

Respondent	Comment	Recommendation
Community Planning Organisation Transportation	<p>More emphasis should be placed on car useage trend – traffic data shows a trend towards zero growth.</p> <p>In section 10 Active Travel the following objectives should be added: K3, K4, K6 and S2</p> <p>In section 15 Travel Behaviour the following objectives should be added: K4, K6 and S2</p>	<p>Traffic data shows flat levels at the majority of count sites AGREE REVISION</p> <p>AGREE REVISION</p> <p>AGREE REVISION</p>
Community Planning Organisation Chief Executives Office	<p>Para 2.1 key Transport Trends - suggested change from ‘around 20%’ to ‘around 18% of population is under 16 years ...’</p> <p>Para 2.1 suggested change from ‘and 19% is of pensionable age’ to ‘22%.’</p> <p>Para 2.2 Active travel – suggested that the reason for the difference in % of travel to work trips of less than 2km is just because the distance travelled for the settlements outwith Elgin (‘Moray as a whole’) involves travel to and from Elgin (and not necessarily their local settlement). The majority of those living in Elgin work in Elgin and this is not the case in the other settlements.</p> <p>Para 3.1 Active travel – suggested error in figures – ‘school travel plans have been developed for 49 schools...’. Notes the update on covalent at 27/4/10 states 16 of 54 schools have completed travel plans, and 49 of 54 schools are actively engaged with the travel plan process.</p> <p>Para 3.7 Traffic Management - ‘ The current UK casualty reduction targets were set for the period of...’ – suggests removal of phrase’ which relate closely to those national targets’ and reword as the local targets are exactly the same as the national ones.</p>	<p>AGREE REVISION</p> <p>AGREE REVISION</p> <p>High levels of Active Travel are observed in other key settlements e.g. Forres. Opportunity for Active Travel is highest in the main settlements. NOTED</p> <p>AGREE REVISION</p> <p>AGREE REVISION</p>

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	<p>Para 4.2.5 Moray Corporate plan 2008-2009, and Para 4.2.6 Moray Community Plan 2006-2010: Notes that these documents are out of date and reference should be made instead to Single Outcome Agreement.</p> <p>Para 4.2.7 Moray 2020</p> <p>Para 4.2.9 The Moray Council Core Paths Plan 2009.</p>	<p>Moray Single Outcome Agreement is identified at para 4.2.4. AGREE REVISION</p> <p>New strategy is to be developed with partners. AGREE REVISION</p> <p>See response from Environmental Protection. AGREE REVISION</p>
<p>Community Planning Organisation Development Services</p>	<p>Para 2.1 'Freight carried by road...' Questioned whether route listed as A98 East of Cullen should be 'west' of Cullen as this route is within Aberdeenshire area.</p> <p>Para 2.1 'Moray is Rural' – questioned the statement Moray has the fourth lowest population density of all Authorities in Scotland' Is this mainland only?</p> <p>Para 2.1 'Elgin, Keith and Fochabers/Mosstodloch display noticeable...' – suggested make reference to reservation of bypass lines for Elgin and Keith but no Scottish Government support/plans for these.</p> <p>Para 2.1 page 4 'Moray has a declining Transport Budget' – suggests that there is contradiction in paragraph. 'resulting in an effective budget cut year-on year...' yet table 1 seems to contradict this statement.</p>	<p>The data is based on permanent traffic count site west of Cullen. AGREE REVISION</p> <p>Data is taken from General Register (Census) NO CHANGE</p> <p>The Bypass lines for Elgin and Keith are identified in the MLP2008. The Strategic Transport Projects Review (STPR) does not include these Bypass options. AGREE REVISION</p> <p>Expenditure across the Council is decreasing. AGREE REVISION</p>

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	<p>Para 2.1 page 5 'Urban freedom' – suggests reference to urban freedom should be expanded upon to provide more information and a better understanding. Notes that there is further info later on page 10.</p> <p>Suggests that the analysis of transportation issues results in a general range of broad actions. Whilst committed schemes are listed and built into the Action Plan, there are no specific new proposals which would “sharpen up” the Strategy, and allow some prioritisation for actions. Questioned whether there was scope to include “desirable” schemes as well as committed ones in the Action Plans.</p> <p>Suggested that reference be added to Climate Change Bill and the need to reduce greenhouse gases from Transportation emissions which some of the themes address (eg Active Travel). Similarly suggests that there is no cross referencing to the Council’s Carbon Management Plan within the strategy, and the need for sustainable patterns of development, and related travel plans. Noted that in March 2010 the Scottish Government published guidance on the Consideration of Climatic Factors within Strategic Environmental Assessment (SEA), and thus these matters may need to be better reflected in the SEA</p> <p>Noted that air Quality/Noise at houses close to roads is monitored by Environmental Health. Noted locations where air sampling was previously undertaken. Queried whether this should be something that should be considered for action?</p>	<p>Cross reference to additional Urban Freedom information on page 10 will be inserted. AGREE REVISION</p> <p>The Action Plan is an element of the Local Transport Strategy that will evolve over time depending on budgets. Like many other local authorities there are competing demands on budgets. Implementation plans (capital and revenue) are brought forward annually and submitted for Committee approval. NOTED</p> <p>Climate Change Bill and Moray Carbon Management Plan will be added to section 4 strategy linkages and the implications for the Strategic Environmental Assessment will be reviewed. AGREE REVISION</p> <p>Air Quality is monitored by Environmental Health. The latest report suggests that there is no action required. Air Quality section within the LTS will be updated. AGREE REVISION</p>

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	<p>Para 2.4 page 6 – Suggests that there is little information on harbours (eg an expenditure table like table 1) Similarly information is scant on Cargo traffic, fish landings etc. Suggested that this category needs expanding and the needs/ options identified.</p> <p>Question 4b. Para 4.2.1 Moray Development Plan – noted to be correct on what comprises the Dev Plan, we must recognise the position with the Cairngorms National Park Area. Whilst they are in the process of adopting their own Plan, the Local Plan currently in place in S Moray part of Cairngorms is Moray Local Plan 2000. This will hopefully be a tidier arrangement by October and easier to record in the finalised LTS. Suggested reference should also have been made to the role of Supplementary Planning Guidance such as Urban Design Guide.</p> <p>Para 4.4 National Strategy Linkages – noted that Designing streets has not been included in bullet list. Noted that it is covered in para 4.4.9 but questioned whether it should also be in the bulleted list.</p> <p>Question 4c Para 6.2 Public Transport – Agrees that facilities at rail stations are limited, but suggested that the seating/ no of carriages on trains may be regarded as an issue.</p> <p>Section 6 Public Transport issues – noted that there is no reference to network capacity issues. Suggested that the need to solve Elgins traffic problems before a by-pass will be considered should be emphasised, as there is only a passing reference to congestion in</p>	<p>There is comprehensive data available in the Moray Key Transport Trend Data publication. Harbour data from this publication will be added to the LTS. AGREE REVISION</p> <p>AGREE REVISION</p> <p>Designing Streets will be added to the bullet list. AGREE REVISION</p> <p>Responses to the Moray Citizens Panel Transport Survey identified fares, frequency and capacity as rail issues. Some improvements have been achieved see First Scotrail and Hitrans response. AGREE REVISION.</p> <p>The Elgin STAG considered a range of transport options. Public transport and other options were evaluated against the key and sub objectives.</p>

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	<p data-bbox="481 247 846 279">Elgin, Fochabers and Keith.</p> <p data-bbox="481 518 1361 683">Para 6.6 Traffic Management – queries the validity of the statement stating that there are no parking capacity issues in Elgin. Also questions the situation when the existing staff relocate to the former ALDI building, and how this displacement may affect streets where there are already issues for the residents.</p> <p data-bbox="481 858 1384 1086">Section 6 – Suggested that this section would be the appropriate place to raise compliance with CO2 reductions and the acknowledgement of climate change, and even reference to climate change adaptation and the risk that climate change may pose to the road infrastructure in terms of erosion, flooding and landslides. Noted that again SEA scrutiny may be looking for these types of considerations.</p> <p data-bbox="481 1129 1397 1262">Question 4d Vision – suggested that the vision was very broad ranging and could be applied to almost anywhere in Scotland. Queried whether there was not anything distinctive that could be drawn up for a Moray vision instead.</p>	<p data-bbox="1422 247 1912 480">Public transport did not achieve as well as other options against these objectives. Never the less public transport journeys to and within Elgin are a key element of achieving the objectives of the LTS. NOTED</p> <p data-bbox="1422 518 1906 815">There are parking problems at various locations across Moray. The new Council HQ parking arrangements will provide an overall improvement to the parking situation in Elgin (for residents, operation of the Council offices, and town centre visitors during out-of-hours periods). AGREE REVISION</p> <p data-bbox="1422 858 1921 1023">The LTS Discussion paper highlighted these issues. The risk to infrastructure from severe weather events will be acknowledged. AGREE REVISION</p> <p data-bbox="1422 1129 1921 1326">The VISION was arrived at via a long consultation process, taking account of the National Transport Strategy, Regional Transport Strategy and local policies. NO CHANGE</p>

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	<p>Question 4e Objectives – suggested that the objectives are couched in very general terms and whilst some slightly more detail is given in Sections 10 to 16, without some more specific objectives/targets; prioritisation between headings; recognition of budget considerations, the Strategy lacks focus and sharpness.</p> <p>Question 4f – integrated transport – suggested that Although it may be based on earlier consultations, it would have been helpful to have a bit more of the rationale behind the preference for Scenario 7. Otherwise this outcome seems to have been very quickly arrived at.</p> <p>Question 4g Action Plans – Section 10 Active Travel -suggested that an action could be to secure pedestrian and cyclist connectivity to networks from new residential development planning applications.</p> <p>Suggested that provision in planning applications and developer contributions should feature more across the board as actions.</p>	<p>A previous report to Committee set out a range of strategy options applying alternative focus. The Committee agreed to take an Integrated approach (more flexible). This is considered a prudent and pragmatic approach (especially given the prevailing budget situation). NO CHANGE</p> <p>Committee report is available via the Council web site. See comment above. NO CHANGE</p> <p>National Planning Policy Designing Streets and the local SPG Urban Design cover these matters. Action Plan to include the promotion of these policies in relation to specific planning applications will be added. AGREE REVISION</p> <p>The key role of new developments is noted. The LTS highlights the MLP2008 policies including T2 and IMP1. These are the fundamental policy mechanisms to derive appropriate infrastructure from new developments. These will be reviewed as part of the Main Issues report for the next MLP. AGREE REVISION</p>

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	<p>Section 12 Ports and Harbours – Queried whether there are no committed schemes that could be incorporated into table, and noted that there is no commitment to review the role of Moray harbours as an action in the table.</p> <p>Question 4g RTRA – noted that Conclusion was agreed with but suggested that the argument could be better expressed, in terms of recognising Morays remote character; dispersed population; high car ownership level; poor quality public transport/need to subsidise.....it will be difficult to achieve reductions in car usage/modal shift. This may be more achievable in other parts of country, but not so much in Moray. Also stated that however in recognising the need for carbon reductions, and measures to combat climate change, the emphasis will be on changing the habits of those undertaking journeys of 2km or less/travel to work patterns etc, through a range of measures</p>	<p>Moray harbours consist of two key operational ports and a number of leisure harbours. The budget situation will bring forward a review of the full range of functions that Moray Council currently undertakes or provides. Harbours are not a special case. NOTED</p> <p>The importance of the car for those who live in the countryside of Moray is acknowledged. The opportunity to change travel habits in the key settlements is acknowledged. Combinations of actions identified in the LTS will achieve some reduction in car use. AGREE REVISION</p>
<p>Organisation Environmental Protection</p>	<p>Para 2.2 Active Travel – suggested adding sentence to last paragraph: <i>‘The emerging Moray Core Paths Plan provides a real opportunity for development of Core Paths, particularly in the principal Moray towns, as active travel infrastructure to encourage modal shift’.</i></p> <p>Para 2.7 Travel Behaviour – suggested adding sentence to first paragraph: <i>‘Crucial to enabling active travel is the Council leading the</i></p>	<p>The Moray Core Paths Plan identifies a network of paths, however there is no funding stream to enable this network to be improved from the existing condition. The MCPP will enable negotiations with developers for improvements through developer contributions. Proposed addition requires some editing. AGREE REVISION</p> <p>The role of key Active Travel routes for journeys to schools and other key</p>

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	<p data-bbox="481 247 1404 379"><i>way in development of a dedicated safe active travel paths network which is fit for purpose particularly in Moray's principal towns. This network should be closely aligned to routes identified in the Moray Core Paths Plan'</i></p> <p data-bbox="481 518 1404 619">Para3.1Active Travel (achievements) – suggested adding following text to bullet 1 (Forres to Findhorn cycleway...etc): <i>'All these routes have been identified within the Moray Core Paths Plan'</i>.</p> <p data-bbox="481 654 1404 1225">Para 4.2.9 Core Paths Plan – suggested rewriting the paragraph: <i>'The Moray Core Paths Plan – Finalised Version 2009 was submitted in May 2010 to Scottish Ministers with adoption expected by early 2011 pending the outcome of a Local Inquiry into outstanding objections. The production of the Plan is a requirement placed on Access Authorities by the Land Reform (Scotland) Act 2003. It provides a timely progression from the Moray Access Strategy Framework Document 2002 which now requires to be reviewed.'</i> <i>Core Paths contained in the Plan, particularly within Moray's Principal towns, have been identified focussing on maximising opportunities for encouraging safe active travel. The development and maintenance of Core Paths is not a statutory duty placed on Councils. The Moray Council has given an undertaking in the Plan to explore all opportunities to secure resources to manage and develop Moray's Core Paths network. There is no core budget available to maintain the Core Paths Network and is reliant primarily on landowners being ultimately responsible for paths on their property'.</i></p> <p data-bbox="481 1260 1404 1329">Para 4.4 National Strategy linkages – suggested adding a bullet for the Disability Discrimination Act.</p>	<p data-bbox="1422 247 1924 483">trip generators (employers) is already recognised through 'Safer Routes to Schools' initiatives and other 'Travel Plan' measures. Routes that perform mainly a recreational role do not form part of the transport network. NO CHANGE</p> <p data-bbox="1422 518 1680 550">AGREE REVISION</p> <p data-bbox="1422 654 1680 686">AGREE REVISION</p> <p data-bbox="1422 1260 1899 1394">DDA is fundamental legislation that will be formally acknowledged in the strategy linkages. AGREE REVISION</p>

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	<p>Para 4.4.10 Land reform act – suggested rewriting the paragraph: <i>A requirement of the Land Reform (Scotland) Act 2003, was for Councils to draw up a plan that provides “a system of paths (‘Core Paths’) sufficient for the purpose of giving the public reasonable access throughout their area”.</i></p> <p><i>The Moray Core Paths Plan – Finalised Version 2009 has been submitted for consideration by Scottish Ministers. The plan is the result of an extensive public consultation process that commenced in 2007. Routes identified in the plan have focussed on providing active travel infrastructure particularly in Moray’s principal towns’.</i></p> <p>Question 4c Transportation issues – did not agree with issues, Para 1 ‘Transport is an...’. Queried whether an additional major challenge be to reduce car usage and increase active travel in line with Government cycling and walking targets.</p> <p>Para 6.1 Active travel - Suggested adding another bullet: <i>‘Absence of an integrated safe and fit for purpose active travel routes network within Moray’s principal towns’.</i></p> <p>Question 4d Vision – did not agree with vision. Noted that it is too general and unspecific. Acknowledged that visions generally have to be all encompassing but suggested that it would be better being up front in the statement about contributing to meet Scottish Government targets by setting specific targets for Moray in terms of reducing car usage and increasing walking and cycling levels. Also suggests that the transport system should sustainably meet the needs of motorised and not motorised transport users.</p>	<p>AGREE REVISION</p> <p>The Cycling Action Plan has recently been published by the Scottish Government. This will be added to the strategy linkages. Objectives K5 and S8 cover walking and cycling. NOTED</p> <p>The MCPP and the Active Travel Audits for key settlements in Moray identify networks. NO CHANGE</p> <p>The VISION was arrived at via a long consultation process, taking account of the National Transport Strategy, Regional Transport Strategy and local policies. NO CHANGE</p>

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	<p>Question 4e – Objectives – did not agree with objectives. Suggested rewriting para8.2 objective K5 as <i>‘Increase sustainable travel choices and provide an integrated active travel routes network for Moray’s principal towns closely aligned with the Moray Core Paths Plan. This will promote behaviour change and’</i></p> <p>Question 4g Action Plan – did not agree with action plan. Suggested adding the following text to 3rd action entry (continue to develop...)<i>‘.....closely aligned with the Moray Core Paths Plan. Maintenance and responsibility for inspection should be identified for the cycle/pedestrian paths network’</i></p> <p>Section 15 Travel behaviour – suggested adding the following text to the last action entry (work with development...) , <i>‘.....and to maximise developer contribution opportunities to develop and enhance an integrated active travel routes network closely aligned with the Moray Core Paths Plan’.</i></p> <p>Question 4g – RTRA – did not agree with not setting targets. Noted that it is accepted that Moray is a predominately rural area with limited travel options available to many people resulting in a high dependency</p>	<p>See recommendation above. NO CHANGE</p> <p>The role of key Active Travel routes for journeys to schools and other key trip generators (employers) is already recognised through ‘Safer Routes to Schools’ initiatives and other ‘Travel Plan’ measures. Routes that perform mainly a recreational role do not form part of the transport network. NO CHANGE</p> <p>The key role of new developments is noted. The LTS highlights the MLP2008 transport policies. MLP2008 policies IMP1 and IMP3 will be added. These are the fundamental policy mechanisms to derive appropriate infrastructure from new developments. All MLP policies will be reviewed as part of the Main Issues report for the next MLP. An additional action will be added to section 15. AGREE REVISION</p> <p>The Government recognises that authorities should have the flexibility to take the characteristics and needs</p>

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	<p>on car usage. Suggested however that within Moray’s principal towns, particularly Elgin, there are real opportunities to reduce car usage in return for what would be a relatively modest investment. In Elgin for instance 68% of travel to work trips are less than 2km so provision of an integrated, safe and well promoted active travel network with good quality supporting facilities could facilitate a wholesale modal shift away from car usage particularly for short journeys. Suggested that specific car reduction targets are appropriate for Moray’s principal towns. Surely The Moray Council cannot just ignore targets set under the Roads Traffic Reduction Act which is statutory legislation. Suggested entirely removing the first paragraph of page 44 of the document. ‘whilst the trunk road...’</p> <p>Question 4j General comments – Stated that the MLT2 seems to give prominence to improvements to road infrastructure and is less focussed on reducing car usage and increasing alternative travel opportunities including walking and cycling. Suggested that if the Council is serious about contributing to meeting governments national targets on climate change, reducing car usage and increasing cycling and walking levels, then the strategy needs to have an equal balance of priority between road infrastructure improvements and other sustainable transport alternatives such as active travel. Suggested that clear targets should be included in the Strategy (not mere aspirations) to achieve modal shift, in line with Scottish Government targets. Also that more attention should be given to how to better integrate active travel activity and infrastructure with bus and rail transport. Suggested that the MLT2 gives little reference to this as a priority or as to how such improved integration might be</p>	<p>of their area into account in deciding how to proceed with the RTRA requirements. Local authorities are advised to consider, a number of factors including: their ability to obtain suitable data to allow them to set such targets and to monitor progress effectively; and their ability to influence the levels and type of traffic to which the targets relate. The conclusion of these considerations is that overall the needs of the area, complications with data collection, ability to influence type of traffic and economic conditions mean that targets should not be set at this time. NO CHANGE</p> <p>The importance of the car for those who live in the countryside of Moray is acknowledged. The opportunity to change travel habits in the key settlements is acknowledged. Combinations of actions identified in the LTS will achieve some reduction in car use. The Urban Freedom project for Elgin involves new infrastructure and associated monitoring of active travel journeys (before and after). The conclusion is that there is no requirement for local targets other than those for specific projects.</p>

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	<p>achieved. Suggested that all these elements could be addressed in an Active travel Strategy which should be a specific action to be implemented within the life of this LTS.</p> <p>The Strategy makes no reference to the maintenance of cycle routes and paths network infrastructure and statements on how this is to be achieved should be included in the document.</p>	<p>NO CHANGE</p> <p>Pedestrian and cycle routes that are adopted/added to the List of Public Roads are maintained and managed by the local road authority. Funding from the Scottish Government is based on the extent of the public road network, including footways and cycleways. A high standard is required for adopted routes to ensure low whole life costs (including future maintenance). Routes created by developers must be to the adoptable standard and provide connections to the existing public road network.</p> <p>NO CHANGE</p>
<p>Organisation Regional Transport Partnership HITRANS</p>	<p>Considered that the draft LTS dealt with a number of important issues very well and it provided a very good foundation for the next stage of drafting the final document in detail.</p> <p>Suggested that the main concern raised at this stage is that the final LTS would be enhanced by reflecting LTS guidance on how it should relate to the Regional Transport Strategy produced by HITRANS and formally approved by each partner local authority including Moray Council.</p>	<p>NOTED</p> <p>The LTS has been developed in accordance with guidance issued by the Scottish Government. It has been prepared through the Scottish Transport Appraisal Guidance (STAG) planning and appraisal process and the requirements of the Strategic Environmental Assessment (SEA) Regulations. The NTS and HITRANS RTS are acknowledged in section 4 strategy linkages.</p>

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	<p>Noted that in the Introduction (Section 1 and Figure 1), there is no mention of the Regional Transport Strategy prepared by HITRANS and approved by member Councils including Moray Council. Suggested that the document also fails to follow LTS guidance from the Regional Transport Partnership. Suggested that it should be clear that the LTS is the short-term articulation of wider long-term strategic guidance given by the RTP and approved through the statutory process of approval of the Regional Transport Strategy.</p> <p>Suggest an updated photograph showing current rail.</p> <p>Suggested that on Page 4 under title of “Moray has a Declining Transport Budget” text “an effective budget cut year-on-year” should be replaced with “a real terms budget cut year-on-year”</p> <p>Supplied table showing Pax growth (Footfall figures) for Moray stations – suggested figures in document were high.</p> <p>Suggested that strategic long-term considerations should be matters for the Regional Transport Strategy and only included in the LTS if deemed necessary through the RTS, Structure Plan and Local</p>	<p>NOTED</p> <p>The LTS communicates the local authority's strategy and proposals for transport to its community. The LTS exists within a regional and national context. This is acknowledged within the LTS. HITRANS was represented at the LTS consultation workshop at the early stage of the preparation of the LTS. A reference to the NTS and RTS will be added to section 1 AGREE REVISION</p> <p>Appropriate photographs will be accepted. AGREE REVISION</p> <p>The funding situation has changed dramatically since the consultation was undertaken. Implementation Plans will be presented annually to Committee. AGREE REVISION</p> <p>The most appropriate data will be used. AGREE REVISION</p> <p>The local authority is entitled to reflect the local issues, needs and aspirations for transport in its area.</p>

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	<p>Development Plan. Highlighted Paragraph 2.5 which refers to schemes including A96 dualling, A941 upgrade and Elgin by-pass without reference to the RTS. Suggested that as these schemes are inspirational and are not included in the STPR, they should not have been included in the LTS as proposals unless the Council and Partners have identified a means of funding these within the LTS timescale.</p> <p>Noted that Paragraph 2.5 Roads section highlights the high cost of winter maintenance against the 2009/10 budget. Queried whether there was value in looking at other years to see if climate change is leading to increased costs of winter and consequential maintenance and with it an added burden to the Council's transportation budget</p> <p>Para 2.3 'Public Transport' queried phrase 'Some additional capacity. Highlighted frequency is two hourly with new services introduced Dec 08.</p> <p>Paragraph 2.7 Travel Behaviour – suggested that this section could highlight the availability of www.IfYouCareShare.com to all employers in Moray and it is also an opportunity to highlight the availability of Energy Savings Trust support for travel plan development. Suggested highlighting www.chooseanotherway.com at this stage as a valuable resource for any organisation in the Moray area wanting to develop a travel plan.</p> <p>Queried whether it would not be worth having a section devoted to Rail infrastructure.</p>	<p>The RTS and STPR do not recognise these transport improvements as priorities, however they are still within a wider set of transport options for Moray. This LTS identifies an action to encourage the Scottish Government to upgrade the two trunk roads in Moray. NOTED</p> <p>Recent report presented to Committee on the impact of severe weather. AGREE REVISION</p> <p>AGREE REVISION</p> <p>Hitrans RTP has supported work carried out by Moray Council to promote and deliver travel plans in Moray. This is acknowledged in the LTS. Reference to the EST and car share web site will be added. AGREE REVISION</p> <p>Rail is covered in sections covering public transport and freight. NO CHANGE</p>

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	<p>Para 3.5 'Freight Transport' suggested addition of rail freight trial with McPherson's funded by HRP 2008.</p> <p>Queried whether it was worth mentioning that AT audits were wholly funded by HITRANS.</p> <p>Suggested that the link between the Active travel Audit and the Local Plan within a development control field are critical to promoting increased active travel and modal shift in the Council area.</p> <p>Paragraph 3.6 Travel Behaviour - suggested including an extra bullet point reflecting that www.IfYouCareShare.com includes a Moray Council staff section and can have other employer groups added.</p> <p>Paragraph 4.3 – HITRANS will provide an updated HITRANS RTS front cover.</p> <p>Paragraph 4.4.1 'Transport white paper...'– queried whether this document was still relevant as the Transport Scotland Act 2005 has</p>	<p>AGREE REVISION</p> <p>AGREE REVISION</p> <p>The key role of new developments is noted. The LTS highlights the MLP2008 transport policies including T2. These are the fundamental policy mechanisms to derive appropriate infrastructure from new developments. MLP2008 policies IMP1 and IMP3 concern requirements for new developments and developer contributions. These will be added to the highlighted MLP2008 policies. All MLP policies will be reviewed as part of the Main Issues report for the next MLP. An additional action will be added to section 15. AGREE REVISION</p> <p>AGREE REVISION</p> <p>This is welcomed and will be used to create a graphic for the LTS AGREE REVISION</p> <p>There is reference to the 2004 White Paper in the RTS. It is considered</p>

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	<p>now been implemented.</p> <p>Para 4.5.4 ‘Scottish Rail Franchise’ – queried whether it was worth mentioning Moray feeding into cross-border rail services at Inverness and Aberdeen.</p> <p>Para 6.2 ‘Public Transport’ – did not agree with statement that journey times to Inverness and Aberdeen are relatively long by rail. Suggested 42mins centre of Elgin to centre of Inverness was ‘hard to beat’.</p> <p>Para 6.2 ‘Public Transport’ –Suggested deleting the last sentence reading “Other parts of Moray however, do not have direct links to Inverness Airport.” Suggested that the inclusion of this sentence suggests Moray Council may take the implementation of such a service as an action and they consider this unlikely. Suggested that it might be better to highlight that a wide range of Moray locations have links to the new service by connecting at Elgin Bus Station.</p> <p>Also queried the statement that there were limited facilities at Moray rail stations – Suggested they were staffed, Forres and Keith were accessible, car parks were free, had cycle shelters and other facilities.</p> <p>Queried the statement that fares were perceived to be higher than rest of the country – Is there any evidence of this?.</p>	<p>appropriate to retain reference to this document at this stage. NOTED</p> <p>Moray is served by rail services between Inverness and Aberdeen. Some of these services travel directly onwards to destinations in the Central Scotland. NOTED</p> <p>AGREE REVISION</p> <p>AGREE REVISION</p> <p>The facilities at rail stations are not available during all periods of rail services. This is limited compared to major train stations such as Inverness and Aberdeen. AGREE REVISION</p> <p>The Moray Citizens Panel Transport Survey identified this as an issue. Compared to equivalent journeys in</p>

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	<p>Suggested more detail on the value of the whisky to Moray economy, as well as RAF logistics.</p> <p>Suggested the addition of text to note that Elgin Freight yard is occasionally used for MOD, agricultural and other goods.</p> <p>Para 6.5 'Freight Transport' – suggested removal of the phrase "despite' the gauge enhancement project' as this may be taken as a personal/group criticism.</p> <p>Suggested that there should be reference to Air quality and in particular to the MOD RAF bases.</p> <p>Section 11 Action plan table – 'Encourage transport operators to upgrade...' train station should be changed to rail station.</p> <p>Expressed disappointment that there is no objective to reduce car traffic (e.g. modal shift) as it would reflect and link to National Transport Strategy objective.</p>	<p>Central Scotland fares are higher. NOTED</p> <p>Moray Council produces key data concerning businesses in Moray. Whisky is recognised as a key economic asset to Moray. The economic value of the RAF bases is also acknowledged by Moray Council and others AGREE REVISION</p> <p>AGREE REVISION</p> <p>AGREE REVISION</p> <p>Air Quality is monitored by the Environmental Health Service. The latest report suggests that there is no action required. Air Quality section within the LTS will be updated. AGREE REVISION</p> <p>AGREE REVISION</p> <p>The LTS objectives K5, S6 and S8 support sustainable travel and improvements to rail services. The Government recognises that authorities should have the flexibility</p>

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	<p>Action Plan Public Transport – Suggested HITRANS could be added to Delivery partners in the table for the second and third action as well as the second last action on the table as it spreads on to page 36 to reflect the role played by HITRANS officers.</p> <p>Action Plan Freight Transport – Suggested HITRANS could be added to the last two actions in the table listed to reflect HITRANS Freight / Rail support role.</p>	<p>to take the characteristics and needs of their area into account in deciding how to proceed with the RTRA requirements. Local authorities are advised to consider, a number of factors including: their ability to obtain suitable data to allow them to set such targets and to monitor progress effectively; and their ability to influence the levels and type of traffic to which the targets relate. The conclusion of these considerations is that overall the needs of the area, complications with data collection, ability to influence type of traffic and economic conditions mean that targets should not be set at this time. The Moray Carbon Management Plan will be acknowledged in the LTS NO CHANGE</p> <p>AGREE REVISION</p> <p>AGREE REVISION</p>
Organisation Regional Transport Partnership	Commented that NESTRANS welcomes the opportunity to comment and wishes to be involved with the Moray Council as appropriate in delivering transport improvements in partnership on cross-boundary and Grampian-wide initiatives. Noted in particular that NESTRANS	NOTED

Respondent	Comment	Recommendation
<p>NESTRANS</p>	<p>and its constituent local authorities already work with the Moray Council on Road Casualty Reduction Strategy and Health and Transport Action Plan.</p> <p>Noted that in the introduction (section 1 and figure 1) there is no mention of HITRANS Regional Transport Strategy or whether the LTS follows guidance from the Regional Transport Partnership.</p> <p>Suggested that it should be made clear that the LTS is the short-term articulation of wider longer-term strategic guidance given by the Regional Transport Partnership and approved through the statutory process of approval of the Regional Transport Strategy.</p> <p>Suggested that Strategic long-term considerations should be matters for the Regional Transport Strategy and only included in the LTS if deemed necessary through the RTS, Structure Plan and Local Development Plan. Highlighted that Section 2.5 refers to schemes including A96 dualling, A941 upgrade and Elgin by-pass without reference to the RTS. Suggested that as these schemes are not included in the STPR, they should not have been included in the LTS.</p>	<p>The LTS has been developed in accordance with guidance issued by the Scottish Government. It has been prepared through the Scottish Transport Appraisal Guidance (STAG) planning and appraisal process and the requirements of the Strategic Environmental Assessment (SEA) Regulations. The HITRANS RTS is identified in section 4 strategy linkages.</p> <p>NOTED</p> <p>The LTS communicates a local authority's strategy and proposals for transport to its community. The LTS exists within a regional and national context. This is acknowledged within the LTS</p> <p>NO CHANGE</p> <p>The local authority is entitled to reflect the local issues, needs and aspirations for transport in its area. The RTS and STPR do not recognise these transport improvements as priorities, however they are still within a wider set of transport options for Moray. This LTS identifies an action to encourage the Scottish</p>

Respondent	Comment	Recommendation
	<p>Noted that travel Planning is rightly identified as an important element in encouraging travel behaviour change, but suggested again that the role of the Regional Transport Partnership is not mentioned.</p> <p>Noted that although partners are mentioned in the section on Health & Transport Action Plan, the role of Nestrans as co-ordinating the group is excluded. Queried that this may be because NESCAMP has been included in error.</p> <p>Para 2.8 Traffic management – suggested that reference is made to the joint working and partnership in producing a joint Road Casualty Reduction Strategy.</p> <p>Para 4.3.2 North East Road Casualty Reduction Strategy – suggests adding nestrans to the list of partners.</p> <p>Para 9 Strategy options and appraisal – suggested that these need to be realistically affordable and should be seen as strategic questions to be addressed through the Regional Transport Strategy.</p> <p>General comment – noted that The conclusion that Policies to reduce traffic levels in Moray are “wholly inappropriate” ignores the need for policies which address national concerns regarding traffic, carbon emissions and air quality concerns.</p>	<p>Government to upgrade the two trunk roads in Moray. NOTED</p> <p>Hitrans RTP has supported work carried out by Moray Council to promote and deliver travel plans in Moray. This is acknowledged in the LTS. NOTED</p> <p>NESCAMP will be replaced by NESTRANS. AGREE REVISION</p> <p>The North East of Scotland Road Casualty Reduction Strategy is identified in section 4. NOTED</p> <p>NESTRANS will be added to the list. AGREE REVISION</p> <p>The LTS is required to follow STAG principles. Section 9 deals with this aspect. NO CHANGE</p> <p>The Government recognises that authorities should have the flexibility to take the characteristics and needs of their area into account in deciding</p>

Respondent	Comment	Recommendation
		<p>how to proceed with the RTRA requirements. Local authorities are advised to consider, a number of factors including: their ability to obtain suitable data to allow them to set such targets and to monitor progress effectively; and their ability to influence the levels and type of traffic to which the targets relate. The conclusion of these considerations is that overall the needs of the area, complications with data collection, ability to influence type of traffic and economic conditions mean that targets should not be set at this time. The Moray Carbon Management Plan will be acknowledged in the LTS NO CHANGE</p>
<p>Organisation Aberdeenshire Council</p>	<p>Para 2.1 Key Transport trends – suggested adding the figures for Moray bus travel (rather than just the %age increase) Similarly suggested adding the figures for Moray rail travel (rather than just the %age increase) Suggested highlighting the trend for freight carried by road transport in Moray.</p> <p>Table 1 Capital expenditure – notes that the report states several times that the budgets are static or reducing but table not only shows that the total budget is increasing year on year but so are most of the elements within the budget. Suggested that this needs clarified. Suggested that the expenditure for 2009/2010 is detailed as projected but should be updated with actual spend instead.</p>	<p>There is comprehensive data available in the Moray Key Transport Trend Data publication. Data is also available from the Scottish Government Transport Statistics. Appropriate data will be added. AGREE REVISION</p> <p>The presentation of the Capital Expenditure will be reviewed. AGREE REVISION</p>

Respondent	Comment	Recommendation
	<p>Para 2.5 Roads – suggests replacing the forecast (£3m) winter maintenance spend for 2009/2010 with the actual spend figures.</p> <p>Para 2.7 Travel behaviour – noted that NESCAMP should be replaced with NESTRANS.</p> <p>Question 4b Strategy links – page 19 bullet list- suggested that recent Scottish documents such as the Freight Action Plan for Scotland, the Cycling Action Plan for Scotland and the Climate Change Delivery plan (amongst others) (Note Freight action plan is noted on page 20 but not others)</p> <p>Para 4.5.2 Transport Scotland – suggested mentioning the recent merging of Transport Scotland and the Scottish Executive Traffic Directorate.</p> <p>Para 4.5.3 Scottish Rail Franchise – suggested that it should be clarified whether any of the 17 stations under the responsibility of Network rail include those in Moray (Elgin, Keith, Forres)</p> <p>Question 4c – Transportation issues – Noted that there was no specific mention of powered two-wheeled vehicles.</p> <p>Question 4e – Objectives – noted that there appeared to be a lack of</p>	<p>AGREE REVISION</p> <p>NESCAMP will be replaced by NESTRANS. AGREE REVISION</p> <p>AGREE REVISION</p> <p>NOTED</p> <p>Clarification will be added – seek info AGREE REVISION</p> <p>The achievements section will be amended to reflect specific parking provision provided in Moray towns, support for awareness campaigns and inclusion of powered two wheelers in workplace travel plans. The relevant actions will be reviewed to show specific actions relating to this road user group. AGREE REVISION</p> <p>The Vision and objectives were</p>

Respondent	Comment	Recommendation
	<p>consistency in the level of the sub objectives compared to the key objectives i.e. some are national and transnational whilst others are very specific i.e. car parking or harbours.</p> <p>Question 4g – Action Plans – noted that there seemed to be significant overlap between Section 10 Active Travel and Section 15 Travel Behaviour.</p> <p>Page 33 Active Travel Action Plan – suggested that it was not clear what definitions are being used for short-term, medium and long term in the Action plan.</p> <p>Question 4g RTRA – agreed - Noted that it would appear reasonable that setting targets to reduce traffic volumes on non trunk roads is inappropriate in Moray.</p> <p>Page 43 RTRA – Suggested that under trunk road network it would be worth clarifying what is meant by the statement “the A96 along with the A9 and the A90 forms part of the Trans European Road Network in the North East of Scotland”. Noted that if this refers to the TEN-T network this is incorrect as that only extends as far north as Glasgow.</p>	<p>developed early in the process of preparing the LTS and have now been agreed. A review of the previous LTS and the NTS and RTS was undertaken. NOTED</p> <p>There is some overlap but these are both essential elements of the LTS. NOTED</p> <p>Guidance issued to local authorities on the preparation of the LTS suggests that the period for the LTS should cover 3 years. However, given the budget situation and subsequent implications for delivery of measures the period to be covered by the LTS is unclear. This is an important aspect that Moray Council is still considering. Experience and practice of other local authorities will be sought over the lifetime of the LTS. NOTED</p> <p>The view of the neighbouring local authority is welcomed. NOTED</p> <p>Clarification AGREE REVISION</p>

Respondent	Comment	Recommendation
	<p>Question 4j General comments – noted that it is not clear what the difference is between key and sub objectives and what importance is put on each category as the sub objectives don't obviously sit under specific key objectives.</p> <p>Noted that the Action Plans do not have any specific or SMART targets attached to them. Noted that it may well be that there is to be a separate implementation plan but there is no mention of this in the draft.</p> <p>Noted that there also does not appear to be any mention of the monitoring regime for the proposed Action Plans.</p>	<p>The objectives are split into key (strategic) and sub (supporting the strategic) levels. NOTED</p> <p>Like many other local authorities there are competing demands on budgets. Implementation plans are brought forward annually and submitted for Committee approval. These are available via the Council web site. This detail will be added to the LTS. AGREE REVISION</p> <p>Data collection and monitoring for specific projects and programmes will be continued. Existing key performance indicators such as road condition monitoring, lighting repairs and road accidents will be continued. Explanation of the monitoring will be added. AGREE REVISION</p>
<p>Organisation (SEA Gateway) Historic Scotland</p>	<p>Welcomes the recognition throughout the document of the need to protect the environment. Considered that due to the 'high level' nature of the strategy it was difficult to offer detailed comments. Welcomed further consultation on any projects that develop from the strategy.</p>	<p>See comment above. Consultation on specific projects will be undertaken as required. NOTED</p>
<p>Organisation (SEA Gateway) Scottish National</p>	<p>Noted previous correspondence with SEA consultant, and their formal response to SEA scoping. Considered that SNH comments had been taken on board fully and 'the document comprehensively and</p>	<p>A deliberate approach was adopted to ensure the LTS and the SEA were fully integrated. This is recognised by</p>

Respondent	Comment	Recommendation
Heritage	accurately' covered the issues identified, and also addressed their original comments to the SEA scoping. Stated that there were no further comments/ suggestions to add. Expressed to staff at the SEA consultant.	SNH. NOTED
Organisation (SEA Gateway) SEPA	<p>Noted that Moray has no designated Air Quality Management Area (AQMA), however noted that in Elgin and Fochabers the levels of nitrogen dioxide are close to annual mean threshold value, so welcomed the inclusion of objective K5 (increase sustainable travel choices...) and S8 (encourage less car dependant forms of transport...) both of which acknowledge that car use can have a detrimental impact on the environment.</p> <p>Air quality – noted that there does not appear to contain a commitment to reduce emissions of greenhouse gasses from road traffic.</p>	<p>Measures towards the achievement of objectives K5, S6 and S8 can achieve air quality improvements. NOTED</p> <p>The Government recognises that authorities should have the flexibility to take the characteristics and needs of their area into account in deciding how to proceed with the RTRA requirements. Local authorities are advised to consider, a number of factors including: their ability to obtain suitable data to allow them to set such targets and to monitor progress effectively; and their ability to influence the levels and type of traffic to which the targets relate. The conclusion of these considerations is that overall the needs of the area, complications with data collection, ability to influence type of traffic and economic conditions mean that targets should not be set at this time. The Moray Carbon Management Plan will be acknowledged in the LTS</p>

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	<p>Noted that the report failed to recognise or highlight that HGVs are a far greater threat to local air quality than cars. Provided information of interest from a recent study that showed that HGV and buses account for about 5.5% of the traffic, but emit 44% of the nitrogen oxides.</p> <p>Highlighted The Water Environment (controlled activities) (Scotland) Regulations 2005 (as amended) (CAR). Noted – the construction of new roads and the replacement of other associated infrastructure will require to take cognisance of CAR. In particular the collection treatment storage and disposal of surface water from new roadways and also the potential need for assessment of flood risk from the erection of new or replacement bridging structures. Emphasised that pre application discussions with them would assist in recognising the potential environmental issues arising from each project and would ensure that any potential detriment to the environment is assessed and mitigated.</p> <p>Noted that the recognition within the LTS of the importance of assessing the environmental impact on new infrastructure was welcomed.</p> <p>Para 13 Roads – suggested the inclusion of an objective which acknowledges that new road infrastructure has the potential for at best negligible impact and with good design a positive enhancement for the environment if the scheme is fully scoped from the outset of the process.</p> <p>Transport initiatives – stated that they are supportive of all measures to reduce the use of vehicles (eg cars) by the provision of alternative methods of transport, however also recognised that financial constraints in the forthcoming period may severely limit the ability of</p>	<p>NO CHANGE HGV traffic flows are shown in the RTRA section (Appendix B). Reference to the impact of HGV traffic will be added to the air quality section of the LTS. AGREE REVISION</p> <p>MLP2008 policy E* identifies the need for SUDS. Staff involved with road design and road maintenance have benefited from recent EU funded training covering these regulations and other water related legislation. Opportunities to liaise with SEPA at a local level will be developed. NOTED</p> <p>NOTED</p> <p>Action to encourage full scoping for new road infrastructure involving consultation/liaison with SEPA will be added. AGREE REVISION</p> <p>The Action Plan is an element of the Local Transport Strategy that will evolve over time depending on budgets. Like many other local</p>

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	<p>the Local Authority to make significant changes that would enhance achievement of this goal. Also accepted that the geography of Moray also necessitates the use and movement of HGVs and that this factor also limits the effectiveness of this policy. Suggested that any measures that can be progressed in respect of this policy would support their aims in terms of improving air quality and protection of the water environment.</p>	<p>authorities there are competing demands on budgets. Implementation plans are brought forward annually and submitted for Committee approval. Air Quality is monitored by Environmental Health. The latest report suggests that there is no action required. Air Quality section within the LTS will be updated. AGREE REVISION</p>
<p>Organisation Edinville Community Hall Council</p>	<p>Considered document very long winded, and questioned whether document was necessary given current budget constraints.</p> <p>Expressed concerns regarding the bus services within Moray and in particular referred to statements – ‘Continue to support bus services in rural areas, including alternative community services where Appropriate - TMC, Bus operators Continue to improve bus infrastructure across Moray subject to available funding and investigate means to improve Elgin bus station - TMC, Bus Operators’ and with the recent withdrawal of service 337 and reductions to service for Dufftown considered proposals meaningless. Considered it a complete waste of time, resources and money to propose such strategies when then decisions to remove/ reduce services to rural areas has already been taken and implemented. Suggested that consultation was conducted because the Council had to, and not because it wanted to seek the views of Moray taxpayers, or take note</p>	<p>There is a difficult balance when presenting a complex strategy covering a wide range of transport matters to not create information overload. A summary document containing the vision, objectives and action plan is proposed. NOTED</p> <p>Moray Council provides subsidy to bus services in Moray. There is a finite budget and decisions have to be made to get the ‘best value’ from the subsidy. The consultation on the LTS and timing of a serious budget decision was a coincidence. The views of the community, and the organisations that represent them, are welcomed. Moray Council actively seeks external funding for public transport services and has introduced two demand responsive transport</p>

Respondent	Comment	Recommendation
	of what they had to say	network areas. Concerns for bus services in Moray are noted. Objectives K5 and S3 support affordable public transport. NOTED
Organisation Elgin Community Council Murray Ross	No comments	NOTED
Organisation First Scotrail	<p>Noted Scotrail had celebrated the 150th anniversary of completion of the Aberdeen-Inverness line through Keith, Elgin and Forres August 2008.</p> <p>Noted that their timetable enhancement of December 2008 included an additional morning train each direction Mondays to Saturdays.</p> <p>Noted The first Inverness-Aberdeen and last Aberdeen-Inverness service of the day are now through trains to and from Edinburgh.</p> <p>Noted that they are supporting an initiative by HITRANS to promote with Transport Scotland the case for additional Sunday trains between Elgin and Inverness, and that they would welcome the opportunity to work with community groups on further adoption of stations such as has been achieved with Forres in Bloom.</p> <p>Noted that for the longer term they must look to the delivery of STPR</p>	<p>NOTED</p> <p>New train timetable includes an additional service. There are however other timetable changes that create a less favourable service arrangement for Moray. NOTED</p> <p>Through trains to Central Scotland are welcomed. AGREE REVISION</p> <p>NOTED</p> <p>The STPR sets out a series of</p>

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	<p>intervention 19 enabling the railway infrastructure to accommodate a faster, more frequent service between Aberdeen and Inverness.</p>	<p>intervention options including railway infrastructure. It is noted that the delivery of these interventions is not yet confirmed in a detailed programme. NOTED</p>
<p>Organisation Inchberry and District Community Association</p>	<p>Question 4a Trends - Suggested that the Trends were narrow appearing to focus and address to satisfy The Moray Council (TMC) task setter's activity when the issues are wider for the whole Moray community transport needs. Suggests that maybe this is a consequence of the author contract holder TMC being pleased by the contractor; Jacobs Consultancy?</p> <p>Question 4b Strategy links – noted that they appeared to reflect the situation. However noted that there needed to be a degree of flexibility retained in reviewing the links, but essentially appeared to cover the principle strategies.</p> <p>Question 4c Issues - Suggested that consideration of joined up transport movement and improvements to the current system of movement to achieve seamless travel between modes and means, must be addressed in the initial statement. This is simply not to identify the "new" which is identified.</p>	<p>There is comprehensive data available in the Moray Key Transport Trend Data publication. In addition the LTS Discussion paper highlighted a wide range of issues. These documents are available on the Council web site. NOTED</p> <p>Strategy links have been identified in the LTS. Other consultees have drawn attention to new and additional strategies that should be acknowledged. Over time new strategy links will be picked up as part of the monitoring and review process. NOTED</p> <p>The transport operators and public sector agencies involved with the procurement of PT services play a key role in achieving 'integration'. There is liaison at a local level. Better liaison across the providers and agencies is needed. NOTED</p>

Respondent	Comment	Recommendation
	<p>Noted that the fact that commercial factors and considerations alone dominate with cancellation of services leaving little alternative modes must be addressed. Public confidence to use modes and routes, consequently become jaded. Suggested that utilisation of a poor rail facility offering both freight and passenger flexibility must be offered with 'do-able' solutions. Noted that the Inverness air link is identified but considered Aberdeen air travellers have been disenfranchised with a broken route. Suggested that maintenance of existing routes and road, rail and sea access need to be a focus for allowing what is available proves always to be 'fit for purpose'</p> <p>Question 4d Vision – Suggested that the Vision champions at the outset 'excellence' (implying changing spend measures by apply finance to an unsustainable level) in connections when, what needs to be achieved, fails to address the simple fact that what infrastructure currently exists, is not being best organised, adjusted and maintained, to achieve free flows providing a 'joined up system' both in Moray and for connections further afield.</p> <p>Question 4e Objectives – Suggested that in the sub objectives their needs to be a concentrated effort to ensure any TMC planning applications ensure full compliance to build in capacity and opportunity to merge with the objectives. Suggested that recent planning changes allowed by TMC, have not aided the primary fact that the main route transport flow should be just that, a main route flow unimpeded by local developer influences to keep their costs down when the greater community is delayed on what are main arteries.</p>	<p>Commercial interests and contractual obligations will inevitably effect the service that are delivered. The rail farnchise is a matter for the Scottish Government. NOTED</p> <p>The vision sets out an ambitious 'first-rate' standard for transport in Moray. This will understandably be a difficult goal given the constraints on budgets, however there is a desire by those who have been involved in the preparation of the LTS to aspire for the best possible connections and accessibility for Moray. This will involve many different organisations and transport providers – not just Moray Council. NOTED</p> <p>National and local planning policy emphasises the need to focus on Place rather than Movement. The new Designing Streets policy clearly states that street design must meet the six qualities of successful places. Designing Streets applies to urban and rural settlements.</p>

Respondent	Comment	Recommendation
	<p>Question 4f Integrated transport – Suggested that the selected STAG 7 is acknowledged, but it is not the full definition of what is needed, it is only part. Suggested that the access across modes must be linked with improvements in those flows - not the myopic present approach encouraged by TMC planners which increasingly throttles these flows and the efficiency of existing modal links already in place.</p> <p>Question 4g Action plans – Referred to comments above to adjust Action Plan priorities repetitively offered in para 10 to 16 document. Suggested that all of these need to be actively promoted in any new or upgraded developments integrated with adjacent developments by strict planning requirements for integrated walk/ cycle paths direct routes avoiding constricting existing main traffic flow structures.</p> <p>Question 4g RTRA - agreed in principle. However noted, as concluded 'free flowing' road modes in Moray are paramount for consideration. The A941 and the regular movement of HGV and PSV traffic on the alternative adjacent B9015 access route (Bulk Liquid transfers, Timber transport in/out, and Canned products supply chain)</p>	<p>The policy is available from the Scottish Government web site. NOTED</p> <p>The LTS is required to follow STAG principles. Section 9 deals with this aspect.</p> <p>The key role of new developments is noted. The LTS highlights the MLP2008 transport policies including T2. These are the fundamental policy mechanisms to derive appropriate infrastructure from new developments. MLP2008 policies IMP1 and IMP3 concern requirements for new developments and developer contributions. These will be added to the highlighted MLP2008 policies. All MLP policies will be reviewed as part of the Main Issues report for the next MLP. AGREE REVISION</p> <p>Comment on RTRA Appendix B is welcomed. The key role of specific roads is noted and the importance of road maintenance for these key routes noted.</p>

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	<p>together with the road user mix and wear/ edge width and maintenance issues needs consideration. Suggested that the lack of alternative modes means this route needs early attention.</p> <p>Question 4h SEA – Accepted the points in the conclusions. Noted the parochial points are agreed but suggested that the whole system need better continuity of flow properly and timely maintained to safe, usable standards 'fit for purpose'.</p> <p>Question 4j general comments – Suggests that if there is substantial divergence from the existing Plan then it has been worthwhile. Queried the cost thus far. Also queried how much more is to be spent when he suggests that the real need is for TMC department staff to make it happen.</p>	<p>NOTED</p> <p>Statement that routes that are 'fit-for-purpose' is welcomed. The road condition survey and maintenance regime are an essential element of ensuring this is achieved.</p> <p>NOTED</p> <p>LTS preparation and consultation has cost in the region of £42k. The consultee acknowledges the importance of delivering achievements against the adopted LTS. Data collection and monitoring for specific projects and programmes will be continued. Existing key performance indicators such as road condition monitoring, lighting repairs and road accidents will be continued. Explanation of the monitoring will be added.</p> <p>AGREE REVISION</p>
<p>Organisation Keith Community Council</p>	<p>No comments added</p>	
<p>Organisation Lhanbryde Community Council</p>	<p>Question 4a Trends - Section 2, P4 Table 1 Key Transport Trends : Street lighting expenditure projected for 2009/10 was £817,000 and suggested that this seems to be increasing considerably.</p>	<p>The funding situation has changed. Implementation plans are brought forward annually and submitted for Committee approval. These are</p>

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	<p>2.2 Active Travel – noted that the Urban Freedom Initiative is welcomed.</p> <p>2.5 Roads – noted that the situation where planned maintenance is declining and emergency repairs and maintenance is predictable – but suggested that over-reliance on ‘response only’ is self-defeating. Page 6 (last para) Suggested that the reference to Roads Asset Management Plan is welcome, but suggested that more effort in supervising and sanctioning work done would be welcome.</p> <p>Section 3 Achievements –noted that the achievements are welcome and acknowledged. Considered the rolling programme of bridge parapet signing as particularly singled out for appreciation.</p> <p>Additionally noted that the work done to encourage people to behave responsibly and carefully is welcomed.</p> <p>Question 4b Linkages - Suggested that these are all very well but there should be noted the damage to roads as a result of road opening by various utilities in an uncoordinated way – followed by inadequate “making good”.</p>	<p>available via the Council web site. This detail will be added to the LTS. AGREE REVISION</p> <p>Support for the Urban Freedom project is welcomed. Moray Council will continue to work with the Scottish Government to secure a cycle link between Elgin and Lhanbryde under the Active Travel theme in the LTS. NOTED</p> <p>Asset Management aims to assist with the decisions that have to be made to ensure effective priority is given to the management of the road network asset. NOTED</p> <p>NOTED</p> <p>Road Safety is an essential element of the LTS. NOTED</p> <p>The Traffic Commissioner of Scotland monitors the performance of the roads authorities in Scotland and the utility companies. He is able to apply fines to offending parties. Information on the Traffic Commissioner will be made available via the Council web site.</p>

Respondent	Comment	Recommendation
	<p data-bbox="481 316 1375 411">Suggested that a plethora of plans and strategies are listed, but unlevelled drains, manhole covers, offlets, poorly maintained verges, abound – and remain in a very poor state for years.</p> <p data-bbox="481 754 1375 850">Considered “objectives” as only valuable to the public when they become “x has been fixed”, or “The new timetable means I can use X transport facility”.</p> <p data-bbox="481 1098 1375 1329">Noted that the current arrangements for Rail Operation seems to have provided some benefit and increased services on the Aberdeen/Inverness line – a better connection with other services. However also noted that lack of availability of pre-book able bicycle spaces on trains is still a problem which prevents best use being made of services to enable more use of recreational opportunities and consequent benefit to the local economy.</p> <p data-bbox="481 1361 1285 1393">Question 4c Issues – Agreed in the main. Suggested that Ref</p>	<p data-bbox="1422 248 1532 272">NOTED</p> <p data-bbox="1422 316 1921 683">There are a number of national, regional and local policies that do have to be acknowledged. The road condition survey shows Moray has roads in better condition than most other local authorities in Scotland. Asset Management aims to ensure the road network is managed in the most effective way. The road condition survey results will be made available on the Council web site.</p> <p data-bbox="1422 691 1532 715">NOTED</p> <p data-bbox="1422 754 1921 1026">Like many other local authorities there are competing demands on budgets. Implementation plans are brought forward annually and submitted for Committee approval. These are available via the Council web site. This detail will provide an opportunity to measure tangible results.</p> <p data-bbox="1422 1034 1675 1058">AGREE REVISION</p> <p data-bbox="1422 1098 1921 1257">Rail services are dealt with by the Scottish Government. Provision for bicycles has improved in recent years. Although carriage is free spaces must be booked.</p> <p data-bbox="1422 1265 1532 1289">NOTED</p>

Respondent	Comment	Recommendation
	<p>“ungated roads” for cycling and walking it is too simplistic to blame this on cars. (See Section 4 above).</p> <p>Para 6.2 Public Transport – Considered that Elgin Bus Station is just inadequate.</p> <p>Para 6.3 Ports and Harbours - Noted the XXXXX way waiting for a reference to dredger replacement, and suggested that this has been an issue since the vessel was inherited from GRC. Where It is suggested that way or measures are sought for joint action to improve this situation – suggests that it should not be necessary through the public sector.</p> <p>6.4 Roads – Suggested that if motorists have to go slower – so be it, and similarly if streets/ roads cannot be lit – they will have to stay dark. Emphasised however that bridge structures must remain a priority.</p> <p>Question 4e Objectives – Suggested adding objectives to recognise the imperatives of fuel costs or car dependence, and also to recognise the need for good supervision on all works, whether new, improvements or repairs:</p> <p>Suggested that the authority goes for “Get it right first time” and doesnt sign off works for payment until the required standard is reached.</p>	<p>Section 11 Public Transport identifies an action relating to Elgin Bus Station. NOTED</p> <p>The ports and harbours of Moray are a key transport asset. Dredging is required to prevent silting. Moray council is the Harbour Authority at a number of harbours NOTED</p> <p>Bridge inspections are undertaken as part of the asset management activities. Funding is in place fro structural maintyenance. NOTED</p> <p>Fuel costs, location and car ownership are recognised within the LTS. The relevance of good supervision on works/projects is recognised by Moray Council through specific project management. NOTED</p> <p>A 12 month maintenance period is normal practice. This allows remedial works to be carried out by the contractor. NOTED</p>

Respondent	Comment	Recommendation
	<p>Question 4g Action plans - Ref 12 Action Plan Ports and Harbours : Suggested looking for partners or alternatives to TMC as solely responsible for delivery.</p> <p>Ref 13 Road suggested noting changeover to electric powered vehicles which is expected to accelerate over next couple of years, and to be aware of this trend. Also requests a willingness to encourage necessary infrastructure eg, T3 Roadside service stations as possible recharging points. Suggested that a changeover to electric powered vehicle may prove to be a realistic answer to many problems of traditionally fuelled vehicles dependency – particular in terms of environmental impact.</p> <p>Ref 15 Travel behaviour : refer to comments above re changeover to electric powered vehicles.</p>	<p>Moray Council has attempted to promote economic development at harbours. An activity to promote diversification is proposed. NOTED</p> <p>Electric vehicles are being considered by Moray Council. Recharging facilities are a necessary element of any proposals. Objectives K5 and S8 support these type of actions. NOTED</p> <p>NOTED</p>
<p>Organisation Road Haulage Association</p>	<p>Noted the references to freight in the draft and agrees with the desire to invest in local roads. No other comments.</p>	<p>NOTED</p>
<p>Organisation Speyside Forum</p>	<p>Complained about distribution list via email.</p> <p>Complained about the lack of notice for the drop in sessions and lack of suitability of venue for speyside residents. Suggested a venue should also have been Aberlour or Dufftown.</p>	<p>The best efforts were made to distribute consultation documents to a wide group of consultees. This response is welcomed. NOTED</p> <p>Two drop in sessions Elgin (West) and Keith (East) were notified in advance to all consultees by email, posted on the Council web site and alerted to the media via a press</p>

Respondent	Comment	Recommendation
	<p>Suggested size and format of document was unsuitable and only the key elements should have been distributed for consultation.</p> <p>Expressed a feeling of complete demotivation at a recent forum meeting whereby they were discussing the withdrawal of bus service 337 along with reductions in service to knockando at the same time as being asked to comment on action statements within document ‘ continue to support bus services in rural areas...’, ‘continue to improve bus infrastructure across Moray’. Suggested that this had left many with little regard to the value of any response.</p> <p>Requested information on the cost of the consultation so that he could inform members.</p> <p>Summed up by reiterating the perceived lack of value of responding whilst local transport in Speyside was diminishing.</p>	<p>release (articles in the local press). NOTED</p> <p>There is a difficult balance when presenting a complex strategy covering a wide range of transport matters not to create information overload. A summary document containing the vision, objectives and action plan is proposed. NOTED</p> <p>Objective K5 and S3 provide policy justification for supporting affordable public transport. NOTED</p> <p>LTS preparation and consultation has cost in the region of £42k. NOTED</p> <p>The consultation on the LTS and timing of a serious budget decision was a coincidence. The views of the community, and the organisations that represent them, are welcomed. Moray Council actively seeks external funding for public transport services and has introduced two demand responsive transport network areas.</p>

Respondent	Comment	Recommendation
		Concerns for bus services in Moray are noted. NOTED
Individual John Ross	<p>Question 4A achievements - Suggested that the increase in rail passenger journeys was mostly due to change in franchise holder from national express to Scotrail on 17th Oct 2004, and suggested that prior to this many travellers were travelling without tickets and therefore not counted.</p> <p>Expressed disappointment that there is no reference to rail freight activity that took place spring 2008 and 2009 that transported consignments of seed potatoes down to England.</p> <p>Similarly there is no mention of the trial carried out by the Mcpherson group spring/summer 2008 of container lift concept as the means of moving bulk whisky and other consignments in freight boxes or Transfersa containers. Also commented that later that same year the MOD also moved vast quantities of equipment by train.</p> <p>Similarly commented Winter 2009/10 also saw the Inverness/Aberdeen line used by Stobard Rail to send their Tesco train to Inverness following a derailment on the Highland main line, this despite the fact that the railway between Elgin Inverness has not been gauge enhanced to take standard ISO containers.</p> <p>Question 4B links to other strategies – Commented ScotRail franchise was extended without any real benefit to the Moray traveller. It is now more difficult to obtain advance low cost fares to travel to Edinburgh and Glasgow and the situation using, ScotRail Sleepers, Virgin or East Coast Rail to travel into England is no better. Empty trains are still run in and out of Elgin and this waste of asset could be used to supply an improved service at very little cost to the franchise holder The</p>	<p>NOTED</p> <p>NOTED</p> <p>AGREE REVISION</p> <p>NOTED</p> <p>Scottish Government deals with the rail franchise. NOTED</p>

Respondent	Comment	Recommendation
	<p>promises made at the Public meeting in Elgin convened by our MSP in March 2007 to build a 25 meter extension at Elgin station to allow 6-car units to run on the line has not been kept.</p> <p>Question 4C Transportation issues - Responded by agreeing that the journey times and frequency of trains is low, but suggested the fares ARE high and this is not merely a perception. Suggested that First ScotRail must give a better deal to the rail user in this area.</p> <p>Question 4d Vision – considers the vision as meaningless words. Suggested statements should be clear and easy to understand in plain language</p> <p>Question 4e Objectives – noted that he could not argue with the objectives but suggested that they were unlikely to become realities in this financial climate.</p> <p>Question 4f integrated transport – agreed</p> <p>Question 4g action plans – agreed</p>	<p>The Moray Citizens Panel Transport Survey identified this as an issue. Compared to equivalent journeys in Central Scotland fares are higher. NOTED</p> <p>The VISION was arrived at via a long consultation process, taking account of the National Transport Strategy, Regional Transport Strategy and local policies. NO CHANGE</p> <p>Like many other local authorities there are competing demands on budgets. Implementation plans are brought forward annually and submitted for Committee approval. These are available via the Council web site. This detail will provide an opportunity to measure tangible results. NOTED</p> <p>Comment on the LTS approach adopted by the Council is welcomed NOTED</p> <p>NOTED</p>

Respondent	Comment	Recommendation
	<p>Question 4g RTRA – suggested that Reducing road transport is important and should not be abandoned in Moray because of its rural nature. Suggested our politicians will have to fight harder for resources and come up with solutions to give this area a decent public transport system.</p> <p>Question 4j general comments – suggested that we still need to come up with smarter solutions to improve our services in these tight financial times.</p>	<p>There is a need for a balanced approach in order to ‘meet the needs of the community’. Both aspects (roads and public transport) are essential elements of the transport network in Moray. NOTED</p> <p>Suggestions and ideas for ‘smarter solutions’ are welcomed by Moray Council. NOTED</p>
<p>Individual AW Peddie</p>	<p>Noted - On behalf of the many people, especially pensioners, who live between Keith and Dufftown we feel we are being completely ignored as far as public transport is concerned. All we have is the school bus service which we don't have during holiday periods and which is completely unsuitable for appointments, work, shopping etc. We Feel it is perfectly feasible to run a mini bus service between Dufftown and Keith at least three times daily and indeed this service could be extended to Tomintoul taking in Glenlivet and Tomnavoulin. As you already run a service to Grantown from Aberlour I am Sure this could easily be extended to include these villages. The costs could be offset by cancelling the Deveron Coaches run to Inverness on a Monday as we would then have a connection to the number 10 service to Elgin, Inverness and Aberdeen. Further savings could be made by introducing a small car service to convey pupils from the Cabrach to Dufftown and I am sure there are many other wastes which could be cut out, eg. the dial a bus service would be redundant if we had a reliable daily service. We have noticed that some of the Moray Council Buses do little all day so could be utilised to supply better services. We hope you will give this request your consideration as it would help</p>	<p>The Council undertakes value for money and efficiency reviews. The current pressure on budgets means that hard decisions are having to be made. NOTED</p>

Respondent	Comment	Recommendation
	<p>the Carbon Footprint that everyone is so concerned about these days.</p>	
<p>Individual Confidential</p>	<p>Question 4j general comments – would like to ensure that every effort is made to protect, provide and promote public transport provision to all hospital and health facilities in Moray. Also to support healthier life styles the use of sport and leisure facilities should be encouraged by adequate public transport provision to service them.</p> <p>Suggested that it was also essential that appropriate transport arrangements are supported/ put in place to service rural communities, most especially for the older and infirm to avoid them being isolated.</p> <p>Noted that transport should cater adequately for use by the disabled. Noted that disabled facilities on some bus routes are less satisfactory and if the wheelchair seating area is already full then disabled passengers are left behind. Suggested that he appreciated that this is a tricky issue but suggested that consideration should be given to how transport operators can be further encouraged to offer better information on wheelchair capacity on their routes and services. Suggested the provision of a pre-booking service.</p>	<p>Welcome this comment about the essential aspect of transport to community facilities such as hospital and medical facilities. NOTED</p> <p>This is supported through objective S3. NOTED</p> <p>The Disability Discrimination Act is fundamental legislation that will be formally acknowledged in the strategy linkages. Transport operators manage their own capacity usually through a booking system. NOTED</p>
	<p>Intentionally left blank</p>	