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HITRANS Regional Transport Strategy

RTS Consultation Note

On behalf of **HITRANS**

HI TRANS
THE HIGHLANDS AND ISLANDS TRANSPORT PARTNERSHIP

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For and on behalf of Stantec UK Limited				

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Contents

Tables

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1 Introduction

1.1 Overview

1.1.1 This note summarises the responses to the consultation on the Draft HITRANS Regional Transport Strategy (RTS) and includes responses to all written comments provided, together with a note on where the Draft RTS has been amended to reflect a comment.

1.1.2 It should be noted that:

- All comments have been reported verbatim – they have not been modified in any way, including to account for e.g., spelling, grammar, sentence structure etc.
- The document is primarily intended for internal use by HITRANS and its constituent authorities. It has not been prepared as a public facing document.

1.2 Summary of responses

1.2.1 From the online survey, we received **28** responses with a further **nine** written responses submitted via email, **37 responses** in total. Several of the written responses were in a form that could be entered into the online survey, and this was done where possible to improve the reporting of the results.

1.2.2 Of these responses, **25** were from a member of the public and the remaining **12** were submitted on behalf of an organisation or business.

1.2.3 Of those who responded to the survey, only **two** respondents noted that they did not read the RTS, with the remaining **2** noting that they had read it.

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2 RTS Vision and Strategy Objectives

2.1 Vision

2.1.1 Respondents were asked whether they agreed with the RTS Vision, the responses to which are summarised in the table below:

It should be noted that, in this table and throughout, 'net agreement' is the sum of those who 'strongly agree' and 'agree' less those who 'disagree' or 'strongly disagree'. 'Neutral' and 'Don't know' responses are excluded.

Table 2.1: Agreement with RTS Vision

RTS Vision	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't know	Net agreement
Our transport networks and services will act to realise the economic potential of our region through reducing the actual and perceived impacts of distance, poor resilience and low population density. By doing this, they will facilitate economically and socially valuable activities for all, provide equality of opportunity, enable people to live active and healthy lives and allow our region to contribute fully to the national net zero emissions target.	5	15	9	1	1	1	+18

2.1.2   The table below summarises comments on the RTS Vision together with Stantec's response:

Table 2.2: Comments on RTS Vision and Stantec response

Comment	Stantec Response
The document is to long for people to read and engage in and respond to	Noted – we acknowledge that the document is long but it is a wide ranging strategy covering eleven RTS Themes, and this was the intention behind summarising it in the StoryMap.
There are too many different aspects to travel. Money is not readily available. New technologies could help or cause different problems. It is a comprehensive report for a difficult problem. What about weather influences on transport.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
The strategy is all over the place. In one respect wanting to decarbonize, then wanting to expand air travel. Promoting the use of taxis when this increases carbon footprint, most taxis require a journey to/from to complete a one way journey (i.e. double the mileage). The strategy should be simplified - what do we want to accomplish and what is feasible. Currently it is a Christmas present wish list and totally impossible to implement.	Noted – the RTS attempts to balance competing priorities, each of which has merit. There will necessarily be trade-offs in its implementation.
The vision is a bit waffly and all things to all men, but the actual policies appear reasonable and focussed	Noted – the RTS Policies are the substantive outcome of the process. The purpose of the Vision is to provide a high-level statement of what HITRANS is seeking to achieve through the RTS and under which the RTS Strategy Themes and RTS Policies can sit.
I am amazed at the number of times the word support has been used throughout this document. What I was looking to read was how these supported aims were actually going to be achieved. Seems like a lot of time spent on aspirational aims with little substance on how to achieve these. Very disappointing but what I have come to expect from these reports	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
This is a comprehensive and ambitious programme. Public transport needs to be better, and this is an appropriate vision.	Noted, thank you.
The Far North needs a lot more investment in connectivity for active travel between villages and towns	Noted – the Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies. Geographically focused actions will emerge from this.
I feel that the public transport network fails significantly and will not provide the independence or easy way of transportation that vehicles do. *[Fort William Marina & Shoreline Community Interest Company]*	Noted, thank you.

Comment	Stantec Response
Given the constraints on public funding - how achievable are the aspirations contained within the RTS. The vision is strong but meeting it will be far more challenging.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies. The public finances are recognised as a constraint, as is the requirement for delivery to be led by parties other than HITRANS. The aim of the RTS is to provide a coherent expression of HITRANS aspirations and the strategic context within which programmes and projects can be developed by HITRANS, its constituent members and other organisations.
Agree on improved public transport but against increasing road capacity	Noted, thank you.
There isn't even a bus service down the west side of the Kyle of Sutherland and the North Highland Line timetable is too infrequent to be used.	Noted, the HITRANS RTS 'Case for Change' sets out at length the problems surrounding bus network coverage, frequency and length of operating day.
Far too wordy for a public consultation. Vision needs to be more simply spelled out.	Noted, thank you.
Expanding road capacity rather than reducing unnecessary journeys or moving freight to rail or sea remains too much of a focus.	Noted – the expansion of road capacity is focused on committed improvements and targeted measures where there is a safety, reliability or resilience issue.
We regret that the Vision is contradicted by the strategy itself. We thoroughly support the vision; "most notably the commitment to net zero by 2045... and to contribute fully to the national net zero target". But the support for more flights and the expansion of the PSO air network (ST5t + v), and ST11g (expansion of Air Discount Scheme) runs entirely contrary to that vision. ST9a forlornly hopes to support the decarbonisation of aircraft - but that is most unlikely to be realised within the 20-year period of the vision. To take another example of the contradictory nature of this strategy: ST1a calls for reallocating road space from general traffic, including parking, while ST7a supports the full dualling of the A9 and A96 to encourage more general traffic. And while the strategy claims to want to encourage public transport, while ST7a calls for the full dualling of the A9, ST7n calls not for full dualling of the Highland Mainline but just for "additional double sections of track, or static of dynamic passing loops" And whilst there is reference to full dualling of the A96, there is no reference to dualling the Inverness-Aberdeen rail line. The strategy details themselves contradict the vision's wish to grow public transport use We agree with ST1L on "the centrality of environmental considerations" But the commitment in ST7a for Elgin and Keith by-passes "to full dual carriageway standards" completely ignores the high level of environmental damage this would cause, compared to a single carriageway by-pass. We fully support the measures to enable and encourage cycling, improve	Noted – the RTS attempts to balance competing priorities, each of which has merit. There will necessarily be trade-offs in its implementation.

Comment	Stantec Response
public transport use and create more opportunities for active travel, but i terms of the net zero agenda, they are dwarfed by the extra air and road traffic the strategy wishes to encourage. In particular we support ST4 j + n + p on the need for buses, trains and ferries to be safe for all. It is important that there is a perception of safety, and reliability of public transport and to that end ST4s and 4y on the development of the Go Hi ap and better information at bus stops are very important. There is a perception, particularly among women, that waiting at bus stops and train stations can trigger unwanted attentions and real time travel information delivered to a phone by ap is a crucial development in reducing waiting times in public places. But ST10d, encouraging the use of autonomous buses is unlikely to improve perceptions of safety. Overall the Strategy can be summed up by "We support More, Bigger Everything, Now." Antonio Guterres, Secretary-General of the United Nations has said "we have a choice; create tipping points for climate progress, or careen to tipping points for climate disaster. It's time for leaders to decide whose side they are on." If Hi-Trans is serious about contributing to the Net Zero strategy, it has to make choices about the sort of transport to encourage - not just blithely say "we support more of everything." *[Highlands and Islands Green Party]*	
Nestrans supports the RTS Vision set out, with clear alignment between the Vision and the national policy context. *[Nestrans]*	Noted, thank you.
Argyll and Bute Council agree in general with the RTS Vision and yes we agree that the very distinct character of our region differs to that of many other areas, that being ours predominantly remote rural which brings with it our own challenges. Aligning with National Policy if you look at the HITRANS region alone urban RTP's will be reliant on our almost Greenhouse Emission neutrality at present to offset their emissions. With our low population density on average 100-200 head per hectare apart from Inverness and Moray which ranges between 300-1000 head per hectare, rural areas will take the pain for urban areas gain. We are already underfunded and forgotten about when it comes to major infrastructure investment. Look at the Rest and Be Thankful for instance, alright significant amounts have already been spent on mitigation however a permanent solution is still a long time off, and the current ongoing ferry fiasco, overdue and over budget, and not to mention a fixed link to Mull as outlined in STPR2, where did TS get that on from? *[Argyll & Bute Council]*	Noted, thank you.
THC welcomes the RTS and very much agrees with the Vision. *[The Highland Council]*	Noted, thank you.

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2.2 RTS Strategy Objectives

2.2.1 The extent to which respondents agreed with the RTS Strategy Objectives is shown in Table 2.3 below.

Table 2.3: Agreement with RTS Strategy Objectives

RTS Strategy Objectives	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don' t know	Net agreement
Strategy Objective 1: To make a just transition to a post-carbon and more environmentally sustainable transport network.	9	15	3	2	0	1	+22
Strategy Objective 2: To transform and provide safe and accessible connections between and within our city, towns and villages, to enable walking, wheeling and cycling for all.	10	14	4	3	0	0	+21
Strategy Objective 3: To widen access to public and shared transport and improve connectivity within and from / to the region.	18	10	1	1	0	1	+27
Strategy Objective 4: To improve the quality and integration of public and shared transport within and from / to the region.	18	12	1	0	0	0	+30
Strategy Objective 5: To ensure reliable, resilient, affordable and sustainable connectivity for all from / to our island, peninsular and remote communities.	17	12	1	0	0	0	+29
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.	14	13	4	0	0	0	+27

2.2.2   The table below summarises comments on the RTS Strategy Objectives together with Stantec's response:

Table 2.4: Comments on RTS Strategy Objectives and Stantec response

Comment	Stantec Response
Rural islands are very different from villages. Weather patterns influence people's behaviour who wants to be on a bike in the wind and rain or try to carry shopping to a bus stop.	Noted, thank you.
These are all very good in an ideal world, there is only so much road, rail, canal and sea. Only so much money. Too many potholes maybe paying for roads and to travel on them if you are in a car would encourage more public transport. and fix the roads.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
There needs to be an understanding that major road infrastructure such as A9 and A96 dualling is needed in order to make active travel within the towns more attractive to locals. Who would want to cycle in Nairn or Elgin just now? Green policies seems to think that its either roads or active travel/public transport - we definitely need both.	Noted – the RTS reflects this in policies ST1b, ST7a and ST7b.
There should be more prominent advertising of public transport, encouraging people to swap from cars to buses and trains. There should also be smoother surfaces on cycle paths. I would recommend that bus fares are capped and can be integrated with the ScotRail card. There should be a public transport card for across Scotland and the UK that can be used to pre-pay and book journeys. There should also be an integrated call centre for buses, ferries and trains too. When public transport breaks down, there should also be automatic compensation for taxi services so people can get home or to appointments and destinations without delay.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
I live in North Kessock. Like most residents I visit Inverness several times each week by car. I would like to use the buses, but the service is limited. Unfortunately many services pass us on by the A9. The bus stops on the A9 are a 20 minute walk from the centre of the village so rarely used. We need more of these services to turn off the A9. A single new stop at the roundabout would provide significantly improved connectivity without adding more than a minute or two to bus routes. For many in the Highlands busses are the only realistic alternative to the car. Service frequency and reliability must be improved if people are to be encouraged to leave the car at home.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.

Strategy Themes 3 and 4 specifically commit to enhancing public transport connectivity and improving the integration, quality of and access to public and shared transport. |
| There are self-evident challenges in delivering the RTS effectively - not least of which is the geographical extent of the HiTRANS area. Carbon reduction as a top priority will also prove challenging - particularly as regards the transition from carbon-based fuels and the provision of charging points. Furthermore the "active travel" aspirations will also have to be tempered by a realism surrounding distances and topography - | Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies. |

Comment	Stantec Response
potentially putting greater emphasis on the carriage of passengers and bikes on bus and train for example.	These trade-offs are acknowledged throughout the RTS and the appropriate solution in one part of the region may differ from that in another.
Much better provision for public transport in the evenings for people to get out socialising and those who work in the leisure and retail who currently work into the late evenings etc instead of the current model of a 9 am to 6 pm provision	Noted, thank you.
Objective 2. Why spend money on cycle/ walking paths in rural areas in the Highlands when existing ones e.g. Dingwall to Tore, are only being used by a small percentage of people? Yes, have walk/cycle paths in cities where there is likely to have the population that could justify the financial expenditure, and have a need for access to green spaces, but it should not be a priority for rural areas. Improve and maintain the existing infrastructure of roads so they are suitable for all. Keep ditches dug and clear so surface water drains away. Keep culverts in good condition and replace broken ones. Keep the road surfaces pothole free and edges and lanes clearly delineated. If these basics are followed all should be able to use rural roads safely.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.

The RTS recognises that the appropriate solution in one part of the region may differ from that in another. |
| The six RTS Strategy Objectives are welcomed by Nestrans with all six aligning with three or more of the four priorities set out in NTS2 (Reduces Inequalities, Takes Climate Action, Helps Deliver Inclusive Economic Growth and Improves our Health and Wellbeing). The Objectives are consistent with the objectives contained in Nestrans' RTS. *[Nestrans]* | Noted, thank you. |
| The objectives are comprehensive and align well with broader regional and national transport goals. They appropriately address the need for sustainability, connectivity, and resilience, which are critical for the long-term success of our transport network. *[ZetTrans]* | Noted, thank you. |
| RTS SO1: A more environmentally sustainable transport network is paramount given the global climate emergency we are experiencing, however the reliance on electrification is not sustainable, grid capacity is not suitable current electric vehicles are not suitable for rural living. Sustainable/alternative fuels for combustion engines may be a better use of resources given the infrastructure is currently in place.

Hydrogen can be seen as having potential however this is generally geared to blue hydrogen which is a by-product of the gas and oil industry. As the reliance on fossil fuels reduces so will the availability of this source of Hydrogen. The energy requirements needed to split water for Green Hydrogen is extreme. Additionally, the | Noted, thank you. |

Comment	Stantec Response
cost of transporting and storage of hydrogen is extremely challenging. *[Argyll & Bute Council]*	
RTS SO2: This is desirable but not conducive to rural areas due to distances and the challenges around shared road space. *[Argyll & Bute Council]*	Noted, thank you.
RTS SO3: Ideally yes, but unless major additional funding is provided to support alternative travel options especially in rural areas where longer travel distances/costs are generally required along with infrequent services the car will still be the primary mode of transport. *[Argyll & Bute Council]*	Noted, thank you.
RTS SO4Ideally yes, but unless major additional funding is provided to support alternative travel options especially in rural areas where longer travel distances/costs are generally required along with infrequent services the car will still be the primary mode of transport. *[Argyll & Bute Council]*	Noted, thank you.
RTS SO5: This is a must to support our fragile island communities, supporting their long-term sustainability and future prosperity. *[Argyll & Bute Council]*	Noted, thank you.
RTS SO6: This is essential to rural living, our fragile transport networks are in need of significant investment now, not just from climate change implications but current condition of the existing infrastructure. *[Argyll & Bute Council]*	Noted, thank you.
We very much welcome these Strategy Objectives as setting a clear direction for transport across the HITRANS region for the next two decades. They align well with many of our own policies and targets; we look forward to working together to deliver the changes we need for Highland and beyond. *[The Highland Council]*	Noted, thank you.

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3 RTS Strategy Themes

3.1 RTS Strategy Themes

3.1.1 Views on the importance of each RTS Strategy Theme are presented in Table 3.1 below.

Table 3.1: Importance of RTS Strategy Themes

RTS Strategy Themes	Very important	Quite important	Neutral	Quite unimportant	Not important at all	Don' t know	Net importance
Strategy Theme 1: Transforming our communities and reducing the impact of transport upon them.	7	17	4	1	0	2	**+23**
Strategy Theme 2: Connecting our communities.	19	8	2	0	0	2	**+27**
Strategy Theme 3: Enhancing public transport connectivity to / from: (i) Inverness; (ii) our sub-regional centres; and (iii) Scotland's other cities and beyond.	18	9	2	1	0	1	**+26**
Strategy Theme 4: Improving the integration, quality of and access to public and shared transport.	20	7	3	0	0	1	**+27**
Strategy Theme 5: Providing connectivity that supports our island and peninsular communities.	20	6	3	0	0	1	**+26**
Strategy Theme 6: Improving the efficiency of transport networks and supply-chains and reducing their impact on our communities.	19	7	4	0	0	1	**+26**
Strategy Theme 7: Improving the safety, reliability and resilience of our road and rail networks.	20	7	3	0	0	1	**+27**
Strategy Theme 8: Facilitating sustainable visitor travel demand	15	9	5	0	0	2	**+24**
Strategy Theme 9: Decarbonising our transport, mitigating the effects of climate change.	13	11	4	1	0	2	**+23**
Strategy Theme 10: Embracing new technologies.	11	10	6	2	0	2	**+19**
Strategy Theme 11: Reducing the cost of travel, particularly for those most in need.	18	5	4	1	0	2	**+22**

3.1.2   The table below summarises comments on the RTS Strategy Themes together with Stantec's response:

Table 3.2: Comments on RTS Strategy Objectives and Stantec response

Comment	Stantec Response
Improve ferries to island communities and fix walkway inter-structure to ferry so passengers do not have to board ferry via car deck. Have a covered walkway from Inverness train station to airport	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
In order to implement the RTS there will be numerous possible 'things that could be done' and each will cost an estimated amount of money. This will come out of a large pot of public money. I'm not interested in the relative merits of individual 'things that could be done', which all have their proponents and detractors. What I am interested in, is a list of every possible 'things that could be done', with their estimated cost, and ordered by the priority that they will be actioned. And for this list to be publicly accessible, and transparent. The Riverside Way is an example of a 'thing that could be done', but its priority is so low, that it should never have been implemented when there are so many other pressing issues the money could have been better spent on.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
This is a twenty year plan; lots can change maybe in 20 years there will be lots of new methods of travel. but there is still only so much land, road, sea canals sky. If self-drive cars work, we can have door to door transport for people instead of taxis. If holographic road signs are a proper thing, then there would be no clutter on the pavements etc when roadworks are happening and help with cycling and walking. Drones delivering goods. etc they are all within reach in the next twenty years, but we need to get there.	Noted, thank you. The RTS 'Case for Change' included a section exploring potential new technologies, and Strategy Theme 10 of the RTS itself specifically embraces new technologies. There will be several RTS Action Plans over the lifespan of the RTS which will reflect changes in technology and the macroeconomic context. If a point is reached where the RTS is no longer relevant due to technological changes within its lifetime, it will be refreshed.
Too many - need to stick to what is important and what is attainable.	Noted – we acknowledge that there are a lot of RTS Themes and Policies and that the document is long overall, but it is a wide-ranging strategy and this was the intention behind summarising it in the StoryMap.
Embracing new technologies is a cautious one. We need to spend our limited resources just catching up by investing in the tried and tested infrastructure that other countries already have, not blowing it all on some self-driving cars for the council or some similar nonsense.	Noted, thank you. The RTS 'Case for Change' included a section exploring potential new technologies, and Strategy Theme 10 of the RTS itself specifically embraces new technologies. There will be several RTS Action Plans over the life of the RTS which will reflect changes in technology and the macroeconomic context. If a point is reached where the RTS is no longer relevant due to technological changes within its lifetime, it will be refreshed.
Keep up the excellent work.	Noted, thank you.

Comment	Stantec Response
Remember that the Highlands is essentially rural with sparse public transport. It's all very well talking about walking and wheeling but that is no help when you are out of town. Car dependency is therefore high and will remain high. HiTRANS must cater for this. I am all for developing public transport. Bus networks are much cheaper to develop than rail. So make bus travel more attractive with bus shelters, electronic real-time boards, low carbon buses and better publicised timetables. No-one wants to stand in the wind and rain waiting for a bus that may, or may not come, so make the whole experience more appealing.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies. The RTS recognises that the appropriate solution in one part of the region may differ from that in another.
The cruise industry is key to the development and transformation of Fort William	Noted, thank you.
Some of the questions answer themselves - especially as regards connecting communities and costs of travel - nobody is going to suggest these are not important - but, again, the overall cost of providing inexpensive frequent transport has to be set against the overall costs of not doing so. This is a circle that is almost impossible to square. Whilst now unpopular the notion of "reducing the need to travel" should be revisited - especially with regard to the use of technologies (although it is acknowledged that it is a theme that runs throughout the consultation).	Noted, thank you.
A wholesale overhaul of the public transport in particular the bus services provided in the area especially for the evening leisure market in evenings are ring fencing that smaller communities will not lose vital connections to bigger Conurbations especially for family visiting, hospital appointments etc. regular unannounced spot checks to make sure that companies are sticking to their terms of provision and if they fail to meet minimum standards they can be stripped of their operation and it moved to HITRANS as similarly done within the rail industry if said provider falls short	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
All the RTS themes are worthy, but it is like a wish list. Get the basics right first.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
Nestrans welcomes the 11 RTS Themes that have been identified. It is noted that the scale of change within these Themes is varied (local, regional and national) therefore will involve different partners for progress to be made. Table 4.4 in the draft RTS is valuable in showing how these Themes interact with the Strategy Objectives with all Themes contributing to at least two objectives, showing the quality of the Themes identified. [Nestrans]	Noted, thank you.

Comment	Stantec Response
The RTS themes are well-structured and cover the essential aspects of transport planning, including sustainability, connectivity, and community impact. They provide a clear framework for addressing the diverse transport needs of the HITRANS region and are very well aligned with the ZetTrans region. *[ZetTrans]*	Noted, thank you.
RTS ST1: Argyll and Bute agree with the concept of reallocating road space to active travel, however this in most cases is not possible due to already conflicting space requirements. Particularly in rural areas where public transport is not as frequent are available at required times, cars are an essential part of rural living to go about your daily routines. In built-up areas a vast amount of available space is allocated to on-street parking. Whilst connections between villages adequate space is not available and off-road connections are costly and resources are not available for maintenance and upkeep. *[Argyll & Bute Council]*	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.

These trade-offs between behaviour change and supporting essential journeys are acknowledged throughout the RTS. Moreover, the appropriate solution in one part of the region may differ from that in another. |
| RTS ST2: Argyll and Bute does what it can to promote active travel however struggles due to the issues mentioned in response to SO1. Additionally, the lack of cycle training for young children has significant implications for attracting new cyclists. The most direct and very often only route always involves interaction for all or part of the journey with fast flowing traffic resulting in only the most confident of cyclists being able to control the traffic. Most motorised vehicle users see cyclist in a negative and do not give cyclists the correct amount of space when passing, (unless they are cyclists themselves). Additionally Scottish weather is not conducive for purposeful journeys.

Argyll and Bute does have a significant level of leisure walkers/cyclists on popular off-road routes which we have upgraded with an extensive network of counters. *[Argyll & Bute Council]* | Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.

These trade-offs between behaviour change and supporting essential journeys are acknowledged throughout the RTS. Moreover, the appropriate solution in one part of the region may differ from that in another. |
| RTS ST3: Public Transport in rural areas could be better if greater Government funding was available to rural LAs. Argyll and Bute lack commercially viable routes with frequency being an issue. Bus is really the only form of Public Transport for Argyll and Bute which is costly, timely and limited route options hence why most people utilise personnel cars. *[Argyll & Bute Council]* | Noted, thank you. |
| RTS ST4: Yes, Argyll and Bute would welcome a increase in Public Trasport availability however additional major Government funding will be required to increase route options and frequency. LA's cannot be expected to continually subsidise non-commercial routes, existing budgets are continually being squeezed with unsustainable saving being requested, public services are already being | Noted, thank you. |

Comment	Stantec Response
affected. As for integration this can be problematic due to the current route options and frequencies. Argyll and Bute has very limited rail travel options with one line heading to Oban albeit one of the most scenic, but almost 30 minutes longer than taking the car and a single for 2 adults and 2 children would cost nearly £100. **[Argyll & Bute Council]**	
RTS ST5: Argyll and Bute has the most number of inhabited islands of any other LA Bite is not really recognised as an island authority, as the latest distribution of Active Travel 24/25 funding from Transport Scotland displays. Argyll and Bute 28% reduction from previous year 23/24, Na h-Eileanan Siar, Orkney and Shetland increased by 18%, 39% and 36% respectively. The aging ferry fleet is causing significant impacts across our island communities with numerous cancellations and re-routing of ferries. As for fixed links the inclusion of a fixed link to Mull was never mentioned until the final publication of STPR2. The chances of this ever being built is negligible due route options, the most likely possibility of this ever happening would be from the Ardnamurchan peninsula which would require major road upgrade and a secondary fixed link replacing the Corran Ferry. **[Argyll & Bute Council]**	Noted, thank you.
RTS ST6: The biggest impact to supply chains affecting Argyll and Bute is the continued disruption that is being experienced as a result of the Rest and Be Thankful landslides. To compound this the October landslide on the Lochgilphead to Oban route had major impacts and as a result of a bridge being damaged completely cut off communities. Climate change will continue to have a severe impact and major investment is required to mitigate and future proof the fragile road network. The continued increase in fuel is having a compound effect on local businesses due to the distances that are required to get their goods to market, and when significant detours are in place it is very often not viable continue. This will also have an impact on population decline if businesses cannot get good to market then they will relocate to where they can. **[Argyll & Bute Council]**	Noted, thank you.
RTS ST7: As with response to SO6 major additional funding is required to futureproof a roads network and other transport routes to ensure transport	Noted, thank you.

Comment	Stantec Response
connectivity is more resilient to significant extreme weather events. *[Argyll & Bute Council]*	
RTS ST8: Visitors are very important to Argyll and Bute and hospitality is one of our key economic drivers however Brexit, the Covid19 pandemic and the subsequent invasion of Ukraine has had a major impact on hospitality destination whether it be a reduction/availability of staff, reduction in visitor numbers/length of stays and cost of living crisis (higher utilities and higher wage costs). To compound this increase in transport costs, lengthy travel disruption and diversions also effects visitor numbers. *[Argyll & Bute Council]*	Noted, thank you.
RTS ST9: This will always be more achievable in a urban situation given the shorter distance required for everyday travel, until technology advances to a point that combustion engines are no longer required and infrastructure is always available even in rural locations. Additionally, the cost for alternative solutions need to be equitable, even hybrid combustion/electric only gives limited zero emission travel. Drones are one potential solution to rural connections however numerous legislative requirements need to be approved. Also technological advancement and safety in this field need to be demonstrated. *[Argyll & Bute Council]*	Noted, thank you.
RTS ST10: To move forward the acceptance and embracing of new emerging technologies is paramount to progress and capitalise on the growth of these technologies. In rural areas we are perfectly placed to accommodate this ever-expanding market whether it be R&D or place of operations. *[Argyll & Bute Council]*	Noted, thank you.
We consider these equally as very important as they are codependent and integral to the delivery of the Vision. *[The Highland Council]*	Noted, thank you.

4 RTS Policies

4.1 Overview

4.1.1 The respondents were asked whether they would like to comment on each of the policies within the Strategy Themes. The following sections set out each of the Strategy Themes and the comments on the individual policies within each Theme.

4.2 Strategy Theme 1 – Policies

4.2.1 Table 4.1 below summarises responses in relation to the RTS Policies under RTS Strategy Theme 1:

Table 4.1: Agreement with RTS Policies under RTS Strategy Theme 1

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don' t know	Net agreement
ST1a	The RTS supports the principle of reallocating road space, including parking, from general traffic. This should support placemaking to shape improved walking, wheeling and cycling opportunities in our communities as a means to promote safe active travel and encourage use of active travel modes. Reallocation of road space should avoid any negative impacts on bus services	2	3	3	-	-	-	+5
ST1b	Where traffic in settlements is reduced by investment in road infrastructure, road space reallocation should be undertaken as an integral component of that investment.	1	6	1	-	-	-	+7
ST1c	The RTS supports the principle of traffic calming and speed limit reductions and enforcement where this is the wish of our communities, including on the Trunk Road network.	1	5	2	-	-	-	+6
ST1d	The RTS supports measures to reduce road-based severance in our communities.	2	2	1	-	1	2	+3
ST1e	The RTS recognises the challenges presented by the impacts of increasing abnormal load movements across the region. It calls for a coordinated approach to be taken to ensure that appropriate planning and mitigation is put in place as part of the planning process for new developments that will generate such movements.	1	4	2	-	1	-	+4
ST1f	The RTS supports greater consistency (in 'like-for-like' locations) of parking management across our region, including payment mechanisms, parking information and enforcement.	1	2	4	-	1	-	+2
ST1g	The RTS supports the principle of improving the management and enforcement of traffic and parking around schools, including School Streets (a road outside a school with temporary restriction on motorised traffic at school drop-off and pick-up times).	2	5	1	-	-	-	+7
ST1h	The RTS supports the prioritisation of new development in locations that are in proximity to key services and already well-served by active travel and public transport.	2	5	1	-	-	-	+7

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don' t know	Net agreement
ST1i	The RTS supports the local delivery of public services, including health and education, and other day-to-day retail and personal services (e.g., banking) which minimise the need to travel.	5	3	-	-	-	-	**+8**
ST1J	The RTS supports the integration of active travel, public transport and shared mobility into the planning of all new developments. New development proposals should be required to outline how they will connect into the local active travel and public transport networks.	5	3	-	-	-	-	**+8**
ST1k	The RTS supports the concept of 'infrastructure first' in relation to major developments across our region.	6	2	-	-	-	-	**+8**
ST1l	The RTS recognises the centrality of environmental considerations, particularly biodiversity enhancements and nature networks, within the planning and decision-making process.	3	4	1	-	-	-	**+8**

4.2.2   The table below summarises comments on the policies contained within RTS Strategy Theme 1 together with Stantec's response:

Table 4.2: Comments on RTS Policies within RTS Strategy Theme 1 and Stantec response

Comment	Stantec Response
Allocating road space to active travel is a reasonable thing to expect in 4 land streets in North American cities where you can effectively create bike lanes as wide as car lanes and keep car lanes as well, that isn't how historic Scottish towns are designed. Creating separated cycle routes or pedestrianising the town centres entirely would result in less conflict being different road users, although this isn't popular	Noted – the RTS sets the strategic direction but individual locations would need to be assessed within this framework.
Replying based on experiences of my relative in Inverness-shire: Priority is affordable & convenient accessibility to essential services without relying on driving - different solutions in different locations. In particular: far better coordination of health & social services with transport (in particular, NHS appointment processes, coordination between centralised and local NHS & social care and health-related businesses such as physios & opticians). Community-run service centres hosting clinics for both NHS and private services (e.g. in vacant ex-bank building in Beauly?), banking, citizens advice, solicitors etc. Co-ordinating appointment times with public transport schedules, community transport and, where necessary, capped-price affordable taxis. Grants to local taxi companies to run low-carbon fully accessible vehicles (e.g. lease). Pay professional drivers (e.g. taxi drivers) to drive community transport vehicles rather than relying only on volunteers. Either greatly increase the geographical coverage of community transport or enable existing taxi services to operate an affordable shared-transport service to connect with public transport routes (combined with courier service, where appropriate - like the "post-bus"). Current transport is often either commercial (focussed on a few routes with biggest income potential) or public sector (e.g. Patient Transport Service - underfunded, unreliable and issues with eligibility thresholds when trying to book)). Given the safety issues with failure of public transport in rural locations, develop a "get me home" guarantee across all public & community transport that can call in other operators or private taxis to rescue stranded passengers (free at point of use rather than refund later, building on "rail replacement coaches" but for multi-modal journeys). Particularly critical given the housing crisis - loss of driving licence in a large proportion of the Highlands is a loss of independent access to nearly all public and community services., relocating to a suitable home in a more accessible area is often not an option. Replying as a frequent visitor to family in the Highlands - public transport information & reliability guarantee needed before people commit to travelling to the Highlands car-free, lack of capacity for bikes on long distance transport really limits the catchment area of public transport and the scope for cycle touring in the Highlands (other than driving	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.

Comment	Stantec Response
with bikes to the start of your route), local transport reliability is a concern when connecting to/from booked long-distance travel. The policies seem good but needs funding and influence / co-ordination beyond just public sector transport policy.	
There is a danger of making car use so difficult and inconvenient that some people may get so fed up with it that they no longer wish to co-operate with the basic objectives - you have to keep people 'on board' and many people in the Highlands will always have to own a car.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies. These trade-offs between behaviour change and supporting essential journeys are acknowledged throughout the RTS. Moreover, the appropriate solution in one part of the region may differ from that in another.
ST1j - there are opportunities for enhancing biodiversity through the integration of active travel within new developments as well as improvements to existing active travel networks for example, and that along with Climate and Air, there is potential for positive effects for the SEA Objective Biodiversity *[NatureScot]*	Noted – whilst this comment related to the SEA Report, an additional paragraph has been added into Section 5.5 of the Draft RTS to reflect opportunities for enhanced biodiversity associated with improving active travel infrastructure.
Strategic Theme 1 is well detailed and recognises the importance of changing communities, with reducing the dominance of the private car and improving active travel at the core of this. The policies identified show a high level of ambition and the link between transport planning and land use planning within this Theme is clear. It is welcomed to see the policies recognise how transport interventions can improve the public realm through better placemaking and promoting biodiversity enhancements. It is noted that in the draft RTS under the 'reducing the impact of traffic on our communities' heading the A96 is listed as a road in which this is an issue in the HiTRANS region, which is also relevant for Nestrans. *[Nestrans]*	Noted, thank you.
ST1f: a 'one size fits all' approach even in like-for-like locations does not recognise the wider context of the different strategic approaches to parking management and enforcement and the differing local contexts. Synergies can, and should, still be sought where possible. Collaboration for consistency on information provision and (where there is an agreed fit) use of technology is supported*. [Moray Council]*	Noted – policy has been amended to: "Parking management is the responsibility of partner local authorities. The RTS supports **the development of a consistent approach (in 'like-for-like' locations) of parking management across our region**, including payment mechanisms, parking information and enforcement".
ST1g: Like many authorities, the management of traffic around schools is a matter that is regularly raised by residents, and work has been ongoing for a number of years in Moray to identify mitigations. Moray has trialled School Streets in two locations and has learning in this area – collaboration across the region on this topic would be supported. *[Moray Council]*	Noted, thank you – we hadn't picked-up the 'school streets' schemes in Moray when drafting the RTS and have thus changed the London-based case study to that of Moray.

Commented [CS1]: Wording to be checked / agreed with Moray Council.

Comment	Stantec Response
Policy ST1a: **Suggested rewording:** The RTS supports the principle of **reallocating road space**, including parking, from general traffic. This should support placemaking to shape improved walking, wheeling and cycling **and public transport** opportunities in our communities as a means to promote safe active travel and encourage use of active travel modes. [insert **"and public transport"**: road space reallocation should deliver improvement opportunities for bus services] *[The Highland Council]*	This change has not been made bus priority is covered separately in Policy ST3c. Improved public transport would not necessarily support placemaking as is suggested by this policy.
Policy ST1c: The RTS supports the principle of **traffic calming and speed limit reductions** and enforcement where this is the wish of our communities, including on the Trunk Road network. Comment: It should be recognised, particularly in Inverness and the larger towns such as Fort William, that 20mph zones can significantly increase the operating cost and therefore reduce the attractiveness of bus services. The impact on bus services should therefore be considered in any 20mph limit implementation (or in continuation of temporary schemes). Traffic calming measures should be designed to be suitable for buses if on an actual or likely bus route. *[The Highland Council]*	Noted. The policy reflects the general principle but the preceding highlights that: *"There are different ways in which this objective can be achieved, including traffic speed enforcement and traffic calming measures such as speed cushions, road humps, road narrowing, pedestrianisation, speed limit reductions and the establishment of 20mph zones in settlements. The most appropriate actions will vary by settlement – e.g., what works for Campbeltown may not work for Benbecula – but we recognise overall the imperative of reducing any negative impacts of traffic on our communities"*
Policy ST1g: The RTS supports the principle of improving the management and enforcement of **traffic and parking around schools**, including School Streets (a road outside a school with temporary restriction on motorised traffic at school drop-off and pick-up times). Comment: we would also like to see some positive encouragement to use alternatives to the "school run", whether walking buses or actual public transport. There are major funding issues here as our public transport policy specifically excludes spend on school transport for pupils below the entitled distances. *[The Highland Council]*	Noted, and we agree with the point made. Policy ST1g is specifically included in a section about managing the impact of parking. The wider point about improving active travel is picked-up elsewhere in ST1 and ST2. We have made specific reference to walking buses in relation Policy ST2i, where they are a helpful addition.
Policy ST1h: **Suggested rewording:** "The RTS supports the prioritisation of new development in locations that are in proximity to key services and already well-served by active travel and public transport, **and does not support new development where this is not the case."** Addition to strengthen, & noted particularly to try to address the problem where developers simply expect buses to be provided. *[The Highland Council]*	Noted new wording not included as this is more of an issue for the LDP.

Comment	Stantec Response
Policy ST1j: **Suggested rewording:** "The RTS supports the integration of active travel, public transport and shared mobility into the planning of all new developments. New development proposals should be required to outline how they will connect into and enhance the local active travel and public transport network, **with first preference being for developers to directly deliver such infrastructure. Alternatively a contribution may be appropriate."** Additions to clarify and strengthen. *[The Highland Council]*	Reworded the policy slightly to strengthen but not as directly as suggested here. The delivery mechanism is perhaps more of an issue for the LDP to cover rather than the RTS.
Policy ST1k: **Suggested rewording:** "The RTS supports the concept of 'infrastructure first' for new developments across our region." Remove "major" to extend the scope of the Policy. *[The Highland Council]*	Amended

4.3   Strategy Theme 2 – Policies

4.3.1   Table 4.3 below summarises responses in relation to the RTS Policies under RTS Strategy Theme 2.

Table 4.3: Agreement with RTS Policies under RTS Strategy Theme 2

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don' t know	Net agreement
ST2a	The RTS supports transformational investment in the improvement of our existing active travel networks to make these accessible to all.	5	1	-	-	-	-	+6
ST2b	The RTS supports the reinstatement and expansion of a network of strategic and local traffic free / quiet walking, wheeling and cycling routes to connect communities across and beyond our region.	4	1	1	-	-	-	+5
ST2c	The RTS supports the expansion of the National Cycle Network to all parts of the region.	4	1	-	1	-	1	+4
ST2d	Our active travel infrastructure should be designed to a high standard in accordance with the most up-to-date best practice and regionally appropriate design standards (as this evolves) to meet the needs of all users.	4	2	-	-	-	-	+6
ST2e	The RTS supports the integration of active travel and public transport connections within our communities.	6	-	-	-	-	-	+6
ST2f	The RTS promotes the adoption of measures outlined in the Sustainable Travel to Stations Strategy with respect to access to railway stations.	5	1	-	-	-	-	+6
ST2g	The RTS seeks the implementation of initiatives which widen access to bicycles and e-bicycles, including e.g., promoting ownership, expansion of bicycle share and hire and provision of new 'first mile, last mile' cycling opportunities.	5	2	1	1	-	-	+6
ST2h	The RTS supports the upgrade and new provision of bicycle parking and facilities at all public buildings, transport interchanges and key on-street locations within the region.	5	3	-	1	-	-	+7
ST2i	Our active travel network should be developed, presented and promoted in a more coherent, recognisable and integrated way for regular, occasional and new users of the network, including visitors.	4	5	-	-	-	-	+9

4.3.2   The table below summarises comments on the policies contained within RTS Strategy Theme 2 together with Stantec's response:

Table 4.4: Comments on RTS Policies within RTS Strategy Theme 2 and Stantec response

Comment	Stantec Response
Need to be able to get between towns by bike - not through on road cycling but in off road cycle paths, like between Dingwall and Maryburgh / Conon bridge, Culbokie and other places.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
Multi-modal "get me home" guarantee that provides suitable alternative transport in the event of public transport failure - also covering 24/7 bike hire (e.g. if you book a bike to collect from a railway station, if that bike is not useable when you arrive), or if train services do not have sufficient capacity to take your bike. Need to know not just the existence of a cycle route but also to be able to judge before arriving if it is suitable (safety, accessibility etc). Streetview equivalent of of-road routes and highlighting any accessibility issues & public transport connections. Signs to public transport connections (and long term commitment to public transport routes, so that they can be included on permanent signs). Where traffic is predicted to increase on rural roads which do not currently have separate cycling & walking routes alongside (e.g. construction traffic to major developments) then build a safe & convenient permanent alternative before agreeing to the development starting on site. Do an assessment of the catchment areas of essential services, based on accessible public transport and SAFE cycling & walking routes, and consider hosting public services in additional locations and/or improving active travel & public transport to existing ones. More support for schools, and for walking and cycling to schools and to activities for school-age people. Provide travel planning for events, building on experience of Highland Cross to ensure other event coordinators can provide viable alternatives for participants that are travelling from outside the Highlands. Visitor travel choices are also tied to the accessibility of visitor accommodation - promote the use of seasonal accommodation (e.g. student halls in summer holidays) and low-impact pods/cabins with existing/new active-travel / public transport links & incentives for car-free holidays, in preference to houses that are more suited as permanent homes.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
Network Rail closed off the Ben Alder Level Crossing that was a Public Right of Way / Cross Country Drover's Route without Public Consultation so to address this at the earliest opportunity the Dalwhinnie Railway Station footbridge should be replaced with a ramped Access for All one that can cater for pedestrians, cyclists, disabled users on wheeled devices and equestrian users (lifts are of no use to horses and in such a remote location would be impacted by weather) and engage with the Landowner to construction a path connect from the Station to the Estate side of the Public Right of Way / Drovers	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.

This is however more of a Network Rail issue with respect to the specifics. |

Comment	Stantec Response
Road. Insist that Network Rail fully engage with various organisations and the Public before carrying out the same action as at Ben Alder Level Crossing.	
ST2a and ST2i – there are opportunities for enhancing biodiversity through the integration of active travel within new developments as well as improvements to existing active travel networks for example, and that along with Climate and Air, there is potential for positive effects for the SEA Objective Biodiversity. There may be LSEs on Biodiversity including protected sites from ST2c – if the expansion of the National Cycle Network is within or has connectivity to sensitive habitats / species including protected areas such as European sites. *[NatureScot]*	Noted, thank you. Whilst this comment is related to the SEA Report, an additional paragraph has been added into Section 5.5 of the Draft RTS under Strategy Theme 1 to reflect opportunities for enhanced biodiversity associated with improving active travel infrastructure. Noted with respect to LSEs. The RTS is focused on the principle of expanding the National Cycle Network to all parts of the region but HITRANS recognises and actively supports the requirement to ensure no Likely Significant Effects (LSEs) or to mitigate them appropriately. As the policy is not location specific, no mitigation is included in the RTS, but this would be integral to any programme or project which emerges from the RTS.
It is pleasing to see a detailed list of policies to improve walking, wheeling and cycling in the HiTRANS region. The policies that have been identified show a significant level of ambition aligning with the significant national ambition for active travel with current record levels of investment and its place at the top of the sustainable travel hierarchy. The value of improving active travel is shown clearly in the draft RTS in Table 6:1 with the Theme contributing to three of the strategy objectives, SO1 and SO2 strongly and SO4 with a minor contribution with improvements to active travel part of the wider objective to improve integration of modes.	Noted, thank you.
ST2d: we would particularly highlight the need for regionally (and locally) appropriate design standards that reflect both predicted usage of active travel infrastructure and the rural environment in which it sits, rather than a standard nationwide approach driven by city/urban needs. *[Moray Council]*	Noted and agreed – an additional line has been added into Section 6.2 of the RTS to reflect this point.
Strongly agree with all. *[The Highland Council]*	Noted, thank you
Policy ST2h: **Suggested rewording:** "The RTS supports the upgrade and new provision of bicycle parking and facilities at all public buildings, transport interchanges, town centres and commercial areas, centres of employment and key on-street locations within the region, **and provision of bicycle storage for residents.** Addition, because lack of secure cycle storage is a barrier to cycling for many residents. *[The Highland Council]*	Added, thank you

4.4   Strategy Theme 3 – Policies

4.4.1   Table 4.5 below summarises responses in relation to the RTS Policies under RTS Strategy Theme 3.

Table 4.5: Agreement with RTS Policies under RTS Strategy Theme 3

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don' t know	Net agreement
ST3a	The RTS supports measures to reduce social exclusion for those without access to a car.	6	3	-	-	-	-	+9
ST3b	The RTS recognises that the decline in bus passenger numbers in the region needs to be reversed and supports measures to extend service coverage, improve frequencies, lengthen the operating day and make the network more integrated.	7	2	-	-	-	-	+9
ST3c	The RTS supports measures to reduce bus journey times both between and within settlements in the region, including through the provision of bus priority measures.	4	4	1	-	-	-	+8
ST3d	The RTS supports innovative alternatives to fixed route bus services where these can be affordably provided.	6	3	-	-	-	-	+9
ST3e	The RTS recognises the role which community transport and Demand Responsive Transport (DRT) plays in our most rural communities and supports its expansion and integration with timetabled services.	4	5	-	-	-	-	+9
ST3f	The RTS supports measures to widen the awareness and use of community transport, DRT and EDRT amongst all members of society.	5	4	-	-	-	-	+9
ST3g	The RTS recognises the role of taxis as a key element of transport provision in the region where community transport, DRT and EDRT services are not provided.	3	4	2	-	-	-	+7
ST3h	The RTS recognises that rail journey times to, from and within the region are typically longer than elsewhere in Scotland, and therefore supports measures to reduce these journey times.	6	3	-	-	-	-	+9
ST3i	The RTS supports the commitment to electrify the Highland Mainline as an opportunity to reduce rail journey times and improve reliability as part of the overall decarbonisation of the network.	4	1	3	-	1	-	+4
ST3j	The RTS recognises that very low rail service frequency often makes rail uncompetitive with the car and therefore supports measures which would facilitate increased rail service frequency, particularly between Inverness and Aberdeen, Edinburgh and Glasgow.	7	1	1	-	-	-	+8
ST3k	The RTS promotes and supports the development of additional local rail services focused on our regional centres.	6	3	-	-	-	-	+9
ST3l	The RTS supports infrastructure measures which would enable increased service frequency, such as the electrification of the Highland Mainline, Aberdeen to Inverness and improvements to the signalling system.	5	1	3	-	-	-	+6

Stantec

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don' t know	Net agreement
ST3m	The RTS supports the planning and delivery of new railway stations, including innovative solutions proportionate to the location, subject to the development of an appropriate business case.	6	2	1	-	-	-	+8

4.4.2   The table below summarises comments on the policies contained within RTS Strategy Theme 3 together with Stantec's response:

Table 4.6: Comments on RTS Policies within RTS Strategy Theme 3 and Stantec response

Comment	Stantec Response
Need more frequent trains and buses to make these attractive options. a half hourly train service from inverness to Invergordon would transform transport patterns along the northern stretch of the A9 - and serve many towns on the way - trains also need to continue until midnight to serve the nightlife of inverness. Buses also need to be more frequent and start earlier and run later. Trans between Inverness and Aberdeen also need to run hourly and be dualled to stop delays at Huntly waiting for trains to pass each other.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
As a visitor to the Highlands, used to a much more extensive rail network in a more populated part of the country, I would suggest that the catchment area of the existing Highland rail lines needs to be increased by integrating with public transport & taxi services & active travel, and offering a "get-me-home" guarantee (including connecting bus services) to provide confidence to passengers that they will not be stranded in isolated locations (or have to buy new tickets if they miss connections) if public transport services are delayed or cancelled or not accessible. MUST introduce trains with more flexible space in carriages on the Highland lines AND lines into the Highland. Promoting the Highlands as a destination for cycle touring (NC500) and then having a capacity for so few bikes per day on public transport into the region is a complete joke. I have witnessed visitors being refused boarding to the last train of the day due to subtle difference in interpreting the rules for cycles on trains. I have taken my bike on the train from Edinburgh to Inverness, but most cyclists I know say it is too risky and would rather drive, and several have had bad experiences with failed bookings. It would also help people that use mobility aids if they could have level access & storage space on public transport. Away from the main towns with pavements, people rely on bigger and bulkier mobility aids - scooters / walkers etc. In Inverness there was a "Shopmobility" service, but only for people that could arrive by car to the Eastgate shopping centre - this should be extended to meet people arriving by train and bus, as part of "passenger assistance".	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
Other parts of Scotland have had mega millions spent on road and rail improvements so time for the Highlands to be focused upon. A9 then A96 must be dualled in full of existing dualled sections having grade separation installed. Transform Scotland took Transport Scotland to Court over funding inequality between A9 and HML Railway and won a ruling that for every £10 spent on the A9 upgrading, the HML must get at the same time £1 Funding toward pure	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies. However, several of the priorities expressed here, including the A9 and A96 dualling, are specifically referenced in the RTS Policies.

Comment	Stantec Response
enhancements (NOT maintenance, life expired renewals or electrification). Money must also be found to produce a modern standard of single carriageway road to the A82, A83 and other high use roads in the HITRANS area.	
No mention is made of whether HITRANS considers the provision of bus services that compete directly with rail is logical or affordable. We'd like to see buses as an adjunct to rail in rail-served area, rather than a competitor. The current unregulated bus provision mitigates against such suggestions. Perhaps it's time to introduce some regulation. **[Friends of the Far North Line]**	This point is addressed in Strategy Theme 4.
Electrification is not necessarily the best solution for rail. Solutions such as mixed mode (hydrogen, battery, diesel, electric) units or locomotives should be considered an alternative as these would reduce investment required in moving/altering bridges and tunnels and making difficult changes to the network. Dueling of the Perth/Inverness line and Inverness to Dingwall line, provision of through trains from Aberdeen/the central belt to Kyle, Thurso and Wick should be considered, along with creation of freight facilities in Dingwall, Aviemore and other areas which could act as foci for taking trucks off the road.	Noted – Policy ST3i specifically refers to an existing commitment to deliver the electrification of the Highland Mainline. Wider decarbonisation of the railway network is addressed in Strategy Theme 9 "Decarbonising our transport, mitigating the effects of climate change".
Much of rural Scotland continues to rely on supported local bus services, and communities within the Tactran region are dealing with the reduction and demise of many routes in their areas. Tactran agrees that the national funding schemes for local bus services in Scotland tend to favour urban areas and areas operating with commercial services. As such, Tactran welcomes HITRANS continuing to articulate the need for dedicated national funding streams for rural transport. Tactran agrees that the resilience of the rail network from climate change poses a significant challenge that needs to be addressed and will continue to offer support in this matter. There is a considerable opportunity for rail to address many of the transport challenges in the Tactran region. Tactran further supports measures that will facilitate increased rail service frequency, particularly between Inverness and Aberdeen, Edinburgh and Glasgow and, supports the commitment to electrify the Highland Mainline. **[Tactran]**	Noted, thank you.
As a neighbouring RTP, this Theme (enhancing public transport connectivity) has a high importance given we have a role in achieving some of the ambition identified. In reviewing the policies, it is clear Nestrans has a role to play in some of the policies identified such as ST3h, ST3j & ST3l. Within our RTS, Nestrans 2040 'improved journey efficiencies to enhance connectivity' is identified as one our six key priorities. Part of this is public transport connectivity and it is mentioned in our RTS that 'contained within this priority, the strategy aims to reduce journey times by rail to the	Noted, thank you. Specific reference has now also been included to travel to health opportunities outwith the region in the introduction to this RTS Strategy Theme.

Comment	Stantec Response
Central Belt and Inverness'. This shows our alignment with the policy ambitions under this Theme. Also within this Theme is the role of access to public and personal services such as health as mentioned in the draft RTS. The Moray Council area of the HITRANS region is part of the NHS Grampian area meaning it is important to facilitate regular conversation on connectivity with colleagues in Moray. This is done through the Health and Transport Action Plan partnership. It is also important to recognise that there are other areas elsewhere in the HiTrans region who may also require travel to Aberdeen for their health needs. *[Nestrans]*	
ST3b: Moray's work in this area in expanding the timetabled and demand responsive m.connect bus network is focused on the need to provide appropriate public transport links across our region, including the use of innovative approaches for service delivery. *[Moray Council]*	Noted, thank you.
ST3d: Moray Council's m.connect service is delivering encouraging early results in terms of demand responsive transport provision and the use of app-based technology. *[Moray Council]*	Noted, thank you. Some additional text has been added to Section 7.4 to reflect this wording.
ST3m: noting that this should be sought without detriment to the preceding policy statements around journey time and frequency. *[Moray Council]*	Noted, thank you. Added a line to reflect this point in the narrative.
Policy ST3f: The RTS supports measures to widen the awareness and use of community transport, DRT and EDRT amongst all members of society. Proofreading: "EDTR" is not explained. *[The Highland Council]*	Added, thank you.
Policy ST3l: The RTS supports **infrastructure measures** which would enable increased service frequency, such as the electrification of the **Highland Mainline and Aberdeen to Inverness line**, and improvements to the signalling system. Rewording to clarify. *[The Highland Council]*	Amended, thank you

Stantec

4.5 Strategy Theme 4 – Policies

4.5.1 Table 4.7 below summarises responses in relation to the RTS Policies under RTS Strategy Theme 4.

Table 4.7: Agreement with RTS Policies under RTS Strategy Theme 4

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don' t know	Net agreement
ST4a	The RTS supports measures that will improve integration within and between modes of transport at key locations and transport interchanges in order to provide new travel options and alternatives to the private car, recognising the constraints within which this is possible (e.g., delivering school bus services).	6	3	-	-	-	-	+9
ST4b	The RTS supports integrated ticketing measures to simplify travel and improve the passenger experience.	5	3	1	-	-	-	+8
ST4c	The RTS supports the adoption of contract conditions for tendered and supported services that encourage operators to work in partnership to improve integration, timetable planning and coordination.	5	4	-	-	-	-	+9
ST4d	The RTS supports the provision and enhancement of mobility hubs across the region, in line with a hierarchy reflecting local requirements.	6	2	1	-	-	-	+8
ST4e	The RTS supports measures which will enable people to leave their bicycle in a secure environment at a bus stop / station, railway station, ferry terminal or airfield.	4	4	1	-	-	-	+8
ST4f	The RTS supports, where practical, the provision of increased bicycle capacity on public transport services within the region.	3	4	2	-	-	-	+7
ST4g	The RTS supports the simplification of the process of taking a bicycle both to and onto a bus or train.	4	3	2	-	-	-	+7
ST4h	The RTS supports more widespread journeys which combine bicycle and public transport.	5	3	1	-	-	-	+8
ST4i	The RTS supports the provision of consistent standards of facilities at bus stations and bus stops reflecting location and usage.	4	5	-	-	-	-	+9
ST4j	Our bus network should be safe, secure and fully accessible to all.	7	2	-	-	-	-	+9
ST4k	Our bus network should provide a high-quality and consistent onboard experience.	6	3	-	-	-	-	+9
ST4l	Travel on buses to, from and within the region should, where possible, enable meaningful working time.	5	4	-	-	-	-	+9
ST4m	The RTS supports the provision of more consistent standards of facilities at railway stations, reflecting station usage.	4	4	1	-	-	-	+8
ST4n	Our railway network should be safe, secure and fully accessible to all.	6	3	-	-	-	-	+9

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know	Net agreement
ST4o	The RTS supports the continuation and expansion of the Scotland's Railway Adoption Programme and other measures to enhance the station environment.	2	6	1	-	-	-	+8
ST4p	Our ferry network should be safe, secure and fully and easily accessible to all. This includes both shore-to-vessel access and movement around the vessel itself.	6	3	-	-	-	-	+9
ST4q	The RTS recognises that there is not a short-term solution to the accessibility issues with the Argyll and Bute and Orkney inter-island air services. We will keep abreast of developments in technology and new aircraft types and, in the meantime, continue to work with partners to support alternative options such as the Scottish Ambulance Service.	4	3	3	-	-	-	+7
ST4r	The RTS supports sufficient provision and better enforcement of Blue Badge parking across the region.	3	4	2	-	-	-	+7
ST4s	The RTS recognises the important role of taxis as part of the overall transport mix in the region. It supports partnership working with licencing authorities and taxi providers to raise standards of provision where required and to facilitate the expansion of the network.	1	4	4	-	-	-	+5
ST4t	The RTS supports the provision of taxi services which are fully accessible in terms of booking and vehicle access	3	4	2	-	-	-	+7
ST4u	A key component of making travel accessible to all, the RTS supports measures to remove barriers to travel, including increased staff training, passenger chaperones and the provision of physical and online travel information in accessible formats.	6	3	-	-	-	-	+9
ST4v	The RTS supports the maintenance and expansion of at-stop / at-station multi-modal real-time information.	6	3	-	-	-	-	+9
ST4w	The RTS promotes the simplification and consolidation of travel planning and in-journey information to make travel easier for less frequent users.	6	3	-	-	-	-	+9
ST4x	The RTS supports the further development of the GO-HI travel app.	2	6	1	-	-	-	+8
ST4y	The RTS supports the provision of up-to-date physical travel information at bus stops, and the removal of out-of-date information.	6	3	-	-	-	-	+9
ST4z	The RTS Calls for improved cross-provider digital connectivity across the region to facilitate access to travel information for all (including in-car information), enable meaningful working time when travelling by public transport and to help reduce the need to travel where possible.	3	6	-	-	-	-	+9

31

4.5.2   The table below summarises comments on the policies contained within RTS Strategy Theme 4 together with Stantec's response:

Table 4.8: Comments on RTS Policies within RTS Strategy Theme 4 and Stantec response

Comment	Stantec Response
There is no mention of expanding the rail network to facilitate passenger travel. Theme 6 only talks about freight and there is no mention of an expanded rail network in Theme 7.	The case for new passenger heavy rail routes was ruled out in the RTS Preliminary Appraisal. At present, there are few realistic prospects for new heavy rail routes (i.e., with a supporting STAG or well-developed business case). Any new heavy rail route would therefore be a very long-term proposition and certainly beyond the period which the RTS will cover.
Extend catchment area of public transport by enabling shared use of taxis with fixed (affordable) fares meeting buses & trains. Bus passes are not much use if you need to drive miles to get to the nearest bus service. Rail passes for the Highland region need to be extended to cover stations in Cairngorms at least, preferably to allow Highland residents to travel to Aberdeen, Glasgow & Edinburgh, given how often people seem to be referred there to access medical treatment. Should be not just rail services, but long distance coach & ferry services (at least, where there is not a train line, such as Ullapool - Inverness). When booking medical appointments, NHS staff should be able to co-ordinate the appointment times to suit public transport (where suitable & accessible), and book free or subsidised travel tickets (public / community / taxi, depending on what is available) at the same time, plus a "get-me-to/from-my appointment" guarantee that allows free transport by taxi if the public transport is delayed. This would be an incentive to make public & community transport accessible, reduce the number of missed appointments, make medical services less stressful to get to, and encourage people to use preventative services such as physio appointments (will need corresponding improvement in NHS service access too). Currently, if you are not fit enough to use public transport, it is difficult to get to the medical services that would help you get fit, but if you ARE fit enough to get there then you are not a high enough priority to get those medical services at all.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
Bicycles on trains is a very difficult issue since each traveller's required space is more than doubled. Emphasis should be on safe cycle storage and availability of shared cycles at destinations. The extra cost of higher capacity trains needed to accommodate many cycles is probably unaffordable. *[Friends of the Far North Line]*	Noted, thank you. The RTS supports both improvements to the ability to leave bicycles at railway stations (Policy ST4e) and to take them onto trains (Policy ST4f). The appropriate solution will vary across the region and would be a matter for the RTS Action Plan and any subsequent studies which emerge from it.
Theme 4 is detailed with a high number of policies identified. Improving integration across the modes is valued by Nestrans. Nestrans can help facilitate	Noted, thank you.

Comment	Stantec Response
improvements to integration for travellers from the HiTrans region such as the ferry and air services from Orkney to Aberdeen, with both modes providing islanders with access to the mainland. Therefore Nestrans has a role to play in making sure Policy ST4p is realised. In addition, Nestrans also recognises the importance of integration of journey planning and ticketing. The GO-Hi app is a lead player in this field within Scotland and therefore is a useful case study to be able to put forward in the draft RTS. Nestrans continue to monitor MaaS, exploring opportunities for collaboration. *[Nestrans]*	
ST4a: although note the tension between provision of school transport and general public transport where pupils and general passengers are often wishing to travel at the same time for both education and employment – measures to remove this conflict to reduce barriers to the use of public transport for employment will be an important factor to consider, so public transport becomes a meaningful option for all journey types. *[Nestrans]*	Noted, thank you.
ST4r: Within the context of individual approaches to enforcement across the region still being supported *[Moray Council]*	Noted, thank you. This policy is more focused on provision than enforcement, but point taken on ensuring flexibility.
Policy ST4d: The RTS supports the provision and enhancement of mobility hubs across the region, in line with a hierarchy reflecting local requirements. Comment: mobility hubs should include key junctions on the main roads / inter-urban bus routes, so that where public transport is sparse, people can drive for part of the journey to join more frequent public transport, rather than driving the whole way. *[The Highland Council]*	Noted, added some text in 8.3.2 to reflect this point.

4.6 Strategy Theme 5 – Policies

4.6.1 Table 4.9 below summarises responses in relation to the RTS Policies under RTS Strategy Theme 5.

Table 4.9: Agreement with RTS Policies under RTS Strategy Theme 5

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don' t know	Net agreement
ST5a	The RTS supports the provision of longer daily time on-mainland and on-island where this is required for the long-term sustainability of a community.	5	-	1	-	-	-	+5
ST5b	The RTS supports the provision of services which minimise the requirement for one or more overnight stays.	4	1	1	-	-	-	+5
ST5c	Where practicable, the RTS supports the operation of additional sailings on the supported ferry networks within the region.	3	3	-	-	-	-	+6
ST5d	The RTS supports year-round seven-day connections for island and peninsular communities where this is required for the long-term sustainability of a community and enjoys public support.	4	2	-	-	-	-	+6
ST5e	The booking and ticketing arrangements for ferry services in the region should support the convenience and efficiency of travel for all.	4	2	-	-	-	-	+6
ST5f	The RTS calls for the earlier opening of ferry booking systems and increased transparency around the release and management of vehicle deck space.	3	2	1	-	-	-	+5
ST5g	The RTS supports the principle of Road Equivalent Tariff (RET). However, where service frequency permits, controlled use of peak times / surge pricing could be used to help manage demand, recognising that this would need to be at no net detriment to the connectivity of island and peninsular communities.	1	4	1	-	-	-	+5
ST5h	The RTS supports operational measures which maximise the efficient management of vehicle deck space on sailings.	4	1	1	-	-	-	+5
ST5i	The RTS supports measures to improve door-to-door journeys through enhancing active travel, public transport and shared mobility connections to and from ferry terminals, combined with other measures to reduce the need to take a car onboard.	3	2	1	-	-	-	+5
ST5j	The RTS recognises the long-term underfunding of vessels and infrastructure in the region and strongly calls for fleet and infrastructure modernisation to address issues of reliability and resilience.	4	2	-	-	-	-	+6
ST5k	The RTS calls for the development of a regularly maintained Vessels and Infrastructure Planning Pipeline across all publicly supported ferry networks in Scotland.	4	2	-	-	-	-	+6
ST5l	The RTS supports an increase in the overall fleet size and the inter-operability of that fleet and supporting infrastructure to strengthen resilience.	2	2	1	-	-	-	+4

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don' t know	Net agreement
ST5m	The RTS supports the principle of increasing capacity through frequency rather than larger vessels.	3	1	2	-	-	-	+4
ST5n	The RTS calls for an objective consideration of the design characteristics of future vessels for all routes, including hull form and the provision of crew accommodation.	4	1	1	-	-	-	+5
ST5o	The RTS supports the introduction of new low or zero emissions vessels to replace life-expired tonnage. This should be done in line with the NTS2 Sustainable Investment Hierarchy.	1	2	3	-	-	-	+3
ST5p	With the vessel and infrastructure replacement cycle, the RTS supports measures to reduce journey times for our island communities. This includes providing direct sailings rather than via another island (where this is the preference of the local community) and consideration of new ferry terminal locations that reduce crossing distances.	3	2	1	-	-	-	+5
ST5q	The RTS supports harbour infrastructure improvements ahead of life expiry where this could contribute to a material improvement in reliability.	3	2	1	-	-	-	+5
ST5r	The RTS supports the conversion of the remaining Lo-Lo routes in the region to Ro-Ro where there is community support.	2	3	1	-	-	-	+5
ST5s	The RTS supports the further development of the Highlands and Islands' air network.	4	2	-	-	-	-	+6
ST5t	The RTS supports the further development of commercial external routes, particularly to London Heathrow and other international hub airports, that support the economic competitiveness of the region.	4	2	-	-	-	-	+6
ST5u	The RTS supports the retention of the PSO air network within the region and, where alternative travel choices are inadequate, its further expansion. 'Adequate' in this context refers to the ability to achieve an affordable daily return to / from a national centre.	4	2	-	-	-	-	+6
ST5v	The RTS supports the operation of additional connections and flights on the PSO air networks within the region, whether delivered by existing, additional or new low emission aircraft.	3	2	1	-	-	-	+5
ST5w	The RTS supports more direct flights rather than via another island.	3	2	1	-	-	-	+5
ST5x	The RTS supports the adoption of technological and infrastructure solutions which would improve the reliability and frequency of inter-island air services.	3	3	-	-	-	-	+6
ST5y	The RTS supports the principle of fixed links where they represent value for money and are supported by the island or peninsular community. Any fixed link should be implemented in conjunction with improved public transport connectivity and incorporate provision for active travel.	4	1	1	-	-	-	+6

Stantec

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don' t know	Net agreement
ST5z	The RTS supports the consideration of tolling where this would assist in making the case for a fixed link. The use of vehicle number plate recognition technology could allow local residents to travel for free.	1	3	1	1	-	-	+3

4.6.2   The table below summarises comments on the policies contained within RTS Strategy Theme 5 together with Stantec's response:

Table 4.10: Comments on RTS Policies within RTS Strategy Theme 5 and Stantec response

Comment	Stantec Response
Again - No mention of expanding the rail network for passenger travel as opposed to only freight. An example would be a route to Ullapool which is the busiest port for ferry travel to the Western Isles (Stornoway), both freight and passenger.	The case for new passenger heavy rail routes was ruled out in the RTS Preliminary Appraisal. At present, there are few realistic prospects for new heavy rail routes (i.e., with a supporting STAG or well-developed business case). Any new heavy rail route would therefore be a very long-term proposition and certainly beyond the period which the RTS will cover.
The Scottish Government to achieve a part of STPR2 Intervention 41, the Scottish Government / Transport Scotland should get involved with the Corran Narrows Crossing, taking it out of Highland Council's remit as the southern side is basically part of the A82 Trunk Road. A fixed link over the Corran Narrows should then be designed and built urgently and a program of road improvements to single carriageway standard undertaken on the A831 from Ardgour to its junction with the A884 (near Strontian) and then along the A884 to the Lochaline area as prelude to building a fixed link over to Mull. Transport Scotland on opening the Corran Narrows fixed link would at some point re-class it and the upgraded road to the Lochaline area as a Trunk Road.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
Building on the comment made under Theme 4, Nestrans has a role to play in achieving the ambition set out under Theme 5 (Providing connectivity that supports our island and peninsular communities). As stated, Nestrans is committed to supporting onwards travel and we are therefore committed to supporting Policy ST5i. It is important as Nestrans that we continue to support services and onward connectivity from the island communities, and we look forward to seeing the Islands Connectivity Plan published following consultation earlier this year. *[Nestrans]*	Noted, thank you.
ST5k: a clear planning framework for vessel and infrastructure requirements would add value.	Noted and agreed, thank you.
Strongly agree with all. *[The Highland Council]*	Noted, thank you.
Policy ST4q: The RTS recognises that there is not a short-term solution to the accessibility issues with the Argyll and Bute and Orkney inter-island air services. We will keep abreast of developments in technology and new aircraft types and, in the meantime, continue to work with partners to support alternative options such as the Scottish Ambulance Service. Comment: this needs to be broadened out. Accessibility is a significant issue for many aircraft operating on regional/sub-regional services, and at present operators and	Added a line to the end of the policy to reflect the wider aviation sector. The focus was specifically on the inter-island services as we have strong evidence of this being identified as a problem in the Case for Change. No particular issues were raised in relation to other aircraft such as the Twin Otter, ATRs or Saabs.

Comment	Stantec Response
sponsoring authorities are reliant on a specific derogation within Regulation (EC) No 1107/2006, Article 4 (or its equivalent as transposed into UK law) to remain compliant with equalities obligations: *1. Notwithstanding the provisions of Article 3, an air carrier or its agent or a tour operator may refuse, on the grounds of disability or of reduced mobility, to accept a reservation from or to embark a disabled person or a person with reduced mobility:* *(a) in order to meet applicable safety requirements established by international, Community or national law or in order to meet safety requirements established by the authority that issued the air operator's certificate to the air carrier concerned;* *(b) if the size of the aircraft or its doors makes the embarkation or carriage of that disabled person or person with reduced mobility physically impossible.* This is not a problem unique to the inter-island services and as such should be recognised as a whole region priority for delivery of future air services. *[The Highland Council]*	
Policy ST5s – ST5v inclusive Comment: Could we include a further position, something along the lines of: Policy ST5XXX – The RTS recognises the importance of both scheduled and non-scheduled aviation to rural and island communities, and supports the retention and development of airport and airfield infrastructure to support aviation activity within the region. *[The Highland Council]*	Rather than adopting a new policy at this juncture, Policy ST5s has been amended to read: Policy ST5s: The RTS supports the further development of the Highlands and Islands' air network *in terms of both services and supporting infrastructure*.
Policy ST5w: The RTS supports more direct flights rather than via another island. Comment: This may be at odds with ST5v in particular, as it may well be more economically feasible to deliver PSO air services incorporating more than one rural/island airport in future. We're in a difficult position in the short-medium term as far as airframe availability – those in the 30-seat range like the Jetstream 41 and Saab 340 ceased production in the late 90s and, while they remain in service, are facing increasing maintenance and reliability issues. For regional services like Wick-Aberdeen, the remaining options are either something like a Dornier 228 (19 seats, too small) or an ATR42-600 (48 seats, too big). Short-medium term delivery of regional air services may well rely on larger aircraft serving multiple destinations, until new aviation technologies come to market.	Noted. Whilst we agree with the principle of the point, this section is specifically related to the inter-island air services in Argyll & Bute and Orkney. Indirect services have their value, but they impose significant capacity constraints on routes like Kirkwall – Sanday / Stronsay.

Comment	Stantec Response
This is also at odds with some of the aims of the SATE project, which would look to bring new aviation technologies in to deliver types of flying that are not currently economically viable or environmentally sound (e.g. air taxi, air bus, etc.) *[The Highland Council]*	
Policy ST5g: The RTS supports the principle of **Road Equivalent Tariff (RET)**. However, where service frequency permits, controlled use of peak times / surge pricing could be used to help manage demand, recognising that this would need to be at no net detriment to the connectivity of island and peninsular communities. Concessionary fares for foot passengers should be available on the same basis as on buses. Comment: Note addition. *[The Highland Council]*	This point has not been incorporated here as this issue is covered in Strategy Theme 11, which is related to the cost of travel.
Policies ST 5j&n: Comment: Strongly agree with the points about vessel size, design and suitability. Although there is relatively little direct impact on Highland, smaller and more frequent vessels would make onward connections easier, and more efficient vessel design will reduce costs, with potential benefits for other parts of the transport network and sector.	Noted, thank you.
Policy ST5z: The RTS supports the consideration of tolling where this would assist in making the case for a fixed link. The use of vehicle number plate recognition technology could allow local residents to travel for free. Comment: The Highland Council's focus is on the redevelopment of the slipways and replacement of the Corran Ferry.	Noted, this policy is considering fixed links in the generality. There is a specific reference to Corran in the preceding text, which is because it is a route on which a fixed link has been considered and where this may remain a long-term aspiration.

4.7 Strategy Theme 6 – Policies

4.7.1 Table 4.11 below summarises responses in relation to the RTS Policies under RTS Strategy Theme 6.

Table 4.11: Agreement with RTS Policies under RTS Strategy Theme 6

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know	Net agreement
ST6a	The RTS supports the principle of new dedicated or high-capacity freight vessels on freight intensive routes.	2	1	1	-	1	1	**+2**
ST6b	The RTS supports the formalisation and extension of the carriage of unaccompanied trailers to a wider range of routes.	1	2	2	-	-	1	**+3**
ST6c	The RTS supports the operation of dedicated freight sailings, either by contracted or commercial operators where there is demand and it is operationally deliverable.	3	2	-	-	-	1	**+5**
ST6d	The RTS supports moves towards greater simplification and consistency in the setting of ferry freight fares across the region, recognising that this would be achieved over the medium-term.	3	-	2	-	-	1	**+3**
ST6e	The RTS supports infrastructure measures which will enable the growth of rail freight to and from the region.	3	1	1	-	1	-	**+3**
ST6f	The RTS supports infrastructure investment and funding initiatives which will enable the growth of waterborne and air freight to, from and within the region.	4	2	-	-	-	-	**+6**

4.7.2   The table below summarises comments on the policies contained within RTS Strategy Theme 6 together with Stantec's response:

Table 4.12: Comments on RTS Policies within RTS Strategy Theme 6 and Stantec response

Comment	Stantec Response
Why only the talk of improved freight? Why not the dual talk of both passenger and freight improvements?	The case for new passenger heavy rail routes was ruled out in the RTS Preliminary Appraisal. At present, there are few realistic prospects for new heavy rail routes (i.e., with a supporting STAG or well-developed business case). Any new heavy rail route would therefore be a very long-term proposition and certainly beyond the period which the RTS will cover.
Rail freight terminals may need to be provided in certain locations as an incentive for use. Freight consigners are unlikely to plan to switch to rail when there are no facilities. Similarly, enhanced capacity on the single track railways to enable more freight trains have to be done first, in anticipation of traffic. *[Friends of Far North Line]*	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
Movement of freight is important, and this Theme is welcomed. Nestrans recognises the challenges that geography and circumstance can have on the transport network. Aberdeen plays a role in sustaining supply chains and therefore we have to make sure that our transport network is efficient and reliable. Nestrans also recognises the role that we play in achieving Policy ST6e with rail freight an important element in decarbonising the freight sector. Rail freight works as an "end to end system" and for this reason, demand needs to be encouraged and improvements need to be made collectively across the full journey, from origin through to destination. *[Nestrans]*	Noted, thank you.
Strongly agree with all. *[The Highland Council]*	Noted, thank you.

4.8 Strategy Theme 7 – Policies

4.8.1 Table 4.13 below summarises responses in relation to the RTS Policies under RTS Strategy Theme 7.

Table 4.13: Agreement with RTS Policies under RTS Strategy Theme 7

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don' t know	Net agreement
ST7a	The RTS restates our support for the full dualling of the A9 and A96, with early prioritisation of the Elgin and Keith bypasses to dual carriageway standards, following the already committed Inverness to Wester Hardmuir scheme.	4	2	2	-	2	-	+4
ST7b	The RTS calls for incremental improvements to our road network where there are safety, efficiency and environmental benefits, including in relation to single track roads.	6	2	1	1	-	-	+7
ST2c	The RTS supports the expansion of 50mph HGV speed limits across the Trunk Road network in the region.	3	4	2	1	-	-	+6
ST7d	The RTS supports the provision of improved overtaking opportunities on our roads, especially where there are known problems with vehicle platooning which can cause driver frustration.	5	4	1	-	-	-	+9
ST7e	The RTS calls for investment in our regional road network where there are regular and sustained periods of disruption due to weather and / or geological instability.	7	2	-	1	-	-	+8
ST7f	The RTS recognises the increasing vulnerability of our region's road network to severe weather events linked to climate change and supports capital and revenue measures to mitigate this.	4	3	1	1	-	-	+6
ST7g	The RTS recognises the increasing vulnerability of the railway network to severe weather events linked to climate change and supports capital and revenue measures to mitigate this.	7	1	2	-	-	-	+8
ST7h	The RTS supports the continued provision and expansion of real-time travel information for motorists and public transport users through existing and emerging platforms.	6	3	1	-	-	-	+9
ST7i	The RTS recognises that many parts of our region's road network are in poor condition. It calls for enhanced preventative and remedial road maintenance to ensure the safe, reliable and efficient movement of people and goods and the delivery of services across our region.	8	2	-	-	-	-	+10
ST7j	Investment in our road network should continue to have an overarching focus on safety with a view to reducing road traffic casualties in accordance with Scotland's Road Safety Framework to 2030.	4	4	1	1	-	-	+7
ST7k	To address risks which are particular to roads in our region, the RTS supports: enhanced advisory signage; ongoing public information campaigns around the use of single-track roads; provision of additional safe motorist	7	2	-	-	-	-	+9

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don' t know	Net agreement
	services and HGV rest areas; and information campaigns for visitors driving left-hand drive vehicles.							
ST7l	The RTS specifically supports the improvement or removal of priority junctions on higher speed trunk roads, especially for right-turning traffic.	4	4	1	-	-	-	+8
ST7m	The RTS calls for increased provision of level boarding at stations across the region, which will reduce station dwell times.	7	2	-	-	-	-	+9
ST7n	The RTS supports the provision of additional sections of double track (or static or dynamic passing loops where double track does not represent value for money) to improve punctuality.	6	3	-	-	-	-	+9
ST7o	The RTS supports infrastructure and timetable improvements external to the region which will improve the reliability of services to / from Inverness, Fort William, Oban and Mallaig.	6	2	-	-	-	-	+8

Stantec

4.8.2   The table below summarises comments on the policies contained within RTS Strategy Theme 7 together with Stantec's response:

Table 4.14: Comments on RTS Policies within RTS Strategy Theme 7 and Stantec response

Comment	Stantec Response
Safety should not be the overarching focus with a view to reducing RTC's. It should be high up on the list, but driver education, training and enforcement of poor driving standards is my top priority. An example would be a car/campervan driving at 35/40 mph in a national speed limit of 60mph in weather conditions which allow that speed to be reached and maintained on a normal single lane road. These vehicles generally do not pull over to let queues pass leading to driver frustration which leads to poor choices/possible RTC's. A simple improvement of the road network needs to be combined with my previous comments.	Noted and agreed. Whilst this policy theme is primarily focused on infrastructure improvements (with the assumption that they will be allied with national driver behaviour and enforcement initiatives), the point around training and enforcement is now explicitly recognised in the narrative.
The A96 and A9 need dualled as an absolute priority - not adding more crawler lanes. the best overtaking opportunity is if they are dualled. The motorways in the Netherlands are 10 lanes wide and they have very high public transport and active travel uptake so the argument that we need to constrain road infrastructure to encourage uptake of alternate modes is just not true in other locations.	Noted, thank you.
Prioritise funding for efficient maintenance & resilience, including maintenance of active travel infrastructure. Given the huge diversions when key routes are closed, real-time information is really important for minimising additional mileage. Also improving viability of essential local services in communities that are reliant on vulnerable transport routes, through managing affordable housing and the distribution of public services such as NHS.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
ST7a: Absolutely not to full dualling. The A9 is already a fast road, on a good alignment. There is enough width for the Swedish 2+1 system to be built at a much lower cost. This would completely remove head-on crashes. On the A96 bypasses are necessary but there is not the capacity requirement on either road for full dualling - even less so once the Scottish Government's car kms reduction target is met. Grade-separated junctions are the other important requirement to remove a frequent cause of accidents. ST7c: No, this would make freight by road more attractive and increase the danger on single carriageway sections since overtaking would require a longer stretch of road. ST7n: This is vital for punctuality and for increased capacity. *[Friends of Far North Line]*	Noted, thank you. Whilst the desire for freight mode shit from road to rail and sea / canal is explicitly stated in the RTS, it is important to recognise that the vast majority of freight to, from and within the region moves by road. It is therefore considered important that these freight movements are made as efficiently and safely as possible.
In addition to the strategic rail corridors, Tactran's Regional Transport Strategy also identifies a number of strategic road corridors, including the A9, A82 and	Noted, thank you.

Comment	Stantec Response
A85. These routes are the key long-distance corridors, connecting regional economies and carry significant levels of freight and goods. Collaborative working between the local, regional and national stakeholders is required to address pinch points that present operational challenges that impact on the efficiency and reliability of these strategic corridors in both the HITRANS and Tactran regions. Tactran will accordingly support HITRANS in this matter. *[Tactran]*	
Nestrans notes the policies set out under Theme 7. It is noted that Policy ST7a restates HiTrans' support for full dualling of the A96. As you will be aware Transport Scotland published a Case for Change in December 2022 following a commitment to review the previous commitment to full dualling. In this report, full dualling remains an option but we should be cognisant of the other options that have been identified. Nestrans will continue to monitor the future of improvements on this key strategic corridor for road and rail. In doing so, a key issue which should remain a priority for the A96 corridor is rest areas for HGVs. Therefore it is welcomed that this is included under Policy ST7k building on the national commitment made in STPR2. *[Nestrans]*	Noted, thank you. HITRANS continues to support the full dualling of the A96, with the early prioritisation of the Elgin and Keith bypasses to dual carriageway standards.
ST7c: Learning from the now well-established approach on the A9 as to the risks and benefits of this would provide a potential mitigation in relation to journey time and driver frustration, however, needs careful consideration to ensure there is no detriment to road safety where trunk road alignments are different to the A9.	Noted – added "where it is safe to do so" to the end of the policy.
ST7d: There have been long-standing concerns particularly in relation to the A95 between Aviemore and Keith in this matter.	Noted, thank you.
ST7i: Note that there is an underpinning fiscal issue in relation to the challenges local authorities face in setting a balances budget which delivers across competing priority areas.	Noted, thank you.
Strongly agree with all. *[The Highland Council]*	Noted, thank you.
Policy ST7a: The RTS restates our support for the full dualling of the A9 and A96, with early prioritisation of the Elgin and Keith bypasses to dual carriageway standards, following the already committed Inverness to Wester Hardmuir scheme. *[The Highland Council]*	Noted, no change implied here.
Policy ST7i: Reword to read "The RTS recognises that many parts of our region's road and active travel network are in poor condition. It calls for enhanced preventative and remedial road and active travel infrastructure maintenance to	Whilst we agree with the principle of this point, we have not made this change as this theme is specifically about the road and railway network. Improvements to the active travel network are included in Strategy Theme 2.

> **Commented [CS2]:** Neil / Ranald - may want to consider whether my response appropriately expresses your position on this.

45

Comment	Stantec Response
ensure the safe, reliable and efficient movement of people and goods and the delivery of services across our region. Comment::reworded to explicitly include active travel; maintenance of the existing asset, both that associated with an adopted road and that remote from an adopted road, is a significant challenge but is crucial in achieving modal shift. **[The Highland Council]**	
Policy ST7n: The RTS supports the provision of additional **sections of double track** (or static or dynamic passing loops where double track does not represent value for money) to improve punctuality **and frequency**. Comment: note addition. **[The Highland Council]**	Not amended as frequency is considered elsewhere. This policy is specifically about targeting areas where track layout gives rise to poor reliability, regardless of frequency.
General comment: We note that budgetary constraints will continue to be a highly significant issue. In line with Transport Scotland's Investment Hierarchy we would like to see an exploration of how Transport Scotland's resources could be allocated to improving and maintaining existing infrastructure, including sustainable travel infrastructure, to achieve the modal shift required. **[The Highland Council]**	Noted and agreed. This would be an issue to be tackled at Action Plan and delivery stage.

⬤ Stantec

4.9   Strategy Theme 8 – Policies

4.9.1   Table 4.15 below summarises responses in relation to the RTS Policies under RTS Strategy Theme 8.

Table 4.15: Agreement with RTS Policies under RTS Strategy Theme 8

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know	Net agreement
ST8a	The RTS supports the further development of long-distance walking, wheeling and cycling routes (including the National Cycle Network), recognising the visitor, economic and local benefits offered.	5	4	-	-	-	-	+9
ST8b	The RTS supports the development of active travel connections to our ports, airports and regionally important railway stations.	5	4	-	-	-	-	+9
ST8c	The RTS supports the development of active travel connections to our key tourism destinations where this would be a realistic option for some visitors.	5	4	-	-	-	-	+9
ST8d	Where there are concentrations of international tourists, including cruise passengers, the RTS supports the provision of enhanced local travel information and coordination to improve visitor experience and reduce impacts on local networks.	5	2	1	-	1	-	+6
ST8e	The RTS supports the operation and promotion of additional local rail services to key tourism destinations.	4	4	-	-	-	-	+8
ST8f	The RTS supports the provision of additional rail carriages on existing services in peak season, where feasible.	5	2	1	-	-	-	+7
ST8g	The RTS supports the principle of flexible timetabling where this can co-exist with regular services for local residents.	4	3	1	-	-	-	+7
ST8h	The RTS supports the principle of expanded open access rail services where these can be accommodated at no disadvantage to scheduled services.	2	6	-	-	1	-	+7
ST8i	The RTS supports the principle of sustainably accommodating visitor demand whilst maintaining or increasing visitor numbers.	2	5	1	-	1	-	+6
ST8j	The RTS supports the introduction of additional parking restrictions and greater enforcement of existing traffic orders at tourist honeypots as a tool to encourage improved access to these locations by public transport or active modes and to address indiscriminate and dangerous parking.	3	5	1	-	-	-	+8
ST8k	Where new or increased parking charges are introduced, this should be done in combination with improved visitor facilities, including e.g., parking provision, public toilets etc.	3	3	2	1	-	-	+5
ST8l	Whilst recognising the benefits of motorhome and campervan-based tourism in our region, the RTS acknowledges that it can impact negatively on our	5	3	-	-	-	-	+8

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don' t know	Net agreement
	communities at certain times of the year. The RTS therefore supports measures to ensure that this demand is sustainably accommodated.							
ST8m	Whilst recognising the benefits of cruise tourism in our region, the RTS recognises that catering for this demand can negatively impact on our communities. The RTS therefore supports measures to ensure that this demand is more sustainably accommodated.	5	3	-	-	-	-	+8
ST8n	The RTS supports measures which would allow the benefits of cruise tourism to be more evenly distributed around the region.	4	3	1	-	-	-	+7
ST8o	The RTS supports the principle of bespoke bus services aimed at tourists to address excessive car-based demand at honeypot locations.	2	5	-	-	1	-	+6
ST8p	The RTS recognises that high volumes of tourist traffic are impacting the condition of some roads in our region and that increased central government funding is required that reflects this increased pressure on local transport infrastructure, to support an enhanced repair and maintenance programme.	6	1	-	-	-	-	+7
ST8q	The RTS recognises that high volumes of tourist traffic can lead to slow and inefficient journeys and therefore supports measures to address this.	3	3	1	-	-	-	+6

4.9.2   The table below summarises comments on the policies contained within RTS Strategy Theme 8 together with Stantec's response:

Table 4.16: Comments on RTS Policies within RTS Strategy Theme 8 and Stantec response

Comment	Stantec Response
All decisions concerning tourists/tourism/visitors should be taken at a local level by the people who are impacted the greatest. Tourists should also not get dedicated travel services. The public travel system should be able to accommodate both locals and tourists together. Stop making a 2 tier system!	Noted – the purpose of the RTS is to provide a regional strategic framework within which local decisions can be made, providing consistency where possible for visitors to the region.
Improving connections between towns on the active travel networks would mean that tourists don't have to drive their bikes around mounted on their cars until they get to the CNPA. They should be able to travel between cars on blue ways or bike trails and locals can actually benefit from this infrastructure too. As nice as trails are in the Rothiemurchas Estate who does that actually serve? Certainly not locals needing to get somewhere in a hurry.	Noted, thank you. Whilst this Strategy Theme is specifically focused on visitors to the region, other Strategy Themes (e.g., 1 and 2) focus more on residents.
The cruise industry is vital for the transformation of Fort William *[Fort William Marina & Shoreline Community Interest Company]*	Noted, thank you.
Answering as a regular visitor to the Highlands - visitor travel choices are influenced by expectations of travel experience, especially reliability and flexibility. A "get-me-to-my-destination" guarantee with public transport could alleviate some of the uncertainty, especially for visitors that are travelling long-distance and may arrive later in the day or need to make connections onto pre-booked services. Sustainable visitor accommodation (e.g. small cabins / pods, not houses that are suitable for permanent occupation) should be mostly in places that are accessible from public transport routes or active travel - this may need an expansion of transport network and managing housing (make it better to rent, or to sell to housing association or community housing trust, than to let whole houses as visitor accommodation or second homes, & make it easier to let croft houses as homes not just as visitor accommodation). Need to influence national transport providers to provide more public transport capacity into the Highlands, especially more flexible space on trains & coaches, & a reliable means of travelling with lots of luggage or bikes. Given the changeable weather, visitors like to be able to decide at short notice where to visit and how long to stay. Also, if I'm travelling a long way to get to the Highlands, I'd want to bring equipment for different activities depending on what the weather does, whether that be cycling or walking or skiing etc...it isn't always practical to carry that on public transport, especially if making several connections. Being able to hire equipment near accommodation would help and being able to hire a car at short notice locally for a few days rather than for a week or two. I note that car clubs	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.

Comment	Stantec Response
online appear to only have 3 or 4 vehicles for the whole of the Highlands...For outdoor activities, it would also be reassuring to know that public transport runs at least until after dusk in summer months or that there is an alternative means of getting to shelter if you miss the last bus/train (preferably not relying on a mobile signal and battery to book)...the idea of waiting indefinitely at the roadside in the drizzle & midges is not that appealing...a "get-me-back-to-my-accommodation" guarantee would be good, if there was a way of activating it at the roadside...Overall, concentrate travel & visitor accommodation & outdoor equipment hire at/near well-connected towns & villages, with flexible travel to the wider area.	
Cruise traffic passes through my village without stopping. Villages affected by cruise traffic should receive some form of community benefit for the disruption, based on a per passenger per day levy for cruise ships docked locally. Additional levies should be used to mitigate pollution affecting Alness and Invergordon when ships are docked. **[Friends of Far North Line]**	Noted, thank you. The issue of visitor / tourist levies is not a transport / HITRANS issue *per se*, but the RTS explicitly recognises the challenges posed by large volumes of cruise passengers visiting rural areas.
Tactran notes that HITRANS refers to issues around tourism at locations of outstanding natural beauty and subsequent high seasonal demands impacting on the regional transport network. With the Cairngorms National Park being considered as a destination of national and international importance, Tactran believes that any actions to address such issues are regionally significant. As such we would recommend strengthening the required cooperation with the Cairngorms National Park Authority and are looking forward to working with both partners. [**Tactran**]	Noted and agreed.
ST8a – if further long-distance walking, wheeling, and cycling routes are developed within or has connectivity to sensitive habitats / species including protected areas such as European sites. **[NatureScot]**	Noted with respect to LSEs on protected areas such as European Sites. The RTS is focused on the principle of these policies but HITRANS recognises and actively supports the requirement to ensure no Likely Significant Effects (LSEs) or to mitigate them appropriately. As these policies are not location specific, no mitigation is included in the RTS, but this would be integral to any programme or project which emerges from the RTS. Consideration will also be given during the assessments of the specific projects to ensure any increased access to the protected sites will be managed / mitigated to ensure direct or indirect impacts are not to the detriment of European sites.
ST8b – if active travel connections to ports, airports, and regionally important railway stations are developed within or has connectivity to sensitive habitats / species including protected areas such as European sites. **[NatureScot]**	
ST8c – if the development of active travel connections increases tourism to areas with sensitive habitats / species including protected areas such as European sites. **[NatureScot]**	
The HiTRANS region is a key tourist destination for residents of the northeast of Scotland and for tourists visiting both regions. Nestrans will monitor this closely given some of these policies would impact on our communities and would therefore require appropriate communication. **[Nestrans]**	Noted, thank you.

Comment	Stantec Response
ST8b: also note that public transport connections between transport modes e.g. bus-rail, bus-air is also important – particularly in areas where active travel may not be feasible (journey length or topography). *[Moray Council]*	Noted, this is covered in Policy ST8d, and is a general point which runs through Strategy Themes 3 and 4, applying to residents as well as visitors.
ST8j: considered use of powers to manage parking is welcomed, along with collaboration and sharing of good practice. However, a one-size-fits-all approach to decriminalised parking or other management tools does not recognise the different positions of each authority on parking management. Some of the wider principles expressed in the strategy around managing supply and demand and considering different approaches such as 'aires' for campervans are still supported. *[Moray Council]*	Noted – policy amended to read: "The RTS supports the introduction of increased parking management measures at tourist honeypots as a tool to encourage improved access to these locations by public transport or active modes and to address indiscriminate and dangerous parking."
ST8k: there are a wide range of factors that need to be considered in relation to introducing new or altered parking charges, and an absolute restriction that links changes solely to visitor facilities neither recognises those factors. Each local authority should still have discretion to consider parking charges in relation to its own strategic position. Collaboration on technology, information provision and sharing best practice would still be welcome. *[Moray Council]*	Noted – policy amended to read: "Where new or increased **parking charges** are introduced, the RTS encourages that this should be done in combination with improved facilities for those accessing via sustainable modes."
Policy ST8: General comment: We note that the intermittent pressure on local bus services from cruise ship passengers arriving at Invergordon can risk excluding local passengers. *[The Highland Council]*	Added a "and services" to the last line of the cruise tourism bullet.

4.10 Strategy Theme 9 – Policies

4.10.1 Table 4.17 below summarises responses in relation to the RTS Policies under RTS Strategy Theme 9.

Table 4.17: Agreement with RTS Policies under RTS Strategy Theme 9

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know	Net agreement
ST9a	The RTS supports the implementation of measures which facilitate the decarbonisation of the public transport vehicle fleet within the region, including commercial vehicles, buses and community transport, rail rolling stock, aircraft and ferries.	3	2	-	-	-	-	+5
ST9b	The RTS recognises the opportunities brought about by the availability of renewable energy in our region, including locally produced green hydrogen. The transport fleet mix and associated infrastructure should reflect this.	3	2	-	-	-	-	+5
ST9c	The RTS supports the development of vehicle pooling and vehicle sharing services across the region to reduce the need for personal car ownership.	2	2	1	-	-	-	+4
ST9d	The RTS calls for the expansion of EV charging infrastructure to support the decarbonisation of all vehicle based travel in our region.	3	2	-	-	-	-	+5
ST9e	The RTS recognises the challenges of distance, topography, climate and short winter daylight hours to the rollout of battery electric powered commercial vehicles and seeks low or zero emission solutions appropriate to our region, and which capitalise on the surplus energy production within our region.	3	1	-	-	-	-	+4
ST9f	The RTS supports the roll-out of other alternative fuels to promote the decarbonisation of our transport networks, ports, ferry terminals, airports and airfields.	3	2	-	-	-	-	+5

4.10.2   The table below summarises comments on the policies contained within RTS Strategy Theme 9 together with Stantec's response:

Table 4.18: Comments on RTS Policies within RTS Strategy Theme 9 and Stantec response

Comment	Stantec Response
Ensure that private sector developments associated with exporting electricity out of the Highland have to commit to providing infrastructure WITHIN the Highlands that reduces dependence on fossil fuels (and vulnerability to fossil fuel prices). Cost effective and low-risk access to low carbon vehicles and refuelling networks (e.g. consider if the leasing scheme of hydrogen vehicles in Wales is applicable to the Highlands). Ensure that relevant skills development is available and attractive to Highland residents so that a local workforce is able to benefit from good quality jobs created by infrastructure development and to set up new businesses. Vehicle-sharing would be easier, for people travelling to access public services, if those services were better co-ordinated. NHS appointments in particular are chaotic, and mobile services like banking and grocery vans only visit villages for very short periods. Home support visits are planned really inefficiently, with staff mostly travelling out from Inverness - better to have people based in other towns & villages to reduce the travelling (and lots of areas are not covered at all because they are too far from the city). However, that would need affordable housing in towns and villages or much higher wages for support workers.	Noted, thank you. Many of the issues cited here are much wider than transport alone, and HITRANS has and will continue to work with partners in the region to deliver a coordinated approach.
Given the distances required for HGVs in the highlands, hydrogen use should be strongly encouraged. More should be done to encourage sensible and efficient small commercial vehicles rather than use of pick-up trucks by tradespeople who would traditionally have used more efficient vans.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
The policies identified for this section are strong and cover a wider range of modes alongside covering both electric and hydrogen power. A key priority in Nestrans 2040 is a commitment to significantly reduce carbon emissions from transport to support net-zero by 2045. Nestrans recognise the need to decarbonise rail, maritime and aviation but we recognise that this needs to be led at a national level. Nestrans and HiTRANS have a role to play in communicating the importance of decarbonisation of rural transport at a national level given rural modal shift is going to be a significant challenge. [Nestrans]	Noted, thank you.
ST9d: note the work done to date on the Pathfinder project for the strategic expansion of EV charging in partnership with public and private sector bodies [**Moray Council]**	Added a line into Section 13.4 to reflect this initiative.
Strategy Theme 9 Introductory subheading: Reword to read **"In addition to supporting decarbonisation through many of the policies above**, supporting the	Noted, not amended as noted in the RTS that decarbonisation is a central theme throughout.

Comment	Stantec Response
decarbonisation of transport through the adoption of zero emission vehicles, vessels, and aircraft." *[The Highland Council]*	
Policy ST9d: The RTS calls for the expansion, standardisation and maintenance of EV charging infrastructure to support the decarbonisation of all vehicle based travel in our region. Note addition. *[The Highland Council]*	Amended, thank you.

Stantec

4.11   Strategy Theme 10 – Policies

4.11.1   Table 4.19 below summarises responses in relation to the RTS Policies under RTS Strategy Theme 10.

Table 4.19: Agreement with RTS Policies under RTS Strategy Theme 10

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don' t know	Net agreement
ST10a	The RTS embraces the opportunities provided by new technologies to improve the provision of transport infrastructure and services across the region.	3	2	-	-	-	1	+5
ST10b	The RTS supports consideration of the provision of future innovative personal transport within the design of our active travel network and mobility hubs.	1	2	2	-	-	1	+3
ST10c	The RTS supports the principle and further development of Mobility-as-a-Service as the technology evolves, particularly through our Go-HI app.	1	4	-	-	-	1	+5
ST10d	The RTS supports opportunities for the more widespread adoption of Connected and Autonomous Vehicles and autonomous buses, whilst recognising the challenges posed in our region.	-	3	2	1	-	-	+2

4.11.2 The table below summarises comments on the policies contained within RTS Strategy Theme 10 together with Stantec's response:

Table 4.20: Comments on RTS Policies within RTS Strategy Theme 10 and Stantec response

Comment	Stantec Response
Don't waste money on expensive stuff that doesn't serve as great a number of people as possible. think of furthering the bike routes and the dualling of trunk roads before spending a single penny on autonomous vehicles.	Noted, thank you.
Any new technology needs to be accessible for all that need to use it. Need a trusted support service (NOT only to people that qualify for benefits etc) to help people learn to use technology and trouble-shoot public and private infrastructure issues. Always offer a face-to-face and telephone alternative (not just answering machines and automated messages) to online access and send information out in the post where necessary. Offer tech access as a service, with equipment loaned...lots of issues with poor mobile signals, poor broadband connectivity, and dealing with multiple private companies to find out which equipment is causing a fault (with threats of fees if you call out the wrong organisation...). This complexity, and the speed at which equipment becomes obsolete or incompatible, is a real barrier to accessing information and support, especially for people that were used to dealing with the same staff in the same local services where they did not need to reconfirm their identity all the time. The more centralised and impersonal the services have become, the more complicated the technology and contracts have become. Autonomous vehicles have the potential in theory to maintain access to transport for people that lose access to a private car, but given the state of basic transport services and mobile/internet access there are much more immediate things to fix first.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
As mentioned under Strategic Theme 4, Nestrans are continuing to explore opportunities around MaaS as we recognise the future role it could play in the transport system. Alongside this, we continue to observe the micromobility measures introduced across Scotland alongside monitoring the legality of e-scooters and other electrically powered vehicles closely *[Nestrans]*	Noted, thank you.

4.12 Strategy Theme 11 – Policies

4.12.1 Table 4.21 below summarises responses in relation to the RTS Policies under RTS Strategy Theme 11:

Table 4.21: Agreement with RTS Policies under RTS Strategy Theme 11

No.	RTS Policies	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don' t know	Net agreement
ST11a	Transport poverty is a complex, dispersed and often hidden problem in our region. The RTS commits to define and evidence this problem and identify appropriate actions to be delivered by HITRANS and our partners.	2	4	-	-	1	-	+5
ST11b	Recognising that, for many in our region (and especially those living in our island communities), transport costs account for a high proportion of household income, the RTS supports a reduction in public transport fares and the introduction of payment plans for multi-journey tickets.	4	2	-	-	1	-	+5
ST11c	The comparative costs of public transport mean that residents and visitors to the region often choose to travel by car. The RTS therefore supports a reduction in the cost differential between travelling by public transport and car.	5	2	-	-	-	-	+7
ST11d	The RTS supports in principle the roll-out of Road Equivalent Tariff to any ferry routes on which it does not currently apply, including local authority services.	2	3	1	-	1	-	+4
ST11e	The RTS calls for greater cross-industry partnership working and regulatory reform to reduce the cost penalty for interchange within or between modes of transport.	2	4	-	-	-	-	+6
ST11f	The RTS calls for the extension of the National Concessionary Travel Scheme and Under-22s Concessionary Travel Scheme to rail, ferry and air services where these are the main or only mode of public transport in an area.	3	3	-	-	1	-	+5
ST11g	The RTS calls for the retention and expansion of the Air Discount Scheme, including to businesses in the region.	2	3	1	-	1	-	+4
ST11h	National road pricing proposals may emerge in response to the reduction in fuel duty and Value Added Tax as a result of the mass adoption of electric vehicles. If this eventuality materialises, the RTS calls for a road pricing system that recognises the unique characteristics of our region.	2	4	-	-	1	-	+5

4.12.2   The table below summarises comments on the policies contained within RTS Strategy Theme 11 together with Stantec's response:

Table 4.22: Comments on RTS Policies within RTS Strategy Theme 11 and Stantec response

Comment	Stantec Response
Stop making a 2 tier system by giving free travel to 60+ or 22 y/o and under! This is a complete and utter waste of money. The travel system should be a fixed cost for all with discounts for frequent travellers such as islanders on lifeline ferry services. Businesses should NOT get any more subsidies such as ADS. National Road Pricing is a con and is simply a way of pricing people out. Road tax should be abolished/added to the cost of fuel so that those who drive more miles should pay more as they emit more CO_2.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
Cross-ticketing needs to be viable for smaller businesses and community transport, not just for national operators that only serve the most lucrative routes. Subside any equipment costs where necessary, and address any issues with mobile/internet connectivity (for example, ensure that the same range of tickets is available to all passengers, even if they start their journey or change plans in a location where they have not got online access - the expectation by some companies that passengers must validate bus tickets online just before they board a bus is unworkable in some locations). Concessionary travel passes should be available on all public transport and, preferably, be linked to affordable fares from local taxi companies in locations where this would extend the catchment area of public transport to more people. It could also work with a "get-me-to-my-destination" guarantee. Include cycle hire and car club membership as options within a multi-modal transport ticket system. Ensure that the timing of connections works for access to long distance travel. With changing between modes of transport (or different bus operators), it is not just the cost of buying separate tickets, there is also the risk of missing connections. With trains, at least your ticket is still valid even if there is no train service, but if the bus is late and you miss the train then advance train tickets and reservations become worthless. That is a big risk with long distance travel.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
The ScotRail Peak Fares Suspension Trial should become permanent. Peak fares are a workers tax on those that can't afford / have access to cars as well as those whose employment isn't flexible so forcing travel at Peak Times or who can't make the choice to work from home. Even if Peak Fares become a thing of the past evidence in European Countries shows that having much lower public transport fares creates modal shift, that creates volume, that equalises out or beats the price difference. The Green impact of lower fares is vast as well. *[Friends of Far North Line]*	Noted, thank you.

Stantec

Comment	Stantec Response
Cost remains a key barrier in modal shift and therefore this Theme is welcomed by Nestrans. It is worth noting that within the policies there is no clear reference to the cost of bikes being a barrier that is stopping more journeys being made by active travel, particularly young children. Widening the availability of cycling is included within the draft RTS but could also be referenced here. **[Nestrans]**	Noted and agreed – the issue of access to bicycles is picked-up in policies ST2g and ST3a. This section largely focuses on fares and the cost paid to travel, but the point is valid.
ST11d: While the principle of RET is beneficial for making ferry travel more affordable, the specific application on longer routes such as Aberdeen to Lerwick requires careful consideration to ensure it addresses the unique challenges and high costs associated with such distances. The implementation of RET should be tailored to maintain affordability while ensuring the financial sustainability of ferry services. ZetTrans promotes a modified version of RET that considers these factors to ensure equitable and effective fare reductions. **[ZetTrans]**	Noted, and agreed. The RTS specifically references the principle that no community should see an increase in their fares when RET is introduced, recognising the need to reflect the specific circumstances of Shetland with regards to this policy.
Policy ST11a: Transport poverty is a complex, dispersed and often hidden problem in our region. The RTS commits to define and evidence this problem and identify appropriate actions to be delivered by HITRANS and our partners. Comment: we note that the cost of short distance travel can be even more problematic than long distance, because these journeys are more likely to be frequent and essential. Bus fares for short journeys tend to be expensive per mile, and cheaper offers such as weekly tickets are geared to people travelling every day, which with changed working patterns is less likely, and doesn't suit those travelling 2-3 times per week for work or non-work purposes. Lack of availability is also an issue even in some urban areas, as is lack of accessibility if the walk to the bus stop is not suitable for all. **[The Highland Council]**	Noted – this comment fits well with the overall statement of policy that transport poverty in the region is not well understood and, in many cases, hidden.

5 RTS Impact Assessments

5.1 Strategic Environmental Assessment Report

5.1.1 The table below summarises comments on the Strategic Environmental Assessment (SEA) Report with Stantec's response:

Table 5.1: Comments on the RTS SEA Report and Stantec response

Comment	Stantec Response
A realisation that one size does not fit all.	Noted, thank you.
It is too complex to read every bit well done in publishing it. we need more money up here to get things work and get rid of the holes in our society.	Noted, thank you.
Comments based on discussions with relatives living in the Highlands, as well as experience of visiting regularly with and without children, and discussions with other visitors.	Noted, thank you.
Overall, we note that while no significant effects on the historic environment are predicted as a result of the strategy objectives, themes and individual policies a number of minor effects and uncertainties have been identified. We therefore welcome the recognition within the report of the need to consider these further at project delivery level and identify mitigation as appropriate. Appendix A Review of Plans and Programmes: We would draw your attention to Scotland's new strategy for the historic environment Our Past, Our Future (OPOF) was published in April 2023 and replaced Our Place in Time which is reference in this Appendix. The strategy sets the direction of travel for the historic environment sector and identifies the priority areas of action to focus work to support this mission. The 3 priorities are Delivering the transition to net zero, Empowering resilient and inclusive communities and places and building a wellbeing economy. The importance of the contribution that the maintenance, reuse and adaptation of our historic environment can make in preventing waste and reducing carbon emissions is recognised under the transition to net zero priority. Environmental Baseline:	Noted, thank you. Specific points made by statutory stakeholders in relation to the RTS SEA have been addressed within the final version of that report.

Comment	Stantec Response
We note that an appropriate historic environment baseline has been identified in order to test the content of the RTS against. It is particularly welcomed that the heritage value of elements of transport infrastructure itself is recognised. Guide Questions and Assessment Criteria: We welcome the guide questions and criteria developed in order to support the assessment and in particular the testing of policies and proposals for potential positive benefits in relation to sustainable access management. Individual policy assessment: We note that no significant effects have been identified here for the historic environment. A number of minor negative and uncertain effects that will require consideration and potential mitigation for project level/locational specific delivery have been identified and we are generally content to agree with the findings presented. *[Historic Environment Scotland]*	
We advise, however, that the SEA could go further in acknowledging and addressing biodiversity loss along with tackling climate change as part of the twin crises. The biodiversity and climate change crises are inextricably linked, and one cannot be addressed fully without addressing the other. With that in mind, we advise that opportunities to address the twin crises through, for example, enhancement of green networks, which can improve biodiversity plus help improve health and wellbeing, needs to be reflected more in terms of environmental effects and mitigation / enhancement in Table 5-2 as part of the Environmental Appraisal of the Transport Options, as well as some of the commentary in Table 5-3, A Summary of the Environmental Assessment by RTS Theme. This should also be reflected in section 5.4.4 onwards of the report. With reference to our query regarding a Habitats Regulations Appraisal (HRA), we also note the response within Appendix E to our Scoping Report comments where it states that an HRA is unlikely required for the RTS. Further to this, we note in section 1.2.3 under 'Other Related Appraisals', it states the following "At this stage of the RTS development, the 'Policies' set out within the Draft RTS 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	Noted, thank you. Specific points made by statutory stakeholders in relation to the RTS SEA have been addressed within the final version of that report. With regards to Habitats Regulation Appraisal (HRA) specifically, HITRANS recognises and supports the importance of HRA for any programme or project which may have LSEs on European sites. The policies in the RTS are not however location specific (with the exception of proposals to dual the A9 and A96, which are subject to their own Transport Scotland-led consenting process) and it is therefore difficult to undertake meaningful HRA screening at this stage. HITRANS commits to undertake appropriate HRA assessment of programmes and projects emerging from the RTS.

Comment	Stantec Response
Regulations Appraisal (HRA). This shall be kept under review as the RTS develops through to the Delivery Plan and implementation, and an HRA Screening will be completed if HITRANS considers that there is any potential for LSE from implementation of the RTS." We advise that under The Conservation (Natural Habitats, &c.) Regulations 1994, all competent authorities must consider whether any plan or project will have a likely significant effect (LSE), alone or in-combination, on a European site. The SEA is a separate and distinct assessment and although it can help to inform an HRA, it cannot be used instead of an HRA to consider likely significant effects alone or in-combination, on a European site. The RTS must, therefore, be subject to at least screening as part of an HRA. With that in mind, we do note that there is potential for LSE's with some of the RTS Themes. For example, and as noted on page 64 within the ER, RTS Theme 5 and specifically ST5y which supports the principle of fixed links, "there is potential to significantly impact important habitats such as marine and terrestrial SPAs and SACs", and we advise that an Appropriate Assessment will also be required. We anticipate that given fixed links are not location specific at this stage of the plan, it is difficult to indicate which European Sites may be affected within the HITRANs area, therefore, the conclusion will likely be that there will be no Adverse Effects on Site Integrity (AESI). There are further strategy themes and policies that we believe may have LSEs alone or in-combination on a European site within the HITRANs area. While the draft RTS is a high-level document, there are opportunities for enhancement measures that will provide positive environmental effects, and specific comments for the relevant transport options and noted below: - Options 1A-1D - There are opportunities for enhancing green networks that also helps to improve biodiversity as part of reallocating road space to active travel for example. Further positive environmental effects include connecting people with nature and improving health and wellbeing. Options 2A-2E – Similar to Transport Option 1, there are opportunities for enhancing green networks, enhancing biodiversity through planting measures and connecting people with nature which would also help to improve health and wellbeing. We note the need for careful siting and design of new active travel	

Comment	Stantec Response
routes to prevent and minimise adverse effects on biodiversity for example, and we support this. We note the recommendation that mitigation measures "should be implemented during the construction of any new railway line or railway stations" and we advise that this should be conducted in line with the mitigation hierarchy. We also advise that opportunities for biodiversity enhancement that provides positive effects for biodiversity should also be implemented. Along with an EIA, an HRA should also be considered. Along with the requirement for an EIA as noted within the mitigation and recommendations column, an HRA will also need to be considered. As with previous Transport Options, there are opportunities for biodiversity enhancement as part of improving green networks to help improve active travel options. Further benefits include connecting people with nature and helping to improve health and wellbeing. An HRA will also need to be considered along with an EIA. Strategy Theme 1: We support the inclusion of opportunities for active travel such as enhancing biodiversity through the creation and connectivity of linear habitats as well as the use of nature-based solutions. Strategy Theme 2: Similar commentary should be included for Strategy Theme 2 – connecting our communities, where there will be benefits to biodiversity as well as the benefits to people through connecting with nature. An HRA will need to be considered along with an EIA. Strategy Theme 7: An HRA will also need to be considered along with an EIA at implementation stage. Strategy Theme 8: We note in the commentary the opportunities for "providing active options for accessing tourist sites, increase the accessibility of green spaces, open areas and new landscape and enhance the setting and appreciation of heritage assets." We advise that while there are benefits to improving access to tourist sites for example, there is potential for negative environmental effects through increased tourism on sensitive natural heritage areas, and that this should be considered in the assessment.	

Comment	Stantec Response
SEA Objective 1: As commented on in our Scoping Report response, it would be relevant to reflect on the twin crises and how measures for tackling biodiversity loss can also help address climate change. For example, on page 57 of your ER, it states that Strategy Theme 1 and its associated policies provide opportunities for active travel such as enhancing biodiversity through the creation and connectivity of linear habitats as well as the use of nature-based solutions including sustainable urban drainage systems, re-naturalisation of water courses and establishment of wetlands. We advise that this should also be reflected in the summary of the findings for SEA Objective 1: Climate Change.

SEA Objective 3: We agree with the findings for potential positive and negative effects to SEA Objective 3: Biodiversity, Geodiversity and Soil. There are links with the SEA Objective 1: Climate Change, where improvements to biodiversity along with nature-based solutions can help to tackle climate change, and this should also be reflected in this section. *[NatureScot]* | |
| Nestrans recognises the importance of this assessment, and it is clear that this is detailed with a range of environmental issues identified. Alongside a thorough assessment with the Vision and Strategy Objectives assessed against the Strategic Environmental Assessment Report objectives developed with seven significance criteria used (significant (major) positive to significant (major) negative effect, alongside uncertain effect and no clear relationship). *[Nestrans]* | Noted, thank you. |

5.2 Equalities Duties Report

5.2.1 The table below summarises comments on the Equalities Duty Report with Stantec's response:

Table 5.2: Comments on the RTS Equalities Duty Report and Stantec response

Comment	Stantec Response
Bear in mind the age of the population, elderly and disabled	Noted, thank you.
Car dependency is a huge issue for people that lose access to their own vehicle. Public (& commercial) services do not advertise clear catchment areas,	Noted, thank you.

Comment	Stantec Response
but it is very difficult to get home visits outside of Inverness, and community transport also seems limited to the city area. We have even looked at possibility of relocating to the city but there is no suitable affordable accommodation. And eligibility for public services seems such a difficult and stressful process - it would be better if the thresholds were raised so that eligibility was not an issue. Charities and community groups say they can only provide support & activities in very limited geographical areas (and there are big gaps between these), and travel times makes many commercial services unviable or unaffordable. Result - vulnerable people default to giving up trying to get to activities that would help their wellbeing & independence and get no support until they are desperate (= admitted via ambulance & A&E for serious medical reasons). Review travel AND housing AND the distribution/planning of essential services together and make sure it works for the most vulnerable people AND the people / organisations / communities they rely on. Personal travel planning for people that are in car-dependent locations (map-based check based on other transport options), then filtered for the accessibility and affordability needs of the individual, which could demonstrate potential need for better travel options and/or more local services and in the meantime ensure that people that are struggling to access essential services can be given subsidised taxi fares (in a low-carbon vehicle that is suitable for the person & their location).	
It is important that policies and strategies do not negatively impact on any member or group and therefore Nestrans welcomes this comprehensive Equalities Duties Report. It is positive to see a strong amount of moderate or major beneficial effect in the assessment showing the importance of this updated strategy. *[Nestrans]*	Noted, thank you.

6 Any other comments

6.1 Any other comments

6.1.1 The table below summarises the response to the 'any other comments' question in the survey, together with Stantec's response:

Table 6.1: Stantec response to 'any other comments' listed

Comment	Stantec Response
More detail on how it will affect Islands.	RTS Strategy Theme 5 sets out the policies specifically relevant to connecting island and peninsular communities, whilst policies across other Strategy Themes are relevant to island communities. The Islands Communities Impact Assessment, which is integral to the Equalities Impact Assessment, details the potential impact of the policies on island communities.
You emphasise cycling to much at the expense of car use. Cycling is not possible / not attractive to many for health / safety / weather reasons. We live in a cold, wet and windy part of the world. Realistically modal shift to cycles has been and will continue to be low.	Noted – the RTS attempts to balance competing priorities, each of which has merit. There will necessarily be trade-offs in its implementation.
Ensure that transport policies designed with urban areas in mind are targeted at urban areas and, if they negatively impact travel in the Highlands beyond Inverness (e.g. fuel prices or restrictions on parking), ensure that this is matched by other support & investment in travel in these areas (e.g. alternative fuels, multi-modal travel & local services).	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
As rail campaigners we are very aware of the current financial constraints being experienced by the Scottish Government, partly as a result of a lower in real terms block grant, and the inability of the SG to borrow significant capital for investment in infrastructure. We therefore would like to see investment priorities angled far more towards rail, since its provision is by its nature is expensive in the short term, although not so when taken over many years. We worry that the recent emotive campaign for the dualling of the A9 and A96, which on occasion used suspect statistics to make its case, has skewed the emphasis away from rail investment. There is only so much money available for transport projects so it would be good to see HITRANS advocating for cheaper safety mitigation on those roads, e.g. the Swedish 2+1 system, thereby releasing funds towards much needed rail investment. *[Friends of the Far North Line]*	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.

Stantec

Comment	Stantec Response
The D RTS is to be commended although its delivery might well be impacted by factors outwith the control of HiTRANS	Noted, thank you.
There seems to be a lack of push for information being made available to bus users. At the moment timetables are only online. Apps do not show all stops, bus stops have the wrong route numbers, that combined with high fares is why cars are used. Lastly bad planning by the council allowing business parks all over the place again means car use.	Noted, the desire to improve the integration, quality of and access to public and shared transport is expressed through Strategy Theme 5.
Please, make our roads pothole free. Please, cut the verges of the roads so we can see the ditches. Please have clear road markings. Get the basics done first, and take pride in doing them well, and only then do a survey.	Noted – the RTS sets the strategic approach across the eleven RTS Themes. The Final RTS will be accompanied by an RTS Action Plan which will identify specific actions that HITRANS will progress to support the delivery of the policies.
Your strategic plan is quite magnificent. The one thing missing (this is typical of Scottish planning) is strategic estimates of cost and risk.	Noted, thank you.