

15 JUNE 2010

STRATEGIC AND LOCAL DEVELOPMENT PLAN CONSULTATIONS**REPORT BY STRATEGY MANAGER**

This report seeks the Partnership's approval for proposed responses to consultation on the TAYplan Main Issues and Environmental Reports and the Stirling Local Development Plan Main Issues Report.

1 RECOMMENDATIONS

1.1 That the Partnership:-

- (i) approves the proposed response to TAYplan's consultation on the Main Issues Report and Environmental Report, as detailed in Appendix A; and
- (ii) approves the proposed response to Stirling Council's Local Development Plan Main Issues Report, as detailed in Appendix B.

2 BACKGROUND

- 2.1 At its meeting on 15 December 2009 the Partnership heard a presentation by the TAYplan Strategic Development Planning Authority Manager on progress in the preparation of the Strategic Development Plan (SDP) for Dundee, Perth, Angus and North Fife.
- 2.2 It was noted that Tactran has a "Key Agency" role in the Development Planning Process both for Strategic and Local Development Plans. The Director explained that the Partnership would be consulted at key stages of the SDP process and that these would be reported to future Partnership meetings.
- 2.3 The timescales for development of TAYplan and the Stirling Local Development Plan, which allow for consultation on the Proposed Plans during 2011, are broadly consistent with and will help inform the statutory need to review the Regional Transport Strategy in 2012.

3 DISCUSSION**TAYplan Consultation**

- 3.1 TAYplan published the Main Issues Report (MIR), Environmental Report (ER) and associated documents for consultation on 30 March 2010. The formal consultation ends on 2 July 2010. The comments received will then be considered between July and September 2010. Following this the Proposed Plan will be published in May 2011 with approval of the Plan and publication of the Strategic Environmental Assessment (SEA) post-adoption statement programmed for April 2013.

- 3.2 The Main Issues Report considers the key issues that are anticipated to impact on the region over the next 20 years. It presents options including the preferred scale of growth and appropriate locations for development between 2012 and 2024, and a broad indication of the scale and direction of growth from 2024 to 2032. A series of 17 questions are posed in the Report.
- 3.3 The Environmental Report forms part of the Strategic Environmental Assessment of the SDP. It has been prepared by Perth & Kinross Council on behalf of TAYplan. The SEA is intended to ensure that the possible environmental effects of the Proposed Plan are fully considered and taken account of in the course of their development. The ER records the assessment of the MIR's vision and spatial strategy. A set of six questions are posed in the Report. All comments received on the ER will be reviewed and taken into account during the preparation of the Proposed Plan.
- 3.4 Also available for comment are the Draft Equalities and Human Rights Impact Assessment and Draft Habitat Regulations Appraisal. The Equalities and Human Rights Impact Assessment aims to ensure that opportunities are taken to promote equality as well as other human rights. The Appraisal does not identify any negative impacts on any equality target group. The majority of positive impacts on target groups are related to increased accessibility to new developments by non-car modes. The Habitat Regulations Appraisal assesses the impact of the SDP against the conservation objectives of the relevant European designated conservation sites. There are no transport related issues identified in the Appraisal.
- 3.5 Supporting documentation has also been received by Tactran, comprising the Background Technical Note to the MIR and the Monitoring Statement. Officer comments have previously been submitted principally clarifying factual issues and statistics.
- 3.6 The consultation documents are available for inspection at: <http://tayplan-sdpa-consult.limehouse.co.uk/portal>.

TAYplan Main Issues Report

- 3.7 The Main Issues Report outlines the policy context for the SDP, including Scotland's National Transport Strategy, Transport Scotland's Strategic Transport Projects Review and the Tactran and SEStran Regional Transport Strategies as well as the visions contained within the Single Outcome Agreements for Angus, Dundee, Fife and Perth & Kinross.
- 3.8 The Report identifies a number of issues and challenges that will affect the TAYplan area which are broken down into "Environment and Settlements", "People", "Economy", "Resource Use and Consumption" and "Infrastructure".
- 3.9 The quality of the built and natural environments influences perceptions, identity and quality of life. In considering "Environments and Settlements" it is recognised that there will be a need to improve accessibility and reduce travel demand, pollution, resource consumption and the contribution to climate change. This will require a modal shift to walking/cycling and public transport.

- 3.10 In considering the region's population, the Report notes that while it is growing at a regional level Dundee has experienced a decline over the past decade. Options are considered to accommodate the anticipated growth in population and associated housing need. These would either allow development across the region to follow past trends or to promote more housing developments in Dundee to reverse the city's decline. The latter is the preferred option which recognises the greater accessibility offered in Dundee to jobs, services and facilities.
- 3.11 TAYplan recognises the need for a strong, stable and functioning economy. The MIR comments on growth sectors in the national and regional economies that have been identified by Scottish Government. The growth sectors are Life Sciences; Digital Media; Finance; Ports and Renewable Energy; Food, Agriculture and Fisheries; Retail and Role of Town Centres; and Tourism, Culture and Major Events. The ports of Dundee and Montrose are identified as having a significant role in supporting the growth sectors and it is considered that the Proposed Plan may need to protect land at Dundee and Montrose for port uses.
- 3.12 The MIR comments that the present rate of resource consumption is not sustainable and that climate change is the single most important issue facing mankind. Reducing the need to travel and adopting technological changes are viewed as critical in attempts to reduce the amount of energy used for transport.
- 3.13 The Report notes that "Infrastructure" enables people and businesses to move or utilise resources and improves accessibility to markets, services and facilities. Transport infrastructure, in particular, can affect the rate of resource consumption, air quality, pollution and carbon emissions, and can also contribute to the region's economic competitiveness. It is recognised that there is a need to locate developments and improve rail and road infrastructure to encourage the use of public transport and other modes of personal and freight transport that minimise resource consumption. However the MIR consultation does not pose any specific questions on transport infrastructure requirements.
- 3.14 The MIR proposes a Vision for TAYplan which brings together the issues identified as well as a series of objectives. The Vision aims for "TAYplan as a sustainable region which is beautiful, vibrant, clean and green where the regeneration and growth of Dundee city region has made it a great place for people to live, work, invest and visit that does not create an unacceptable burden on the planet".
- 3.15 The Report concludes by outlining a Spatial Strategy that sets out where new development should and should not be in order to achieve the vision and address the main issues. Two Strategy Options are considered for concentrating most development in the region's Principal Settlements. Strategy A would see most of the new development in Dundee and Perth with the remainder largely concentrated in the other Principal Settlements. Strategy B is similar but would see a more dispersed pattern of housing development round Perth and into the Carse of Gowrie. Strategy A is preferred for a number of reasons including offering the best option both to reduce the need to travel and improve accessibility.

TAYplan Environmental Report

- 3.16 The Environmental Report outlines a review of other plans and programmes covering the TAYplan area to ensure that the relevant environmental protection and sustainability objectives are taken on board through the assessment. This process helped to identify the key environmental issues.
- 3.17 Baseline environment conditions were identified along with the environmental issues in the TAYplan area which can be influenced by the SDP. These included transport related topics in terms of air pollution and “material assets”. High emissions from road traffic in Dundee and Perth were considered to be a problem, with the implication that the SDP should promote the reduction of emissions through improved energy efficiency, resource efficiency, green travel and behavioural change. In terms of “material assets” TAYplan has identified issues around transport infrastructure, also derelict and vacant land and sustainable waste management. However, the implications of transport infrastructure are not directly examined in the ER where the emphasis is largely on waste water treatment, energy efficiency in buildings and waste management.
- 3.18 Environmental assessment was applied to the development of the Proposed Plan at two key stages; the Vision and the Spatial Strategy. The assessments have identified a number of suggested mitigation and enhancement measures, some of which were incorporated into the MIR and others will inform the development of the Proposed Plan. The ER proposes a monitoring framework linked to SEA objectives. There would be scope for the indicators developed as part of the RTS Monitoring Framework to assist with this process.

Stirling LDP Consultation

- 3.19 Stirling Council published the Stirling Local Development Plan (LDP) Main Issues Report (MIR) and associated documents for consultation on 22 April 2010. The consultation ends on 30 July 2010. The LDP covers that part of the Stirling Council area outwith the Loch Lomond and The Trossachs National Park. Following consultation, the Proposed Plan will be published in May 2011 with approval of the Plan and publication of the revised Environmental Report programmed for 2013. The consultation documents are available for inspection at: http://www.stirling.gov.uk/mir_26_04_10.red.pdf.
- 3.20 The MIR seeks views on policy and development options to be included in the Proposed Plan. It also highlights key changes that have occurred since the Structure Plan and Local Plan, which it replaces, were last produced. It presents preferred and alternative proposals for development for the period to 2022 and a broad indication of the scale and direction of growth from 2022 to 2032. A series of questions are posed in the Report.
- 3.21 Supporting documentation has also been received by Tactran, comprising Topic Papers and other Background Papers. Officer comments have previously been fed into the Topic Papers while the Background Papers are factual rather than policy papers and therefore there is little scope for comment.

Stirling LDP Main Issues Report

- 3.22 The LDP MIR outlines the Vision for the LDP area. This was developed from a review of policies and plans, including the RTS; an examination of existing Structure and Local Plans; consideration of pressures and evidence for change; and an identification of visions and aspirations for change. A key part of the LDP vision is that more people will work close to and within their homes, reducing the amount of travel undertaken by residents. It will also have some substantial new housing areas with layouts that accommodate bus and cycle routes; more pedestrianised streets, bus lanes, cycle tracks and more opportunities for walking; and more Park and Ride facilities. LDP Key Objectives include creating sustainable communities, helping to tackle climate change challenges and promoting healthy environments, all of which have a central theme of reducing car use and encouraging travel by greener modes.
- 3.23 The main issues for the LDP have been identified. These focus on how strategic land use changes can be managed, supplying the necessary infrastructure to support future development, and how development can be concentrated in sustainable locations, in ways that support, inter alia, social inclusion and managed to reduce greenhouse gas emissions. Each of the main issues is accompanied by an analysis of challenges together with a Preferred and Alternative approach to dealing with them. Detailed consideration is given to supply of housing and employment land; the provision of retail space and education; the provision of transport, drainage and waste management infrastructure; securing developer contributions to infrastructure costs; concentration of development at sustainable locations; maintaining and creating high levels of amenity; conserving the historic environment, natural heritage and biodiversity; the delivery of affordable housing and provision of particular needs housing; dealing with energy efficiency and renewable energy; minimising the use of unsustainable resources and supporting low input food production and self-sufficiency.
- 3.24 The transport infrastructure section of the Main Issues chapter indicates that the LDP will support regional transport objectives, in particular to locate development so as to reduce the demand for travel and enable travel demands to be met by a choice of modes; and to manage the travel demands from development in a sustainable manner. Reference is made to projects identified in the RTS and Transport Scotland's Strategic Transport Projects Review (STPR). The STPR projects considered are Strategic Park & Ride to the south of Stirling, Edinburgh to Glasgow Improvement Programme, Further Electrification of the Strategic Rail Network, and the Keir Roundabout grade separation which forms part of the A9 upgrading from Dunblane to Inverness.
- 3.25 Sustainable locations are identified as those locations that reduce the need to travel and promote and support a choice of transport modes. Consequently the Report concludes that the existing urban area and those settlements closest to it as being the most sustainable in transport terms and therefore most suitable for future development.
- 3.26 The Report concludes by outlining a Spatial Strategy which defines the Planning Authority's policies and proposals as to the development and use of land. It includes all the sites that could potentially appear in the Proposed Plan. A "place-shaping" approach has been adopted with the development of sustainable communities at its heart.

- 3.27 A range of spatial growth strategies have been considered which were then evaluated against place-making criteria taken from a City Visioning exercise. These ranged from concentrating all development in the city to placing development in new settlements in the rural area. The recommended strategy that emerged from this exercise suggested that there should be controlled development in villages to support and sustain local services and amenities; controlled external expansion of the city to the north and south to take advantage of the city's strategic connectivity; and prioritisation of brownfield development within the city providing opportunities for more sustainable forms of movement. Development to the south of the city has the potential to link into a range of transport initiatives including a new Park & ride site.

4 CONSULTATIONS

- 4.1 Tactran officers have been closely involved in the various stakeholder consultation fora which have been established by TAYplan and Stirling Council to inform the development of their Strategic and Local Development Plans.
- 4.2 The proposed responses set out in the Appendices have been compiled in consultation with partner Councils through the relevant Officer Liaison Groups.

5 RESOURCE IMPLICATIONS

- 5.1 There are no resource implications arising directly from this report.

Michael Cairns
Strategy Manager

For further information e-mail michaelcairns@tactran.gov.uk or tel 01738 475774.

NOTE

The following background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973 (and not containing confidential or exempt information) were relied on to a material extent in preparing the above Report:

TAYplan The Main Issues Report

TAYplan Environmental Report Non-technical Summary

TAYplan Environmental Report

TAYplan Equalities and Human Rights Impact Assessment

TAYplan Habitat Regulations Appraisal (draft)

TAYplan Background Technical Note to the TAYplan Main Issues Report

TAYplan Monitoring Statement

Stirling Local Development Plan Main Issues Report

TAYplan Strategic Development Planning Authority
Main Issues Report Consultation
Enterprise House
3 Greenmarket
Dundee
DD1 4QB

15th 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 policies 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

Planning & Policy
Stirling Council
Viewforth
Stirling
FK8 2ET

15th June 2010

Dear Sir,

Stirling Local Development Plan: Publication of Main Issues 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

Main Issues Questions

Q1a: Do you agree with the preferred approach outlined which will ensure a generous supply of housing is provided for the future?

Tactran has no views on this issue though as windfall sites are not allocated in the LDP it is considered that the planning process must ensure that issues of accessibility and connection to public transport, cycling and walking networks must be applied vigorously to such sites.

Q1b: Do you agree with the preferred approach outlined which will ensure an effective supply of business land for the future?

Tactran supports the Preferred Approach, in particular the requirements that all development should take account of accessibility by a range of modes and that major business developments should produce Travel Plans. In order to ensure effectiveness Travel Plans should be supported by review and monitoring arrangements which ensure that developers meet agreed targets for modal shift and other sustainability objectives. The opportunities to co-locate housing and employment uses, as stated, will help to reduce the need to travel.

Q1c: Do you agree with the preferred approach outlined which will look to meet some of the quantitative and qualitative demand for retail space in the future?

Tactran supports the Preferred Approach, particularly with regard to supporting the City Centre which will enable shoppers and retail workers alternatives to travel by car. In considering convenience retailing, accessibility by a variety of modes should be assessed alongside quantitative and qualitative requirements to reduce car travel and ensure access to all sectors of the population.

Q2a(i): Do you agree with the preferred approach to future education provision in association with new residential developments?

The Preferred Approach is supported subject to requiring new residential developments to fund pedestrian and cycling links to schools as appropriate.

Q2a(ii): Do you agree with the preferred approach to dealing with transport infrastructure in association with new developments?

The Preferred Approach is supported. In addition, all new developments should be designed to allow bus access on the new road network as appropriate with suitable links between bus stops and all new building units. It is believed that developer contributions should also be used to fund bus service enhancements, where appropriate, in addition to infrastructure improvements. In terms of the transport infrastructure projects listed as being identified in the RTS and sub-strategies, mention should also be made of improvements to the multi-modal interchange at Stirling and completion of the National Cycle Network including Doune - Callander, at Manor Powis and between Cowie and Fallin.

Q2a(iii): Do you agree with the preferred approach to dealing with drainage infrastructure in association with new developments?

No comment.

Q2a(iv): Do you agree with the preferred approach to dealing with waste management infrastructure?

In terms of the Preferred Approach it is believed that the reference to mode of transport should be changed to seek to minimise the amount and distance that waste is moved by road. The Alternative Approach is preferred as this will reduce the amount of waste moved.

Q2b: Do you agree with the preferred approach to dealing with developer contributions?

The Preferred Approach is supported, as this will ensure that developer contributions are targeted at addressing problems or issues created by the development. It is recognised that the amount of contribution will need to be proportionate and that some elements of transport infrastructure may need to be funded by more than one development.

Q3: Do you agree with the preferred approach to ensuring development comes forward in sustainable locations?

The Preferred Approach is supported and accords well with the RTS in identifying locations that reduce the need to travel and promote and support a choice of transport modes. It is suggested that reference should be made in the text to the increasing number of Demand Responsive Transport services that can radically improve accessibility particularly in rural areas compared with the conventional bus services and postbuses that they have replaced.

Q4a: Do you agree with the preferred approach to maintaining and creating high levels of amenity?

Tactran supports the Preferred Approach. In particular, the Green Network Concept can serve a dual function in providing attractive car-free routes to promote walking and cycling.

Q4b(i): Do you agree with the preferred approach to ensuring planning policies conserve the historic environment?

No comment.

Q4b(ii): Do you agree with the preferred approach to ensuring planning policies conserve natural heritage and biodiversity?

No comment.

Q4c(i): Do you agree with the preferred approach to dealing with the delivery of affordable housing?

No comment.

Q4c(ii): Do you agree with the preferred approach to delivering particular needs housing, particularly the needs resulting from an ageing population?

Tactran supports the Preferred Approach. A key aspect of the location of particular needs housing is the requirement to ensure locations are accessible by non-car modes as both elderly people and people with disabilities have lower than average car ownership which decreases further with age and the degree of disability.

Q5a: Do you agree with the preferred approach to dealing with energy efficiency and renewable energy?

This question relates [specifically to energy efficiency in new buildings/renewable generation](#) therefore Tactran has no comment.

Q5b: Do you agree with the preferred approach to minimising the use of unsustainable resources?

This question relates specifically to energy efficiency in new buildings/renewable generation therefore Tactran has no comment.

Q5c: Do you agree with the preferred approach to supporting low input food production and self-sufficiency?

Tactran supports the Preferred Approach which should have an impact in reducing “food miles”.

Spatial Strategy Questions

Q: Do you agree with the overall approach which is based on controlled appropriately scaled development in the villages and regeneration, controlled external expansion of the city (to the north and south) to enhance the city image and take advantage of the city's strategic connectivity, and prioritisation of brownfield development within the city and other towns and villages?

Tactran agrees with this Approach which offers opportunities for new developments to be less dependent on car travel and greater scope for promoting greener modes.

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