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15<sup>th</sup> June 2010

Dear Ms Ewen,

**TAYplan Main Issues Report: Options for Scotland's SusTAYnable Region (2012-2032) and Environmental Report**

The Tayside and Central Scotland Transport Partnership considered the above consultation at its meeting on 15 June 2010 and agreed to submit the following comments.

**Main Issues Report**

**Section 3 Quality Places – Environment and Settlements**

Paragraph 3.8 refers to forestry. Reference should be made to difficulties of access to many forests and the potential adverse impacts of forestry-related traffic on rural communities.

**Section 4 Quality Places – People**

*Q1. The Main Issue D considers two options for population and housing growth. Which option do you think the Proposed Plan should include?*

Tactran supports Option 2. This offers greater potential for encouraging the use of public transport, walking and cycling as alternatives to driving as Dundee has the densest public transport network while walking and cycling distances would be less than for a more dispersed population.

*Q2. The housing land figures are represented as ranges. Do you think the upper ranges in the option you chose for Question 1 are deliverable given the present economic climate and should they be higher given the recent 2008-based population projections?*

No opinion.

## **Section 5 Quality Places – Economy**

In paragraph 5.5 the potential of the area's transport connections to London and the Central Belt needs to be recognised and in particular the role of Dundee Airport in providing fast connections to London, Belfast and Birmingham.

*Q3. Several key actions could be in the Proposed Plan to support the growth of the economy; do you agree with these:*

- 1. Identify the need or a new strategic employment site at Forfar as an agricultural service centre*
- 2. Identify the need for a new strategic employment site at the Scottish Crop Research institute, Invergowrie, for food research*
- 3. Protect Dundee and Montrose Ports for port related uses only.*

The location of new strategic employment sites should support broader environmental objectives of reducing carbon emissions, through discouraging over reliance on the private car for employee and other travel. Maximum emphasis should be placed on encouragement of public transport and other sustainable modes for commuting and other operational travel. In this connection all strategic employment locations should be required to develop, monitor and maintain effective Travel Plans which contribute to national, regional and local targets for carbon and other emissions reduction. In terms of the site at Invergowrie account should be taken of the scope for connection with the potential Dundee West Park and Ride facility, which forms part of both the Tactran Regional Park & Ride Strategy and the national Strategic Transport Projects Review.

Proposals to protect the two Ports for port related uses are supported particularly in light of the potential for both ports to service the off-shore renewables sector. Protection should also include the potential for future development of multi-modal freight transshipment at both Ports, including sea and road to rail.

*Q4. Do you agree that the retail hierarchy in Main Issue F is the right one to deliver Scottish Government objectives to concentrate comparison goods retail in town centres?*

Tactran agrees with the hierarchy and would strongly support the concentration of new retail development in these centres where shoppers will have alternatives available to travelling by car.

*Q5. Do you agree that the Proposed Plan should require Local Development Plans to identify a supply of effective employment land?*

Tactran agrees that LDPs should be required to provide an effective supply of employment land, particularly in small communities. This will encourage more employment to be taken up locally.

## **Section 6 Quality Places – Consumption and Use of Resources**

*Q6. In order to reduce resource consumption in development do you think the Proposed Plan should require high resource efficiency standards in development and that TAYplan should work with local authorities to develop a consistent framework for these requirements?*

Tactran agrees. A key aspect of this should be the requirement for development and maintenance of Travel Plans with supporting monitoring regimes which measure and maintain effectiveness in meeting modal shift objectives in favour of more sustainable modes.

*Q7. The Proposed Plan could require the designing-in of waste collection/management for new development to be agreed between the local authority and the developer/operator. Should the Proposed Plan adopt this approach?*

No comment.

*Q8. How can the Proposed Plan best protect prime agricultural land to support food security whilst allowing some development at the edge of towns?*

No comment.

## **Section 7 Quality Places – Infrastructure**

In paragraph 7.12 it should be noted that the STPR improvements between Aberdeen and the Central Belt extend beyond the double tracking of the line at Usan and include line speed improvements, additional loops, upgraded signalling and more powerful rolling stock.

*Q9. Do you think that the Proposed Plan should set out a framework to ensure that renewable energy and waste management development are located in the most appropriate locations?*

Tactran agrees. A key consideration should be the need to minimise lorry mileage serving such sites and to maximise opportunities to use rail or water borne transport where appropriate.

## **Section 8 Quality Places – Vision**

*Q10. Do you think paragraph 8.2 sets out the right objectives for the vision?*

Agree.

*Q11. Do you agree with the proposed vision?*

Agree.

## **Section 9 Quality Places – Spatial Strategy**

*Q12. Do you agree that the settlements identified in figure 9.1 are the region's Principal Settlements?*

Agree.

*Q13. Which Spatial Strategy Option do you think the Proposed Plan should include?*

Tactran strongly supports Strategy A as this would concentrate development in settlements where good quality, sustainable alternatives to the car exist or can be developed.

*Q14. Main Issue N sets out priorities for sequencing the release of land for the TAYplan area. Do you believe:*

- *The order is correct*
- *If an alternative, Please tell us what the alternative should be and why?*

Tactran agrees that the order is correct as this will encourage the use of non-car modes and avoid adding to long distance commuting.

Q15. Do you agree that the following issues do not need to be covered by the Proposed Plan?

- Affordable Housing
- Minerals
- Wind Energy

No opinion.

*If you think that there are other issues that do not need to be covered by the Proposed Plan then please explain.*

Tactran is satisfied that the Main Issues identified for the Proposed Plan appropriately covers the relevant topic areas as they relate to strategic transport connectivity, accessibility and land use policy integration.

Q16. *If there are other main issues which are strategic and cross boundary that you feel the Proposed Plan should cover please tell us what these are and how you think it should consider them?*

None.

Q17. *If you would like to make any other comments please do so.*

None.

## **Environmental Report**

It is noted in Table 3 of the Non-technical Summary that the SEA topic “material assets” includes “issues around transport infrastructure, ... “ however, in the remainder of the Summary and the main report transport infrastructure does not receive direct mention.

In Section 10 of the report a number of indicators are proposed. Tactran has developed a Monitoring Framework for the RTS and will be pleased to assist TAYplan in establishing transport related indicators.

Q1. *Do you agree with our understanding of the baseline environment in the TAYplan area?*

Tactran agrees with the understanding of the baseline environment.

Q2. *Do you think there are other plans, policies (in addition to those listed in the Environmental Report) or wider environmental objectives that should be taken into account?*

The plans and polices listed are considered to be comprehensive though Appendix 1 of the Report should make reference to the SEStran Regional Transport Strategy for its coverage of North Fife in addition to Tactran’s RTS relevance to remainder of the TAYplan region.

Q3. *In your opinion have we identified the most important or significant environmental problems affecting the TAYplan area?*

In general terms Tactran would agree that the most important or significant environmental problems have been identified. A further environmental factor that could be considered is noise, particularly traffic noise. This can impact on human health through increased stress and has an intrusive impact on both urban and rural environments.

*Q4. Do you disagree with any of the assessment questions?*

Tactran does not disagree with any of the assessment questions.

*Q5. Do you have concerns about significant or cumulative environmental effects on particular parts of the TAYplan area or on particular environmental features?*

Tactran has no such concerns.

*Q6. Do you think that there are further, relevant aims and aspirations for the environment that the Strategic Development Plan could deliver in the long term?*

Tactran has not identified any further considerations.

### **Equalities and Human Rights Impact Assessment**

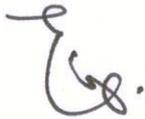
It is noted that many of the positive impacts on target groups are related to increased accessibility to new developments by non-car modes. Consequently Tactran has no further comment to offer.

### **Habitat Regulations Appraisal**

Tactran has no comment as there are no transport related issues.

I trust that the above comments are of assistance. If you require any further information, or clarification of any aspect in this response, please contact Michael Cairns, Strategy Manager on 01738 475774 in the first instance.

Yours sincerely,



Eric Guthrie  
Director