HITRANS Regional Transport Strategy

Strategic Environmental Assessment (SEA) 'Case for Change' Report

On behalf of HITRANS Regional Transport Partnership

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For and on behalf of Stantec UK Limited				

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1 Introduction

1.1 Background

1.1.1 Stantec UK, in partnership with Ecus Ltd and Eyland Skyn, has been commissioned by HITRANS, the Highlands and Islands Transport Partnership, to assist with the preparation of a new Regional Transport Strategy (RTS). This commission includes undertaking a multi-stage Strategic Environmental Assessment (SEA) of the emerging new RTS for the Highlands and Islands ('the emerging RTS') in accordance with the statutory requirements.

1.1.2 This Environmental Report (ER) has been prepared to accompany the Scottish Transport Appraisal Guidance (STAG) 'Case for Change' Report which will underpin the development of the new RTS. This ER is the second stage of the SEA process to identify, assess and address any likely significant effects on the environment from the emerging RTS.

1.1.3 Working collaboratively with Stantec, HITRANS has produced a 'Case for Change' Report (the 'Case for Change') which seeks input and views from stakeholders on the type and level of change needed to the transport system in the Highlands and Islands of Scotland to inform the development of the Strategy.

1.1.4 HITRANS is the statutory Regional Transport Partnership (RTP) for much of the Highlands and Islands covering the entire council areas of Comhairle nan Eilean Siar, Orkney Islands Council, Moray Council, The Highland Council and much of Argyll and Bute Council. HITRANS is by some distance the largest of the Scottish RTPs by landmass, although the population is estimated to be only 7% of the Scottish total. The diverse region includes the city of Inverness; several regional service centres such as Fort William, Oban, Portree, Stornoway and Thurso; large rural hinterlands; and most of Scotland's island communities. Transport services in the HITRANS region are equally diverse covering active travel, bus, rail, road, ferry and air services – the coordination and planning of these services is critical to the social and economic wellbeing of the Highlands and Islands.

1.2 Overview of RTS 'Case for Change' and ER

RTS 'Case for Change'

1.2.1 As detailed further in **Section 3**, the 'Case for Change' provides a consolidated evidence base to identify the main transport problems experienced within the HITRANS region and sets out a series of Transport Planning Objectives (TPOs) and RTS Objectives to underpin the development of the new RTS. In doing so, the 'Case for Change' seeks to ensure the RTS is founded on an evidence base which reflects the latest understanding of problems and issues in the region and reflects travel behaviour changes arising from the COVID-19 pandemic.

1.2.2 This ER provides a proportionate assessment of the likely environmental effects associated with these proposed substantive components of the 'Case for Change' which are intended to underpin the development of the RTS. This forms part of a multi-stage appraisal and strategy development process which will include a future consultation on the full Draft RTS and an accompanying ER.

1.2.3 In developing the Draft RTS, options will be identified and developed, sifted and appraised through Stage 2 – Preliminary Options Appraisal of the STAG process. Details of options development, appraisal and how the SEA has informed the selection of options (including consideration of reasonable alternatives) will then be set out in the full Draft RTS and accompanying ER in due course.

Strategic Environmental Assessment (SEA)

1.2.4 The Environmental Assessment (Scotland) Act 2005 ('the 2005 Act') requires Responsible Authorities, including RTPs such as HITRANS, to assess the likely significant effects on the environment of implementing relevant and qualifying plans and programmes, as defined within the Act. This assessment must also examine the likely significant effects of implementing reasonable alternatives to the plan or programme under consideration. The assessment is carried out by following a staged process of reporting known as SEA.

1.2.5 The SEA process is being undertaken from the outset in tandem with the development of the emerging RTS to allow key environmental issues to inform the content of the RTS. This SEA Commentary accompanies the RTS 'Case for Change' Report and builds upon an earlier RTS SEA Scoping Report (Stantec, June 2022) ('the SEA Scoping Report'), which was consulted on with SEA Consultation Authorities[1] from 30th June 2022 to 4th August 2022. The SEA Scoping Report set out a proposed SEA Framework (a final version of which is included in **Appendix A**) and methodology to underpin all stages of the SEA.

1.3 Purpose and Objectives

1.3.1 This report has been prepared by Stantec to assess the extent to which the 'Case for Change' addresses relevant environmental issues. In doing so, this report responds to relevant statutory requirements[2], considers the development of the emerging RTS to date and presents an initial assessment of likely significant effects from the proposed RTS Objectives. This forms the second stage of a multi-stage SEA that will be carried out to assess the likely significant environmental effects from the emerging RTS throughout its development.

1.3.2 The objectives of this report are to:

- **Assess the compatibility of the proposed Transport Planning Objectives with the SEA Objectives**, including their coverage of key environmental issues, as previously identified through SEA Scoping.
- **Assess the extent to which the proposed RTS Objectives address identified key environmental issues** with reference to the 2005 Act. Whilst the high-level nature of the 'Case for Change' precludes the identification of likely significant effects at this stage, the assessment includes testing the compatibility of the proposed RTS Objectives with the suite of 'SEA Objectives' to underpin the SEA process.
- Contribute to the on-going SEA process for the emerging RTS.

1.3.3 This report is structured as follows:

- **Section 2: Approach to SEA**: provides an overview of the SEA being undertaken in respect of the emerging RTS.
- **Section 3: Assessment**: assesses the coverage of key environmental issues within the issues and problems as set out in the 'Case for Change' and assesses the compatibility of the proposed RTS Strategic Objectives with the RTS SEA Framework.
- **Section 4: Recommendations and next steps:** builds upon Section 3 to set out specific recommendations to be addressed at the next stage of the RTS development process.

[1] The SEA Consultation Authorities are defined by section 3 of the Environmental Assessment (Scotland) Act 2005 as NatureScot (formerly Scottish Natural Heritage (SNH)), Historic Environment Scotland (HES) and the Scottish Environment Protection Agency (SEPA).

[2] In accordance with Section 14 of the Environmental Assessment (Scotland) Act 2005, this report acts as a statutory Environmental Report insofar as required to accompany each substantive component of the emerging RTS which is subject to public consultation.

These seek to ensure the avoidance of likely significant adverse environmental effects and improve the effectiveness of the emerging RTS.

1.4 Case for Change Engagement

1.4.1 As the 'case for change' provides the basis for the RTS overall, it was important to consult on its content with stakeholders and the public at large. To this end, the 'Case for Change' Report, Strategic Environmental Assessment, Equalities Duties Report and Island Communities Impact Assessment were put out to consultation between 27th March and 9th May 2023. This took the form of: an online-based consultation using ArcStory Map (with paper-based versions available at the HITRANS office) summarising the 'case for change'; publication of the four draft reports which collectively make-up the 'case for change'; and a short online survey.

1.4.2 In total, **202** responses to the survey were received, with **181** respondents identifying as a member of the public and **21** as an organisation. The survey results were analysed and have been used to inform the final package of documents which form the 'case for change'.

1.4.3 The engagement process validated the findings of the 'Case for Change' and accompanying impact assessment reports, with broad support for the RTS Strategy Objectives upon which the RTS itself will be based.

2 Approach to Strategic Environmental Assessment

2.1 Overview

2.1.1 This report builds on a SEA Scoping Report (Stantec, June 2022) which was subject to consultation with the SEA Consultation Bodies between June and August 2022 in accordance with Section 15 of the 2005 Act. The Scoping Report:

- Sought the views of the SEA Consultation Authorities on the proposed scope, methodology and level of detail required in undertaking a legally compliant SEA of the emerging RTS.
- Took account of the information requirements for Environmental Reports (ER) contained in Schedule 3 to the 2005 Act (where relevant), including through providing detailed baseline and policy reviews in appendices A and B respectively[3].
- Set out an evidence-based SEA Framework, comprising a set of 10 linked SEA Objectives and associated guide questions and criteria, for use in assessing the likely significant environmental effects of the emerging RTS.
- Outlined the proposed methodology to assess the likely significant environmental effects of the emerging RTS throughout its development.

2.1.2 Having regard to all consultation responses provided in respect of the SEA Scoping Report, the proposed SEA Framework and proposed assessment methodology remain valid. However, the SEA Framework has been refined in response to comments provided by the SEA Consultation Authorities, including the following amendments:

- Amendments to guiding questions, including reference to connectivity, to biodiversity (in addition to proximity) and the addition of access to nature.
- Increased emphasis through the SEA process on the interrelationship between climate change and biodiversity loss.
- Updates to the environmental baseline and policy review (to be documented within the ER accompanying the Draft RTS).
- Extension of the consultation period on the 'Case for Change' to six weeks.

2.1.3 The updated SEA Framework is provided in **Appendix A** and has been used in this assessment of the 'Case for Change'. The summarised comments received from the SEA Consultation Authorities in response to the Scoping Report and this SEA 'Case for Change' Report and a description of how these have been addressed are provided in **Appendix B**.

Other Impact Assessments

2.1.4 This SEA is being carried out alongside the application of relevant 'equalities duties' prescribed through relevant statutory and policy requirements:

- Public Sector Equality Duty

[3] In accordance with Sections 14(c) and (d) of the 2005 Act, it is not considered necessary or proportionate to append detailed baseline and policy reviews to this short Environmental Report. Instead, the key environmental and policy issues arising from reviewing baseline environmental characteristics and the relationship of the emerging RTS with other relevant plans and programmes are summarised in **Section 3** below. In accordance with the 2005 Act, updated environmental baseline and policy reviews will be included in the full Environmental Report (ER) that will be prepared to accompany the Draft RTS in due course.

- Fairer Scotland Duty
- Island Communities Impact Assessment (ICIA); and,
- Child Rights & Wellbeing Impact Assessment

2.1.5 These duties are being assessed within an **Equalities Impact Assessment (EqIA)** and an **Islands Community Impact Assessment (ICIA)**. The findings of these assessments are presented in separate reports which will be made available with the 'Case for Change'.

2.1.6 At this stage of the RTS development, the objectives set out within the 'Case for Change' are not predicted to have any likely significant effects (LSE) on European sites and as such the RTS is unlikely to be subject to a requirement for a Habitats Regulations Assessment (HRA). This shall be kept under review as the RTS develops in more detail following this 'Case for Change', and an HRA Screening will be completed if HITRANS considers there is any potential for LSE from implementation of the RTS.

2.2 Assessment of the Case for Change

Pre-Assessment Phase

2.2.1 The SEA process has directly informed and helped to improve the 'Case for Change'. The initial internal Draft 'Case for Change' was reviewed by the assessment team and advice regarding identified weaknesses and opportunities for enhancement provided to the RTS development team prior to the formal SEA (leading to the preparation of this ER). This identified any gaps or weaknesses that could be addressed to strengthen the 'Case for Change'. As a result of this review, the 'Case for Change' as published now considers environmental issues more strongly, including the identification of opportunities to avoid and reduce environmental effects and where appropriate seek environmental enhancement.

Methodology

2.2.2 The high-level nature of the 'Case for Change' precludes the identification of specific likely significant environmental effects. The assessment has therefore focused more generally on:

- Assessing the compatibility of the proposed Transport Planning Objectives with the SEA Objectives, including their coverage of key environmental issues, as previously identified through SEA Scoping.

2.2.3 Assessing the extent to which the proposed RTS Strategic Objectives address key environmental issues and thus the ability of the emerging RTS to tackle such issues. At this stage of the SEA, opportunities to improve the coverage of key environmental issues and policy drivers and to enhance the ability of the emerging RTS to tackle such challenges have been identified. These recommendations (**Section 4**) should be considered as the emerging RTS is developed and addressed in the Draft RTS which will be prepared in due course.

Consideration of Reasonable Alternatives

2.2.4 The 2005 Act requires the likely significant effects of implementing a plan or programme (i.e., the emerging RTS) and reasonable alternatives to be examined, as well as the rationale for identifying reasonable alternatives to be described. The 2005 Act further states that to be considered as reasonable alternatives, options must relate to the plan or programmes' corresponding objectives and geographical scope. To be eligible for consideration in this SEA process, reasonable alternatives must therefore be:

- Realistic, in that they are plausible alternatives which could be implemented instead of proposals within the emerging RTS and are consistent with relevant national and other policy frameworks.
- Related to the objectives of the emerging RTS.
- Within the geographical scope of the emerging RTS, i.e., any reasonable alternatives would need to be related to the distribution characteristics of future development within the HITRANS region.

2.2.5 SEA reporting needs to demonstrate how all reasonable alternatives for the substantive components within an emerging plan have been identified and iteratively assessed in a timely manner. The assessment found that extensive analysis has been undertaken to consider a wide range of issues to derive the TPOs and the subsequent RTS Objectives which set the direction for the strategy. These are considered to represent reasonable alternatives relevant to this stage of the Strategy's development.

Difficulties Encountered

2.2.6 No significant difficulties have been encountered in preparing this SEA ER.

3 Assessment

3.1 Key Environmental Issues and Policy Requirements

3.1.1 In accordance with Section 14(3) of the 2005 Act, appendices A and B of the SEA Scoping Report (Stantec, June 2022) presented detailed baseline and policy reviews to identify the key environmental issues and policy requirements which should be addressed in the new RTS. These were summarised in **Section 3** of the SEA Scoping Report with reference to the 13 environmental factors ('the SEA topics') prescribed in Schedule 3 of the 2005 Act.

3.1.2 Responses received from initial engagement with key stakeholders have been reviewed and considered in the preparation of the 'Case for Change'.

3.1.3 Environmental Issues are addressed within the following sections of the RTS 'Case for Change':

- Chapter 2: The HITRANS Region - Background & Context
- Chapter 3: Policy Review
- Chapter 4: Transport in HITRANS
- Chapter 5: Future Context
- Chapter 6: Developing RTS Objectives

3.1.4 Chapters 2 and 4 provide the baseline and a background to the region and its transport network, establishing the overall factual context within which the RTS is being developed. Chapter 3 provides a comprehensive review of local, regional and national policy documents, including Scotland's National Transport Strategy 2 (NTS2) which provides the national transport policy framework and sets out four interlinked national priorities: *Reduces Inequalities*; *Takes Climate Action*; *Helps Deliver Inclusive Economic Growth*; and *Improves our Health and Wellbeing*. Consideration is also given to the National Planning Framework 4 (NPF4). It clearly demonstrates how existing and emerging policy has been used to identify problems, issues, constraints and opportunities which the emerging RTS should address.

3.1.5 Having regard to all consultation responses and relevant policy, a suite of key environmental issues and policy requirements for the emerging RTS is presented in **Table 3.1** and discussed further at 3.1.7 below. The suite of key environmental issues was originally identified within the HITRANS RTS SEA Scoping Report and has been updated following consultation.

Table 3.1: Key Issues Relevant to the SEA of the New RTS for the Highlands and Islands

Grouped Baseline Topics	SEA Environmental Aspects	Key Issues
Air and Climate	Air Quality Climatic Factors	• The need to improve air quality in the main urban areas for the benefit of human health and the environment. • The need to respond to the climate emergency by reducing carbon emissions, including through promoting sustainable land use patterns (drawing on the 20-minute neighbourhood concept) and the decarbonisation of the transport sector. • The need to respond to the climate emergency by adapting to climate change, including ensuring that new development, including transport infrastructure and facilities, is resilient to adverse weather and adaptable to the effects of climate change. • The need to integrate and enhance natural (green/blue) infrastructure for tackling climate change. • The need to protect and enhance forest, woodland and soil resources (including peat) for carbon storage and sequestration. • The need to align with the national Update to the Climate Change Plan 2018-2032 (Scottish Government, 2020) and relevant regional commitments. • A key issue in the HITRANS region is the contribution to transport sector emissions of seasonal vehicle kilometres associated with visitors to the region.
Physical Environmental	Biodiversity, Geodiversity Flora & Fauna	• The need to conserve and enhance biodiversity interests, including sites designated for their ecological importance, including within the marine environment. • The need to maintain, restore and expand valued habitats and to safeguard protected species and non-designated biodiversity interests. • The need to protect and enhance green infrastructure assets and wildlife corridors, such as through nature-based solutions as part of transport infrastructure projects. • The need to achieve biodiversity/environmental-net gain. • The need to prioritise the redevelopment of previously developed (brownfield) land. • The need to protect sites designated for their geological interest. • The need to recognise the effect of climate change on vulnerability and condition of habitats and species.
	Soil	• The need to protect and enhance the health of soils, including peatland and other carbon rich soils. • The need to recognise the effect of climate change on vulnerability and condition of soils, and the carbon storage capacity of soils.
	Water	• The need to protect and enhance the availability and quality of water resources and the water environment. • The need to locate new development, including transport infrastructure away from areas of flood risk, and for such infrastructure to be resilient to flooding (and adverse weather more widely).

Grouped Baseline Topics	SEA Environmental Aspects	Key Issues
	Cultural Heritage	• The need to protect and enhance cultural heritage assets and their settings. • Protection and enhancement of important designated areas including internationally important areas of archaeology, gardens and designed landscapes and their settings. • Recognition of the connections between the historic environment and transport, including elements of the transport infrastructure which have historic significance and which often support current active travel networks.
	Landscape	• The need to conserve and enhance landscape character and to protect visual amenity. • The need to protect and enhance regional character, customs and traditions including in areas recognised for their importance, such as areas of wild land and designated landscapes, including areas of the Cairngorms National Park and National Scenic Areas (NSAs). • The need to protect and enhance the seascape character.
Social and Economic	Population (including relevant socio-economic issues), Human Health, Material Assets	• The need to align with and support the implementation of adopted and emerging relevant national policies and legislation, including the Climate (Emissions Reduction Targets) (Scotland) Act 2019, NTS2 (Scottish Government, 2020), The National Islands Plan (Scottish Government 2019), the emerging Strategic Transport Projects Review 2 (STPR2) and National Planning Framework 4 (NPF4). • The need to align with and support the implementation of current and emerging statutory Local Development Plans and other relevant regional and local policies applicable to the HITRANS region. • The need to develop an integrated and efficient transport system which meets identified needs and supports population growth and enables in-migration and island / remote rural area population retention. • The need to develop an affordable and accessible transport system which provides connections between the region's islands and the Scottish mainland. • The need to support the growth and diversification of key economic sectors and to deliver sustainable and inclusive economic growth. • The need to tackle deprivation and transport severance and to improve access to key amenities, the natural environment and economic opportunities for all demographic groups and communities. • The need to ensure transport services are demand responsive and provide convenient travel options. • The need to provide transport services appropriate to meet the needs of the projected ageing population. • The need to support sustainable transport modes for seasonal visitors. • The need to provide transport services that enable participation and reduce rural isolation. • The need to provide transport infrastructure and services that support the large seasonal influx of visitors to the Highlands and Islands.

3.1.6 These issues and requirements should be reflected within the emerging RTS and taken account of in the associated SEA. It should be noted that whilst key population and health issues need to be addressed in the SEA, some aspects of these are also considered where relevant in the implementation of applicable equalities duties (refer to separate '**Case for Change' Equalities Duties Report** and **Island Communities Impact Assessment Report**).

3.1.7 Existing and emerging policy requirements which the emerging RTS should take account of include the need to:

- Ensure the avoidance of likely significant environmental effects from the implementation of the plan on sites designated at international and national levels for reasons of biodiversity conservation or ecological importance.
- Follow the mitigation hierarchy, and to always aim to avoid likely significant environmental effects on nature-rich sites both that are designated at the regional and local level and that have no level of protection; and aim to protect species.
- Support the reduction in greenhouse gas emissions to 75% of 1990 levels by 2030, 90% by 2040 and net-zero by 2045. To include support for a reduction in the number of kilometres travelled by car by 20% by 2030, the phase out of new petrol and diesel cars and vans, the decarbonisation of the bus fleet and investment in Active Freeways.
- Minimise the environmental impacts of transport provision and infrastructure, including in terms of reducing carbon and greenhouse gas emissions and using natural resources sustainably.
- Underpin the development of a safe, secure, efficient, reliable and integrated transport system across the HITRANS region.
- Support improvements in journey times and connectivity to and from key destinations, including between islands and mainland Scotland.
- Encourage measures that reduce the need to travel and allow communities in different locations to flourish supporting efforts to reduce inequality of outcome in the Highlands and Islands and improve quality of life for all in the region.
- Ensure the conditions are in place to allow a widespread uptake of active and sustainable modes of transport for all demographic groups and communities.
- Improve the accessibility of the transport system (both physical access and access to transport information) and the provision of a range of appropriate transport modes to meet identified needs.
- Ensure that transport and transport information is accessible to all and does not contribute to social exclusion or disadvantage, whether through severance or unaffordability.
- Ensure that the transport network offers convenient and flexible inter-island services that meet the needs of the population in terms of accessing employment (where relevant), education, facilities and services.
- Enable the efficient, effective, affordable and sustainable movement of people and freight to increase economic productivity, competitiveness and opportunities for all, ensuring island and remote rural communities are not unfairly dis-advantaged.
- Secure economic growth and inward investment by supporting the delivery of new and upgraded transport infrastructure to increase connectivity and improve access to high quality employment and economic opportunities.
- Minimise the amenity impacts of transport, including reducing noise and vibration from road traffic.
- Ensure the avoidance of unacceptable health impacts from transport, in particular impacts on air quality and support the delivery of public health benefits through facilitating and encouraging active travel.

- Seek to protect and enhance the health and wellbeing of the resident and working population, including through facilitating access to healthcare (particularly for remote and island communities), safeguarding physical health and providing opportunities to enhance mental health and social wellbeing.
- Seek potential mutual benefits for transport and the historic environment through the investment in, maintenance of, and continued use of our existing transport infrastructure.

3.1.8 Whilst all of the key environmental issues covered in **Table 3.1** and policy requirements listed above should be addressed in the new RTS, the following must be afforded particular importance given their significance at national and international levels and their local relevance:

i. Responding to the climate emergency (both in terms of the causes of climate change and adaptation to climate change) and the interrelated biodiversity loss;

ii. Supporting nature recovery, such as through nature-based solutions; and

iii. Contributing to the delivery of sustainable and inclusive economic growth.

3.1.9 It is recognised that response to the climate emergency is closely related to other environmental topic areas, including biodiversity, soils (both in terms of their carbon storage and the effect of climate change on soils), water, human health and socio-economics. As transport is Scotland's biggest contributor to climate change, emitting over a quarter of all greenhouse gas emissions, the RTS provides an opportunity to contribute to net zero targets, thus also indirectly supporting these wider topic areas.

3.2 Initial SEA Comments on Internal Draft 'Case for Change' Report

3.2.1 An assessment of the coverage of environmental issues in the initial internal Draft 'Case for Change' was undertaken and feedback was provided to the RTS team who made subsequent amendments to the Draft RTS. A summary of the comments provided and the subsequent amendments to the document is presented in **Table 3.2** below.

Table 3.2 Initial SEA comments on internal 'Case for Change' Report

Problem / Issue / Framework Element of Draft 'Case for Change'	SEA Recommendation for internal Draft 'Case for Change'	How did the SEA Influence the Published 'Case for Change'
Chapter 3: Policy Review		
▪ Consultation on the 20% Reduction in Car kms: Route Map	▪ The Consultation on the 20% Reduction in Car kms: Route Map includes as the first step, reducing the need to travel, such as through supporting online option. Whilst this is noted in the policy review, is there an opportunity to carry this forward through the RTS TPOs and RTS Objectives? Whilst these would not result in transport measures per se, they would meet the objectives of the RTS.	The Scottish Government's *Reducing car use for a healthier, fairer and greener Scotland - A route map to achieve a 20 per cent reduction in car kilometres by 2030* sets out a framework of sustainable travel behaviours to this end, these being: ▪ Reducing the need to travel ▪ Living well locally ▪ Switching modes ▪ Combining or sharing car trips As a transport strategy, the RTS can have a limited impact on reducing the need to travel. This relies on the increased use of online options in e.g., shopping or the provision of public services, land-use planning approaches and, in some cases, the implementation of effective demand management measures. Similarly, living well locally depends on the services you require being available locally, both in terms of existing settlements and new development where the planning system clearly has a role. Good local walking, wheeling and cycling connections can enable this though, if the services do exist. While the strategy supports wider policy implementation focused on reducing the need to travel / living well locally, as a transport strategy much of the focus of the RTS is on switching modes as this is the most practical alternative to car travel for most. Much of the strategy focus is therefore on switching modes as this is the most practical alternative to car travel for most. In addition, enabling people to combine or share car trips will also be a focus of the Strategy. Whilst the 20% car kilometres reduction target is important, it cannot be the sole focus of the strategy – rurality and the essential role of the private car make this a challenging target in the HITRANS region and thus a proportionate contribution to this target will be sought through the RTS. The transport networks need to provide reliable, resilient and sustainable options for the

Problem / Issue / Framework Element of Draft 'Case for Change'	SEA Recommendation for internal Draft 'Case for Change'	How did the SEA Influence the Published 'Case for Change'
		safe movement of people and goods within and to / from the region.
Chapter 6: Developing RTS Objectives		
▪ Transport Planning Objectives ▪ RTS Objectives	▪ There is one objective included to improve the resilience of air transport, including with respect to more frequent severe weather linked to climate change – consideration should be given to the need to expand this to other modes of transport / infrastructure. ▪ Consideration should be given to inclusion of a direct reference to the transition to a green circular economy or the potential for Green Freeports. ▪ Consider including within RTS Objective 6 supporting text that resilience of the transport network to climate change is important socially (as well as economically), particularly for more outlying/harder to reach locations. ▪ Recommend a word change to RTS Objective 6 to 'To improve the efficiency, safety and resilience of our transport networks for people and freight and *adapt to* the impacts of climate change' to be clear this is referring to climate adaptation and resilience to climate change. ▪ Suggest considering inclusion of text to support reducing the need to travel.	▪ Improving the resilience of other transport modes with respect to climate change is covered by the following new / updated TPOs for each mode: Bus – "Improve the reliability of bus journey times, including improving resilience with respect to more frequent severe weather linked to climate change" and "Increase certainty of bus travel times, including improving resilience with respect to more frequent severe weather linked to climate change" Train – "Improve the reliability of rail journey times, including improving resilience with respect to more frequent severe weather linked to climate change" Ferry – passengers and cars: "Increase certainty of ferry travel, including improving resilience with respect to more frequent severe weather linked to climate change" Ferry – Freight: "Increase certainty of ferry travel, including improving resilience with respect to more frequent severe weather linked to climate change" ▪ The RTS Objectives, as amended, define what will be required from the transport network serving any green freeport, if indeed such a facility is progressed within the HITRANS region. ▪ Text under Objective 6 added as follows "This objective is important in allowing the society and economy of the HITRANS region to prosper *and to reduce inequalities of outcomes associated with socio-economic disadvantage"*. ▪ Added text covering support to reduce the need to travel "While the strategy supports wider policy implementation focused on reducing the need to travel / living well locally, as a transport strategy much of the focus of the RTS is on switching modes as this is the most practical alternative to car travel for most"

3.3 Assessment of Transport Planning Objectives and Proposed RTS Objectives

3.3.1 The 'Case for Change' Report records how the SMART (Specific, Measurable, Agreed, Realistic, Time-bound) and evidence-based TPOs were developed. It provides the robust basis necessary to underpin the development and assessment of sound candidate policies, proposals and future transport interventions for potential inclusion within the emerging RTS. It has involved extensive baseline analysis of the socio-economic context and the transport system and demand.

3.3.2 The RTS seeks to address the problems experienced by users and potential users of the transport network in the Highland and Islands of Scotland as identified through stakeholder and public consultation and analysis of relevant transport planning data. This provides a structured and logical approach to define problems and relate them to outcomes and impacts. From a user perspective the transport problems relate to a range of parameters which define a trip, including:

- All modes of travel:
  - Concern over environmental impact of travel
  - Cost of travel and affordability
  - Fuel / power issues
  - Integration of travel between modes
  - Journey information, including for protected groups who may find accessing information particularly difficult
  - Journey quality
  - Journey times
  - Journey time reliability (including public transport service punctuality)
  - Lack of awareness of travel options
  - Personal security (fear of crime)
  - Personal accessibility – being able to access transport networks and services specifically including for people with disabilities or other protected characteristics which affect accessibility
  - Travel safety (collisions, personal injury)
- Public transport services specifically:
  - Booking and journey planning
  - Capacity – seating/ferry car deck and sleeping accommodation
  - Comfort
  - Connectivity and network coverage (availability of services)
  - Ease of use / convenience
  - Integration between services (within mode, e.g., bus to bus and between modes, e.g., ferry-to-train)
  - Service reliability (cancellations and punctuality)
  - Timetables (first and last / frequency/days of the week etc.)

Transport Planning Objectives

3.3.3 A high-level assessment of the compatibility of the identified circa 100 TPOs in the 'Case for Change' with the SEA Objectives included in the RTS SEA Framework (Appendix A) is presented in **Table 3.3** below.

Table 3.3 Compatibility of RTS Transport Planning Objectives with SEA Objectives

SEA Objective	Relevant Transport Planning Objectives (TPO)
Climate Change: Respond to the climate emergency by decarbonising infrastructure assets and services, promoting natural infrastructure, facilitating a low carbon economy and adapting to accommodate the effects of climate change.	The TPOs provide adequate coverage of the Climate Change SEA Objective through seeking to facilitate and encourage active travel by creating environments which better allow people to choose walking and cycling as options. Reducing the environmental impacts associated with the operation of all modes of transport is included, along with support for EVs and non-ICE-powered commercial vehicles. Improvements to public transport to make it more reliable, improve interchanges and improve journey times also support this SEA Objective. Support is given to sustainably located developments, with provision of more sustainable modes of transport. The TPOs which relate to car travel could prove problematic, for instance improving journey times could have a reverse effect and make these the preferred travel mode above active and public transport. However, it is recognised that car travel will remain important socially and economically in the Highlands and Islands, given the population density and rural nature of the region. Through the SEA review during the drafting of the TPOs, objectives are now included to improve the resilience of air, bus, train and ferry transport including with respect to more frequent severe weather linked to climate change.
Air Quality and Amenity: To maintain air quality, by reducing concentrations of harmful atmospheric pollutants and minimise exposure to noise and vibration.	Many of the TPOs included are likely to have a positive impact on Air Quality and Amenity by reducing the need to travel, decarbonising the transport network, lowering pollutant emissions, supporting alternatives to car use and promoting active travel. During the next stage of the RTS, options will be developed and appraised. The appraisal will include consideration of environmental impacts, including contribution to air pollution and noise and vibration.
Biodiversity, Geodiversity and Soil: Conserve, protect, restore and enhance biodiversity and geodiversity interests, including through safeguarding important sites, species, soil resources and habitats and by protecting and enhancing green infrastructure.	The impact of the operation and development of the region's transport network on biodiversity, geodiversity and soils is noted as a transport problem. Whilst there are no TPOs which directly cover this SEA Objective, it is noted that these issues will be covered within the Environment STAG Criterion during the options development, appraisal and strategy development. Any option that involves the delivery of new (or modification of) infrastructure (including active travel infrastructure) should have regard for the potential impact on biodiversity, geodiversity and soil (including peat and other carbon rich soils) and opportunities to enhance the physical environment (such as peatland restoration and use of nature-based solutions and green/blue infrastructure) should be included. Creating environments which allow more people to walk and cycle have the potential to create, protect and enhance green infrastructure and this should be considered as the RTS progresses. These issues will be

SEA Objective	Relevant Transport Planning Objectives (TPO)
	considered as part of the options appraisal during the next stage of the RTS development.
Water, Flood Risk and Resilience: Conserve, protect and enhance water environments, water quality and water resources, whilst adapting to climate change and reducing exposure to flood risks.	The impact of the operation and development of the region's transport network on the water environment is noted as a transport problem. Direct coverage of this SEA Objective within the TPOs is limited, however reducing the environmental impact is included for each mode of transport and note is made that water will be covered within the Environment STAG Criterion during the options development, appraisal and strategy development. As the RTS progresses it should be ensured that any transport interventions should not contribute to flood risk on the transport network or elsewhere as a result of transport interventions. During the next stage of the RTS, options will be developed and appraised. The appraisal will include consideration of environmental impacts, including the effect on water, drainage and flooding (and resilience of transport infrastructure to the changing climate and more extreme weather events).
Cultural Heritage: Conserve, protect and enhance the historic environment, designated and non-designated cultural assets and promote the Highlands and Islands distinct cultures.	The impact of the operation and development of the region's transport network on cultural heritage is noted as a transport problem. Opportunities to conserve, protect and enhance the historic environment and cultural assets are not directly included in the TPOs, however reducing the environmental impact is included for each mode of transport and note is made that these issues will be covered within the Environment STAG Criterion during the options development, appraisal and strategy development.
Landscape: Protect and enhance the landscape character, townscape character and visual amenity.	The impact of the operation and development of the region's transport network on landscape is noted as a transport problem. Landscape considerations are not given much coverage in the TPOs, however reducing the environmental impact is included for each mode of transport and note is made that landscape will be covered within the Environment STAG Criterion during the options development, appraisal and strategy development. The appraisal of the options should consider landscape impact and seek to minimise the impact on, and enhance, landscape and townscape character and visual amenity. These issues will be considered as part of the environmental appraisal of the options during the next stage of RTS development.
Accessibility and Connectivity: Facilitate appropriate connectivity and affordable, sustainable access for all to employment, education, facilities, services, and social and leisure opportunities.	The TPOs give good coverage of this SEA Objective with a particularly strong emphasis on improvements to affordability and accessibility with regard to active travel and public transport. Connectivity within the region is covered as well as integration between transport modes which focus on improving accessibility and reducing uncertainty, allowing for easier access to facilities, services, and opportunities.
Inclusive Growth: Improve social and economic prosperity for all by enhancing productivity and competitiveness and through reducing socio-economic and environmental inequalities.	This SEA Objective is indirectly supported by the majority of the TPOs, for example through the support of more sustainable modes of transport. Some coverage is also given to the ferry freight sector. Whilst there is no direct reference to the transition to a green circular economy or the potential for Green Freeports, this is considered to be covered by the TPOs overall which would apply to proposed developments.

SEA Objective	Relevant Transport Planning Objectives (TPO)
Human Health: Improve the health of the resident and workplace population, including with respect to physical and mental health and social wellbeing.	Human health is afforded good coverage through the TPOs related to increased safety and personal security, reduced conflicts, injuries and fatalities, improved active travel environments, improved mobility on public transport for seniors providing well-being benefits, decarbonisation (and subsequent air quality improvements) and public transport improvements.
Material Assets: Manage, maintain and where possible regenerate the efficient use of natural resources, ecosystem services, land and infrastructure to meet identified needs.	Through seeking to make improvements to existing infrastructure, good coverage is given in the TPOs to this SEA Objective. No specific mention of ecosystem services is given in the TPOs. Any interventions resulting from the RTS should seek to ensure that natural resources and ecosystem services are promoted, and that infrastructure, materials and land are used efficiently. These issues will be considered as part of the environmental appraisal of the options during the next stage of RTS development.

3.3.4 Overall, the identified TPOs provide good coverage of the HITRANS RTS SEA Framework and associated key issues, especially in relation to socio-economic related SEA Objectives.

RTS Strategic Objectives

3.3.5 The 'Case for Change' includes an assessment of the alignment between the identified TPOs and six proposed RTS Strategic Objectives. This demonstrates that the proposed RTS Strategic Objectives provide good coverage of the TPOs whilst setting out a manageable number of RTS Strategic Objectives to underpin the development of wider RTS components.

3.3.6 The proposed RTS Strategic Objectives are:

- **Strategy Objective 1:** To make a just transition to a post-carbon and more environmentally sustainable transport network.
- **Strategy Objective 2:** To transform and provide safe connections between, our city, towns and villages, to enable walking, wheeling and cycling for all.
- **Strategy Objective 3:** To widen access to public and shared transport and improve connectivity within and to / from the region.
- **Strategy Objective 4:** To improve the quality and integration of public and shared transport within and to / from the region.
- **Strategy Objective 5:** To ensure reliable, resilient, affordable and sustainable connectivity for all to our island, peninsular and remote communities
- **Strategy Objective 6:** To improve the efficiency, safety and resilience of our transport networks for people and freight, and adapt to the impacts of climate change.

3.3.7 Each objective is supported by text setting out 'why' it is required, which is helpful in setting out further detail on the scope and intention of the objectives, which have aided the SEA process.

3.3.8 An assessment of the compatibility of the proposed RTS Strategic Objectives with the SEA Objectives defined within the RTS SEA Framework (Appendix A) is presented in **Table 3.4**.

Table 3.4 Compatibility of RTS Objectives with SEA Framework

SEA Objectives	RTS Objectives								Commentary
	1. Transition to post carbon, more sustainable transport network	2.Transform and provide safe connections for walking and wheeling	3. Widen access to public and shared transport within and to the region		4. Improve the quality of and integration between public/shared modes of transport	5. Ensure reliable, resilient, affordable, and sustainable connectivity to island, peninsular and remote communities		6. Improve the efficiency, safety and resilience of transport networks for people and freight and adapt to the impacts of climate change	
1. Climate Change: Respond to the climate emergency by decarbonising infrastructure assets, protecting, promoting and enhancing natural infrastructure, facilitating a low carbon economy and adapting to accommodate the effects of climate change.	++	++	-	+	+	-	+	++	All of the proposed RTS Objectives match well with SEA Objective 1 relating to climate change. Through improving the quality, reliability and connectivity of public transport, these Objectives will encourage a shift towards less carbon intensive travel options. However, addressing barriers to travel could increase the amount people travel and thus (without intervention), carbon emissions. This conflicts with the targets to achieve net zero although this issue is somewhat balanced by the support of the decarbonisation of the transport system within RTS Objective 1. RTS Objective 1 supports the transition to a post-carbon transport network. RTS Objective 2 supports active travel which will reduce the reliance on carbon intensive travel options. RTS Objective 6 highlights the needs for network resilience to extreme weather and adaptation to climate change which aligns well to the SEA Objective.

SEA Objectives	RTS Objectives						Commentary
	1. Transition to post carbon, more sustainable transport network	2.Transform and provide safe connections for walking and wheeling	3. Widen access to public and shared transport within and to the region	4. Improve the quality of and integration between public/shared modes of transport	5. Ensure reliable, resilient, affordable, and sustainable connectivity to island, peninsular and remote communities	6. Improve the efficiency, safety and resilience of transport networks for people and freight and adapt to the impacts of climate change	
							However, there is also a natural conflict between objectives 3 and 5 as improved transport connectivity may increase use of roads and traffic levels, ferry services and flights. However, it is recognised that road-based travel will remain important to this rural area, and flights/ferries a necessity given the geography. This issue is somewhat balanced through the support of the decarbonisation of the transport system within RTS Objective 1.
2. Air Quality and Amenity: To maintain and improve air quality and, reduce concentrations of harmful atmospheric pollutants and minimise exposure to noise and vibration.	++	++	+	+	?	+	RTS Objectives 1 and 2 both strongly support SEA Objective 2 by supporting the transition to a post-carbon and more environmentally sustainable transport network (with subsequent benefits for air quality and amenity) and supporting active travel. These objectives will help to reduce the amount of traffic and congestion leading to better air quality and minimising human exposure to noise and vibration. RTS Objectives 3 and 4 support SEA Objective 2 by encouraging a shift towards better public transportation and thus reducing the number of vehicles on the road. Any increase in emissions

SEA Objectives	RTS Objectives						Commentary
	1. Transition to post carbon, more sustainable transport network	2.Transform and provide safe connections for walking and wheeling	3. Widen access to public and shared transport within and to the region	4. Improve the quality of and integration between public/shared modes of transport	5. Ensure reliable, resilient, affordable, and sustainable connectivity to island, peninsular and remote communities	6. Improve the efficiency, safety and resilience of transport networks for people and freight and adapt to the impacts of climate change	
							to air through increased provision of public transport, may be off-set through a reduction in private vehicle kilometres associated with a modal shift to public transport and the support for decarbonising the transport network, as supported by RTS Objective 1. RTS Objective 5 aims to provide reliable, resilient, affordable and sustainable connectivity for all to our island, peninsular and remote communities. As such, there is a natural conflict with the SEA Objective. However, it is recognised that road-based travel will remain important to this rural area, and flights/ferries a necessity given the geography. This issue is somewhat balanced through the support of the decarbonisation of the transport system and reduced impact on communities within RTS Objective 1.
3. Biodiversity, Geodiversity and Soil: Conserve, protect, restore and enhance biodiversity and geodiversity interests, including through safeguarding designated and non-designated sites, species and soil resources and by protecting,	++	+?	+?	+?	?	+	Whilst there is no explicit consideration of impact on biodiversity, geodiversity and soils in the RTS Objectives, they are covered in the broader sense by RTS Objective 1 (to transition to a more environmentally sustainable transport network) and will be considered as part of the environmental appraisal of options during the next stage of RTS development. Further, Objective 1

SEA Objectives	RTS Objectives						Commentary
	1. Transition to post carbon, more sustainable transport network	2.Transform and provide safe connections for walking and wheeling	3. Widen access to public and shared transport within and to the region	4. Improve the quality of and integration between public/shared modes of transport	5. Ensure reliable, resilient, affordable, and sustainable connectivity to island, peninsular and remote communities	6. Improve the efficiency, safety and resilience of transport networks for people and freight and adapt to the impacts of climate change	
promoting and enhancing green infrastructure.							indirectly supports biodiversity and soils through tackling the causes of climate change. Where the RTS Objectives support measures to reduce emissions of pollutants to the atmosphere, there is potential for subsequent benefits to biodiversity. This includes the support of active travel through RTS Objective 2 and public transport through RTS Objectives 3 and 4. As such these RTS Objectives have the potential to support this SEA Objective, depending on the way in which they are implemented as the RTS is developed. Further, active travel infrastructure could be taken forward in a manner which supports green infrastructure. Where relevant the subsequent policies and proposals to implement these Objectives should include appropriate consideration and safeguards in respect to biodiversity, geodiversity and soils. RTS Objective 5 aims to provide improved, connectivity for the remote areas and as such, there is some natural conflict with the SEA Objective. However, it is recognised that road-based travel will remain important to this rural area, and flights/ferries a necessity given the

SEA Objectives	RTS Objectives						Commentary
	1. Transition to post carbon, more sustainable transport network	2.Transform and provide safe connections for walking and wheeling	3. Widen access to public and shared transport within and to the region	4. Improve the quality of and integration between public/shared modes of transport	5. Ensure reliable, resilient, affordable, and sustainable connectivity to island, peninsular and remote communities	6. Improve the efficiency, safety and resilience of transport networks for people and freight and adapt to the impacts of climate change	
							geography. This issue is somewhat balanced through the support of the decarbonisation of the transport system and reduced impact on communities within RTS Objective 1. There is potential for some options that may arise from the RTS to affect biodiversity, geodiversity, and soils. The impact on biodiversity, geodiversity, and soils will be considered as part of the environmental appraisal of options during the next stage of RTS development.
4. Water, Flood Risk and Resilience: Conserve, protect and enhance water environments, coastal environments, water quality and water resources, whilst adapting to climate change and reducing exposure to flood risks.	+	?	?	?	?	+	Whilst there is no explicit consideration of impact on water quality and flood risk in the RTS Objectives, they are covered in the broader sense by RTS Objective 1 (to transition to a more environmentally sustainable transport network) and will be considered as part of the environmental appraisal of options during the next stage of RTS development. RTS Objectives 2, 3 and 4 support active travel and more sustainable travel options. As such, they have the potential to support this SEA Objective, depending on the way in which the aspect is managed as the RTS develops.

SEA Objectives	RTS Objectives						Commentary
	1. Transition to post carbon, more sustainable transport network	2.Transform and provide safe connections for walking and wheeling	3. Widen access to public and shared transport within and to the region	4. Improve the quality of and integration between public/shared modes of transport	5. Ensure reliable, resilient, affordable, and sustainable connectivity to island, peninsular and remote communities	6. Improve the efficiency, safety and resilience of transport networks for people and freight and adapt to the impacts of climate change	
							RTS Objective 6 is compatible with the resilience element of this SEA Objective, through supporting travel networks resilience and ability to adapt to the threat posed by climate change. There is an element of uncertainty in the relationship of RTS Objective 2, 3, 4 and 5 with this SEA Objective as potential impacts (beneficial or adverse) would depend on their implementation. Where relevant the subsequent policies and proposals to implement these Objectives should include appropriate consideration and safeguards in respect of the water environment and flood risk e.g., through appropriately locating and designing infrastructure and use of green/blue infrastructure in drainage designs.
5. Cultural Heritage: Conserve, protect and enhance the historic environment, designated and non-designated cultural assets and promote the Highlands and Islands distinct cultures.	+	?	?	?	?	?	Whilst there is no explicit consideration of impact on cultural heritage in the RTS Objectives, they are covered in the broader sense by RTS Objective 1 (to transition to a more environmentally sustainable transport network) and will be considered as part of the environmental appraisal of options during the next stage of RTS development.

SEA Objectives	RTS Objectives						Commentary
	1. Transition to post carbon, more sustainable transport network	2.Transform and provide safe connections for walking and wheeling	3. Widen access to public and shared transport within and to the region	4. Improve the quality of and integration between public/shared modes of transport	5. Ensure reliable, resilient, affordable, and sustainable connectivity to island, peninsular and remote communities	6. Improve the efficiency, safety and resilience of transport networks for people and freight and adapt to the impacts of climate change	
							RTS Objectives 2, 3, 4 and 5 have the greatest potential to align with Cultural Heritage as they could make heritage assets more accessible to residents and tourists alike. However, increased visitor numbers should be supported by any required infrastructure to cope with larger volumes of people. There is an element of uncertainty in the relationship of RTS Objectives with this SEA Objective as potential impacts (beneficial or adverse) would depend on their implementation. Where relevant, policies and proposals to implement these Objectives should include appropriate safeguards in respect of cultural heritage to conserve, protect and enhance the historic environment and cultural assets.
6. Landscape: Protect and enhance the landscape character, townscape character, seascape character and visual amenity.	+	?	?	?	?	?	Whilst there is no explicit consideration of impact on landscape in the RTS Objectives, they are covered in the broader sense by RTS Objective 1 (to transition to a more environmentally sustainable transport network) and will be considered as part of the environmental appraisal of options during the next stage of RTS development.

SEA Objectives	RTS Objectives						Commentary
	1. Transition to post carbon, more sustainable transport network	2.Transform and provide safe connections for walking and wheeling	3. Widen access to public and shared transport within and to the region	4. Improve the quality of and integration between public/shared modes of transport	5. Ensure reliable, resilient, affordable, and sustainable connectivity to island, peninsular and remote communities	6. Improve the efficiency, safety and resilience of transport networks for people and freight and adapt to the impacts of climate change	
							There is an element of uncertainty in the relationship of RTS Objectives with this SEA Objective as potential impacts (beneficial or adverse) would depend on their implementation. Where relevant, policies and proposals to implement these Objectives should include appropriate consideration and safeguards in respect of landscape character and visual amenity.
7. Accessibility and Connectivity: Facilitate appropriate connectivity and affordable access for all to employment, education, facilities and services, and social and leisure opportunities, including tourism.	+	++	++	++	++	+	The Accessibility SEA Objective receives good coverage across the RTS Objectives by supporting improvements to the transport network. RTS Objective 2 aims to facilitate active travel for everyone. RTS Objectives 3 and 4 look to improve the quality, sustainability, access to, and connectivity of public transport within the region; and improve integration between all modes of travel within the region. RTS Objective 5 looks to improve connectivity for all island, peninsular and remote communities to overcome pronounced difficulties. RTS Objective 6 focuses on the efficiency, safety and resilience of the transport networks.

SEA Objectives	RTS Objectives						Commentary
	1. Transition to post carbon, more sustainable transport network	2.Transform and provide safe connections for walking and wheeling	3. Widen access to public and shared transport within and to the region	4. Improve the quality of and integration between public/shared modes of transport	5. Ensure reliable, resilient, affordable, and sustainable connectivity to island, peninsular and remote communities	6. Improve the efficiency, safety and resilience of transport networks for people and freight and adapt to the impacts of climate change	
8. Inclusive Growth: Improve social and economic prosperity for all by enhancing productivity and competitiveness and through reducing socio-economic inequalities.	+	+	+	+	+	+	All the RTS Objectives align with this SEA Objective through seeking to enhance the efficiency and performance of the transport system for all groups whilst increasing accessibility enabling economic growth/ prosperity. RTS Objective 2 supports active travel for all users supporting economic prosperity through improved access to employment and education; as well as potentially providing opportunities for tourism. RTS Objective 6 directly supports the movement of freight/people/goods, supporting growth.
9. Human health: Improve the health of the resident and workplace population, including with respect to physical and mental health and social wellbeing.	+	+	+	+	+	+	Overall, the Health SEA Objective is well represented throughout all RTS Objectives. RTS Objectives 1 to 4 reduce the reliance on carbon-based transport, thus reducing emissions to air and potentially subsequently improving human health. RTS Objective 2 supports active travel, has clear links to the Human Health SEA Objective as it provides the opportunity to improve health (both

SEA Objectives	RTS Objectives						Commentary
	1. Transition to post carbon, more sustainable transport network	2.Transform and provide safe connections for walking and wheeling	3. Widen access to public and shared transport within and to the region	4. Improve the quality of and integration between public/shared modes of transport	5. Ensure reliable, resilient, affordable, and sustainable connectivity to island, peninsular and remote communities	6. Improve the efficiency, safety and resilience of transport networks for people and freight and adapt to the impacts of climate change	
							physical and mental) and wellbeing and improved road safety. By supporting the safety of the transport network, RTS Objective 6 relates well to this SEA Objective. RTS Objective 6 seeks to reduce the impact of transport on the people of the region including through decarbonising the transport network, reduced traffic and reduced effects on communities affected by traffic.
10. Material Assets: Manage, maintain and where possible improve the efficient and effective use of natural resources, ecosystem services, land and infrastructure to meet identified needs.	+	?	?	?	?	?	RTS Objective 1 seeks to transition to a more environmentally sustainable transport network. There is no explicit consideration of the efficient and effective use of natural resources, land and infrastructure to meet identified needs in the RTS Objectives. These issues will be considered as part of the environmental appraisal of options during the next stage of RTS development. RTS Objective 2 supports active travel; RTS Objectives 3 and 4 support more sustainable travel options. As such, they have the potential to support this SEA Objective, depending on the

SEA Objectives	RTS Objectives						Commentary
	1. Transition to post carbon, more sustainable transport network	2.Transform and provide safe connections for walking and wheeling	3. Widen access to public and shared transport within and to the region	4. Improve the quality of and integration between public/shared modes of transport	5. Ensure reliable, resilient, affordable, and sustainable connectivity to island, peninsular and remote communities	6. Improve the efficiency, safety and resilience of transport networks for people and freight and adapt to the impacts of climate change	
							way in which the aspect is managed as the RTS develops. Where relevant the subsequent policies and proposals to implement these Objectives should include appropriate safeguards in respect of the efficient and effective use of natural resources, ecosystem services, land and infrastructure to meet identified needs.

KEY:				
	++	Strong compatibility	-	Incompatible
	+	Compatible	~	No clear relationship
	0	Neutral	?	Uncertain

3.3.9 The assessment provided in **Table 3.4** demonstrates that in general the proposed RTS Objectives provide an appropriate high-level platform from which to develop specific schemes, policies and proposals to address a range of key environmental (as well as socio-economic and wider) issues. RTS Objective 1 provides an overarching direction to the RTS to transition to a post-carbon and more environmentally sustainable transport network. Although this is not specific to some aspects of the environment (such as the water environment, heritage, landscape or material assets), it is noted that these issues will be considered within the appraisal of the options during the next stage of the RTS development process (see section **4.3 Next Steps** below).

3.3.10 The assessment has identified some areas of potential conflict between objectives to promote connectivity with requirements to meet emissions reductions targets. This is in part due to the rural nature of the region because of which it is recognised that road-based travel will remain important as part of an integrated transport system in the region, and the need to connect via sea and air to island and peninsular communities. The potential conflict between these objectives is however partly offset by the objective to decarbonise transport and therefore reduce emissions while also providing connectivity.

3.3.11 Going forward the SEA process will be used to test the relationship between the proposed RTS Strategic Objectives and individual options to maximise likely significant beneficial effects and avoid or minimise likely significant adverse effects from the RTS when read and implemented as a whole.

4 Recommendation and Next Steps

4.1 Introduction

4.1.1 Building upon the analysis in **Section 3**, this section identifies specific recommendations to be addressed in the next stages of the RTS development process to further enhance the consideration of key environmental issues. These recommendations should be considered as the emerging RTS is developed and addressed in the Draft RTS which will be prepared in due course.

4.2 Compatibility with SEA Objectives and Opportunities for Enhancement

4.2.1 The 'Case for Change' has good coverage of most environmental issues and no major omissions have been identified. Each RTS Objective is supported by text setting out 'why' it is required, which is helpful in setting out further detail on the scope and intention of the objectives. These provide a useful expansion of the Objectives to confirm their scope and intent. The review has identified that the RTS Objectives have a good level of compatibility with the SEA Objectives. As the RTS develops, relevant policies and proposals within the RTS should include appropriate safeguards in respect of the SEA topic areas, with a preference for preventing environmental effects before reducing and mitigating them. Opportunities to capture and commit to relevant environmental enhancement will be sought wherever practical.

4.2.2 The SEA review of the draft 'Case for Change' document (prior to publication) identified several opportunities for improvement, which have resulted in the strengthening of the (published) RTS Objectives as follows:

- Amendment of RTS Objective 6 to clarify 'adaptation' to climate change is being considered within this Objective.
- Addition of the support for wider policy implementation focussed on reducing the need to travel and living well locally.
- Further text changes to clarify and strengthen the RTS Objectives and subsequent text.

4.2.3 During the next stage, each of the RTS Strategic Objectives will underpin the development of a long-list of options. The long-list of options will be considered through the SEA to check that all 'reasonable alternatives' are being considered.

4.2.4 To avoid potential tensions, gaps or 'silo working' between the implementation of individual RTS Objectives (which could undermine the overall environmental performance of the RTS) it will be important for the RTS to include an over-arching Vision.

4.2.5 When developing the options, consideration should be given to the potential natural conflict between objectives to promote accessibility with requirements to meet emissions reductions targets. This is likely to be particularly relevant to car, ferry and air-based travel which are important socially and economically in the region.

4.2.6 The 'Case for Change' identifies both risks and opportunities to tackle issues, for partnerships with other organisations and improvements which should be taken forward as the RTS develops. Many of the challenges and opportunities identified within the 'Case for Change' are driven by the identified environmental and social issues (such as decarbonisation of transport driven by climate change) which will be central to the development of the RTS and thus the nature of transport in the Highland and Islands going forward.

4.3 Next Steps

4.3.1 This SEA Environmental Report is being published for consultation alongside the 'Case for Change' which has been prepared to underpin the preparation of the new RTS for the HITRANS region. This forms the first part of a multi-stage process which will include a detailed options appraisal process and future consultation on a full draft RTS.

4.3.2 In accordance with the 2005 Act and best practice the SEA process is being carried out from the outset and in tandem with the development of the emerging RTS to allow key environmental issues to inform the content of the new RTS. All consultation feedback received in respect of the 'Case for Change' and this ER will be reviewed and used to inform and refine the proposed RTS Strategic Objectives and the development of options. The next stage will be the Stage 2 – Preliminary Options Appraisal.

4.3.3 During this stage, subject to the consultation, the problems and opportunities identified in this document along with the stated RTS Objectives will be used as a basis to generate a long-list of options which will subsequently be appraised against the:

- RTS Objectives
- STAG criteria:
  - Environment
    - Biodiversity and habitats
    - Geology and soils
    - Land use (including agriculture and forestry)
    - Water, drainage and flooding
    - Air quality
    - Historic environment
    - Landscape
    - Noise and vibration
  - Climate Change
    - Greenhouse gas emissions
    - Vulnerability to the effects of climate change
    - Potential to adapt to the effects of climate change
  - Health, safety, and wellbeing
    - Accidents
    - Security
    - Health outcomes
    - Access to health and wellbeing infrastructure
    - Visual amenity
  - Economy
    - Transport Economic efficiency
    - Wider economic impacts
  - Equality and accessibility
    - Public transport network coverage

        - Active travel network coverage
        - Comparative access by people group
        - Comparative access by geographic location
        - Affordability
    - Established policy directives
    - Feasibility, affordability, and public acceptability
    - Sustainable Investment Hierarchy and Sustainable Travel Hierarchy
    - Risk and uncertainty

4.3.4 The SEA framework will be applied during this appraisal process.

4.3.5 The results of the appraisal of options will be presented and the remaining options taken forward. Following this stage, the RTS document will then be produced which will collate the outputs of the above tasks into a Strategy and an associated Delivery Plan.

4.3.6 A full Environmental Report (ER) will be prepared to accompany the Draft RTS for consultation, with all relevant information requirements prescribed in Section 14 and Schedule 3 of the 2005 Act addressed in that ER. This will include the identification of all likely significant environmental effects (with appropriate strategic mitigation measures if required) from all proposed RTS components, a detailed review of the approach adopted to identify and assess reasonable alternative options, and full details of how all comments received from the SEA Consultation Authorities at each stage have been taken account of in the SEA and RTS development process.

4.4 Request for Comments from the SEA Consultation Authorities

4.4.1 In accordance with the 2005 Act, the SEA Consultation Authorities are invited to provide comments regarding the ER of the CfC. Any comments are requested within six weeks of receiving this report and directed via email to:

Cathy O'Connor – Principal Environmental Advisor, Stantec UK

Tel: 0118 952 0229

Email: *cathy.oconnor@stantec.com*

Appendix A SEA Framework

Proposed SEA Objectives	Proposed Guide Questions: Will the RTS (component)…	Proposed Criteria to Assess Candidate Transport Interventions and Schemes
1. Climate Change: Respond to the climate emergency by decarbonising infrastructure assets, protecting, promoting and enhancing natural infrastructure, facilitating a low carbon economy and adapting to accommodate the effects of climate change.	• Contribute to decarbonisation of the transport system? • Promote modal shift towards sustainable public transport and active travel? • Support a sustainable pattern of development which minimises energy consumption and GHG emissions? • Support sustainable tourism? • Reduce the number of single occupant car journeys and encourage car sharing? • Promote the use of clean fuels and technologies? • Enhance the resilience of infrastructure assets to adverse weather and the effects of climate change? • Include the use of nature-based solutions? • Include blue-green infrastructure? • Contribute to net zero emissions of all greenhouse gases by 2045 (2030 for Orkney Islands and Moray)? • Help make the Highlands and Islands become the world's first net zero aviation region by 2040?	• Support a sustainable pattern of development that facilitates achieving carbon neutrality. • Changes in emissions from traffic and public transport services. • Impacts on climate change mitigation: modal shifts and GHG emissions or saving (construction and operational phases). • Adaptability of new and upgraded transport infrastructure and services. • Resilience to adverse weather and the effects of climate change.
2. Air Quality and Amenity: To maintain and improve air quality and, reduce concentrations of harmful atmospheric pollutants and minimise exposure to noise and vibration.	• Maintain or enhance air quality? • Avoid unacceptable noise and vibration levels at sensitive locations (including ports and ferry terminals)? • Prevent and reduce emissions of harmful pollutants from all forms of transport?	• Proximity to congestion pinch points. • Sensitive areas (human and habitats). • Likely operational emissions, including at ports and ferry terminals.
3. Biodiversity, Geodiversity and Soil: Conserve, protect, restore and enhance	• Ensure appropriate safeguards for the integrity, conservation objectives and	• Proximity and connectivity to and impacts on sites designated at international, national

Proposed SEA Objectives	Proposed Guide Questions: Will the RTS (component)…	Proposed Criteria to Assess Candidate Transport Interventions and Schemes
biodiversity and geodiversity interests, including through safeguarding designated and non-designated sites, species and soil resources and by protecting, promoting and enhancing green infrastructure.	features of sites designated at international, national, or local levels for reasons of biodiversity or geodiversity value or species protection? • Support the protection and enhancement of valued species and habitats? • Support safeguarding against habitat loss or fragmentation? • Support the protection and enhancement of protected trees and important woodland areas? • Protect and enhance important soil resources? • Support the protection and restoration of soils, including peatland?	and regional levels for reasons of biodiversity conservation, ecological importance or geological importance (i.e., effects on integrity, objectives and features). • Potential impacts on protected species. • Proximity and connectivity to and impacts on designated woodlands and other valued habitats. • Proximity and connectivity to and impacts on non-designated biodiversity features including wildlife corridors and connectivity. • Opportunities to deliver biodiversity net gain and promote the enhancement of natural capital. • Through tackling climate change, improvements in the quality and quantity of habitats and soils and an increase in the species that depend on them. • Positive impacts on soils.
4. Water, Flood Risk and Resilience: Conserve, protect and enhance water environments, coastal environments, water quality and water resources, whilst adapting to climate change and reducing exposure to flood risks.	• Avoid deterioration and enhance the overall, ecological and chemical classification of water bodies and the water environment in accordance with the Water Framework Directive? • Affect the volume of surface water runoff into or abstraction from water bodies including groundwaters? • Minimise the risk of flooding to people, property, infrastructure and environmental assets? • Manage residual flood risks appropriately and avoid new flood risks including by incorporating nature-based solutions? • Seek to minimise new development in proximity to areas shown to be at risk on	• Proximity to Flood Risk Zones. • Proximity to and impacts on the WFD status of waterbodies and aquifers. • Resilience to flood risk. • Consideration of marine aquatic resources and the coastal environment.

Proposed SEA Objectives	Proposed Guide Questions: Will the RTS (component)…	Proposed Criteria to Assess Candidate Transport Interventions and Schemes
	SEPA's Flood Map or mitigate the potential for such risk? • Support the coastal environment?	
5. Cultural Heritage: Conserve, protect and enhance the historic environment, designated and non-designated cultural assets and promote the Highlands and Islands distinct cultures.	• Conserve, protect and enhance the integrity, character and setting of heritage assets? • Preserve important archaeological sites and protect potential unknown archaeological resources? • Promote sustainable access to and interpretation of cultural heritage sites for communities and visitors?	• Proximity to and potential effects on designated and non-designated heritage assets, archaeological sites and their settings. • Opportunities to enhance sustainable access to, and enjoyment and understanding of, sites of archaeological and cultural heritage significance.
6. Landscape: Protect and enhance the landscape character, townscape character, seascape character and visual amenity.	• Protect and enhance landscape character? • Safeguard important landscape and townscape features? • Protect visual amenity and valued views? • Protect the unique characteristics of the Highlands and Islands? • Maintain and enhance the attractiveness of the public realm and built environment and locally valued landscapes?	• Proximity to and impacts on designated landscapes and areas with wild land character. • Changes in landscape, townscape and seascape character from new infrastructure. • Impacts on visual amenity and key views. • Impacts on settlement integration or coalescence and locally valued landscapes and townscape areas.
7. Accessibility and Connectivity: Facilitate appropriate connectivity and affordable access for all to employment, education, facilities and services, and social and leisure opportunities, including tourism.	• Improve connectivity to employment, education, personal business and social and leisure opportunities (including tourism) in particular by active travel and public transport? • Improve the accessibility and integration of the transport network, including between islands? • Improve availability and uptake of sustainable transport modes for tourists? • Improve availability and access to transport and travel information (including for tourists)?	• Support the NTS2 sustainable travel hierarchy. • Address the evidenced physical accessibly problems. • Proximity to and impacts on the public transport network. • Proximity to the existing transport network. • Proximity to and impacts on identified congestion pinch points. • Proximity to and impacts on the accessibility of community facilities, public services and key amenities. • Proximity to and impacts on the accessibility of education infrastructure.

Proposed SEA Objectives	Proposed Guide Questions: Will the RTS (component)…	Proposed Criteria to Assess Candidate Transport Interventions and Schemes
	• Respond to periods of increased travel demand e.g., during holiday periods and special events? • Reduce the need to travel? • Maintain or improve connections between island communities and the wider HITRANS region? • Reduce congestion and allow for greater journey time reliability? • Help reduce severance effects of the transport network? • Help to meet the Climate Change Plan commitment to reduce vehicle kilometres by 20% by 2030? • Maintain or improve access to nature?	• Proximity to and impacts on the accessibility of tourist attractions/routes. • Impacts on journey times to mainland Scotland. • Access to nature and areas of green space and open space including in communities.
8. Inclusive Growth: Improve social and economic prosperity for all by enhancing productivity and competitiveness and through reducing socio-economic inequalities.	• Support better integration of land-use/spatial planning, transport planning and economic development decisions, including those relating to tourism? • Help to integrate labour and housing markets to meet identified population needs in a sustainable manner? • Support the delivery of existing and emerging spatial strategies at national, regional and local levels? • Support the growth of the population of the Highlands and Islands through both retaining and attracting people to live, work and invest in the region? • Promote the co-location of synergistic economic activities and land uses? • Support efficient, sustainable and affordable freight movement within and to / from the Highlands and Islands? • Support increased and diversified employment opportunities?	• Economic development, employment benefits and social value unlocked by the intervention. • Support the creation of safe and attractive public realm. • Contribution to area-based regeneration and socio-economic renewal. • Impacts on transport efficiency including inter-island and mainland journey times. • Impacts on freight movement. • Proximity to and impacts on key employment locations (existing and planned). • Ability to help reduce identified inequalities (as assessed through separate reporting).

Proposed SEA Objectives		Proposed Guide Questions: Will the RTS (component)…	Proposed Criteria to Assess Candidate Transport Interventions and Schemes
		• Address transport needs resulting from existing and changing demographic socio-economic characteristics? • Support the implementation of relevant equalities duties, as assessed through separate reporting?	
9.	Human health: Improve the health of the resident and workplace population, including with respect to physical and mental health and social wellbeing.	• Facilitate and encourage use of public transport and active travel? • Improve connections to and access to recreational opportunities and facilities? • Reduce the negative impacts of transport on human health, especially in terms of pollution and air quality? • Reduce the likelihood of transport-related road accidents and casualties? • Improve connectivity to healthcare facilities, including e.g., connectivity to on-island facilities in Orkney (Balfour Hospital), Western Isles (Western Isles Hospital) and longer-distance health journeys to access specialist treatment? • Safeguard sensitive environmental receptors to maintain and enhance human health?	• Proximity to and impacts on access to healthcare facilities, including through long distance travel. • Proximity to and impacts on active travel networks. • Levels of active travel. • Health outcomes and determinants. • Proximity to impacts on open space. • Contribution of biodiversity and the natural environment (access to them) in people's health. • Consideration of post COVID-19 issues for transport and working/ living patterns.
10.	Material Assets: Manage, maintain and where possible improve the efficient and effective use of natural resources, ecosystem services, land and infrastructure to meet identified needs.	• Unlock the delivery of housing to meet identified needs? • Prioritise the re-development of previously developed (brownfield) land? • Support the provision of adequate infrastructure, services and facilities to meet identified needs? • Improve movement of people, goods and services within, out of and into the Highlands and Islands? • Support the large seasonal influx of overnight tourists, day trippers and cruise passengers?	• Alignment with or ability to support land-use/spatial planning and economic development decisions. • Proximity to and impacts on the delivery of major development allocations and committed developments. • Facilitate the redevelopment of previously developed (brownfield) land. • Proximity to and impacts on vacant and derelict land (VDL). • Impacts on best and more versatile agricultural land and important grazing land • Impacts on marine-based assets / fisheries.

Proposed SEA Objectives	Proposed Guide Questions: Will the RTS (component)…	Proposed Criteria to Assess Candidate Transport Interventions and Schemes
	• Promote efficient resource and materials use consistent with the objectives of a circular economy?	• Impacts on natural resources, including the extraction of mineral resources. • Impacts on ecosystem services. • Improve the connectivity of the islands to the mainland of Scotland or the main destination within that island archipelago.

Appendix B Review of SEA Scoping and 'Case for Change' Consultation Responses

SEA Consultation Authority	Comment	Response
Scottish Environment Protection Agency (28 July 2022)	<u>Relationship with other Plans, Policies and Strategies (PPS)</u> Note that an update Cleaner Air for Scotland Strategy was published in 2021. The Action Plan for Inverness City Centre Air Quality Management Area and the proposed Inner Moray Firth Local Development Plan (which includes a transport policy) are additional regional relevant PPS for consideration. Some of the PPS included in the report have themselves been subject to SEA. Where this is the case you may find it useful to prepare a summary of the key SEA findings that may be relevant to the Strategy.	Update to the baseline and policy review is being deferred until the full ER that will accompany the Draft RTS, suggested amendments will be made at that stage.
	<u>Baseline Information</u> SEPA holds significant amounts of environmental data which may be of interest to you in preparing the environmental baseline, identifying environmental problems, and summarizing the likely changes to the environment in the absence of the PPS, all of which are required for the assessment. Many of these data are now readily available on SEPA's website. Additional local information may also be available from our Access to Information unit (foi@sepa.org.uk). Other sources of data for issues that fall within SEPA's remit are referenced in our SEA topic guidance notes for air, soil, water, material assets and human health.	Update to the baseline and policy review is being deferred until the full ER that will accompany the Draft RTS, the relevant information sources will be reviewed further at that stage.
	<u>Environmental Problems</u>	

SEA Consultation Authority	Comment	Response
	We consider that the environmental problems described generally highlight the main issues of relevance for the SEA topics within our remit.	Noted.
	Assessment We agree that in this instance all environmental topics should be scoped into the assessment. We are generally content with the proposed SEA objectives in relation to our interests. We support the air quality objective "To maintain and improve …" and presume that Table 4.2 simply includes an early iteration of the objective. We do however query whether objective 8 is required as both population and material assets are already covered by other objectives and the overall assessment may be better balanced without it. The use of guiding questions to help assess the SEA objectives looks a useful approach. We suggest that for SEA objective 4 the first proposed criterion for flood risk relates to proximity to areas shown to be at risk on SEPA's Flood Map (rather than Flood Risk Zones). We understand that the proposal is to integrate the STAG and SEA criteria to carry out a single assessment; this seems a sensible approach. We are content for the approach to be taken to the vision and strategic objectives as being an assessment of compatibility with the SEA objectives. We are also content that policy options, polices and proposed site-specific interventions and schemes will be assessed using a different matrix where significance is considered. When it comes to setting out the results of the assessment in the Environmental Report please provide enough information to clearly justify the reasons for each of the assessments presented. It would also be helpful to set	Noted. Noted, the SEA objectives are subject to further review through the consultation process. The necessity of Objective 8 is subject to further review however is considered to remain relevant covering the more economic issues. Noted, the refence has been updated to SEPA's Flood Map. Noted. Noted, sufficient information to be provided to clearly justify the reasons for each of the assessments presented. Assumptions to be set out alongside difficulties and limitations encountered where appropriate.

SEA Consultation Authority	Comment	Response
	out assumptions that are made during the assessment and difficulties and limitations encountered. We suggested that to get the most out of the SEA process it may be better to consider policies (and other elements) individually rather than in groups as this provides an opportunity to improve individual components, which can be lost if a grouped assessment is carried out. We would also encourage you to use the assessment as a way to improve the environmental performance of these individual aspects of the strategy with making amendments to the individual element (for example changing the wording of a policy) often being the best way to achieve this.	Noted, policies/elements of the RTS to be considered individually as suggested (however they may be grouped together within the main report for the purposes of concise reporting). Noted, the SEA team will be feeding back comments on the RTS throughout its development.
	<u>Alternatives</u> Our understanding of the information provided is that there is no alternative to updating the strategy and that assessment of alternatives will concentrate on the different vision components, aims, policies or projects that were considered as part of the strategy-making process. If this is the case then we welcome this approach as it can really help inform decision making regarding what elements to include within the final strategy or what overall direction to take.	Yes, it has been determined that a new RTS is required, the SEA will focus on the alternative components of the strategy.
	<u>Consultation Period</u> We are satisfied with the proposal for a four week consultation period for the initial Environmental Report that supports the 'Case for Change' Report and a 12 week consultation period for the final draft Strategy consultation period. It is our understanding that the initial ER will provide an assessment of the transport planning objectives and related strategic objectives (and their reasonable alternatives).	Noted with thanks.

SEA Consultation Authority	Comment	Response
NatureScot (29 July 2022)	**Overall Approach to the SEA** We welcome that all of the SEA topics have been scoped into the SEA. This reflects the wide range of possible impacts from transport policies and projects, as well as the range of opportunities for environmental improvement. Key opportunities that we would highlight include: • The use of nature-based solutions for challenges, especially as part of transport infrastructure projects – this could be a key principle in the new RTS. • Improving opportunities for people to have access to and engage with nature through better transport provision – especially for those who don't have access to a private car. • Enhancing nature as part of proposals by delivering positive effects for biodiversity (also referred to as biodiversity/environmental net-gain) at both a strategy and project level. • Indeed, we note consideration of (in Table 4.4 from page 22 onwards) promotion of the use of nature-based solutions for addressing climate change, and delivering biodiversity net gain for biodiversity, geodiversity and soil, and we very much welcome this. Climate change and biodiversity loss are closely linked and must be tackled together, and we therefore advise that the SEA must focus on climate change and biodiversity loss as a twin crises, and not addressed separately, and that addressing the twin crises should be a common thread throughout the SEA and the Draft RTS.	Noted, references to climate change and biodiversity loss to be checked and updated where appropriate.
	<u>1.5.8 Other Impact Assessments</u> We note that other impact assessments are to be carried out and that they will be integrated as part of the SEA for the Draft RTS. It is unclear,	At this stage it is considered unlikely that a HRA will be required for the RTS, however the need to

SEA Consultation Authority	Comment	Response
	however, if a Habitats Regulations Appraisal (HRA) as per The Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) is planned to be conducted separately. An HRA can help to inform an SEA and vice versa, therefore, we would advise making reference to the HRA within the SEA environmental report and whether you intend to conduct this separately, and to note how it, along with other assessments, have helped to inform both the SEA and the emerging RTS.	screen the RTS for HRA will be kept under review as the strategy is developed to consider if any part of it would have a likely significant effect (LSE) on a European site. In line with the relevant guidance, if the strategy is restricted to general policy statements, or shows the general will or intent of HITRANS, it will not be likely to have a significant effect on a European site. A statement explaining the approach to consideration of the need for HRA will be included in the SEA Environmental Report for the Draft RTS.
	3.3 Relationship Between the Emerging RTS and Other Relevant Plans We note that the RTS will align with the National Transport Strategy 2 (NTS2) (and the Strategic Transport Projects Review 2 (STPR2)), plus wider policy and legislation including the National Planning Framework 4 (NPF4) which we support. Much, however, has changed significantly since the NTS2 was published in early 2020, including the Covid-19 pandemic and the need to tackle both the climate emergency and biodiversity loss, and these elements are addressed within the draft NPF4. We note the four thematic priorities and we would advise that instead of just taking climate action, that the SEA and the proposed RTS addresses both climate change and biodiversity loss. Both climate change and biodiversity loss are inextricably linked and cannot be addressed alone, and should be addressed as a twin crises. To reflect the NPF4, we recommend that the second thematic priority to take climate action is amended to tackle the twin crises of climate change and biodiversity loss and that the twin crises is also reflected in the 'Case for Change'.	Noted, references to climate change and biodiversity loss to be checked and updated where appropriate within the SEA ER. In terms of the 'Case for Change' (and subsequently the RTS), the strategy will have a larger direct influence on climate change as it deals primarily with public and active transport services, which will subsequently influence biodiversity loss, at least indirectly. The 'Case for Change' document provides a policy review, setting out the key elements of NTS2, STPR2, NPF4, and other requirements. Reference has been included in the CfC of the later NPF4 principles, including the connection between climate change and biodiversity loss. Whilst the objectives of the RTS are to remain unchanged, the interrelationship of the issues has been highlighted to and discussed with the RTS team and drawn out within the 'implications for the RTS' text.

SEA Consultation Authority	Comment	Response
	Table 3.1 Key Issues Relevant to the SEA of the New RTS for the Highlands and Islands Air And Climate - We support the key issues noted to address air quality and climatic factors including those key issues associated with natural infrastructure, forests, woodlands and soil resources. Given that there is a twin crises of climate change and biodiversity loss, and that these are intertwined, we recommend strengthening and amending the fourth and fifth bullet points and associated key issues to state 'the need to integrate and enhance natural (green/blue) infrastructure for tackling climate change' and 'the need to protect and enhance forest, woodland and soil resources (including peat) for carbon storage and sequestration'. This will also help the new RTS take account of the NPF4 as noted within section 3.3.4 of your scoping report. We also suggest that the key issue should be about aiming to reduce carbon emissions and adapting to climate change rather than just mitigation. We would, therefore, recommend amending the second bullet point to state the following 'the need to reduce carbon emissions and adapt to climate change through promoting sustainable land use patterns (including the 20-minute neighbourhood) and the decarbonisation of the transport sector.'	Noted, the second bullet point to be amended to read 'the need to reduce carbon emissions and adapt to climate change including through promoting sustainable land use patterns (including the 20-minute neighbourhood) and the decarbonisation of the transport sector.' Likewise, the fourth and fifth bullet points to be amended to read 'the need to integrate and enhance natural (green/blue) infrastructure for tackling climate change' and 'the need to protect and enhance forest, woodland and soil resources (including peat) for carbon storage and sequestration'
	Section 3.3.5 We note that the first bullet point refers to 'likely significant adverse effects'. To ensure consistency throughout the SEA and with Scottish Government guidance, we suggest amending to 'likely significant environmental effects'. We support the need to 'ensure the avoidance of likely significant environmental effects from the implementation of the plan on sites designated at international and national levels for reasons of biodiversity conservation or ecological importance.' We do, however, note that the scoping report states that the RTS should 'minimise and appropriately mitigate likely adverse effects on sites designated at the regional and local level for their ecological importance'. To ensure that	Noted, 'likely significant adverse effects' to be amended to read 'likely significant environmental effects' as suggested. Agreed, the second bullet point to be amended to read 'Follow the mitigation hierarchy, and to always aim to avoid likely significant environmental effects on nature-rich sites both

SEA Consultation Authority	Comment	Response
	the RTS is in line with NPF4 and is addressing the twin crises, we would advise that the plan should aim to avoid likely significant environmental effects on all protected areas including non-protected areas important for biodiversity, and that the mitigation hierarchy should be applied as per the CIEEM's Good Practice Principles for Development which can be found at https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf We advise, therefore, to amend the second bullet point to say for example 'follow the mitigation hierarchy, and to always aim to avoid likely significant environmental effects on nature-rich sites protected at the regional and local level, including those nature-rich sites that have no level of protection.' Along with protecting habitats, we advise that the emerging RTS should also aim to protect species and that this aim should be reflected in the list of bullet points within section 3.3.5.	that are designated at the regional and local level and that have no level of protection.' Noted and added to the second bullet point.
	Table 4.1 Previous SEA Framework – Assessment of Continuing Validity Soils – we would suggest adding to the third column for 'Assessment of Continuing Validity', detail on the importance of soils as a carbon store and the links to climatic factors as well as biodiversity.	Agreed, whilst this table is not being carried forward through the 'Case for Change' stage, the importance of soils as a carbon store (as well as for biodiversity) will be carried forward.
	4.5.1 Proposed SEA Framework We note in the third bullet point, proposed criteria that includes distance-based thresholds. With respect to natural heritage interests, some impacts on species or habitats can happen as a result of works that occur some distance away. For example, works which affect a stream in the upper parts of a catchment can subsequently affect interests much further downstream. On the other hand, a sensitive site can be quite close distance-wise to a project area but be situated in a different catchment. As a result, there may be very little risk to natural heritage interests. Therefore, distance should not be the only	Agreed, both distance and connectivity to the habitats to be considered in the SEA.

SEA Consultation Authority	Comment	Response
	consideration and we advise that connectivity is also important and should also be considered.	
	Section 4.2.2 to 4.2.3 These paragraphs focus on climate change or the climate emergency only, when there is a twin emergency of climate change and biodiversity loss. As previously advised, the SEA (and the revised RTS) should focus on the twin crises and address climate change and biodiversity loss together and should be a common thread throughout the SEA.	Noted, climate change and biodiversity loss to be considered and addressed together as twin crises.
	Section 4.4.1 We note that the emphasis for the SEA will be on 'implementing a holistic approach to climate action and tackling inequalities across many objectives and is intended to reflect the cross-cutting nature of relevant environmental issues and to provide a focus to underpin this SEA.' While we do support this approach, we advise that the focus should be (along with tacking inequalities) on addressing the twin crises, and not climate change alone.	Noted, climate change and biodiversity loss to be considered and addressed together as twin crises.
	Table 4.2 Proposed SEA Objectives for the emerging RTS 1. Climate Change – to help address the twin crises of climate change and biodiversity loss, we recommend amending the objective to say 'Respond to the climate emergency by decarbonising infrastructure assets and services, protecting, promoting and enhancing natural infrastructure and the associated habitats, facilitating a low carbon economy and adapting to accommodate the effects of climate change.'	Noted, 'protecting' natural infrastructure has been added to the SEA objective. Given biodiversity is covered by a separate objective, 'and associated habitats' has not been added to the objective, although the interrelationship of these issues will be stressed elsewhere.
	Table 4.3 Relationship between Proposed SEA Objectives and the 2005 Act	Suggestions noted. As this table is not being carried forward to the subsequent stages, these additions have not been made however the

SEA Consultation Authority	Comment	Response
	1. Climate Change – we welcome that both biodiversity and climatic factors are noted as relevant SEA topics for the climate change SEA objective. We would advise that soils in terms of its role as a carbon store, and human health are also relevant. 3. Biodiversity, Geodiversity and Soil – we would advise that SEA topics climatic factors, landscape and human health are relevant here in terms of tackling the twin crises, and how access to nature and landscapes can help to improve health and well-being. 6. Landscape – habitats help to shape landscapes, and we recommend that biodiversity is included as a relevant SEA topic. Landscape also provides a range of social and health benefits, and we would advise that the SEA topic human health is also included. 7. Accessibility and Connectivity – due to the role of natural infrastructure for helping to provide 'leisure opportunities', we would recommend including the SEA topics biodiversity and landscape for this proposed SEA objective. 9. Human Health – access to nature and landscapes can help to improve health and wellbeing. We, therefore, recommend including the SEA topics biodiversity and landscape for this proposed SEA objective.	interdependency of the issues will be taken forward.
	Table 4.4 Proposed RTS SEA Framework We welcome the proposed SEA objectives covering all of the SEA topics including the objective to promote and enhance natural infrastructure to help address climate change and to protect, restore and enhance biodiversity for example. We would, however, like to suggest the following: - 1. Climate Change – to include within the second column a question relating to green and blue infrastructure. An example question could be - will the RTS 'include green and blue infrastructure?' Green and blue	Noted, a question relating to green and blue infrastructure to be included in the second column as suggested.

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	infrastructure can provide active travel options, enhance biodiversity, enable people to have more access to nature as well as help to improve health and wellbeing. To strengthen the need to tackle the twin crises of climate change and biodiversity loss, we recommend changing the following question 'promote the use of nature-based solutions?' to say 'include the use of nature-based solutions?'. We also note that the questions in the second column include contributing to a '90% reduction in greenhouse gas emissions for Scotland by 2040, and the Highland Council to be carbon neutral by 2025, alongside the Orkney Islands and Moray aiming to be carbon neutral by 2030.' To reflect the significant changes since early 2020, the Scottish Government published a Climate Change Plan update in December 2020 which set a new target for net zero emissions of all greenhouse gases by 2045. The Councils are also aiming for net zero carbon emissions, with The Highland Council having agreed to develop a net zero strategy to align with national targets, and Moray Council aiming to reduce its carbon emissions to net zero by 2030. We would, therefore, recommend that the question noted above is amended to reflect current targets and aims for net zero carbon emissions. 3. Biodiversity, Geodiversity and Soil – for this proposed SEA objective, the table currently includes in the third column for proposed criteria 'consideration of climate change on vulnerability and condition of habitats, species and soils.' Due to the way it is written, we are not entirely clear as to the aim of this criteria. It may be that this (and some of the other criteria) would benefit from being more specific to reflect the desired outcome in terms of monitoring the effectiveness of the emerging RTS. We would, therefore, suggest amending this criterion to say 'through tackling climate change, improvements in the quality and quantity of habitats and soils and an increase of species that depend on them.'	Agreed, the question to be amended to read 'include the use of nature-based solutions?' Agreed, question amended to 'Contribute to net zero emissions of all greenhouse gases by 2045 (2030 for Orkney Islands and Moray)?' Agreed, the text to be amended to read 'through tackling climate change, improvements in the quality and quantity of habitats and soils and an increase of species that depend on them' Noted, text to be added to read 'positive impacts on soils' Noted, the text to be amended to read 'Proximity and connectivity to and impacts on…'

SEA Consultation Authority	Comment	Response
	Following on from the previous comment, we would also advise including a criteria to support the question in column two which is will the RTS 'protect and enhance important soil resources?'. The criteria could be 'positive impacts on soils.' Based on our previous comment regarding the need to consider connectivity rather than just distance, we recommend amending the first four bullet points to begin with 'connectivity and impacts on…'. 4. Water, Flood Risk and Resilience – we strongly support the inclusion of the question 'manage residual flood risks appropriately and avoid new flood risk including by incorporating nature-based solutions?' along with the criteria for 'resilience to flood risk'. We also support the question relating to the coastal environment and the criteria for 'consideration of marine aquatic resources and the coastal environment'. 7. Accessibility and Connectivity – we would like to see consideration of better access to nature and would recommend including a question in the second column to say for example 'improve access to nature?'. A relevant criterion could also be 'opportunities to accessing nature'.	Noted. Noted, a relevant question and criteria to be added accordingly.
	6.1.2 Proposed Consultation Arrangements We are content with the period of 12 weeks for consulting on the environmental report for the Draft RTS. We note that there will also be an environmental report produced for the 'Case for Change' phase, and our understanding is that the 'Case for Change' will help to inform the Draft RTS. We also note that the proposed consultation time for the 'Case for Change' environmental report is 4 weeks, and we think this is rather short. We are also unclear on how the environmental report for the 'Case for Change' will influence	Noted. To clarify, there will be two SEA Environmental Reports produced within the development of the draft RTS, firstly a more succinct report for the 'Case for Change', and secondly for the draft RTS. These shall be separate reports undertaken

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	the Draft RTS if the plan is to consult its environmental report at the same time as the environmental report for the Draft RTS. We would recommend that a simple diagram is included to demonstrate clearly how the two environmental reports are going to inform the Draft RTS. We would also recommend increasing the consultation period for the 'Case for Change' to at least a minimum of 6 weeks up to 12 weeks, and to preferably consult on this environmental report prior to the consultation for the Draft RTS environmental report.	alongside the progression of the RTS to ensure the SEA process informs its development. The consultation period for the 'Case for Change' will be extended to 6 weeks in line with your request.
	<u>Table A.1 Summary of Highlands and Islands Environmental Designations</u> We note that some of the designations have the incorrect number of sites and we advise that Table A.1 is updated as follows: - Special Protection Areas – 98 Special Areas of Conservation – 119 Ramsar – 26 Sites of Special Scientific Interest – 591 National Nature Reserve – 22 Local Nature Reserve – 7 National Scenic Areas of Scotland – 27 National Park – 2 (Argyll and Bute Council covers an area of the Loch Lomond & the Trossachs National Park; Moray Council and Highland Council cover areas of the Cairngorm National Park.)	Noted with thanks, the numbers are to be checked and updated where appropriate.

SEA Consultation Authority	Comment	Response
	Further information on protected areas can also be provided at the following NatureScot SiteLink: - https://sitelink.nature.scot/home	
	Table B.1 Policy Documents of Relevance at Scoping Stage National (Scotland) – Physical Environment: Biodiversity, Flora & Fauna, Soil, Water, Cultural Heritage & Landscape – there is reference to a number of biodiversity documents including 'It's in your Hands: Scotland's Biodiversity Strategy, 2020 Challenge for Scotland's Biodiversity and Scotland's Biodiversity: a Route Map to 2020'. The Scottish Government's 'Scottish biodiversity strategy post-2020: statement of intent' (which can be found here - https://www.gov.scot/publications/scottish-biodiversity-strategy-post-2020-statement-intent/) should also be listed in this section and the key messages from that document should inform the Draft RTS SEA process. There is also reference to the 'SNH Landscape Policy Framework', and this should be changed to 'NatureScot Landscape Policy Framework' and can be found here: - https://www.nature.scot/professional-advice/landscape/framework-landscape-policy/naturescot-landscape-policy-framework We also advise that NatureScot's Landscape Character Assessment (which can be found here - https://www.nature.scot/professional-advice/landscape/landscape-character-assessment) should be listed either as a set of national documents, or the relevant ones for the HITRANS region should be listed in this part of the table.	Noted with thanks, these documents to be reviewed and included in Table B.1 when republished in the draft RTS ER. Noted with thanks, the document reference to be amended accordingly. Noted with thanks, these documents set to be included in Table B.1.
Historic Environment Scotland	Scoping and Level of Detail	Noted with thanks.

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(03 August 2022)	It is our understanding that the HITRANS Regional Transport Strategy will set out the long-term transport vision, outcomes and strategic objectives for transport in the Highlands and Islands. We note that the historic environment has been scoped into the assessment and we agree with this. On the basis of the information provided, we are content with this approach and are satisfied with the scope and level of detail proposed for the assessment, subject to the detailed comments provided in the attached annex.	
	<u>Consultation period for the Environmental Report</u> We note from the scoping report that you intend to consult on an Environmental Report over two stages in tandem with both the STAG 'Case for Change' stage as well as the draft Regional Transport Strategy. We welcome this approach although we would recommend that the consultation period for the 'Case for Change' report and its ER be a minimum of 6 weeks. In terms of the consultation period for the draft strategy we can confirm we are content with the proposed 12-week timescale. Please note that, for administrative purposes, we consider that the consultation period commences on receipt of the relevant documents by the SEA Gateway.	The consultation period for the 'Case for Change' will be extended to 6 weeks in line with your request. Noted. Noted.
	<u>Baseline</u> Historic Environment Scotland hold a substantial amount of cultural heritage baseline information and locational data including statutory designations and the National Record for the Historic Environment (NRHE). This information can be downloaded from the HES Portal and the NRHE is accessed through Canmore.	Noted, relevant information from HES Portal and Canmore to be reviewed.

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	When considering the historic environment at a strategic level we would encourage the holistic consideration of this resource, both designated and undesignated. It is also important to consider the connections between the historic environment and transport and the potential for mutual benefits through transport infrastructure investment. The historic environment provides elements of our transport infrastructure from bridges and stations to historic routes, canals and former branch railway lines that contribute across a number of areas such as our active travel network.	Noted, both designated and undesignated historic environment to be considered, and the connection between the historic environment and transport to be considered as well.
	<u>Relationship Between the Emerging RTS and Other Relevant Plans</u> We welcome the recognition in Appendix B of the relevant Plans, Programmes and Strategies for the historic environment. However, we would advise that the Historic Environment Scotland Policy Statement 2016 has now been superseded by the Historic Environment Policy for Scotland (HEPS). HEPS sets out principles and policies for decision making in Scotland that affects the historic environment. A key policy for preparation of strategies of this type is HEP3 which states that "Plans, programmes, policies and strategies, and the allocation of resources, should be approached in a way that protects and promotes the historic environment". The environmental assessment of the strategy should aim to inform and influence the final content of the strategy. We also welcome the recognition of the key relevance of the recently published Scottish Government's Infrastructure Investment Plan here. Of particular interest to the strategy topic and the historic environment is the introduction of a Sustainable Investment Hierarchy that encourages the maintenance, repair and use of our existing assets over new build.	Noted with thanks, the latest Historic Environment Policy to be noted and particular attention to HEP3 to be paid. Noted.
	<u>Proposed SEA Methodology</u> We note that a matrix-based framework has been developed in order to test the components of the emerging strategy including the proposed vision, strategic objectives, polices and identified options as well as their	Noted.

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	reasonable alternatives. We are content with the SEA objective proposed for the historic environment and consider that the guide questions will aid in focussing the assessment. We also welcome the SEA objectives and guide questions around landscape and accessibility/connectivity as these also connect closely with historic environment considerations.	
	Mitigation and Monitoring As you will be aware, proposals for the monitoring of significant environmental effects should be put forward. Such monitoring proposals should be driven by the identified effects and we look forward to further detail on this within the environmental report where appropriate.	Noted.
Scottish Environment Protection Agency (13 Apr 2023)	In line with the procedures previously agreed between SEPA and SG, SEPA's Planning Service will not be submitting comments on this ER; any comments SEPA may have will come direct from our Air Quality team which is cc'd to this email.	Noted.
NatureScot (13 Apr 2023)	Environmental Assessment (Scotland) Act 2005: HITRANS Regional Transport Strategy – Case for Change – Environmental Report Thank you for consulting NatureScot on the Environmental Report for the HITRANS Regional Transport Strategy – 'Case for Change' – Environmental Report. In our role as a Consultation Authority we have reviewed the above report and have provided comments below.	Noted.
	Environmental Report Approach NatureScot welcomes the approach taken for the Environmental Report including the easy-to-follow layout and the use of tables to help present	Noted.

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	information such as the Compatibility of the Regional Transport Strategy (RTS) Objectives with the Strategic Environmental Assessment (SEA) Framework. Indeed, we also welcome the level of integration between the RTS 'Case for Change' and its SEA, and how the SEA process will continue to help the development of the RTS.	
	Taking Account of Comments at Scoping Stage We welcome that our comments at scoping stage have been taken into account and we are content with the changes that have been made including the recognition of the need to tackle climate change and biodiversity loss as a twin crises.	Noted.
	Assessment of Compatibility of RTS Objectives with SEA Framework We agree with the findings of the assessment of the compatibility of the RTS objectives with the SEA objectives. The commentary which helped to explain the findings of the assessment was very clear and thorough, and we welcome this.	Noted.
Historic Environment Scotland (27 April 2023)	Thank you for your consultation which we received on 17 March 2023 about the above and its Environmental Report (ER). We have reviewed these documents in relation to our main area of interest for the historic environment. The first part of this response relates to the 'Case for Change', with part two focusing upon its environmental assessment. We understand that this consultation on the HITRANS Regional Transport Strategy 'Case for Change' is the first of two consultations. Following this consultation on the 'Case for Change' there will be further consultation on the Regional Transport Strategy itself. Furthermore, both consultations will be accompanied by an Environmental Report.	Noted.
	Part 1: HITRANS Regional Transport Strategy – 'Case for Change' We welcome the preparation of this 'Case for Change' report which we understand will inform the development of the Regional Transport Strategy (RTS). In terms of the historic environment and transport we note the acknowledgment within the Transport Problem Themes section of the potential for the region's transport network to impact on the historic environment. While we agree with this, we would also note the important	Noted.

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	role that transport infrastructure can play in providing access to the historic environment as well as the recognition that such infrastructure can be of historic environment significance in itself. We have offered further comments on this below in our response to the first Environmental Report.	
	Part 2: Environmental Report We welcome the identification of the key issues relevant to the SEA with regard to the historic environment. We particularly welcome the recognition of the connections between our historic environment resource and transport. This relationship covers both the transport infrastructure that forms a part of our historic environment as well as the role that historic environment assets play in providing existing transport networks.	Noted.
	As the report notes, these key issues will continue to be an important consideration for the emerging transport strategy. The assessment should also be mindful of potential mutual benefits for transport and the historic environment through the investment in, maintenance of, and continued use of our existing transport infrastructure.	Noted and we will incorporate within the Draft RTS.
	Compatibility of RTS Objectives with SEA Framework The assessment of the SEA Objective in relation to the RTS objectives notes that, while the historic environment is not explicitly covered it is considered that such interactions are implicit in RTS Objective 1. We would agree with this and welcome the commitment to consider impacts at the next stage of the RTS development.	Noted.
	SEA Framework The approach outlined here for testing the components of the RTS is welcomed. As we have noted above, in using the proposed questions and criteria, you should be mindful of both positive and negative potential effects on historic environment resources.	Noted. Our assessment will cover both positive and negative potential effects on historic environment resources.
	Next Steps We welcome that the second Environmental Report will set out how the option development has been assessed and how the selection of options has been informed by this process.	Noted.

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	None of the comments contained in this letter constitute a legal interpretation of the requirements of the Environmental Assessment (Scotland) Act 2005. They are intended rather as helpful advice, as part of our commitment to capacity building in SEA.	Noted.