Scottish Borders Council Response to the Regional Transport Strategy

Report by Director - Infrastructure and Environment

SCOTTISH BORDERS COUNCIL

27 January 2022

1 PURPOSE AND SUMMARY

1.1 **The report proposes the approval of the consultation response to South-East of Scotland Regional Transport Partnership (SEStrans) in reply to the Draft Regional Transport Strategy. The response is required to be submitted by 11 February 2022.**

1.2 The Draft Regional Transport Strategy (RTS) for the South-East of Scotland has been prepared by the South-East of Scotland Regional Transport Partnership (SEStran) which was set up under the Transport (Scotland) Act 2005. It covers eight constituent Local Authorities:

- Clackmannanshire
- East Lothian
- City of Edinburgh
- Falkirk
- Fife
- Midlothian
- Scottish Borders
- West Lothian

1.3 This Act also set the requirement to produce a statutory RTS to provide a strategic framework for transport management and investment for the Partnership area.

1.4 The Draft RTS has been prepared to replace the Regional Transport Strategy 2015 -2025 Refresh published in July 2015. It replaced the original SEStran Regional Transport Strategy 2008 –2023 published in November 2008.

1.5 An Officers Group have reviewed the draft strategy in the context of national policy, local challenges and opportunities created through the establishment of SOSE and the regions involvement in two growth deals.

1.6 From this review it is clear that the draft strategy does not properly represent the Scottish Borders and should be significantly changed to reflect more rural challenges and solutions.

1.7 It is proposed that Scottish Borders Council submit a structured response through the SEStran consultation portal and a detailed response to clearly articulate the areas where change is required in the draft strategy. The draft responses are provided in Appendix 1 & 2. Without an honest and detailed response the final strategy will not reflect the challenges and ambition of the Scottish Borders, leaving the region without the leverage to support cross boundary and local transport projects that are vital for our communities.

1.8 SEStran also use the draft strategy to highlight the historic constraints that have hindered their delivery of cross boundary transport projects in the past and identify that there are discussions ongoing with Transport Scotland regarding further powers and funding for SEStran. Developments will be monitored by Officers and communicated back to Scottish Border Council at the appropriate point.

1.9 SEStran's programme for approval of the final Regional Transport Strategy indicates the ambition to seek approval from their board in March 2022. It is proposed that the Council requests a written response from SEStran on how they have actioned the Council's comments so that we can consider the Council's approach to being involved in the final approval process.

1.10 The Scottish Government will publish the draft Strategic Projects Review 2 on the 20 January 2022 (following the publication of this report) and it will inform transport investment programme in Scotland over the next 20 years (2022-2042). Any implications of this draft investment commitment on the Council's review of the Draft Regional Transport Strategy will be highlighted at the Council meeting.

2 RECOMMENDATIONS

2.1 **I recommend that Scottish Borders Council:-**

(a) Agrees that the finalised strategy should fully reflect the challenges and ambition of the Scottish Borders;

(b) Agrees that the finalised strategy should specifically address the comments identified in Section 4 of this report;

(c) Approves the online questionnaire responses provided in Appendix 1, for submission to SEStran on, or before 11 February 2022;

(d) Approves the detailed response provided in Appendix 2, for submission to SEStran on, or before 11 February 2022;

(e) Agrees that officers request a written response from SEStran on how Scottish Borders Council's comments have been incorporated into the next draft of the Strategy prior to the planned approval in March 2022;

(f) Agrees that a further update should be brought back to Council as the discussions develop regarding potential additional powers and funding being allocated to SEStran.

(g) Consider any implications on the Council's views on the Draft Regional Transport Strategy following the publication of the Scottish Governments Strategic Transport Review 2 on 20 January 2022.

3 BACKGROUND

3.1 The Draft Regional Transport Strategy (RTS) for the South-East of Scotland has been prepared by the South-East of Scotland Regional Transport Partnership (SEStran) which was set up under the Transport (Scotland) Act 2005. It covers eight constituent local authorities:

- Scottish Borders
- Clackmannanshire
- City of Edinburgh
- East Lothian
- Falkirk
- Fife
- Midlothian
- West Lothian

3.2 This Act also set the requirement to produce a statutory RTS to provide a strategic framework for transport management and investment for the Partnership area

3.3 The Draft RTS has been prepared to replace the Regional Transport Strategy 2015 -2025 Refresh published in July 2015. It replaced the original SEStran Regional Transport Strategy 2008 –2023 published in November 2008.

3.4 SEStran confirm that the Draft RTS has been prepared in accordance with RTS development guidance (Transport Scotland, 2006), the Scottish Transport Appraisal Guidance (STAG) and all relevant legislative and policy requirements. It is supported by a suite of evidence drawn from published policy documents, data analysis as well as stakeholder and public consultation. This has been set out in the documentation accompanying the development of the RTS:

- This includes a STAG Case for Change report which details the problems and issues that need to be tackled by the RTS as well as defining options to address them along with the strategy objectives.
- The options which emerged from the Case for Change also underwent appraisal with the findings outlined in the STAG Preliminary Options Appraisal report.
- A Strategic Environmental Assessment (SEA) and Equalities Impact Assessment (EqIA) processes have been undertaken, each of which has identified key environmental and equalities issues which need to be addressed in the new RTS.

3.5 The Draft RTS sits within and is being developed in the context of a policy hierarchy which spans the national, regional and local levels. It is being developed within the policy framework provided by the National Transport Strategy 2 which was published in February 2020. It set out four strategic priorities:

- Reduce Inequalities
- Take Climate Action
- Help Deliver Inclusive Economic Growth
- Improve Our Health & Wellbeing

As well as defining a Sustainable Travel Hierarchy

1. Walking & wheeling
2. Cycling
3. Public Transport
4. Taxi's & shared transport
5. Private car

These four priorities and hierarchy have been used to guide the development of this Draft RTS.

4 CONSULTATION RESPONSE

4.1 Appropriate Officers across the Authority have undertaken a detailed review of the draft strategy and the following themes have emerged:

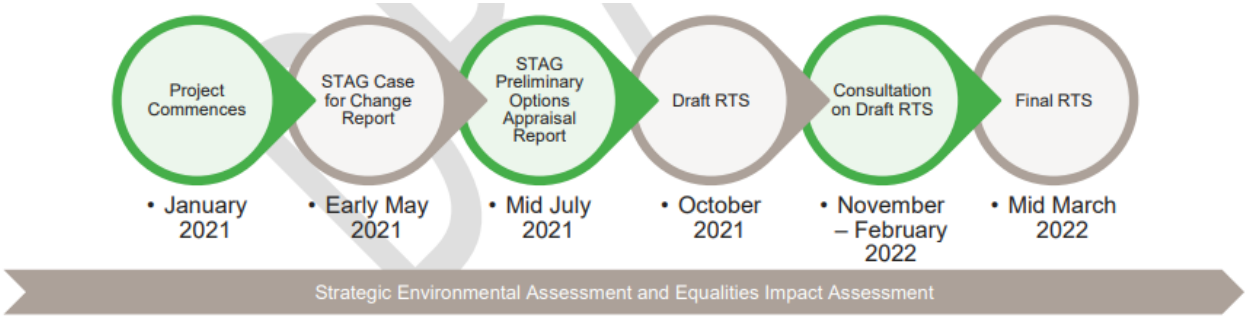
- There needs to be more differentiation between urban and rural areas. The document seems to be heavily skewed to urban challenges and solutions. There is no recognition of the role that rural regions make to the overall transport network, other than travelling into Edinburgh;
- The draft strategy needs to acknowledge the important linkages of the region to the south into northern England; west to Dumfries & Galloway, South Lanarkshire and Glasgow; and north into Perth & Kinross and beyond. These corridors and linkages provide important opportunities for the SEStrans region and the Scottish Borders;
- There needs to be support for the development/delivery of the Borders Railway extension, improvements on the existing line and action to maximise the integration of Reston Station into the east coast mainline so that it supports the community and a modal shift. There is a clear opportunity to support these strategically important infrastructure projects in sections 9.1 & 9.3 of the RTS;
- There should be more emphasis on the correlation between good transport and good digital connectivity. Digital equality across the region will support an integrated and connected transport network especially in rural areas.
- The final strategy should have significantly more emphasis on increasing public confidence in public transport following the national messaging to avoid public transport during COVID 19. Also there is a lead role to play in behavioural change and public education to support sustainable transport choices to help deliver the strategy vision.
- The 'Vision' and 'Objectives' need to have clear alignment with National Transport Strategy 2, the Just Transition recommendations and support the ambition of regional Economic Strategies and Growth Deals.
- The links back to the strategy 'Vision' and 'Objectives' needs to be clearly articulated throughout the document. The core linkages seem to get too lost in each section to accurately define how the actions will help deliver the strategy objectives. There also needs to be clear and measurable outputs for each action so that they are quantifiable and link to the Monitoring and Evaluation section of the strategy.

- There is a significant number of actions within the draft strategy without clarity on ownership, how they will be funded, delivered or programmed;
- The document would benefit from being shortened, especially in comparison with other regional strategy documents such as the Regional Economic Strategy, the Indicative Regional Spatial Strategy for the South of Scotland and the Edinburgh & South East Scotland City Region Deal Regional Prosperity Framework;

4.2 These are all key themes that need to be addressed in the final strategy so the vison, objectives and actions respond to the challenges of the Scottish Borders and supports the ambition of the region. A detailed response has been produced by Officers (contained in **Appendix 2**) that suggest areas of the strategy that need to be amended to mitigate concerns and make the final strategy representative of the Scottish Borders.

4.3 SEStran have created an online virtual consultation portal with specific questions to be answered as a consultee. The questions on the portal provide an opportunity for a high level response to be submitted, so it is proposed that Scottish Borders Council respond via the portal with the answers in **Appendix 1**, but also provide a detailed written response to reflect comments across the whole document, as per the draft in **Appendix 2**.

4.4 SEStran indicates that following the consultation process, they will work to finalise the strategy in March 2022. It is Officer's opinion that we require written feedback from SEStran on their review of our comments, to confirm what has, and has not been incorporated into the final strategy document. This response should be brought back to Council for consideration and influence our approach for involvement in the final SEStran approval process.



5 SESTRAN'S USE OF STATUTORY POWERS

5.1 SEStran have highlighted key constraints for delivering cross boundary projects since 2008 as:

'*This was largely attributed to difficulties with the existing delivery mechanisms and in coordinating cross-boundary and multi-partner schemes. In addition, given SEStran's position as a 'Level 1' Regional Transport Partnership and the limited statutory powers this conveys along with a lack of dedicated funding to support delivery of the RTS, it was highlighted that the current regional governance arrangements present a constraint to the delivery of cross-boundary schemes and interventions emerging from the RTS*'.

5.2 In Section 3.2 of the Draft Strategy, SEStran has highlighted that an interim solution to this issue maybe:

'*…the Transport (Scotland) Act 2005 (2005 Act) allows for arrangements and associated functions that could be developed for cross boundary or multi partner RTS schemes which can be agreed and brought into effect through the provisions of sections 10 and 14 of the 2005 Act. SEStran, in consultation with its constituent authorities and other stakeholders, will consider use of these powers as appropriate in relation to such schemes.'*

5.3 The request for the use of Statutory Powers by SEStran will require detailed consultation with the LA partners and any recommendations will require approval through statutory process, following validation by each Local Authority. SBC will engage proactively with this consultation process, when it takes place, and bring any recommendations back to Scottish Borders Council at the appropriate time.

5.4 Section 3.2 also confirms that:

'As part of development of the National Transport Strategy 2 work to review transport governance was undertaken by the Roles and Responsibilities Group. The review also recognised this barrier (lack of statutory powers) to delivery. The Roles and Responsibilities group continue to consider this issue and until a decision or direction is given this barrier could continue to affect the ability for SEStran and its partners to deliver cross-boundary and multi-partner schemes that emerge from the new RTS.'

5.5 Council officers will continue to monitor the development of this issue through involvement in SEStran forums and provide any information and/or reports to Council committees as this topic develops.

6 STRATEGIC TRANSPORT PROJECTS REVIEW 2

6.1 The second Strategic Transport Projects Review (STPR2) will inform the Scottish Government's transport investment programme in Scotland over the next 20 years (2022-2042) and will help to deliver the vision, priorities and outcomes for transport set out in the National Transport Strategy (NTS2). It will align with other national plans such as the Infrastructure Investment Plan, National Planning Framework (NPF4), Climate Change Plan and the National Strategy for Economic Transformation.

6.2 The announcement for STPR2 is programmed for 20 January 2022 in advance of the publication of this report, so any implications on the key theme of our review of the Regional Transport Strategy will be verbalised at the Council meeting for consideration and approval.

6.3 A separate detailed review will be undertaken on the draft STPR2 and taken through the appropriate Council approval process.

7 IMPLICATIONS

7.1 Financial

There are no costs attached to any of the recommendations contained in this report.

7.2 Risk and Mitigations

(a) It is important that we are authentic in our response to the Draft Regional Transport Strategy and clearly state that in its current form it is not representative of the Scottish Borders. Without an honest and detailed response the final strategy will not reflect the challenges and ambition of the Scottish Borders, leaving the region without the leverage to support cross boundary and local transport projects that support our communities.

(b) The drafting of the current document is very city focused and doesn't acknowledge the importance of the Scottish Borders connections into northern England, Dumfries & Galloway and South Lanarkshire. This has been highlighted in the draft response and needs to be addressed in the final strategy to maximise the opportunities for the region.

(c) There is currently no mention of the Borders Railway, whether it is improvements to the existing line or the proposed extension. This is a priority project for the region and needs to be addressed in the final strategy.

(d) Absent from the draft strategy is the support required to develop the Reston Station proposals further to enable it to operate to its full potential for the region. SEStran should play a key role in this process to lobby Scottish Government and Network Rail to deliver facilities and timetabling that supports the Berwickshire communities' access opportunities, services and help reduce the reliance on the private car. This has been highlighted in the draft response and needs to be addressed in the final strategy.

7.3 Integrated Impact Assessment

No Integrated Impact Assessment required for this report. This report details the proposed Scottish Borders Council's consultation response to the SEStran Regional Transport Strategy. The proposed response does highlight that there needs to be a greater emphasis on rural areas, the challenges, ambitions and solutions for the benefit of our communities. SEStran have completed an IIA as part of their Strategy development process, it highlights positive and negative implications for the groups identified in this assessment. The SEStran IIA can be found at the link below:

https://sestran.gov.uk/publications/sestran-2035-equalities-impact-assessments/

7.4 Sustainable Development Goals

The finalised Regional Transport Strategy will positively impact the Sustainable Development Goals in the following ways:

- There will be a step change to the prioritisation of transport projects to reduce inequalities, improve wellbeing and inclusive growth. Local equity and accessibility will be regional priorities.
- Active travel sits at the top of the new transport hierarchy, so further investment and behavioural change will benefit the health & wellbeing of our communities.
- Building resilient infrastructure and transport solutions are at the core of the proposed strategy.

- The safety of users on the transport system is a fundamental principle of the draft strategy, which is specifically important for a transition to active travel solutions.
- All of the actions within the draft strategy are focused on delivering the national net zero targets.

7.5 Climate Change

The final SEStran Regional Transport Strategy will identify methodologies for reducing impacts, include direct and indirect greenhouse gas emissions, resulting from regional transport projects. This report provides a proposed consultation response to the draft SEStran Regional Transport Strategy to highlight the need for linking the actions back to the vision of carbon reduction. As this is just a consultation response to a new strategy being delivered by and external organisation, SEStran have already completed an Integrated Impact Assessment (IIA) and Strategic Environmental Assessment (SEA) as part of their Strategy development process. This will highlight positive/negative implications and mitigation for the actions identified in the Climate Change checklist. The SEStran IIA and SEA can be found at

https://sestran.gov.uk/publications/

7.6 Rural Proofing

The final SEStran Regional Transport Strategy will identify methodologies for reducing impacts and providing benefits for rural areas resulting from regional transport projects. This report provides a proposed consultation response to the draft SEStran Regional Transport Strategy to highlight the need for equitable benefits across the whole region. As this is just a consultation response to a new strategy being delivered by and external organisation, SEStran have already completed an Integrated Impact Assessment (IIA) and Strategic Environmental Assessment (SEA) as part of their Strategy development process. This will highlight positive/negative implications and mitigation for the actions identified in the Climate Change checklist. The SEStran IIA and SEA can be found at

https://sestran.gov.uk/publications/

7.7 Data Protection Impact Statement

There are no personal data implications arising from the proposals contained in this report.

7.8 Changes to Scheme of Administration or Scheme of Delegation

NA

8 CONSULTATION

8.1 The Director (Finance & Corporate Governance), the Monitoring Officer/Chief Legal Officer, the Chief Officer Audit and Risk, the Director (People Performance & Change), the Clerk to the Council and Corporate Communications have been consulted on this report and comments received have been incorporated into the final report.

Approved by

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Background Papers: NA
Previous Minute Reference: NA

Note – You can get this document on tape, in Braille, large print and various computer formats by contacting the address below. Jacqueline Whitelaw can also give information on other language translations as well as providing additional copies.

Contact us at Jacqueline Whitelaw, PLACE, Business Support, Scottish Borders Council, Council Headquarters, Newtown St Boswells, Melrose, TD6 0SA, Tel 0300 100 1800, email JWhitelaw@scotborders.gov.uk.

APPENDIX 1 – Draft Response to Online Questionnaire

1. In Chapter 3 the draft RTS has identified 29 individual transport challenges and problems, do you agree or disagree that these provide an appropriate focus for the RTS?

   ANSWER:

   Yes in part.

2. Do you feel there are any other transport challenges and problems which have been missed?

   ANSWER: Yes

Additional challenges to be added should be:

- *The public transport travel information and ticketing landscape is too complicated and spread across multiple places so it makes it difficult for passengers to plan journeys and buy the best value tickets.*
- *The integration between operators and different modes of transport is not coordinated so it makes it difficult for passengers to plan journeys and buy the best value tickets.*
- *Data is not shared across commercial services so that there is better strategic planning of the transport network.*
- *The power network does not have the resilience to support the on-street EV charging ambition.*
- *The current model of Local Authority led EV charging infrastructure is not sustainable in the long term as the infrastructure created a high resources demand for operation and maintenance support, with regular technology updates and customer support. This has led to high instances of inoperable charging infrastructure that affects public confidence. With the anticipated growth in demand, the private sector delivery and operation model needs to be developed in urban and rural areas to facilitate a transition to companies that have the experience and resources to deliver a network to meet the future demand.*
- *The reputational damage caused to the public transport system during the COVID response have not yet been countered with positive encouragement to re-engage with the services. Public transport is only at 50-70% of its original patronage and to ensure longevity there needs to be sustained growth.*

3. The RTS vision is set out in Chapter 4. Do you agree or disagree that this should be the vision for the new RTS?

   ANSWER:

   Yes in Part. Additional themes to be added should be:

   - *The inclusion of wording that reflects that all of our transport modes need to be fully integrated (physically and through information, ticketing and data sharing).*
   - *Also the development of the strategy will support a 'Just Transition' toward Net Zero. A vision that ensures that the benefits of a transition to a net*

zero economy are shared widely, while also supporting those who stand to lose economically.

4. The Strategy Objectives are outlined in Chapter 4. Do you agree or disagree that these should be the Strategy Objectives for the new RTS?

   ANSWER:

   Yes in Part.

5. Do you think any other Objectives should be considered for the new RTS?

   ANSWER: Yes

   Additional objectives to be added should be:

   - *A strategy objective that will support a 'Just Transition' toward Net Zero. An objective that ensures that the benefits of a transition to a net zero economy are shared widely, while also supporting those who stand to lose economically.*
   - *Also think an objective is required to support 'Inclusive' economic growth, aligning the strategy with NTS2 and to support the regional economic ambitions.*

6. We have identified 'Shaping development and place' as one of the key themes for the RTS in Chapter 5. How important is this theme to you?

   ANSWER:

   High Importance.

   - *Infrastructure first principles included in the draft NPF4. The Transit Orientated Development needs to align closely with the final NPF4 and be clearer in its ambition and practical delivery.*
   - *Putting the burden of cost on developers to deliver more solutions is of concern from a rural perspective, where developments are smaller and house prices are lower than central Scotland.*

7. We have identified 'Delivering safe active travel' as one of the key themes for the RTS in Chapter 6. How important is this theme to you?

   ANSWER:

   High Importance.

   - *The role that Active Travel takes in the future transport network is important to deliver the objectives of the RTS, but also other regional and national policies (health & wellbeing, carbon reduction etc). The barriers to the use of Active Travel, highlighted in the RTS can only be overcome with an approach to enhance the standards and investment in this vital form of infrastructure.*
   - *The delivery of Active Travel has to be undertaken in an overarching vision of how it fits within a connected network to support public transport, placemaking, rural and urban development. Each transport option has a role to play and it isn't a one size fits all across the SEStran region.*
   - *The role of Active Travel also has to acknowledge the seasonal variations in usage due to weather and darker winter evenings.*

8. We have identified 'Enhancing access to public transport' as one of the key themes for the RTS in Chapter 7. How important is this theme to you?

   ANSWER:

   High Importance.

   - *'Physically accessible' should also cover having access to a bus in the first instance. As per the RTS Main Issues report, 5% of people across the region are without access to public transport and 9% in the Scottish Borders.*
   - *Believe that this section does not fully respond to the 29 challenges in Chapter 3 and we need it to respond to the additional challenges identified in this consultation response.*
   - *The role of Active Travel also has to acknowledge the seasonal variations in usage due to weather and darker winter evenings.*

9. We have identified 'Enhancing and extending the bus service' as one of the key themes for the RTS in Chapter 8. How important is this theme to you?

   ANSWER:

   High Importance. However:

   - *This section again doesn't recognise the differences between urban and rural challenges.*
   - *There is no reference to the data gathered and analysed through the Workforce Mobility project as validation of the regional differences and scale of the challenges.*
   - *The role of Demand Responsive Transport is valuable in rural and urban contexts, but it is not a whole system solution for rural areas.*
   - *Again, SEStran has a huge opportunity to lead the educational and behavioural change agenda for public transport, repairing public confidence from COVID and leading a generational change to make more sustainable transport decisions.*

10. We have identified 'Enhancing and extending the train service' as one of the key themes for the RTS in Chapter 9. How important is this theme to you?

    ANSWER:

    High Importance. However:

    - *We would like to see a specific mention of the Borders Railway extension.*
    - *We would like to see specific mention of improvement work for Borders Rail (Phase 1) i.e. more dynamic loops, more carriages and electrification.*
    - *We would like to see more support for service provision at Reston Station.*
    - *We see SEStran having an important role in lobbying Scottish Government and Transport Scotland for better integration of rail services into the wider transport network. This should include partnership working, shared information, shared ticketing and better active travel connectivity (more disabled and on train bike storage for example).*

11. We have identified 'Reallocating roadspace on the regional network' as one of the key themes for the RTS in Chapter 10. How important is this theme to you?

    ANSWER:

    Medium Importance.

12. We have identified 'Improving integration between modes' as one of the key themes for the RTS in Chapter 11. How important is this theme to you?

    ANSWER:

    High Importance. However:

    - *We see SEStran having an important role in lobbying Scottish Government and Transport Scotland for better integration of rail services into the wider transport network. This should include partnership working, shared information, shared ticketing and better active travel connectivity (more disabled and on train bike storage for example).*
    - *We see SEStran having an important role in lobbying Scottish Government and Transport Scotland for better integration information and ticketing across the region and Scotland. Obtaining clarity on a single Mobility as a Service solution to include multiple modes without adding to the ticket prices of the customer.*
    - *Again, SEStran has a huge opportunity to lead the educational and behavioural change agenda for public Transport, repairing public confidence from COVID and leading a generational change to make more sustainable transport decisions.*

13. We have identified 'Decarbonising transport' as one of the key themes for the RTS in Chapter 12. How important is this theme to you?

    ANSWER:

    High Importance. However:

    - *There is an opportunity for SEStran to help carry out further work to help LA's especially around EVs and hydrogen*
    - *We see SEStran having an important role in ensuring the journey to Net-Zero is undertaken in a way that support a 'Just Transition' for the whole region and supports 'inclusive economic growth'.*
    - *Again, SEStran has a huge opportunity to lead the educational and behavioural change agenda for public Transport, repairing public confidence from COVID and leading a generational change to make more sustainable transport decisions.*

14. We have identified 'Facilitating efficient freight movement and passenger travel' as one of the key themes for the RTS in Chapter 13. How important is this theme to you?

    ANSWER:

    High Importance. However:

- *This will be led by Transport Scotland on Trunk Road infrastructure. The local provision that are being proposed may not be deliverable in a rural context due to density of population and demand.*

15. We have identified 'Working towards zero road deaths and serious injuries' as one of the key themes for the RTS in Chapter 14. How important is this theme to you?

    ANSWER:

    High Importance. Further comment:

    - *The policy on 20mph zones specifically mentions the urban environment but not rural. This need to be clarified, and it is suggested the SEStran review the SBC report on the regional pilot project that went to Council in December 2021 regarding the proposed approval of our 20mph schemes.*

16. We have identified 'Reducing car kilometres' as one of the key themes for the RTS in Chapter 15. How important is this theme to you?

    ANSWER:

    High Importance. However:

    - *This section misses the point in terms of trying to deliver public transport improvements for rural areas to enhance the reduction in private car usage. Need rural solutions, where car will always form a large part of the transport jigsaw for rural communities. Need to focus on infrastructure first investment for the short journeys.*
    - *There is no priorities around education and generational shift in view. A big part of this strategy should be education, communication and encouragement of the long term sustainable chance to daily transport habits.*

17. We have identified 'Responding to the post-Covid world' as one of the key themes for the RTS in Chapter 16. How important is this theme to you?

    ANSWER:

    High Importance. However:

    - *The final strategy should have significantly more emphasis on increasing public confidence in public transport following the national messaging to avoid public transport during COVID 19. Also there is a lead role to play in behavioural change and public education to support the right transport choices to help deliver the strategy vision.*
    - *The better utilisation of data and information sharing will form a big part to the COVID recovery. Ideal location to mention the Edinburgh & South East Scotland City region Deal Workforce Mobility Project that is working with anchor employers to analyse employee postcode date to help optimize the transport network and enable the latent commuting demand to shift to sustainable transport options. Also, working with Government, employers and operators to identify incentives that make the change affordable and flexible compared to the private car.*
    - *Only one paragraph referencing professionals working from home, I don't think this has been taken into account fully and how that working pattern HAS and WILL reflect on commuter passenger numbers into the future.*

18. In Chapter 17 the spatial strategy identifies two themes to direct where individual projects should be progressed. Do you agree or disagree that these themes provide an appropriate focus for interventions emerging from the new RTS?

ANSWER:

Disagree. Additional considerations to be added should be:

- *Overall this section should align with the principles of NPF4 and the ambitions in the various regional Economic Strategies and growth Deals.*
- *Also we need to remember that we need a focus on stronger links outside the SEStran region to the north, west and south into England.*
- *From a Scottish Borders perspective there are a significant volume of journey within the region or to non-SEStran's regions and these need to be better catered for within the Strategy. This will require cross regional working with other Regional Partnerships.*
- *Again, SEStran has a huge opportunity to lead the educational and behavioural change agenda for public Transport, repairing public confidence from COVID and leading a generational change to make more sustainable transport decisions.*

19. In Chapter 18 a set of Key Performance Indicators (KPIs) linked to the Strategy Objectives are set out. Do you agree or disagree that these KPIs provide an appropriate means to monitor performance of the RTS?

ANSWER:

Disagree. Additional considerations to be added should be:

- *The links back to the strategy 'vision' and 'Objectives' needs to be clearly articulated throughout the document. The core linkages seem to get lost in each section to accurately define how the actions will help deliver the strategy objectives. There also needs to be clear and measurable outputs for each action so that they are quantifiable and link to the Monitoring and Evaluation section of the strategy.*
- *The KPI's drafted in this section are not measurable as there is no baseline data and there is no objective to increase or reduce the baseline data by a prescribed value.*
- *The KPI's mentioned in this section are the means of monitoring progress and need defined targets to achieve, so that performance can be monitored and action taken to deliver the desired outcomes.*

20. If you have any comments to make on the Equalities or Strategic Environmental Assessment documents, please do so in the boxes below

ANSWER:

No

21. If you have any other comments regarding the RTS which have not been covered within the survey, please add them below

ANSWER:

A full list of comments will be provided separately, as per Appendix 2 of this report.

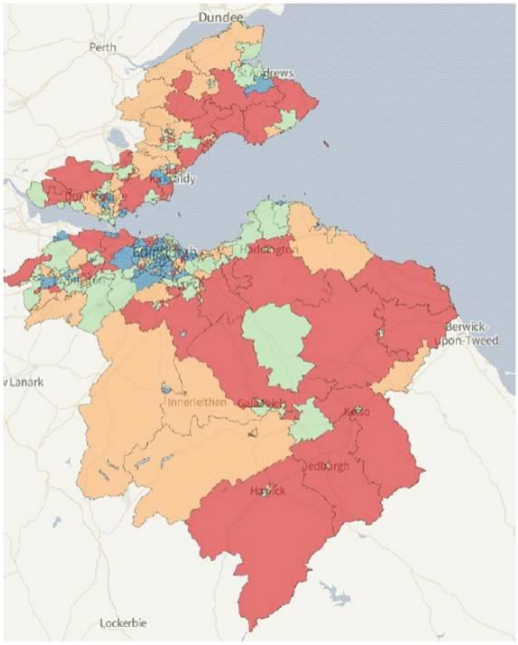
APPENDIX 2 – Draft Detailed Response Following Whole Document Review by Officer Group

Section/page number	Comment
General	The document needs to include photos and graphic that reflect the whole region. The current selection supports the view that this document is predominately urban focussed and is not representative of all the SEStran partners.
Page 2	Don't like the reference that Scott Borders is the 'Hinterland'. Also the correct name is the 'Scottish Borders'.
Page 4	It should be noted that these projections do not reflect the potential impact of Brexit on net-migration which has been the primary driver of growth in recent years - This could have a big impact can assumptions not be made (based on reliable sources) and factored in?
	New Ways of Working (as a result of Covid) will impact where population growth occurs? Can assumptions be made (based on reliable sources) and factored in?
Page 7	Repetition from previous page. Word missing 'overview of the spatial strategy is shown in A…'
	IRSS diagram of page 7 is not finalised version (should not include green networks in SBC)
Page 8	The RPF is now approved and moving to a deliver plan. Need to mention SOSE & Regional Economic Strategy
Page 10	User perspective 'Complexity of transport information' is a barrier, so is 'lack of coordinated services and modes' and 'an overlay complex transport network'
SECTION 3	
Page 13	Need a regional and rural perspective in here. The region isn't just served by Lothian Buses
Page 13	Where does the reference "The majority of the most 'at risk' population was situated in urban areas" come from? There are high risk populations across the whole region.
Page 13	Who provided the passengers surveys? Is it reflective of the whole region?
Page 14	Mention of surveys again. What surveys? Can you reference where the surveys info comes from and is it representative?
Page 15	Good to see the below is included as a problem: 15. Combining cycling and public transport use is not possible: few buses and trains have facilities to carry bikes whilst those that do have low capacity which creates a degree of uncertainty for users. Finally, the further rollout of bike-buses presents an additional opportunity to improve integration between modes. These have been successfully introduced by Borders Buses with 23 bike friendly vehicles now available with space for between 2 - 4 bikes. These have enabled people to combine bike and bus journeys where previously this wouldn't have been possible. In the future similar provision should also be further extended on train services where practical f) Opportunities should be sought to expand the provision of bike-buses across the region to facilitate more integrated journeys. Actions Work with partners to deliver more buses in the region with the facilities to carry bikes.
Page 17	What was the public survey? How far reaching across the region was it?
	"Public Consultation: A public survey was undertaken online over a six-week period between Monday 8th March 2021 and Monday 19th April 2021. This explored pre-pandemic travel patterns, anticipated post-pandemic travel behaviour along with the reasons for these travel choices. In total 998 responses were received." – Would it be possible to share this data with the partner LA's and the Workforce Mobility Project and a full breakdown of the results?

Page 18	Charger problems/unavailability across the region from the burden of LA's having to operate and maintain has created a negative experience for users. Feedback from SBC
Page 19	The request for the use of Statutory Power by SEStran will require detailed consultation with the LA partners and any recommendations will require approval through statutory process, following validation at each LA. SBC will engage proactively with this consultation process.
SECTION 4	
	Should it be strategic objectives instead of strategy objectives?
Page 21	Could the regional mobility themes be related to urban-rural classification?
Page 22	Grey Box –Additional points required: - Coordinated Transport Network required - Simplifying information and multi-modal ticketing - Affordable transport to support NTS2 hierarchy
	Very little mention of working with other RTPs or cross Border relations with our colleagues to the South, Lanarkshire or D&G. SESTRANS maybe should look at more holistic view.
SECTION 5 – Shaping Development & Place	
Page 24	Transit Orientated Development (TOD) – Is there not already pressure on these corridors? These should be sustainable access corridors. How will this reduce inequalities across the region? Does it increase the gap between urban and rural? How does this support rural jobs and economy? it seems based on a hub and spoke model that all employment and opportunities are in Edinburgh, which is contrary to NTS2, RPF and SoS RES. The draft NPF4 supports a principle of sustainable infrastructure first, but also confirms that is won't accept the sub-urbanisation of rural areas. This creates a conflict in rural areas, but promotes wider/equitable investment. Can you please check and align this section with NPF4? Transit Orientated Development – Needs further exploration with Planning partners – lets simplify the language;
Page 24	20min neighbourhoods – acknowledgement that this is an urban solution which is good. What is the solution in rural areas? Do we look at key connections between Active travel with bus/train (including bike for first mile/last mile) Need to see a rural equivalent of the 20 min neighbourhood;
Page 24	Zero Car development – again this could be an urban solution only. How do you build the commercial incentive for this in the market for developers? The customer has to want this solution for the developer to deliver. What about rural areas? Car sharing communities? Again, getting in line with NPF4 in this section would be helpful.
Page 25	Developer contribution is already a heavily used mechanism in rural areas. Rural developers are already pushed on contributions and margins, based on lower house prices. Could this be assigned to TOD developments? Legislation should only be in relation to certain types of developments, phased graduation to the principles, as the market may not be ready for this yet? Again NPF4 coordination would be helpful
	I don't think LAs will welcome the request for audits for LDPs and other relevant strategies.
SECTION 6 – Delivering Safe Active Travel	
Page 27	Strategic Active Travel network misses the ambition from the SBC LATS Main Issues report in 2015. There is a more extensive ambition in the Scottish Borders. Berwickshire is not covered, neither is the Borderlands Destination

	Tweed, national cycle routes or the Coast 2 Coast development etc..
Page 27	The phase 2 developments are already in place, so all programmed for phase 4 & 5 in the region. Can we have some clarity on the rationale for the phasing please?
Page 27	Why is there no apparent alignment with SUStran design standards? Widths, segregation, lighting etc. The key rule from SUStran is, can a 12 year old safely use the route unaccompanied?
Page 28	Fully supportive of the role of active travel. Bike storage in housing and business developments is key to help adoption. Again, this could be fed back into the NPF4 consultation from SEStran. It would also be more representative if there we more example pictures from across the whole region. GO ebike is another urban solution, how can we roll out equitably across the region?
	Barriers to bike ownership, cost, storage, safety, personal safety, instruction, weather, lack of parking at workplace, lack of welfare facilities at workplace for cyclists. eBikes are a distraction from the real problems not a solution, the public will still need to store, park and use them safely.
Page 29	Is the picture representative of the user? How do we get multiple generations and backgrounds using the bikes? How do we make it equitable? Do we involve the 3rd sector, NHS etc
Page 29	A comment for all of this section – There is no priorities around education and generational shift in view. A big part of this strategy should be education, communication and encouragement of the long term sustainable chance to daily transport habits. Sorry if I have missed this theme and action.
	More funding for feasibility would be really useful for LAs;
	Would like to see more action on E-bike infrastructure and how this links to mobility hubs and EV charging, possibly more feasibility work;
SECTION 7 – Enhanced Access to Public Transport	
Page 31	Physically accessible should also cover having access to a bus in the first instance. As per the Main Issues report 5% of people across the region are without access and 9% in the Scottish Borders.
Page 31	Information – agree with the text, but it doesn't go far enough. The information where there is more than one services provider or transport option is difficult and complex to access. A single place for all transport information is required in multiple formats.
Page 31	RTI is great where it works and is installed, but there is not 100% network coverage. Commitments around this and improving digital connectivity across the whole region is essential. The first step on the Transport Hierarchy should be digital connectivity and avoiding the need to travel in the first place.
Page 32	Affordability is a key barrier for both the customer and the operator. The English BSIP's are moving away from a commercial orientated approach to bus transport and looking at investment of profits in the wider network to reduce inequalities and increase the level of services. The network is still provided by the private sector whether through a JV or Franchise. The status of bus services and funding for Local Authorities needs to be protected to allow investment & growth to encourage more passengers, thus reducing subsidies in the longer term and helping to deliver Net Zero
Page 33	Good case study, but Greater London has a fully coordinating role, which isn't the case out-with Edinburgh. Forced car ownership point good. Fully integrated travel information and ticketing essential.
Page 33	A comment for all of this section – There is no action about reversing the trend from COVID. There should be a communication exercise prioritised to re-assert public confidence in using the bus. There is no priorities around education and generational shift in view. A big part

	of this strategy should be education, communication and encouragement of the long term sustainable chance to daily transport habits. Sorry if I have missed these themes and actions.
	Overall it doesn't mention MaaS but it does come later in the report. We need better services, frequency versus price, high volume commuter flows need to be identified, shake up of bus timetables to meet peak demand, rail services need to integrate with the bus, integrated ticketing.. SESTRANS to lobby and influence industry please
	SEStran should be concentrating on working with Scottish Government and other Regional Transport Authorities to deliver improved ticketing arrangements for the whole of Scotland;
SECTION 8 – Enhancing and Extending the Bus Service	
Page 35	Overview – Why not mention that buses transport 4x as many passengers as rail but receive ¼ of the funding. This should help build the argument for further investment.
	BRT – doesn't really reflect the rural barriers of long distances and multiple settlements to services to be commercially viable. Need cross referencing with the whole tool box of transport options in a coordinated way. Not a one size fits all solution for the region.
Page 36, 37, 38,	There does not seem to be recognition of rural issues in the report or in the workforce mobility the Workforce Mobility Deprivation Index developed for the City Region Deal Edinburgh & South East Scotland. Overview of the Workforce Mobility Deprivation Index has been shared with the Improvement Service. • To have a context by which to identify areas where there are challenges for workforce mobility. • Working with intermediate zones (IZ) for each of the local authorities within the City Region Deal Edinburgh & South East Scotland. • Each of the 4 components impact on workforce mobility o People living in 15% most 'access deprived' areas –rurality/ transport / digital o Population income deprived –reflecting income challenges o Working age population employment deprived –reflecting employment challenges o Educational attainment of school leavers –reflecting the potential challenges for young adults Would be helpful if the RTS uses information from the WFM Interim Baseline Report, or the final report to be published in April 2022.

	 **Workforce Mobility Deprivation Index** **Workforce Mobility Deprivation Index (WMDI)** A. Low B. Mid C. High D. Higher The report could also reference the Scottish Access to Bus Indicator – available for each data zone in Scotland reference year is 2019 https://spice-spotlight.scot/2021/11/19/where-can-i-get-a-bus/ Extract from report: About the data The Scottish Access to Bus Indicator (SABI) gives a score for the accessibility of bus services in each data zone (around 7,000 small areas in Scotland with roughly equal populations) and provides an objective measure of accessibility to public transport by bus in Scotland. This score is worked out by finding all the bus stops within 400 metres of the of the centre point of each 2011 Census Output Area, which are made up of at least 50 people and 20 households. Then they work out the average number of buses per hour within each area. The indicator provides separate scores for weekday and weekend services. The output areas are aggregated to data zones using a population weighted average. The data zones are then ordered from least to most accessible by: • quintile, where the data is split into five parts of equal size • decile, where the data is split into ten parts of equal size.
Page 39	DRT has its place across the region, but it is not the whole solution within rural areas without significant funding, as it is an expensive solution in areas with low populations and limited commerciality. If funded properly for the merits of net zero, wellbeing, reducing inequalities and inclusive growth then a wider adoption across the region would naturally happen.
	Good to see BSIP and franchise models mentioned
Page 39/40	How are these actions to be delivered and funded?
Page 40 – 8.3	Ideal location to mention the Edinburgh & South East Scotland City region Deal Workforce Mobility Project that is working with anchor employers to analyse employee postcode date to help optimize the transport network and enable the

	latent commuting demand to shift to sustainable transport options. Also, working with Government, employers and operators to identify incentives that make the change affordable and flexible compared to the private car.
	Overall it would be helpful to provide case study here about what partners are undertaken across the wider region.
	Overall most of the solution in here are urban. What about sub-urban, sub-rural and rural solutions? This would help the overall connectivity of the region and deliver the priorities of NTS2 and each LA's ambition for reducing inequalities, increasing wellbeing and opportunities for all.
	Bus corridors should mean no private cars, bus priority measures advanced signalling, bus gates at peak hours, and it just needs the support to put the measures in place. Modal shift needs to be more attractive, SESTRANS to lobby Scottish Gov and lead on Communications.
	There is no priorities around education and generational shift in view. A big part of this strategy should be education, communication and encouragement of the long term sustainable chance to daily transport habits. Sorry if I have missed these themes and actions.
	DRT provision for rural areas requires more financial support and resourcing;
SECTION 9 – Enhance and Extend the Train Service	
	I would like to see a specific mention of Borders Rail Extension;
	I would like to see specific mention of improvement work for Borders Rail (Phase 1) i.e. more dynamic loops, more carriages and electrification;
	I would like to see more support for service provision at Reston Station;
	We have looked at Edinburgh Cross Rail before and the service was really poor because of constraints at Waverley and the length of route travelled. The service runs much better now although you do require to change at Waverley. SEStran should be working with key partners to try and help resolve the constraints at Waverley such as the Calton Tunnel and the reworked Portobello Junction which has been promised for years;
Page 42	Good clear opposition to reducing rail services and frequencies
	Would also like to see hydrogen trains mentioned, as it would help generate hydrogen demand across the region that maybe helps create the critical mass for local production, thus generating economic benefits.
Page 43	9.2 Policies – Not strong enough. SBC needs clear support for the Borders railway extension and potentially new stations. This should be within this regional strategy despite what may be the position through the SPTR2 process
	9.2 f) – This is potentially counterproductive and could lead to less stops and a reduction in rural services. This needs to maybe be changed that the region wants to benefit from HS2/3/4. This again supports the East Coast Mainline and extension to the Borders Railway (especially with recent announcements about changes to HS2 commitments in the North East of England)
	9.2 h) – Agree with the principle. Can't be done in isolation. It has to be undertaken with bus transport so it is comparable, joined up and not creating more competition for passengers between the two modes. This also needs to be clear on the need to spare information and joint ticketing, rather that the rail network continuing to operate in a silo to the detriment of the vision of a fully integrated transport network.
	9.3 – Need to be a Borders Railway Extension action to lobby and provide support for the extension.
	9.3 – is this list fully representative of the ambitions of the region? Or does it just align with SPTR2
	SEStran should lead the change to get better partnership working and sharing of information from rail to other transport modes.
	Why do train services charge more at peak times, when we should be encouraging an increased use of trains rather than deterring travel and pushing

	people back into cars. If there were more carriages to take commuters it would remove the overcrowding issue that higher charging is meant to control. This could also help reduce car Km's. Is a rethink of the old peak time models required? Is our infrastructure actually resilient enough to support a modal shift (both train and bus) in its current form? What is the long term effect of flexible working on commuter habits?
SECTION 10 – Reallocating Roadspace on the Regional and Local Network	
	I am not sure we actually need this chapter. It is inherent in the NTS and the just transition and just feels an add-on here and doesn't really add anything
	Overall, this seems to be a section (like a number of others) where 'behavioural change' initiatives should be lead and supported/led by SEStran.
	There is no priorities around education and generational shift in view. A big part of this strategy should be education, communication and encouragement of the long term sustainable chance to daily transport habits. Sorry if I have missed these themes and actions.
	explore 'Golden Hour' of regional distribution, get the trucks on and off major transport corridors overnight, early morning before commuter services begin, HGV embargo during rush hour, off peak deliveries only.. SESTRANS to lobby LA's and the Freight sector to determine solutions.
SECTION 11 – Improve Integration Between Modes	
	There is an opportunity for greater integration between bus and rail when ScotRail becomes a public company and SEStran should be lobbying on this issue on our behalf;
	Agree the 'Hubs' concept is scalable. Again very reliant on good digital connectivity.
	Completely supportive of Maas. Need the aspiration to be a single Scotland wide solution so you can plan your trip on one site from Langholm to Lerwick
Figure 11.2	Not sure I would agree that Bus is a **low cost** option in a rural setting (is for those with concessions but not other users/potential users) Unless it's subsidised, DRT will be high cost for users in a Rural context
Page 50	Disagree with the spare capacity statement to accommodate DRT with existing fleet. The fleet in the Scottish Borders is utilised across fixed routes services and school services to sweat the asset. The fixed routes are running all day. The key here from an SBC perspective is to look at the fleet specification. Moving to smaller buses that are fully accessible provides the flexibility to optimise the fleet across fixed routes (where patronage number allow), school services and DRT. Again this shouldn't be done in isolation as requires the sharing of patronage data across commercial and subsidised services to optimise the network, and the Workforce Mobility project data analysis to respond to the untapped demand of the car travelling workforce. (if we can get 10% of the car travelling workforce to move to public transport it could be a significant boost to services and help target subsides to harder to reach areas through DRT)
	Bike on bus infrastructure should be mandatory across the region, especially on through routes (first mile/last mile support)
	More bike storage provision on trains (first mile/last mile support)
Page 52	There are a lot of positive items in 11.3 – How are you going to support LA's deliver these actions and how are they going to be delivered equitably across the region?
	Need to re-inforce the vision of a fully coordinated transport network, with better collaboration, information sharing, single point of information and ticketing for the public across all modes in Scotland.
	How are we going to fund this ambition?
	There is no priorities around education and generational shift in view. A big part of this strategy should be education, communication and encouragement of the

	long term sustainable change to daily transport habits. Sorry if I have missed these themes and actions.
SECTION 12 – Decarbonising Transport	
	There is an opportunity for SEStran to help carry out further work to help LA's especially around EVs and hydrogen;
Page 54	Need to explain the following statement further '*There is some debate about much less carbon intensive an EV is over its lifecycle compared to a fossil fuelled car, but there is little doubt that where a car trip has to be made, it is better made in an EV.*' How do you justify the statement? Not saying it is wrong, but what parameters is this measured against (whole life carbon?) What are the benefits?
	What are the Local/regional incentives to replace Gov Funding for EV cars & Chargers? There are a number of feasibility studies looking to deliver solution aligned with NTS 2 Delivery plan through commercial models for charging infrastructure. What is happening elsewhere in the region? There are various approaches being investigated across the region. SEStran role to share best practice across the region is a key priority on this topic and find urban and rural exemplar.
Page 55	Should this section not have more on hydrogen and link with economic strategies across the region? Again linking with Private sector providers to help deliver urban and rural solutions
	This section should include a strong position on 'Just Transition' and links to wider policies across nationally and regionally. This agenda has the potential to minimise transport costs across the region, attract new users, increase accessibility and make our environment clear for our health and wellbeing.
	Need a better balance between EV, Hydrogen and anything else that is developed in the next 10 years. This section need flexibility and needs to be open to new technologies emerging. Still a bit prescriptive at this point. The recent storms highlight the vulnerability of a fully electric system for transport and heating.
	No mention of coordination with NRSWA and the implications of private supplies in public spaces
	Should Ferry and planes be mentioned in this section?
	How do we incentivise operators to change when the prices are high and the technology is developing so quickly? In two year's time the fleet could be out of date and inefficient. Difficult position until we know if hydrogen is going to be a solution for >3.5t vehicles.
	There is no priorities around education and generational shift in views/habits. A big part of this strategy should be education, communication and encouragement of the long term sustainable chance to daily transport habits. Sorry if I have missed these themes and actions.
SECTION 13 – Facilitating Efficient Freight Movement and Passenger Travel	
Page 57	Why don't we use congestion 'hot spots' to help change public perception and accelerate a modal shift? If you get the modal shift then the 'hot spot' is removed.
	The rest area commitments need strengthened.
Page 60	Need to strengthen commitments to increase rail provisions to take freight
	13.2 a) why are we trying to increase capacity if we want a modal shift, except where there is a safety issue?
	How are these elements going to be delivered and financed
	Consolidation Centres and Rail Freight require double handling of goods, adds to time and cost and not suitable to FMCG's and Parcel sector. liability for handling product, security and safety all a concern. SEStran to lead engagement with the sector?

SECTION 14 – Working Towards Zero Road Deaths and Serious Injuries	
	This section should also link with supporting a modal shift and reducing traffic volumes
	I may have missed it, but what about police enforcement?
	The policy on 20mph zones specifically mentions the urban environment but not rural. This need to be clarified, especially with an SBC report going to Council next week regarding the proposed approval of our 20mph scheme;
	I am curious that SEStran is proposing to develop Route Action Plans?
SECTION 15 – Reducing Car Km	
	This section misses the point in terms of trying to deliver public transport improvements for rural areas to enhance the reduction in private car usage;
	There is also the issue of equipping people adequately so that they do not need to travel as much as they used to do;
	There is still the question regarding EVs in rural areas, are we supporting or are we not supporting?
	Need rural solutions, where car will always form a part of the transport jigsaw for rural communities. Need to focus on infrastructure first investment for the short journeys, but be open to shared transport and different mass transport models
	How do 'LEZ's' impact Just Transition and equalities? Need to consider the wider implication out with the urban areas that introduce these
	The actions should be delivered equitably across the region
	Digital improvements across the region as an alternative to travel in the first instance
	There is no priorities around education and generational shift in view. A big part of this strategy should be education, communication and encouragement of the long term sustainable chance to daily transport habits. Sorry if I have missed these themes and actions.
SECTION 16 - Responding to the Post Covid World	
	Great opportunity here to commit to regional communications to get people back using public transport. Hopefully the U22 roll out will help raise the profile of public transport but it needs to be undertaken for all ages.
	The better utilisation of data and information sharing will form a big part to the COVID recovery. Ideal location to mention the Edinburgh & South East Scotland City region Deal Workforce Mobility Project that is working with anchor employers to analyse employee postcode date to help optimize the transport network and enable the latent commuting demand to shift to sustainable transport options. Also, working with Government, employers and operators to identify incentives that make the change affordable and flexible compared to the private car.
	one paragraph referencing professionals working from home, I don't think this has been taken into account fully and how that working pattern HAS and WILL reflect on commuter passenger numbers into the future
	Could be opportunities as workplaces now more flexible on working hours (where appropriate) so peak congestion could reduce? What is the impact on traditional morning and evening peaks?
	Should think about referencing current inflation which could impact the cost of using public transport which is already a barrier for many.
	Bus driver shortage impact service and potentially increasing ticket prices? And transport availability? How are SEStran representing the sector with key employability agencies?
SECTION 17 – Spatial Strategies	
	Overall this section should align with the principles of NPF4 and the regional Economic Strategies
Page 74	Does this information not suggest that we should de-centralise the employment and develop the working pattern shift that has taken place as a reaction to

	COVID19?
Page 75	This regional car travel could help better inform our public transport system if we can get origin destination data and shift patterns (as per the workforce mobility project)
Page 76	It would be good to get some number behind the % figures. What number and percentage of each area don't commute into Edinburgh? What are the percentages that community within their own region? What are the percentages that commute to other SEStran regions.
	We need to remember that we need a focus on stronger links outside the SEStran region to the north, west and south into England also.
Page 79	You don't seem to have picked up all the Border Buses connection out with the region, which are important to the Scottish Borders. We can't just focus on all corridors leading to Edinburgh.
	Overall this section needs to align and reflect the ambition of the Regional Prosperity Framework and the SoS Regional Economic Strategy
	The section highlights the huge investment needed to get people out of cars and using Active Travel and mass transit options. How can this be delivered?
Page 91	Theme 2 – Where is the detail behind this statement? Sorry if I have missed it in the Section
	Is the spatial strategy correct? Does it not need to reflect how we connect between corridors