



# SEStran Draft Regional Transport Strategy

## Environmental Report Consultation Note

On behalf of **SEStran**



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## Document Control Sheet

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# 1 Strategic Environmental Assessment Feedback

## 1.1 Introduction

- 1.1.1 A Draft Regional Transport Strategy (RTS) for the South East of Scotland was published by SEStran in November 2021 for stakeholder and public consultation. The Draft RTS was published together with a Strategic Environmental Assessment (SEA) Environmental Report and with the report of an Equalities Impact Assessment (EqIA).
- 1.1.2 This Consultation Note summarises feedback provided by respondents to the consultation on the Environmental Report, along with feedback on the Draft SEStran RTS of relevance to environmental issues.
- 1.1.3 A separate note of EqIA consultation responses relating to equalities issues has been prepared and will be published with this Environmental Report Consultation Note.

## 1.2 Key feedback and responses

- 1.2.1 All responses received from local authorities, other organisations and members of the public have been reviewed. Where key issues were received relating to the coverage of environmental issues in the draft RTS or in the Environmental Report, these have been set out in **Error! Reference source not found.** with a response on how SEStran has addressed the points raised in updating the RTS to a final version.

**Table 1. Summary of Consultation Comments and Responses on Environmental issues**

Respondent	Comment	RTS Response	SEA Response
SEPA	The transport planning Objectives in the RTS are likely to have a positive impact on Air Quality and Amenity, however none specifically address improving air quality or reducing exposure. More focus should be provided on supporting local authorities to address air quality issues, particularly within AQMAs. It would be useful to review the Cleaner Air for Scotland 2 (CAFS2) strategy, to integrate and strengthen the RTS to deliver Strategy Objective 1.	One of the outcomes associated with Strategy Objective 1 is “Air Quality Transformed”. On this basis air quality is already intrinsically considered within the objectives and outcomes framework.	Such a change would improve the environmental effects of the Strategy. However, it would not substantially alter the Strategy and are not likely to give rise to significant negative environmental effects. As such, updates to the Environmental Report are not required.
	The Low Emissions Zones (LEZs) should reference the National Low Emissions Framework to determine whether an LEZ should be implemented.	Reference included in Chapter 16	Such a change would not substantially alter the Strategy and are not likely to give rise to significant negative environmental effects. As such, updates to the Environmental Report are not required.
	We agree that active travel provides important health benefits and promoting these through educational campaigns is key to encouraging greater uptake of these modes. We note that the Scottish Government (through the CAFS2) has committed to	The RTS is a long-term strategy with a 15 to 20 year horizon and we do not believe it is appropriate to reference specific working groups which may only be active for part of its lifetime. However, the RTS includes a new Delivery Chapter	Noted. No updates to the Environmental Report are required.

Respondent	Comment	RTS Response	SEA Response
	<p>actively linking with other organisation that deliver programmes having co-benefits for air quality, such as Cycling Scotland, Sustrans and Living Streets. Additionally, the Scottish Government will develop a public engagement strategy on air quality, accounting for the UWE evidence review.</p> <p>SEStran have been invited to the CASF2 Public Engagement Working Group and we'd welcome an action in relation to this work in the RTS.</p>	(18) which sets out a commitment to work with partners to identify interventions to implement the RTS.	
	We'd like to see an indication of action priorities or timelines for the delivery of these. An action plan for the delivery of measures, or a separation of actions by priority.	This is addressed by the new Delivery Chapter (18) referred to above.	Such a change would make the Strategy more specific. However, it would not substantially alter the Strategy and is not likely to give rise to significant negative environmental effects. As such, updates to the Environmental Report are not required.
NatureScot	Section 3.2.1 of the non-technical summary gives the impression that SEA work only commenced in October 2021 and is incongruent with Section 4.2.3 where there is reference to work beginning in August 2021.	N/A	Noted. The relevant dates will be reviewed and amended accordingly to provide clarity within the post-adoption statement.
	In the post-adoption report and further documentation, reference to outline how the SEA has informed the development of RTS throughout the development of the strategy. Examples of specific strategic decisions would be useful.	N/A	The post-adoption statement will outline how SEA influenced the development of RTS throughout the development of the strategy, including examples of specific strategic decisions.
	Section 5.1 of the SEA non-technical summary that lists policies and actions is long and repetitive and would benefit from being summarised. Suggestions include a brief commentary for each Objective on the main positive and negative impacts from policies. Additionally, a summary table to present the information for each Objective currently included in the lists of policies and actions.	N/A	Noted. Where these elements are taken forward from the Environmental Report to the post-adoption statement, they will be reviewed to ensure they are concise and presented in the most effective way for readers.
	The draft NPF4, published by the Scottish Government, includes Policy 3(e) on Nature Crisis and inclusion of	N/A	Para 6.1.3 of the SEA ER notes that further amendments to the RTS may be required once NPF4 is

Respondent	Comment	RTS Response	SEA Response
	measures to enhance biodiversity for local, non-EIA development. The final RTS, post-adoption statement and further documentation, should include reference to this policy and any subsequent guidance to support its implementation.		published. At the time of writing (early March 2022), the consultation on the draft NPF4 is still on-going. Measures implemented through NPF4 will be carried forward regardless of the RTS and as such the omission of such a reference from the RTS is not likely to give rise to significant negative effects.
	Section 5.2 in the non-technical summary outlines the environmental sensitivities for each RTS Transport Corridor that have been listen in Appendix F. Each corridor has a section in the table covering landscape issues. Here, it would also be useful to include a list of the Landscape Character Types within each transport corridor. This information could be used to inform infrastructure decisions and other transport projects along the corridor.	N/A	As the RTS is taken forward, further review of information such as the Landscape Character Types within each transport corridor will be taken into account to inform infrastructure decisions and other transport projects along the corridor.

- 1.2.2 Where responses have identified commitments to amendment of the RTS these changes will be implemented in the re-drafting of the Strategy. SEStran aims to prepare a revised and final RTS document for discussion and approval at the SEStran Board in March 2022.
- 1.2.3 Changes identified as needed to the RTS, both through the SEA ER consultation and the consultation on the wider associated documents would not substantially alter the Strategy and are not likely to give rise to significant environmental effects. As such, updates to the SEA Environmental Report are not required. However, where relevant, issues will be taken forward within the SEA post-adoption statement.