

## TAYSIDE AND CENTRAL SCOTLAND TRANSPORT PARTNERSHIP

14 SEPTEMBER 2010

## CONSULTATIONS

## REPORT BY STRATEGY MANAGER

This report updates the Partnership on responses to Dundee City Council's Local Development Plan consultation; seeks endorsement of officer responses to the Scottish Government's consultation on the National Planning Framework Action Programme and Department for Transport consultation on the review of the Trans-European Network – Transport (TEN-T); and seeks approval for a proposed response to the Scottish Ferries Review.

**1 RECOMMENDATIONS**

## 1.1 That the Partnership:-

- (i) notes the officer responses to Dundee City Council Local Development Plan consultations, as detailed in Appendices A and B;
- (ii) endorses the officer response to the Scottish Government's consultation on the National Planning Framework Action Programme, as detailed in Appendix C;
- (iii) endorses the officer response to the Department for Transport consultation on the review of the Trans-European Network – Transport (TEN-T), as detailed in Appendix D; and
- (iv) approves the proposed response to the Scottish Ferries Review, as detailed in Appendix E.

**2 BACKGROUND**

- 2.1 Dundee City Council has published a number of items for early consultation on the Local Development Plan. Consultation responses were to be submitted by 30<sup>th</sup> August and 8<sup>th</sup> October 2010. The consultation material is available for inspection at <http://www.tactran.gov.uk/members/14sep2010.html>.
- 2.2 The Scottish Government has consulted on the National Planning Framework Action Programme. Consultation responses were to be submitted by 7<sup>th</sup> September 2010. The consultation material is available for inspection at: <http://www.scotland.gov.uk/Topics/Built-Environment/planning/National-Planning-Policy/npf/action-plan>.
- 2.3 The Department for Transport has published an invitation to contribute to the UK response on the review of the Trans-European Network – Transport (TEN-T). Consultation responses were to be submitted by 10<sup>th</sup> September 2010. The consultation material is available for inspection at <http://www.dft.gov.uk/consultations/open/2010-31/consultation.pdf>.

- 2.4 The Scottish Government has published a consultation on its Ferries Review. Consultation responses are to be submitted by 30th September 2010. The consultation material is available for inspection at: <http://www.scotland.gov.uk/Publications/2010/06/17134718/0>

### **3 DISCUSSION**

#### **Dundee City Local Development Plan**

- 3.1 Dundee City Council has commenced consultation in preparation for production of the Local Development Plan Main Issues Report. The first paper produced was for Key Agencies to assist in the identification of main issues. This outlined the background and strategy of the current local plan for a range of topics comprising living, working and shopping in Dundee, the environment in Dundee, accessibility and waste management. A series of questions were posed for each topic. The deadline for this element of the consultation was 30<sup>th</sup> August 2010. A copy of the submitted officer response is included at Appendix A, which the Partnership is asked to note.
- 3.2 The Council has issued further consultation papers following the Key Agencies consultation outlined above. A wider ranging "Initial Consultation" is seeking initial views on any key issues that require to be addressed by the Plan or direction the Plan should take, and to identify potential development sites across the Plan area. Responses have to be made via the Council's internet site no later than 8<sup>th</sup> October 2010. Appendix B shows the officer response submitted, which the Partnership is asked to note. Formal consultation on the Main Issues Report and Proposed Plan will be the subject of detailed reports to future Partnership meetings.

#### **National Planning Framework Action Programme**

- 3.3 The National Planning Framework for Scotland 2 (NPF2) Action Programme identifies 80 actions, setting out how they contribute to the NPF strategy, milestones and the partners that will be involved in delivery. The Action Programme is designed to be a tool for use by all partners involved in implementing the NPF2 strategy. A report was presented to the Scottish Parliament's Local Government & Communities Committee in June 2010 outlining progress in the first year since publication of NPF2 and the Action Programme. Following completion of the first annual progress report the Scottish Government is undertaking a review of the Actions and has invited comments on them. The principal concerns for the Partnership are the absence of reference to Tactran and to projects that are planned or are in progress in the region. Responses were invited by 7<sup>th</sup> September 2010 and a copy of the submitted officer response is included at Appendix C, which the Partnership is asked to endorse.

#### **Trans-European Network – Transport (TEN-T)**

- 3.4 The Department for Transport has published an invitation to contribute to the UK response to the European Commission (EC) consultation on the review of the Trans-European Network – Transport (TEN-T). The UK response will help the EC with the formulation of proposals for the next TEN-T Guidelines. The draft TEN-T Guidelines, which will set the priorities and funding objectives of the TEN-T programme, will be published in spring 2011.

- 3.5 Currently the major road and rail routes in the region, from Glasgow/Edinburgh to Inverness/Aberdeen and the West Highlands routes, are identified as forming part of the TEN-T network. The major concern is that none of the region's ports is identified as a TEN-T port and therefore are excluded from any potential funding opportunities for improvements. The definition of "Community seaports" which includes those ports that handle annual freight volumes of not less than 0.5 million tonnes would cover the Port of Dundee and, apart from trading in the last two years, also Montrose. Responses required to be submitted by 10<sup>th</sup> September 2010 and a copy of the submitted officer response, which was compiled in consultation with the ports of Dundee and Montrose, is included at Appendix D, which the Partnership is asked to endorse.

### **Scottish Ferries Review**

- 3.6 The Scottish Ferries Review was a commitment in the National Transport Strategy. The purpose of the Review is to develop a shared vision and outcomes for lifeline ferry services in Scotland; to analyse current ferry services, identifying how well they meet the proposed outcomes and link to other modal networks; to inform the Scottish Government's long term plan for ferry services and influence the next round of procurement of ferry services; and to identify policies to be taken forward to deliver the long term plan.
- 3.7 A consultation document has been produced seeking opinions and views about how ferry services could be delivered in the future. This will be used to inform the preparation of a Draft Ferries Plan that will cover the period up to 2022. The consultation document in Chapter 1, Paragraph 19 notes that consultants were appointed to provide detailed information and their reports have been published as Working Papers. A high level Strategic Environmental Assessment has been undertaken and this also forms part of the consultation.
- 3.8 The consultation document poses 32 questions covering aspects of funding, tendering, fares, design of ferry services, accessibility, information provision, climate change objectives and responsibility for ferry services. The questions are principally concerned with existing ferry services serving the Western and Northern Isles and, therefore, are not of direct relevance to Tactran. However, recommendations are made in Ferries Review Working Paper 1 – Freight that would have implications for freight movements on the region's roads as a consequence of proposed new freight ferry routes. There are no questions referring to these issues within the formal consultation, therefore the proposed response at Appendix D seeks clarification on the status of the recommendations in the Working Papers.

## **4 CONSULTATIONS**

- 4.1 The various responses addressed in this report have been prepared 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:

Dundee City Local Development Plan, Identification of Main Issues, Key Agencies, Dundee City Council

National Planning Framework Action Programme 2 Action Programme, Scottish Government, March 2010

National Planning Framework 2 - Action Programme, Progress Report for Local Government & Communities Committee - June 2010

Scottish Ferries Review Consultation Document, Scottish Government, 10 June 2010

Scottish Ferries Review: Consultation, Strategic Environmental Assessment: Environmental Report, Scottish Government, June 2010

Scottish Government Ferries Review, WP1 – Freight, 31 March 2010

Stephen Page  
Planning Officer  
Dundee City Council  
Tayside House  
DUNDEE  
DD1 3RB

30<sup>th</sup> August 2010

Dear Stephen,

**Local Development Plan – identification of Main Issues – Key Agencies**

I refer to the above consultation. The RTP appreciates the opportunity to comment at this stage and is keen to play a full role in the development of the LDP.

**Living in Dundee**

*Q1 Is the existing strategy still appropriate, if not, what other things should be considered?*

The development of brownfield land for housing development is supported as this concentrates development in the existing built-up area where there are more likely to be realistic travel alternatives to the private car. It is accepted that certain development will need to be located at Dundee Western Gateway. Where this occurs it should be supported by good access from all new dwellings to suitable infrastructure to encourage the use of public transport, cycling and walking. As you are aware there are proposals for a Park & Ride site in the vicinity of the Western Gateway. Access should be provided between new housing and the Park & Ride site to maximise opportunities to encourage non-car travel.

*Q2 Have the existing policies in the Dundee Local Plan Review adequately limited Greenfield housing land release and encouraged brownfield development?*

*Q3 Have the policy measures mitigated the potential negative effects of residential development?*

*Q4 Should there continue to be a blanket ban on flatted developments? Or should flats be allowed depending on site specific circumstances and if so should there be a required minimum floorspace? In terms of house type should there continue to be a distinction between the City Centre, inner city and suburban areas? If so, what boundaries are appropriate?*

*Q5 What are the main housing issues facing the City?*

*Q6 What should the housing priorities for the planning system in Dundee be for the next 10 year period?*

No comment.

## **Working in Dundee**

*Q7 What are the key aims which should guide the economic and business strategy of the new Local Development Plan for Dundee?*

Key aims should be to promote sustainable economic growth, improve the connectivity of Dundee particularly by sustainable modes to enhance the city's role in the wider national economy, to contribute to attaining Scottish climate change targets. An important aspect should be to ensure ease of access to employment for all of those wishing to work. New developments therefore should be accessible by a range of modes of transport from all residential areas of Dundee and particularly from those areas with low levels of car ownership and/or concentrations of young people.

*Q8 Is the level of protection afforded to all of Dundee's business land assets adequate, appropriate and fit for purpose?*

*Q9 What measures are required to be in place to mitigate the effects of development for all of Dundee's business assets and how would we judge them in terms of adequacy and appropriateness?*

*Q10 What measures should be put in place to enhance Dundee's business land provision to support existing businesses and attract inward investment?*

*Q11 What should the economic and business priorities for the planning system in Dundee be for the next 10 year period?*

*Q12 What are the main employment issues facing the city?*

No comment.

## **Shopping in Dundee**

*Q13 Should the present hierarchy be maintained or should another approach be adopted?*

It is believed that the current hierarchy should be maintained to ensure the vitality and viability of the City Centre and District Centres. Consideration needs to be given to protecting and strengthening the smaller local shopping centres that may be adversely affected by the more car-orientated retail parks and other major out of centre food and non-food retailing developments.

*Q14 What further measures should be considered as a means of underpinning and strengthening Dundee's regional shopping centre role?*

*Q15 What else could be done to improve the attraction of the City Centre?*

Policies should be promoted to enhance access between the regionally significant Seagate bus station and Dundee railway station. These would complement enhancement of the passenger concourse and station environment at the railway station, as proposed in the Regional Transport Strategy (RTS).

*Q16 Is there a need for further measures to help revive the fortunes of the declining District Centres and, if so, what are these measures?*

No comment.

*Q17 Given the relatively limited retail investment recently in the City Centre, is there a need to restrict major new out of centre provision (with a view to encouraging more investment in the city centre)?*

*Q18 Should the goods range, etc. controls on out of centre developments be maintained as they stand at present or is there a need for a different approach?*

It is believed that restrictions on out of centre provision and goods range controls should be maintained and applied more stringently. The city centre has the best level of access by non-car modes. The RTS includes the promotion of Park and Ride for Dundee which will enhance access by public transport to the City Centre for residents of neighbouring Council areas.

*Q19 Is there a need to ensure a good supply and quality of neighbourhood shopping across the City as a whole and, if so, how might this be achieved?*

It is considered that there is a strong need to ensure a good supply and quality of neighbourhood shopping as this will reduce the need to travel. Among other aspects ensuring priority access is provided for bus services, good pedestrian links and cycle parking and cycle routes to the shopping centres will make them relatively more attractive.

### **The Environment of Dundee**

*Q20 What are the key principals, if any, in the existing environmental strategy which should be carried forward into the environment strategy of the new Local Development Plan for Dundee?*

A key principle should be ensuring that the LDP seeks to achieve carbon reduction, through minimising the need to travel, and the use of the car in particular, as well as other aspects including reducing energy consumption in buildings, etc. This would be complemented by the RTS objective to contribute to the achievement of the Scottish national targets and obligations on greenhouse gas emissions.

*Q21 Is the level of protection afforded to all of Dundee's environmental assets adequate, appropriate and fit for purpose?*

*Q22 Are adequate and appropriate measures in place to mitigate the effects of development for all of Dundee's environmental assets and are they fit for purpose?*

*Q23 Are adequate and appropriate measures in place to enhance the effects of development for all of Dundee's environmental assets and are they fit for purpose?*

No comment.

*Q24 What should be included in the strategic environmental priorities for the planning system in Dundee over the next 10 year period?*

*Q25 What are the main sustainability issues requiring policy guidance facing the city?*

*Q26 What can the planning system in Dundee do to help secure economic benefits from environmental issues?*

The priorities should include aiming to reduce carbon emissions, air pollutants (particularly NO<sub>x</sub> and PM<sub>10</sub>) and noise generated by road traffic, in support of relevant national and local statutory targets, through reducing the need to travel and encouraging a shift to more sustainable modes.

*Q27 What is to stop a realistic environmental strategy and policies achieving the highest aspirations?*

The environmental strategy and policies should be aspirational yet realistic. There is a need to reflect and complement the objectives, strategy detail and policies contained within the RTS and SDP.

### **Accessibility in Dundee**

*Q28 Have the elements of the strategy of the local plan relating to accessibility been successfully pursued and have they delivered what was intended?*

*Q29 Have the policies and proposals been successful in delivering improved infrastructure and contributed to the increased use of sustainable modes of transport?*

The accessibility elements of the local plan are supported. However, evidence from the Scottish Household Survey and Scottish Travel Survey suggest that there is no identifiable trend in increased use of sustainable modes, which suggests that the aims of the policies and proposals have been not been achieved.

*Q30 What type of infrastructure provision or improvement should be included within the Local Development Plan?*

*Q31 What are the main areas of infrastructure provision that will need to be addressed over the plan period?*

The LDP should address the transport infrastructure improvements included in the RTS, RTS Delivery Plan and Transport Scotland's STPR. These are:

- Dundee railway station enhancement
- Park & Ride serving Dundee on the main radials approaching the city; A90 from the west, A90 from the north, A92 from the east and A92 from the south
- A90 improvement through or around Dundee and associated pedestrian, cycling and bus priority measures
- Tay Estuary Rail study including the relocation of Invergowrie station to a location in Dundee West
- Improved road links to Dundee Port
- Inter-modal regional rail freight facilities at Dundee Port.

*Q32 What role should developer's contributions play in the provision of infrastructure and how this should be achieved?*

In view of the more straitened financial position in the public sector over the forthcoming years it is considered critical that developers' contributions play a full part in funding improvements where it is shown that the development will impact on operation of transport infrastructure. It is believed that existing legal and planning

arrangements could be more innovative and effective in capturing developer contributions to support transport infrastructure such as Park & Ride.

### **Waste Management**

*Q33 Are there any additional (or upgraded) elements of major infrastructure that you believe may be needed to meet the requirements of Scotland's Zero Waste Plan?*

*Q34 If so, what are they and what planning issues might they raise?*

*Q35 apart from the above, are there any other steps which can be taken to provide for sustainable waste management in new developments?*

No comment.

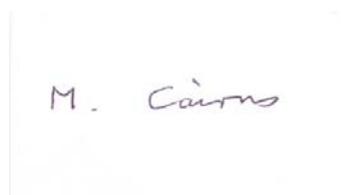
### **New or additional issues**

*Q36 Are there any new or additional issues you wish to have considered?*

Tactran believes there is a significant role for Travel Plans to be prepared and implemented for new developments to ensure that travel is minimised and, where it is needed, that alternatives to the car are used as much as possible. There are concerns however, about the effectiveness and monitoring of Travel Plans. It is recommended these should be a requirement for all relevant developments and that a mandatory process of monitoring be introduced.

I trust that the above comments are of assistance. If you require any further information, or clarification of any of the above comments, please contact Michael Cairns, Strategy Manager on 01738 475774 or [michaelcairns@tactran.gov.uk](mailto:michaelcairns@tactran.gov.uk) in the first instance.

Yours sincerely,

A rectangular box containing a handwritten signature in blue ink that reads "M. Cairns".

Michael Cairns  
Strategy Manager



### Land Use Planning Issues - Initial Consultation

What do you believe will be the most important land use planning issues that will need to be addressed over the coming 5 - 10 years in terms of:

#### **Housing**

##### **What issues related to housing should the Local Development Plan consider?**

The Plan should aim to maximise development of brownfield land for housing development as this concentrates development in the existing built-up area where there are more likely to be realistic travel alternatives to the private car. Where it is necessary to consider the use of greenfield sites they should be supported by good access from all new dwellings to suitable infrastructure to encourage the use of public transport, cycling and walking. Restricting parking availability at locations with good public transport, cycling and walking should be considered. However, this may necessitate consideration of appropriate controls on parking, such as residents parking schemes, on neighbouring streets to avoid overspill from the development site.

In encouraging alternative modes to the car it will be necessary to consider the provision of appropriate infrastructure or seek developer contributions for improvements such as routes for pedestrians and cyclists; the provision of secure parking for residents' cyclists, particularly in flatted accommodation; and support for enhanced bus services to operate, as far as possible, from the time the first units are occupied.

#### **Employment Land**

##### **What issues related to Employment Land and Business should the Local Development Plan consider?**

The Plan should aim to ensure that employment land is located to guarantee equality of access and opportunity for both car and non-car users alike. Accession software is available within the City council or through Tactran that can assist in measuring accessibility at different sites and highlight which are more accessible than others or give an indication of where bus services, for example, may need to be improved.

Where employment land is allocated it should be a mandatory requirement for developers to produce Travel Plans to ensure that travel is minimised and, where it is necessary, to ensure more sustainable modes are used. This should be supported by appropriate provision made through developer contributions, where necessary, to cater for non-car modes, for example, through walking and cycling routes, provision for cyclists within developments (parking, showers, etc) and support for enhanced bus services.

#### **Shopping**

##### **What issues related to shopping should the Local Development Plan consider?**

The LDP should aim to minimise car travel for shopping through ensuring the vitality and viability of the City Centre, District Centres and smaller local shopping centres.

It is believed that restrictions on out of centre provision and goods range controls should be maintained and applied more stringently. The city centre has the best level of access by non-car modes. The RTS includes the promotion of Park and Ride for

Dundee which will enhance access by public transport to the City Centre for residents of neighbouring Council areas.

If out of centre retailing is to be permitted, then provision should be made for non-car modes to have more favourable access than the private car. This could be achieved, for example, by ensuring easy access to buses, cyclist and pedestrians through the site with bus stops and cycle parking to be located closer to main retail unit entrances than car parking (with the possible exception of priority parking bays for Blue Badge holders).

### **Environment**

#### **What issues related to natural and built environments should the Local Development Plan consider?**

The Plan should aim to reduce the adverse environmental impacts associated with traffic, in particular, seeking to reduce carbon emissions, localised air pollutants, traffic noise and the severance effects caused by traffic in communities. Reducing the need to travel and encouraging a shift to more sustainable modes will address these issues as well as contributing to the achievement of the Scottish national targets and obligations on greenhouse gas emissions and local air quality obligations.

### **Infrastructure and Resources**

#### **What issues related to infrastructure and resources needed to support development should the Local Development Plan consider?**

The LDP should address the transport infrastructure improvements included in the RTS, RTS Delivery Plan and Transport Scotland's STPR. These are:

- Dundee railway station enhancement
- Park & Ride serving Dundee on the main radials approaching the city; A90 from the west, A90 from the north, A92 from the east and A92 from the south
- A90 improvement through or around Dundee and associated pedestrian, cycling and bus priority measures
- Tay Estuary Rail study including the relocation of Invergowrie station to a location in Dundee West
- Improved road links to Dundee Port
- Inter-modal regional rail freight facilities at Dundee Port.

In view of the more straitened financial position in the public sector over the forthcoming years it is considered critical that developers' contributions play a full part in funding improvements where it is shown that the development will impact on operation of transport infrastructure. It is believed that existing legal and planning arrangements could be more innovative and effective in capturing developer contributions to support transport infrastructure such as Park & Ride.

**The above topics are not exhaustive and any comment concerning the future development and use of land in Dundee is welcomed. Please submit any further comments or information.**

There are no further comments or information.

Ross Sandbach  
Student Planner  
Directorate for the Built Environment  
Scottish Government Area 2-H Bridge  
Victoria Quay  
Edinburgh EH6 6QQ

7<sup>th</sup> September 2010

Dear Ross,

**National Planning Framework Action Plan**

Thank you for your invitation to comment on the National Planning Framework Action Plan.

Initially I wish to make a couple of general points. Where reference is made to the Partnership it should read Tactran not Tactrans. Our partner Council, Perth & Kinross Council, is incorrectly referred to as Perth Council.

Comments with regard to specific Actions are as follows:

**Action 3 Develop High Speed Rail Link to London**

RTPs are listed as delivery bodies. The RTPs are interested in the proposals and wish to play a full role in determining aspects such as where the Line will terminate in Scotland, however, it is unlikely that they would be involved as delivery bodies. This role would undoubtedly fall to High Speed Two Ltd (or replacement body), DfT, Transport Scotland and Network Rail.

**Action 37 Promote active travel.**

This Action omits reference to RTPs. Tactran positively supports active travel. In the regional Walking & Cycling Strategy and Action Plan, Action B1 supports “development of the National Cycle Network, develop a complementary regional network connecting key settlements, and provide local links to the NCN in cooperation with Sustrans”. This complements the milestones listed in NPF Action 37 which include “completion of a national cycle network well connected to local neighbourhood networks”.

**Action 38 Investigate potential for a National Coastal Trail as Scotland's contribution to Europe's North Sea Trail.**

Again, RTPs are not listed. The North Sea Cycle Route follows the NCN through the Tactran region and, as with Action 37, Tactran would expect to be involved in further developments.

**Action 58 Strengthen East Coast Corridor connectivity and collaboration.**

Tactran should be listed as a delivery body under Milestone 1. It is noted that partner Councils, Stirling and Perth & Kinross Council are included. This Action should make reference to STPR Projects 13 (East of Scotland Rail Improvements) and 29 (A90 through or around Dundee) as they are intended to improve rail journey times and reduce unreliability of road journeys respectively on the East Coast Corridor. Also of relevance are the Partnership's Tay Estuary Rail Study (TERS) and Park & Ride Strategy and Action Plan.

Tactran is involved in the preparation of the Dundee SDP (TAYplan). However, it is noted also that TAYplan are not listed as a delivery body.

**Action 61 Develop the potential of the Dundee - Perth - Stirling strategic transport corridor.**

Tactran should be included as a lead partner. Reference should be made to the Partnership's Tay Estuary Rail Study (TERS) which seeks to enhance services on the Arbroath – Dundee – Perth – Stirling – Glasgow corridor. Also of relevance are STPR Project 8 (Park & Ride/Park & Choose) and work in progress implementing Tactran's Park & Ride Strategy and Action Plan. The Partnership is keen to play an active role in progressing this Action, however, it is unclear who is leading on this Action.

**Action 65 Strengthen connectivity, reduce journey times and increase travel opportunities between Inverness and Perth and more effectively link Inverness to the Central Belt.**

Tactran should be listed as a joint lead partner or delivery body on this project.

I trust that the above comments are of assistance. If you require any further information, or clarification of any of the above comments, please contact Michael Cairns, Strategy Manager on 01738 475774 or [michaelcairns@tactran.gov.uk](mailto:michaelcairns@tactran.gov.uk) in the first instance.

Yours sincerely,



Eric Guthrie  
Director

TEN-T Policy Review  
Europe, International and Better Regulation Division  
Department for Transport  
Zone 2/23 Great Minster House  
76 Marsham Street  
London SW1P 4DR

9<sup>th</sup> September 2010

Dear Sir/Madam,

**European Commission Consultation on the future Trans-European Network – Transport (TEN-T) Policy**

I refer to the above consultation. This response is from Tactran, the statutory Regional Transport Partnership covering the Angus, Dundee City, Perth & Kinross and Stirling Council areas.

**Section I Dual Layer Approach**

*Q1 Do you agree with this approach? Do you think it can provide wider benefits such as improved interconnections or promotion of modal shift?*

Yes. This approach will encourage consideration of the most appropriate mode of transport and encourage modal shift particularly to short sea shipping. While recognising the need to define a “Core Network” the needs of peripheral regions, such as Scotland, should be considered and recognise, for example, the role of short sea shipping to other European countries rather than concentrating freight movements on routes through ports in England.

*Q2 Are these the right principles for the design of the network? Are there any other principles that should be taken into account?*

Yes. The principles satisfactorily cover aspects of the design of the network.

*Q3 Do you agree with the Commission’s ideas for network configuration? Is there anything else that should be taken into account?*

Yes. An important link that must be considered is the connection between gateway ports and the smaller ports throughout the Union that are used to feed traffic in and out of the gateway ports, and the role that short sea shipping can play in providing such links.

**Section II The UK TEN-T Network**

*Q4 Taking into account the suggested EC criteria, are the UK TEN-T routes/ports/airports still valid? Are there any missing links we need to add?*

No. Tactran agrees with the land routes and airports identified, but believes that the ports of Dundee and Montrose in the Tayside and Central Scotland region should be included as Community seaports. Dundee currently handles in excess of 1.0m tonnes per annum, while the Montrose annual cargo tonnages have been slightly below 0.5m tonnes per annum for the last two years but it is anticipated that they will increase over next two years. Both ports are in close proximity to the TEN-T designated Edinburgh – Aberdeen railway line, though neither currently has a direct connection onto the line. Dundee is located within 1.5 miles of the TEN-T designated A90 Perth – Aberdeen road. The road access into the port is currently being upgraded. Montrose is 9 miles from the A90. Dundee offers a range of transshipment facilities including a ro-ro berth while Montrose offers cargo handling by means of mobile cranes.

*Q5 Are the principles and criteria for designing the core network, as set out above, adequate and practicable? What are their strengths and weaknesses? Are there other criteria that could be taken into account?*

Yes. As noted above there should be a safeguard so that smaller freight movements are not assumed to use the core network when more suitable direct alternatives may exist.

*Q6 To what extent do the supplementary infrastructure measures contribute to the objectives of a future-orientated transport system, and are there ways to strengthen their contribution? What specific role could TEN-T planning in general play in boosting the transport sector's contribution to the "Europe 2020" strategic objectives?*

Better knowledge and understanding, particularly of alternatives to road transport, will contribute to a sustainable TEN-T network. The information needs for example, of transport managers and drivers may have to be considered separately to ensure that correct choices are made at all levels in the supply chain. Improved travel and traffic information should be comprehensive and include aspects such as rest and refreshment facilities for all drivers and parking for lorries as well as information on anticipated journey times, routing, roadworks, etc.

### **Section III Funding Instruments**

*Q7 In which way can the different sources of EU expenditure be better coordinated and/or combined in order to accelerate the delivery of TEN-T projects and policy objectives? How can an EU funding strategy coordinate and/or combine the different source of EU and national funding and public and private financing? Would the setting up of a European funding framework adequately address the implementation gaps in the completion of TEN-T project and policy objectives?*

The setting up of a European funding framework would be a positive step in addressing the implementation gaps. However, it will need to be flexible enough to account for the availability and spending deadlines of the match funding elements.

### **Section IV Legal Framework**

*Q8 In which way can the TEN-T policy benefit from the new legal instruments and provisions as set out above? Do you have any suggestions for simplifying the way the programme is managed?*

These are procedural and legal issues which Tactran would not wish to comment on.

I trust that the above comments are of assistance. If you require any further information, or clarification of any of the above comments, please contact Michael Cairns, Strategy Manager on 01738 475774 or [michaelcairns@tactran.gov.uk](mailto:michaelcairns@tactran.gov.uk) in the first instance.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Eric Guthrie', written in a cursive style.

Eric Guthrie  
Director



Scottish Ferries Review Consultation  
Ferries Division  
2<sup>nd</sup> Floor North  
Victoria Quay  
Edinburgh  
EH6 6QQ

15<sup>th</sup> September 2010

Dear Sir/Madam,

**Scottish Ferries Review**

I refer to the above consultation document and Strategic Environmental Assessment: Environmental Report.

Tactran does not have any comments on either document as existing Western and Northern Isles ferry services do not currently directly serve any part of the region. However, I note that reference is made to the consultant-produced Working Papers. I would be grateful for clarification on the status of these Papers. Recommendations particularly aimed at boosting intermodality and short sea shipping would have implications for modal shift within the region and Tactran would wish to be involved in any further developments in relation to these opportunities.

I trust that the above comments are of assistance. If you require any further information, or clarification of any of the above comments, please contact Michael Cairns, Strategy Manager on 01738 475774 or [michaelcairns@tactran.gov.uk](mailto:michaelcairns@tactran.gov.uk) in the first instance.

Yours sincerely,

Eric Guthrie  
Director