

## Appendix C – Response from Aberdeen City Council (ACC) to the NESTRANS 2040 Draft Regional Transport Strategy (RTS)



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Our Ref: ACC/RTS2040  
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Dear Sir/ Madam

### **RESPONSE FROM ABERDEEN CITY COUNCIL (ACC) TO THE NESTRANS 2040 DRAFT REGIONAL TRANSPORT STRATEGY (RTS)**

Thank you very much for the opportunity to comment on the draft Regional Transport Strategy, NESTRANS 2040. Please find below the comments from Aberdeen City Council. If you have any questions or queries regarding these, please contact Alan Simpson, Senior Planner, Aberdeen City Council.

#### **General Comments**

The Council believes that there is a need to reference climate more tangibly and strengthen this theme. Although it is mentioned, there is still a bit of confusion around emissions (carbon/climate change) and (NO2).

It would be beneficial for the RTS to reference the Net Zero plans in more detail as this would help to keep the pressure on the council regarding our own transport patterns.

The RTS should seek to raise the bar and build on initiatives like Spaces for People and present making town and city centres more people friendly for the benefit of tourists and visitors and not just residents.

Links should be made to the key economic drivers such as the NPF4 projects and the Energy Transition Fund projects

The STA appraisal paper references 5 option categories, one of which is strategic connectivity. The RTS feels light in terms of global connectivity of the city in a post Brexit world. Its silent on free ports for example . The Council is conscious that the Scottish Government Programme for Government commits the Scottish

Government to publishing a vision for trade before end of this year and its trading nations export growth plans are being refreshed in 2021. It would be good to take account of this.

The Council also acknowledges that Programme for Government indicates that Scottish Government are going to consult on zero/ultra low emission city centres by 2030. It would be good to take account of this.

The RTS should address the balance of economic growth being planned for within the regional economic strategy versus the environmental impact and present this in terms of actual numbers!

The RTS includes a set of proposed indicators but there are no targets.

### **Section 1 – Introduction**

The Council suggest adding a second short paragraph on the geographical place context and our 'sense of place' in the North East, including our need/desire for to be connected within Scotland and beyond and our push forward to promote/embrace change as well as being the oil if not energy capital of Europe.

### **Section 2 – Background**

As with Section 1, some scene setting on drive/ambition/place characteristics would be a useful inclusion. As well as listing projects it would be beneficial to mention the investment/ spend that has been made here and the estimated Added Value to business/economy, as the platform for this forthcoming RTS.

### **Section 3 – Key trends to 2020**

In the section about the AWPR, it would be useful to include some percentage figures of the traffic reductions this has brought, especially to the City Centre.

### **Section 4 – The wider policy context**

In this section, the Aberdeen Net Zero Vision and Strategic Infrastructure Plan for energy transition needs to be referenced. This is a key part of the Council's local context and was approved in May 2020.

Legislation covering the strengthened target is the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019.

No reference is made to the UN Sustainable Development Goals (SDGs). These could be a useful addition to the wider policy context discussed at point 4 of the DRTS. They add to the policy thread running from the Scottish Government's National Performance Framework to Local Development Plans and would signal relevance to other strategies and plans which also reference the SDGs. Three areas of particular relevance would be

Goal 3. Ensure healthy lives and promote well-being for all at all ages – Section 3.6 "By 2020, halve the number of global deaths and injuries from road traffic accidents"

Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation – Section 9.1 "Develop quality, reliable,

sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all”

Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable – Section 11.2 “By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons”.

It would be useful to make mention of Covid-19, Brexit and/ or <\$20 oil and the impact of these external shocks on the economy to help set the policy context that the North East of Scotland operates in.

In Section 4.14, for ‘the’ CCMP the concept of just ‘giving over space’ to pedestrians and cyclists seems the wrong approach. It’s not just about giving them space but how you do it, why you do it and the benefit this brings to the city.

In section 4.15 it is suggested that the LOIP is moved up the hierarchy and the mission statement ‘Aberdeen is a place where everyone can prosper’ is included as well as an image of its front cover too. The ‘prosper’ is key to the RTS.

## **Section 5 – The need for a new Transport Strategy in the North East**

Section 5.3 should read “Phasing out **the need for** petrol and diesel cars”

It would be worth including in this section the need to better balance ‘place’ and ‘movement’ in order to create better, more attractive /inclusive/ multifunctional/ sustainable places as part of a strong awareness/ appreciation/ understanding of ‘place’ and our vision for it.

## **Section 6 – The Strategic Transport Appraisal**

This is covered in more detail in the Council’s separate response to the City Region Deal Strategic Transport Assessment draft preliminary Options Appraisal

However, there is a need to be explicit in this section on this investment and what the key priority interventions are that have come out of this.

## **Section 7 – Engagement**

There is very good evidence here of the amount of engagement undertaken which the Council welcomes. However, the wording in Section 7.1 should be changed to remove ‘amount of’. It would be more positive to say, ‘informed by significant consultation and engagement...’

## **Section 8 - Key issues and opportunities**

Although COVID-19 is referred to in the document, it would be beneficial to highlight it as an issue. The Council suggest including that, at the time of writing the North east of Scotland, like many parts of the UK, has been and continues to be affected by the COVID-19 health pandemic. This has brought the need to

socially distance which in turn has had a huge affect on the transport network and people's use of it. The long term affect that this will have on daily life is unknown and the need to guard against future similar occurrences has become far more real. The need to ensure the resilience of the transport network going forwards cannot be underestimated.

COVID-19 should also be identified in the Opportunities. It has significantly increased numbers of people working from home and lockdown and the reduction in traffic has led to far more people walking and cycling than before, both to get to work/ shops/ services as well as for exercise and leisure. This initially forced change may have led to people discovering the benefits of working from home (where this has been possible) and in using active travel, both of which might lead to long-term behaviour change. It has also given them the chance to try a new mode when the transport network has been quieter and, as they get more confident, they may stick with it even as traffic levels increase. It has probably made people more likely to travel out with peak times as well, especially on public transport, to avoid crowds.

This section should also mention the harbour and maritime developments and reference offshore opportunities and inward investment including the External links to the harbour project brought about by the City Region Deal and plans for the Energy Transition Zone in this area that is in the Aberdeen LDP

It would also be worth considering if a position needed on Freeport status.

Section 8.2 should include 'better connected communities and getting people where they need to be' and in Section 8.3 include reference to the need for using different materials in our urban realm to better cope with climate change needs. For section 8.3, inclusion here of landslip/ landslide – known climate risk – which, given the recent rail incident, highlights the risk and impact while rise in sea level – risk of wave overtopping for any coastal transport routes – should also be referenced.

For Section 8.6, there are likely to be more people re-evaluating how they live and promotion and publicity are needed to shape thinking, awareness and availability / increased intensity of use which is what we are seeking.

Section 8.11 infers that Geographical distance makes Aberdeen 'remote', However, is that the reality with improvements in technology, especially given the way people have changed their communications during COVID-19.

## **Section 9 - The vision and key priorities of the Regional Transport Strategy to 2040**

Given what has been experienced with COVID-19, the vision should contain reference to "Resilience". - To provide a safer, cleaner, more inclusive, **resilient** and accessible transport system in the north east, which contributes to healthier, more prosperous and fairer communities.

The direct link between the RTS 4 pillars and NTS2 is welcome and very clear to the reader, which should help ensure that the RTS focus aligns with national thinking. However, the 6 Priorities should be wrapped in a wider context of 'place'

as they all contribute to its / life betterment by added value in sustainable economic development – whilst this is a RTS the purpose is people and connectivity for life quality and opportunity. The LOIP could be referenced again which is the common policy across the partner agencies. This would all demonstrate wider understanding and inclusiveness in a few sentences.

In the 6 priorities, the “Wellbeing” side of health doesn’t seem appropriately reflected. Although it can be argued that improved journey times, reduced carbon, better air quality, safety and accessibility all contribute to better wellbeing, a 7th priority on information is also suggested, for example “Quality information enabling informed transport choices”. This again would help remove the unpredictability around mode choices which some people may find difficult.

Also, the priority referencing a step change in public transport and active travel enabling a 50:50 mode split implies that it’s a split between those two modes rather than 50% car, 50% sustainable. This should be clarified. The mode split should also be increased on the active/ sustainable side to better reflect key objectives such as Net Zero Carbon and harness the recent positive changes in travel behaviour. Furthermore, this section could be added to with a “Place’ reference. Investment in urban realm infrastructure has to be a large part of achieving this. Designing the necessary infrastructure into places to support active travel both at the planning stage and retrospectively will help achieve the mode split.

It would be beneficial to attach some targets to the priorities to quantify them. What are the regional SMART targets? Given the National context, this RTS has to make some serious inroads (!) to reducing emissions in the city (region) by the 2035 date so “cleaner” is a bit passive compared to x% contribution.

In Section 9.5, improving journey times for private car should be focused more around strategic or essential journeys by private car. If it is too easy to get around by private car this will come at the expense of mode shift encouragement.

Section 9.8 should mention the LEZ plans being developed for the City Centre as well as the 3 AQMAs across the City. It would be useful also to provide statistics on local air quality.

Section 9.10 should also include recognition of climate risks to transport for the north east - including:

- Risk of flooding creating transport delays and disruptions, damage to surfaces and erosion.
- Peak river flows result in erosion to riverbanks, undermining bridge structures. Threat of scour on bridges with footings in the watercourse. Risk of structural damage or failure, if bridges are hit by floating debris.
- Coastal surge/ wave overtopping affects coastal transport routes.
- Risk of landslide and landslip disrupting transport networks.
- Damage and corrosion to transport surfaces.
- Pressure on drainage systems from increased rainfall.

In Section 9.17 Chart title should make it clear that these figures are for travel to work to reflect the information in the paragraph.

## **Section 10 – The Strategy**

Shared vehicles – car club and liftshare mainly – would benefit from its own section. It is acknowledged that there are references peppered throughout but nothing actually committing to their value in reducing numbers of private cars. Given active travel, bus, rail, rapid transit, air, sea and low emission vehicles are covered by their own sections it would make sense to include this as a section too.

There is no mention of powered two wheelers/ motorcycles or a position on electric scooters. Given the rising interest in electric scooters, should the RTS be posing some questions around the role of these within an active travel approach and does the regulatory environment of Scotland permit these?

MAAS feels very under-developed/unambitious. There is lots of mention of it for rural areas and linking it to public transport and affordability but the concept needs to be further developed in the regional context (not just rural) and looked at across a greater range of modes.

It would be useful to address remote working or multi use spaces in this section too. Should the City/Shire be providing flexible working spaces to support staff and businesses in not having to commute?

Although environment is mentioned in the Active Travel Section, this is in relation to air and carbon emissions – there are no specific policy headings or actions in the strategy section around the wider environment. Nothing around reducing risk of run off, impact on biodiversity from fragmented spaces looking at options to improve connectivity for nature, use of sustainable urban drainage systems, trees, wildflowers on verges etc, no specific mention on noise – creation buffer zones etc, impact of heat on existing transport surfaces, consideration for sustainable use of resources used in developing new and maintaining existing transport infrastructure, the need for integrated solutions ie connection energy use surplus buildings and transport infrastructure. The strategy also needs to promote more green networks to mitigate the effect of climate change and emissions arising from transport. There has been no mention of Green Infrastructure (ecosystem services and functions) in mitigating the effects of climate change and air pollution. It would be useful to know how the RTS intend to support this and promote Green Infrastructure given it is one of the priorities of National Planning Framework.

Although some reference to Noise pollution is made, there is no reference to Aberdeen City Council's noise action plan for the city and no specific actions around noise.

In Section 10.12, the Council want to increase the density and liveability of the city centre, but it needs to be made an attractive place to live first and transport plays a role in that. Density increases can also aid public transport demand/viability. The statement should be amended to getting **to, from and around** the city centre by active travel (and public transport)

After Section 10.15, the Action AT3 should have consideration of impact of light pollution and support low carbon lighting as part of wider GHG emission reductions, Action AT4 should also consider infrastructure for e-bike charging - and options for low carbon charging, distribution while Action AT6 should not just recognize the benefits of cycle training for children but also the need for adult cycle

training. Good for those who don't have the confidence to ride a bike while it may also help with encouraging children to ride if groups/ families can all confidently cycle together

For Section 10.31, we appreciate the complexities of looking at a rail link to TECA and the airport. However, it would be worth mentioning that, given the regional importance of these facilities, aspirations to better link these facilities to the city are presented in the "Rapid Transit" and "External Air and Sea connections" chapters that NESTRANS will continue to work with partners to further explore ways to improve connectivity to these facilities.

After Section 10.34, in the Actions, it would be worth again making reference to the point above in 10.31. Also, is there evidence that Dundee is a key employment location for the region or is this recognising the fact that there is likely to be a lot of business movements between the two cities due to their commercial nature?

In "Improving the Region's Bus Network" – Sections 10.41-10.59 – this is an area where RTS need to be more focused. The declining trends in bus use should be taken as one of the major priorities to meet the hierarchy set out by this RTS.

Section 10.44 states "Both Aberdeen and Aberdeenshire face very different challenges when it comes to bus provision". It then mentions the Shire challenges but not the City ones.

After Section 10.59, the Council would suggest a better coding for these actions than "BS" as it might have negative connotations.

In Section 10.66, the Council suggests that a park and ride identity may also be useful.

In Sections 10.84-10.98 "Reducing Emissions", there is no mention of the H2 Aberdeen project or work already being undertaken in public sector fleets. Also, worth referencing the TS/ SG commitment to use H2 to fuel trains or ferries. Consideration for renewable options to support the necessary charging refuelling, infrastructure to support the low carbon transition and mention of the role blue/ green infrastructure can play in helping to absorb air pollution, as well as contributing to wider climate change ambitions to reduce emissions. In addition, BGI can contribute to absorbing rainfall, reducing run off and helping to connect fragmented habitats.

In Section 10.96 for EV chargepoint numbers, are these number for publicly available ones and do they count a double chargepoint, that can charge 2 vehicles, as two chargepoints or 1 unit? Also, are these numbers only for those operated by each local authority or do they contain those put in by private companies too?

In Section 10.97, could car clubs be a solution to the poverty side? Could also benefit from a link to the Just Transition – ensuring people are not priced out and are able to access low carbon transport.

After Section 10.98, Action RE1 should reference public transport, cycling, walking and shared vehicles

Sections 10.102-10.105 are duplicated

In Section 10.106, as well as information campaigns, there should be a bullet point here about making the right information easily available and using the Getabout website to do this. Not just an information campaign like an advert, event or Facebook post but something that is always there and always up to date.

As a new section after Section 10.106 and with a corresponding Action, the Behaviour Change section should contain an acknowledgement that engaging with children as a target audience is important for behaviour change as they are often more receptive to change and less set in their ways. The RTS should also be addressing which means of communication works best for each type of customer to ensure they best reach them. E.g. when targeting young people is digital and mobile phone friendly technology the best way? This communications could be a numbered section within “Behaviour Change” with a corresponding action.

Furthermore, there should be an action in the “Behaviour Change” section of “Continuing to promote travel planning, car clubs liftshare and pool vehicles (including bikes) as useful tools to encourage behaviour change” and a further action around supporting adults with the right training – e.g. cycle training so they are able to encourage children – with some reference in the main “Behaviour Change” section.

In Section 10.119 it would be useful to have a recognition that climate change may make this worse and make reference to issues such as peak river flows result in erosion to riverbanks, undermining bridge structures, threat of scour on bridges with footings in the watercourse, risk of structural damage or failure, if bridges are hit by floating debris.

For Section 10.123, there has been no focus on promoting green infrastructure to reduce the effects of climate mitigation and adaptation. The changing climate patterns requires to develop more green infrastructure.

In Section 10.124, it might be worth listing climate risks affecting transport

- Risk of flooding creating transport delays and disruptions, damage to surfaces and erosion.
- Peak river flows result in erosion to riverbanks, undermining bridge structures. Threat of scour on bridges with footings in the watercourse. Risk of structural damage or failure, if bridges are hit by floating debris.
- Coastal surge/ wave overtopping affects coastal transport routes.
- Risk of landslide and landslip disrupting transport networks.
- Damage and corrosion to transport surfaces.
- Pressure on drainage systems from increased rainfall.

After Section 10.124, for Action RD3, given the strategy proposes joining the lobby for ring roads around Dundee will Dundee City Council produce a formal response welcoming the inclusion of that?

Section 10.129 states “With the opening of the AWPR and Balmedie-Tipperty improvements there is now a need to consider the provision of service and rest facilities along the trunk road network within the north east. Should this also have an action for NESTRANS to work with both Councils as well as the trunk road authority to facilitate this?

For Section 10.146, should the RTS state that the most connected regional airport (to overseas) needs to 1. Protect its routes; and 2. Compete on a level playing field against subsidised routes ex Inverness or Dundee?

For section 10.152 the new harbour will not be completed in 2021. Here, as well as mentioning the cruise market being untapped, it would be worth promoting the location of the region in proximity to ScotWind licenses and the 3 east region sites

After Section 10.180. Action RU 5 “deals with MAAS in rural areas but what about MAAS in urban areas? Seems no MAAS-specific action around this anywhere in RTS.

In Section 10.181-10.196 “Improving Access to Health”, it reads strongly/literally as transport connection for health centres. It would benefit from a few lines on walking and creating the right conditions for walking with the direct health benefits, tied to the Active Travel section.

After Section 10.196 an action based on the importance of access to transport for mental and physical health and ensuring that this is promoted and maintained - The health benefits of improved access to transport – backing up Sections 10.191 and 10.192 would be welcomed.

The “Affordability of Transport” topic (10.197-10.219) needs a car club section recognizing the benefits of this service in giving people access to cars without the need to own one, meaning that you only pay for the journeys you need without all the other running costs that go with a car. It would also benefit from a liftsharing section encouraging people to share journeys rather than each taking their own vehicle as a means of saving money. Furthermore, recognition should also be made that equipping people with skills to cycle allows them to access another low-cost, healthy mode of transport. These three points should all have corresponding actions.

In the “Planning and designing places for people” topic (10.230-10.237), it is suggested that reference is made to the importance of high quality, inclusive placemaking, integrated within the planning system through engagement and statutory processes available). It also seems to be too far away, being at the end of the doc, especially given the importance of it for people, for shaping new development, and remodelling the existing to be fit for purpose.

Section 10.235 should also refer to providing access to green space for health and wellbeing.

The “New Technologies” Topic (Sections 10.238 – 10.256) should contain reference to hydrogen, reference to energy and balancing the grid which could be an increasing challenge with an upsurge in EVs (there are systems vehicle to grid etc for electric vehicles), reference around using apps as a means of relaying information and interacting with users and an acknowledgement that technology might assist with engagement with citizens, especially with a younger audience. Associated actions should be included.

## **Section 11 – Managing the risk of future uncertainties**

The Council supports the point in 11.8 “With this in mind, this strategy seeks to make best use of our existing assets and encourage behaviour change rather than relying on significant new infrastructure to accommodate unconstrained growth”.

## **Section 12 – Monitoring and Evaluation**

The RTS includes a set of proposed indicators but there are no targets. For example, the strategy gives no target in terms of the reductions in transport created emissions that need to be achieved in order to support the net zero target of 2045. This is especially important when talking about the balance of economic growth being planned for within the regional economic strategy against the environmental impact and what this means in terms of actual numbers!

It would be better to use a picture of the AWPR which has more vehicles on it.

## **The Regional Transport Strategy Strategic Environmental Assessment**

In Table 3.1 “Environmental Issues”, under “Climatic factors” the “Implications for NESTRANS RTS 2040” does not highlight any adaptation measures in relation to the climate risks indicated. In the “Water” section, coastal and fluvial flooding is mentioned but other flood risks are not including, pluvial and groundwater. Areas potentially vulnerable to flooding are indicated in the North East Flood Risk Management Plan.

In the Environmental and Policy Context Section (Paragraph) 1.1.10 it should make reference to the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

As regards all the individual actions in the RTS, the Council has also prepared an appendix with our comments on each action presented.

Yours sincerely

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