured consultancy support services. All procurement will be conducted through Public Contracts Scotland, to ensure full compliance with current procurement rules and legislation.

Project Management Arrangements

The delivery of the new RTS will be overseen and managed internally by SEStran.

Key roles with specific RTS responsibilities are outlined here:

Partnership Director:

- Responsible for overall oversight of project management and delivery;
- Review escalated risks and agree remedial actions when required.

Senior Partnership Manager:

- Provide strategic direction for the development of the RTS ensuring strategic alignment;
- Oversee RTS progress, resource allocation, risk management and approved budget;
- Convene regular meetings of the Project Management Team;
- Review Risk Register and further escalate any risks as necessary;
- Review draft RTS material and reports;
- Ensure RTS processes are fully compliant with all statutory requirements.

Strategy and Projects Officer:

- Communicate with partners representatives regularly on RTS development;
- Provide technical overview of consultancy services and quality;
- Manage consultancy support service providers;
- Draft consultancy brief and agree procurement processes for RTS;
- Manage consultancy support services;
- Escalate all performance issues and risks to Senior Partnership Manager;
- Maintain RTS Risk Register and RAID logs, reporting at Project Management Team;
- Initiate and carry out integral SEA and EQIA assessments for the RTS;
- Prepare Project reports to Partnership Board, liaison committees and RTS Steering Group a as appropriate.

RTS Project Management Team Remit

An internal Project Management Team (previously termed Officer Delivery and Working Group), as agreed at the June 2019 meeting, will ensure the delivery of the RTS functions meets agreed objectives. The SEStran RTS Project Management Team will provide the day to day management of delivery of the RTS. (The work within each of the key stages of the RTS, including statutory and good practice consultation, technical appraisal, any modelling, report drafting will be largely be delivered through procured consultancy support). The RTS Project Management Team will meet separately, in addition to weekly SEStran Team Meetings.

The core RTS Project Management Team includes the Senior Partnership Manager, Strategy and Projects Officer, supported as required by the Partnership Director, Programmes Manager or Projects Officers as required. Membership may draw on any or all staff expertise at any appropriate stage, and attendance at meetings will reflect the stage of RTS development.

RTS Steering Group Remit

Whilst the final sign-off of the RTS rests with Scottish Ministers, and the governance of the RTS is a requirement of the SEStran Board, the establishment of a special RTS Steering Group, made up of SEStran Board members, was agreed in June 2019 to help challenge, and provide scrutiny to support the development of the Strategy prior to reporting key stages of RTS development to the Board.

Membership: 2 x Councillor Board Members, 2 x Non Councillor Board Members, SEStran Partnership Director.

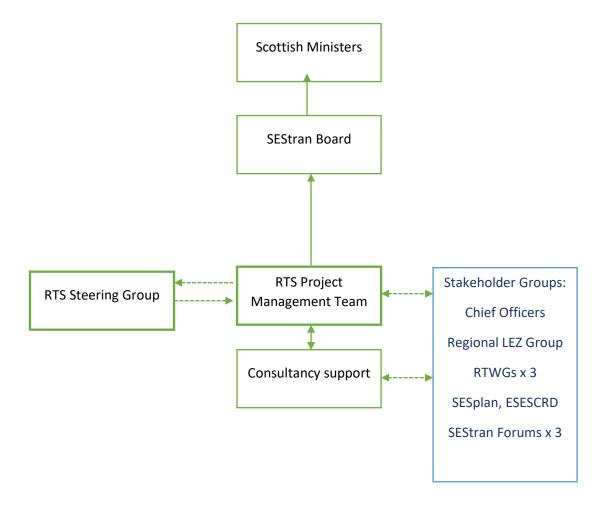
Attendees: Transport Scotland Transport Partnerships Manager, in attendance as RTP advisory officer.

Support: Senior Partnership Manager, Strategy and Projects Officer, Administration Officer

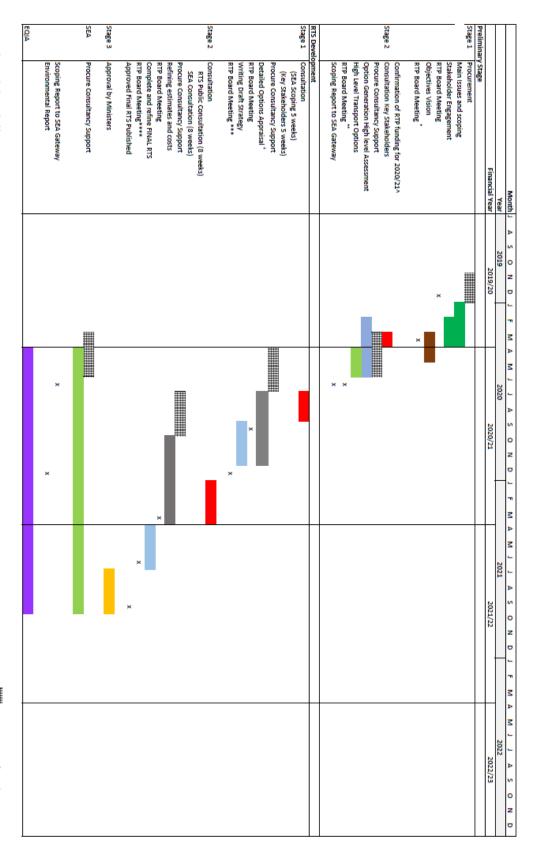
Project Governance Arrangements

The RTS Project Management Team will report RTS project progress and outcomes to the SEStran Board.

The relationships with key interface / partner / stakeholder groupings are included here for clarity, as the project moves to the next stage of RTS development.



RTS Delivery Programme and Key Work Stages



CA's Consultation Authorities

- Board Approval of main issues and objectives
- ** Board Approval of options report along supported by high level assessment (STAG case for change evidence). Decision to proceed to full RTS.
- *** Board Approval of Draft RTS
- **** Board Approval of Final RTS
- + Preparing reports e.g STAGs ASTs cots estimates etc
- A Confirmation of funding and implementation of Transport (Scotland) Act 2019



Key Stages

1	Main Issues and report	Review the following existing RTS areas: Objectives Policies Monitoring Delivery Current Strategy objectives Vision Engage and discuss with local authority chief officers/transport officers. Undertake technical analysis of multiple datasets. Develop Transport Planning Objectives. Summarise findings and develop report for consultation stage. Embark upon SEA and EQIA processes.
2	Consultation Transport Options	Full and wide engagement and consultation on findings of the main issues report. Detailed development of transport options, following a sifting and preliminary assessment based on the evidence gathered and reviewed as part of Stage 1.
3	Consultation Appraisal Draft Strategy	Stakeholder consultation on transport options report. Detailed appraisal of options and development of transport options, policies and regional and national context. Development of implementation, monitoring and evaluation plan. Prepare and write draft strategy seek board approval for formal final consultation.
4	Consultation Final RTS	Analysis of consultation feedback and responses, prior to final strategy approval and then publication. Completion of EQIA and SEA work.