

**REPORT TO: DUNDEE, PERTH, ANGUS AND NORTH FIFE  
STRATEGIC DEVELOPMENT PLANNING AUTHORITY  
JOINT COMMITTEE MEETING ON 31 AUGUST 2010**

**REPORT ON: TAYPLAN MAIN ISSUES REPORT: CONSULTATION  
RESPONSES**

**REPORT BY: PAMELA EWEN, STRATEGIC DEVELOPMENT PLAN  
AUTHORITY MANAGER**

**REPORT NO: SDPA 06-2010**

## **1 PURPOSE OF REPORT**

- 1.1 To provide the Joint Committee with an overview of the response to the consultation on the Main Issues Report of the Strategic Development Plan.

## **2 RECOMMENDATION**

- 2.1 It is recommended that The Joint Committee:
- Note the overview of responses to the Main Issues Report consultation.

## **3 FINANCIAL IMPLICATIONS**

- 3.1 There are no direct financial implications arising from this report.

## **4 MAIN ISSUES REPORT CONSULTATION**

- 4.1 The TAYplan Main Issues Report Consultation started on 12 April 2010 for twelve weeks until 2 July 2010. Late submissions up to 16 July were accepted. The consultation sought responses to the Main Issues Report itself and on the accompanying Environmental Report and draft Equalities and Human Rights Impact Assessment. The documents were made available in council planning offices, area/access/local offices, libraries and on the internet.
- 4.2 Copies of all documents in hard copy and/or disc were sent out to community councils two weeks prior to the consultation commencing and all documents were available within the Members lounges within the four Constituent Authorities.
- 4.3 Also in advance of the consultation TAYplan officers briefed community councils at two events to give prior notice of the consultation and to support community councils in explaining it to their communities. In addition TAYplan held a series of information events between 4 May and 8 June 2010. These took place in Dundee, Perth, Arbroath, St. Andrews, Cupar, Blairgowrie, Forfar, Kinross, Montrose, Crieff and Pitlochry. In addition, two information events were held in TAYplan's office in May and June and two days in St Johns Shopping Centre, Perth and Overgate, Dundee. The information events were drop in sessions for

people to find out more and talk with staff. These were run from 2.00pm until 8.00pm and were well received.

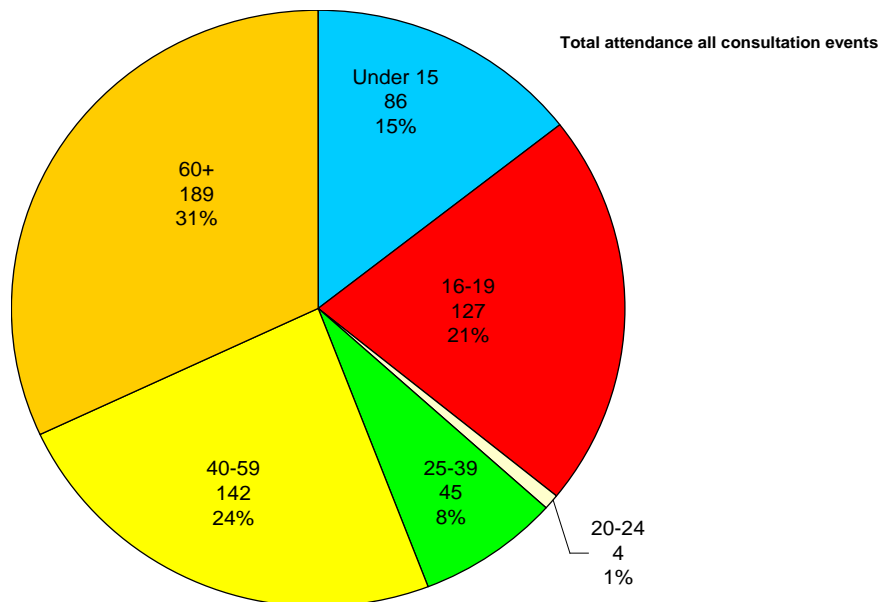
4.4 In addition, a variety of approaches and methods to engage with interested parties were utilised these included: advertisements in the Courier and Press and Journal (over 3 weeks), awareness raising exercises such as information events, press releases, radio, posters/leaflets, online and other publicity including:

- Four sets of static displays across various locations throughout the area in advance of information events including Council offices, libraries, Dundee University, St. Andrews hospital, Perth College, SEPA and SNH offices;
- Press releases to local newspapers ahead of events and towards end of consultation;
- Stalls at Tay Estuary Forum conference (Dundee) and National Transport conference (Glasgow);
- On-line interactive Main Issues Report access and questionnaire response;
- Stakeholder briefings including Community Councils and Elected Members; and,
- Four secondary school workshops in mid-late June.

#### Attendance at Events

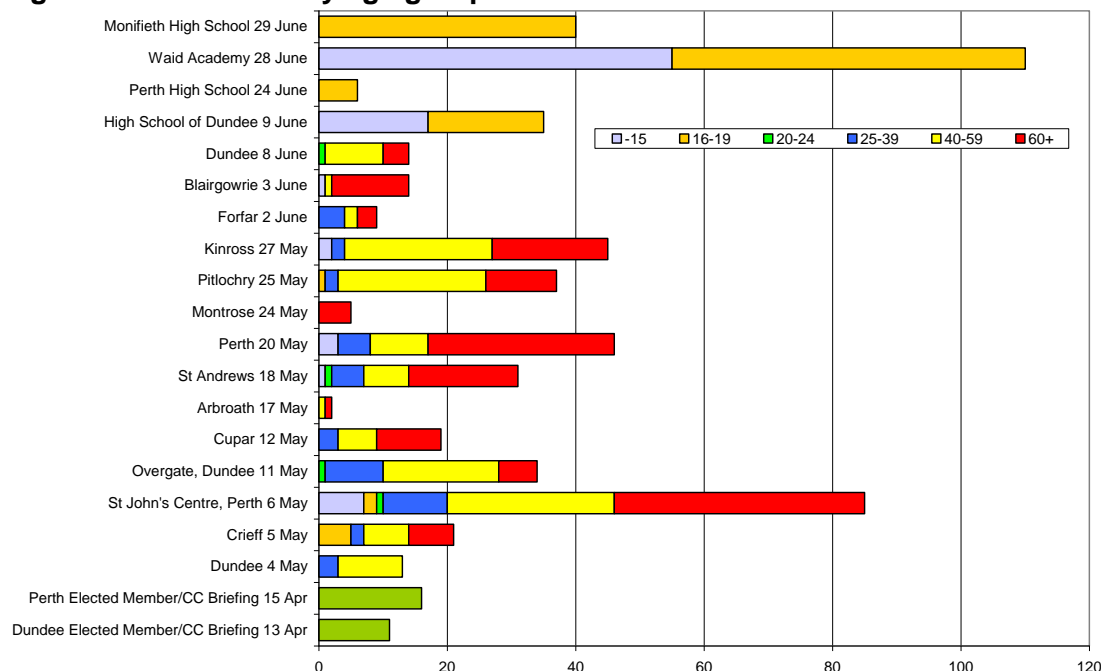
4.5 During all the Main Issues Report public events, a record was maintained (where possible) of the age and gender of attendees. As shown in Figure 1 (below) the majority of attendees were aged over 40 (55%). The school events accounted for almost all of the under-19 year olds. Those aged between 20 and 30 represented the smallest share of attendees.

**Figure 1: Attendance at consultation events by age group**



4.6 The information events attracted the greatest number of attendees (256), followed by the two days where there were displays in St. Johns Shopping Centre, Perth and Overgate, Dundee (119). Figure 2 below provides an indication of the various age groups of those who attended some of the consultation events. The largest groups of attendees were reported at Perth and Kinross venues and at St. Andrews.

**Figure 2: Attendance by age group and event location**



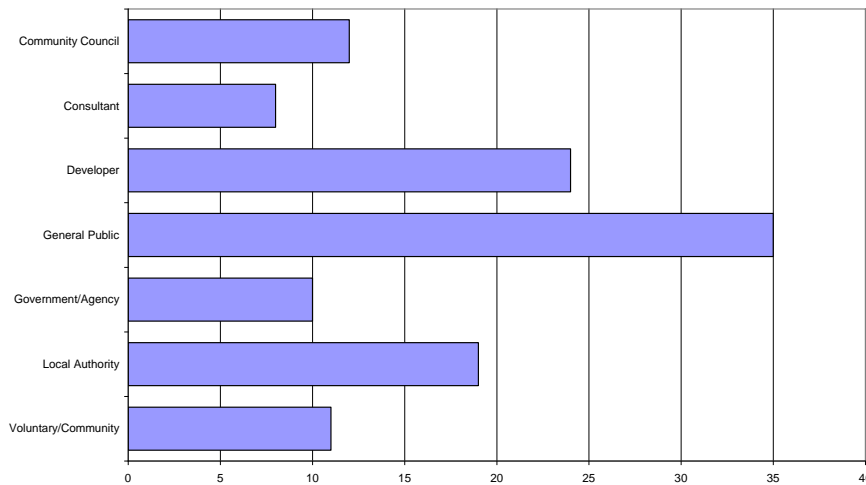
4.7 In addition, to involve a younger section of the population, engagement took place with a number of school pupils (191) in the High School of Dundee, Perth High, Wade Academy (Anstruther), and Monifieth High. This engagement differed from the other consultation as it did not involve the pupils considering the whole Main Issues Report. Instead they considered the vision and/or spatial strategy. This was beneficial as it provided an insight as to how the younger generation view the issues within the TAYplan area.

### Consultation Responses

4.8 The TAYplan Main Issues Report has generated interest amongst a variety of organisations and the general public. There were a total of 173 responses to the Main Issues Report, 26 responses to the Environmental Report and 10 responses to the draft Equalities and Human Rights Impact Assessment. The vast majority of comments were made online. TAYplan officers were on hand in the closing weeks to guide people through the process if required. Some written responses were also received. These were entered into the system by the TAYplan team along with the four secondary school workshop responses. Copies of all consultation responses have been made available both through the TAYplan website and in libraries/access/local offices in those locations where we held the information events.

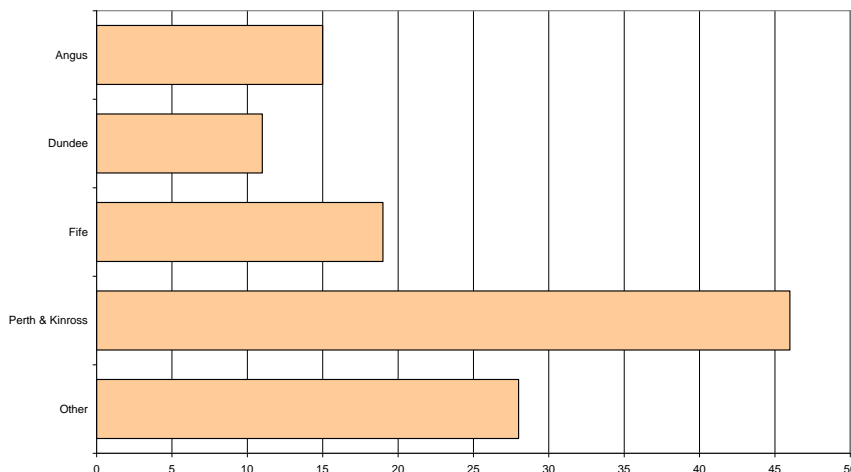
4.9 As part of the consultation process people registered and recorded useful information that helps us to understand their backgrounds. However, it was not possible to complete all of this information for those responding in hard copy or for some organisations. Therefore Figure 3 (below) shows information for the 119 respondees who did complete the information. It shows that the largest individual interest group was the general public followed by developers. The level of response from the general public is encouraging as this is the first round of strategic development planning for the TAYplan area. The broad coverage of interest across different groups is also notable.

**Figure 3: Respondees by type of organisation**



4.10 Figure 4 below illustrates that the largest group of respondents were from the Perth & Kinross Council area. It should be noted that the reasons for a relatively high return from respondents outwith the TAYplan area is probably because some consultants answering on behalf of their clients, government agencies, and organisations which have interests here but are based elsewhere.

**Figure 4: In which local authority the organisation/individual is based**



### Broad thrust of the responses

- 4.11 In considering the responses received, questions 1-7 and 9-15 asked respondents for 'yes/no' answers which has made it easier to analyse the information. Questions 8, 16 and 17, asked respondents to provide comments which are not so readily transferable into chart form. More detail is provided in appendix 1 to this report.

#### *Quality Places - People*

- 4.12 There was general consensus supporting the TAYplan preferred option for population and housing growth (option 2 – Reverse the decline of Dundee and plan for General Register Office Projections elsewhere). This was broadly supported as an important policy principle for the region. The Main Issues Report set out ranges to anticipate the 2008-based population and household projections. However, there is an emerging issue to consider about whether or not the upper range of house building is deliverable. Some feel this is unrealistic given the present climate where as others think it is important to plan for the recovery. This is an emerging issue for further consideration in preparing the Proposed Plan.

#### *Quality Places – Economy*

- 4.13 There was general consensus that land should be identified for employment at the Scottish Crop Research Institute, Invergowrie; that Forfar should be identified as a regional agricultural service centre; and that the Ports of Dundee and Montrose should be protected for port-related uses. There was also general consensus regarding the retail hierarchy that was proposed.

#### *Quality Places – Resource Consumption*

- 4.14 There was support for the inclusion of measures to reduce resource consumption in development and to design-in waste collection/management in the Proposed Plan. Those opposing this considered it to be a local development plan matter. This is an emerging issue for the further consideration in preparing the Proposed Plan. There was also strong support for the protection of prime agricultural land.

#### *Quality Places – Infrastructure*

- 4.15 There was general support to set out a framework to ensure that renewable energy and waste management infrastructure are directed to the most appropriate locations.

#### *Quality Places – Vision*

- 4.16 There was strong consensus on the proposed objectives and draft vision. Some respondees both agreed and disagreed - they supported the direction but felt some improvements could be made in how the vision is expressed.

#### *Quality Places – Spatial Strategy*

- 4.17 There was strong support for the TAYplan preferred option 'Strategy A – Principal Settlements'. There was also consensus around the settlements which had been defined as principal settlements. Most supported the land release priorities that were proposed.

#### *Other questions*

- 4.18 Question 15 asked whether specific issues were not considered as strategic. This generated some disagreement from local authorities and key agencies who felt that the TAYplan should include affordable housing as part of the overall land requirement and that an approach to minerals and wind energy should also be considered, although most recognised that this may be within the second Strategic Development Plan. Minerals bodies were concerned that minerals are not considered as a strategic issue. This is an emerging issue for further consideration in preparing the Proposed Plan.
- 4.19 Question 16 asked whether any additional issues should be considered. Some considered minerals and airports to be additional issues. These matters are covered in the Main Issues Report but were not raised as main issues themselves.
- 4.20 Question 17 allowed respondents to raise any other points they wished to. This included many land owners/developers informing us about sites of interest to them and supplementary material in support of previous responses.

#### Comments on the Environmental Report

- 4.21 In parallel with the Main Issues Report, a Strategic Environmental Assessment (SEA) was undertaken and an Environmental Report was published for consultation. The purpose of this assessment is to provide consideration of the environment by ensuring that environmental issues are considered by decision makers alongside economic and social issues.
- 4.22 Six questions were posed regarding the Environmental Report. In terms of the responses to the questions, the majority of respondents (11) were satisfied that the Main Issues Report has identified most of the significant or important environmental problems affecting the TAYplan area.
- 4.23 As shown in the Appendix 2 to this report, the majority of respondents who provided comments in relation to the Environmental Report were members of the general public (8). These respondents were predominantly in the 45-54yrs age group with an equal split in terms of gender and it is interesting to note that the respondents were concentrated in the Perth & Kinross Council area.
- 4.24 In summary, the Consultation Authorities welcomed the proactive approach adopted in the preparation of Environmental Report and the early engagement that the TAYplan SEA team had sought with them. The Consultation Authorities also considered that the Environmental Report provided a clear assessment of the potential significant environmental effects of the Proposed Plan and that their comments on the scope of the Environmental Report had been incorporated into it and that they agreed the overall findings of the assessment. Notwithstanding this both SNH and SEPA raised some concerns that will have to be considered in the preparation of the Proposed Plan.

## Comments on the draft Equalities and Human Rights Impact Assessment

- 4.25 A draft Equalities and Human Rights Impact Assessment was carried out to help ensure that the TAYplan does not discriminate and that where possible TAYplan utilise opportunities to promote equality as well as other human rights and good relations between groups.
- 4.26 As set out in Appendix 3 to this report, those who commented on the draft Equalities and Human Rights Impact Assessment were found to be predominantly female members of the public in the 45-54yrs age group.

## **5 CONSULTATIONS**

- 5.1 The Treasurer and Clerk to TAYplan, the Director of Infrastructure Services, Angus Council, The Director of City Development, Dundee City Council, The Head of Development Services, Fife Council and the Executive Director (Environment), Perth & Kinross Council have been consulted and are in agreement with the contents of this report.

## **6 BACKGROUND PAPERS**

- 6.1 The TAYplan Main Issues Report: Options for Scotland's SusTAYnable Region 2012-2032 , March 2010.
- 6.2 Environmental Report, March 2010.
- 6.3 Draft Equalities and Human Rights Impact Assessment, March 2010.

Pamela Ewen  
Strategic Development Planning Authority Manager  
19th August 2010

## Responses to Main Issues Report Questions

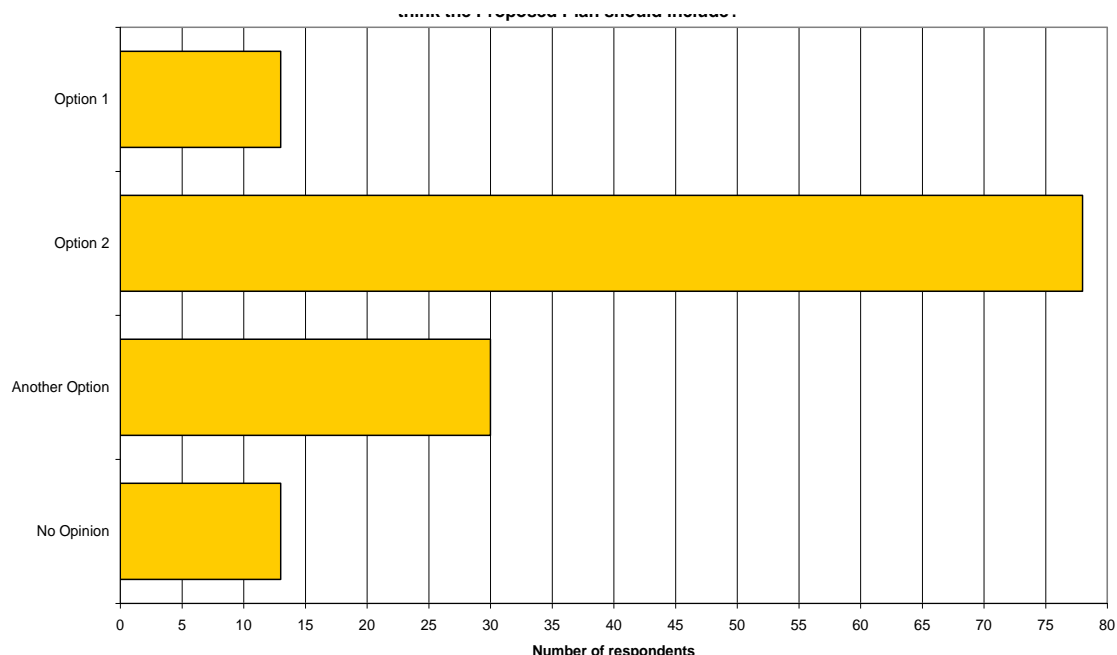
**Q1: The Main Issue D considers two options for population and housing growth. Which option do you think the Proposed Plan should include?**

- Option 1, Option2, Another Option, No Opinion
- If another Option - Please say what this is
- If you chose an option please tell us why

### Response to Question 1

10% option 1	These were made up of builders and land owners some community councils and the general public. Although having chosen option 1 some went on to describe support for option 2 or reflect on how option 1 supported settlements.
58% Option 2	These were a mixture of local authorities and government bodies, developers and land owners, community councils, voluntary bodies and the general public. Support was consistently on the basis that it was considered unsustainable to allow the continued decline of Dundee City and that this approach would support regeneration. Additional points also suggested that this would relieve pressure on other places.
22% another option	These were made up of up of builders and land owners some community councils and the general public. There were several responses which articulated the same alternative option, generally where a consultant had responded on behalf of several developers. The alternative options are summarised as a higher overall build rate for TAYplan, following GROS 2008-based projections; increasing or decreasing the provision for some of the local authorities and somewhere between option 1 and option 2.
10% no opinion	

- Angus Council have suggested an alternative approach to calculating population/housing growth. This will be considered in the next stage of the process.





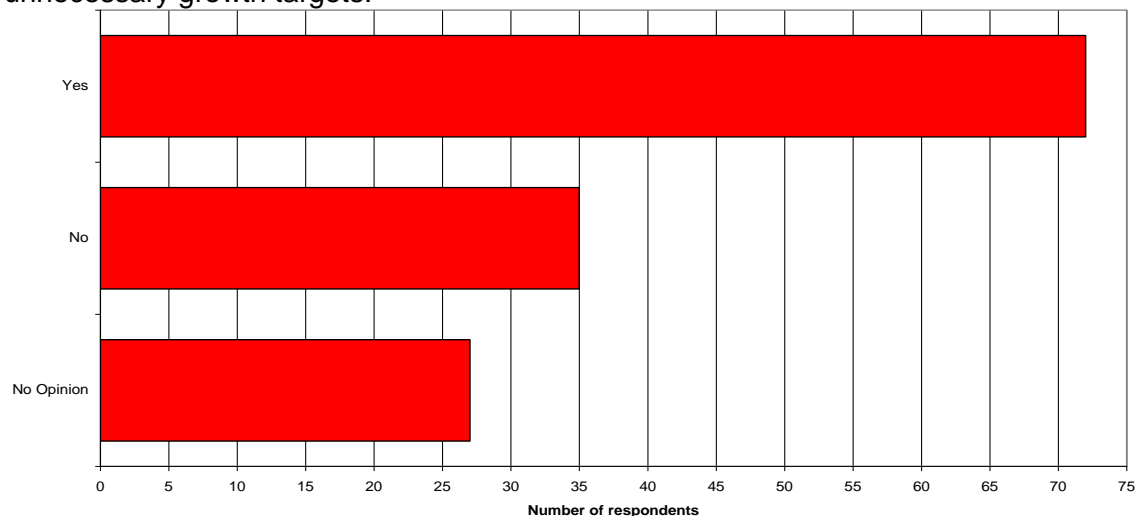
**Q2: The housing land figures are presented as ranges. Do you think the upper ranges in the option you chose for Question 1 are deliverable given the present economic climate and should they be higher given the recent 2008-based population projections?**

- Yes , No, No opinion
- If you answered yes or no, please explain why you think this

**Response to Question 2**

54% upper range deliverable	These were a mixture of builders and land owners, local authorities and government agencies, some community councils and members of the public. Some of these responses were identical where consultants responded for numerous clients. The general position was that the recession will be a comparatively short-term and making higher provision reflected the longer term view. Other considered this would actually support the recovery. It was also considered an opportunity to rebalance the housing stock, particularly in Dundee City which is made up of 54% flats. Some responses were specifically about sites with developer interest.
26% upper range not deliverable	These were a mixture of builders and land owners, local authorities and government agencies, some community councils and members of the public. The key arguments related to the 2008-projections reflecting the recent boom rather than the present. Others suggested that the pace of recovery will be such that it will take longer to achieve the upper range on average. Further arguments related to the upper range exceeding even the average for the boom period. Other arguments related to the migration driver being made up of non-UK migrants who were unlikely to purchase housing and that demand had fallen during the economic crisis.
20% no opinion	

- Perth & Kinross Council suggest that 27% (2008 GRO base) projected population growth is unrealistic and that 22% (2006 GRO base) is more appropriate.
- Dundee City Council and Fife Council suggested that consideration should be given to the introduction of a range in Dundee to recognise a longer term growth potential.
- Scottish Natural Heritage (SNH) feels the upper range is unrealistic in the current and future economic climate and is concerned about excessive land allocations to meet unnecessary growth targets.

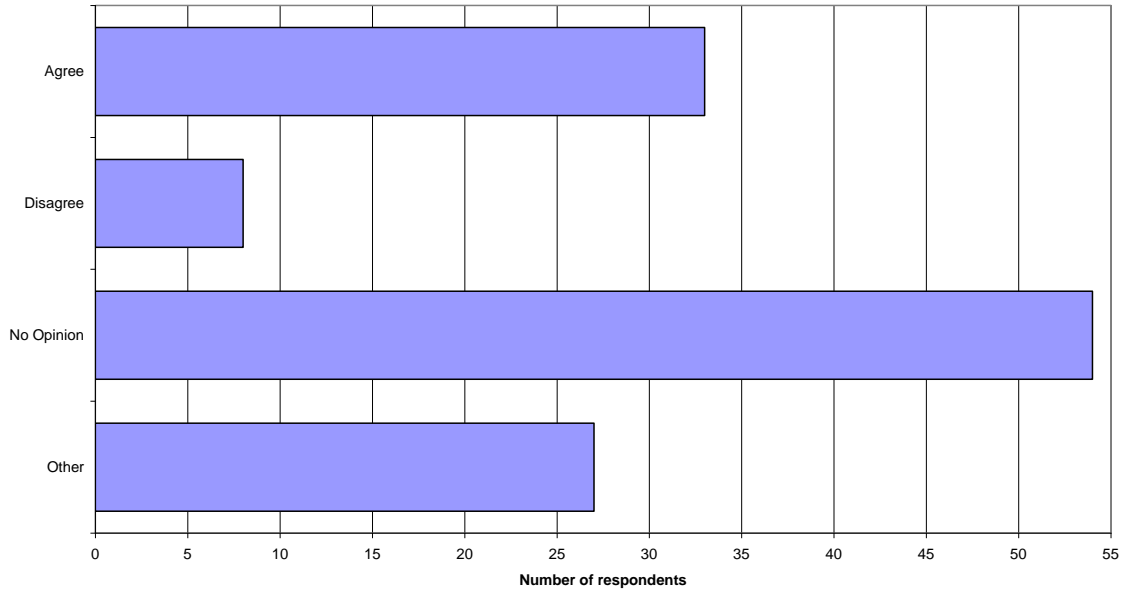


**Q3: Several key actions could be in the Proposed Plan to support the growth of the economy; do you agree with these:**

- 1. Identify the need for 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**
  - Agree, Disagree, no opinion, other
  - If disagree, Please tell us why?
  - If other please explain

**Response to Question 3**

27% agreed	Many of those who chose 'other' provided a response supporting the original three above. In both cases this was made up of local authorities and government bodies, land owners/developers and businesses as well as community bodies and the general public. The broad support was made on the basis of protecting the ports and protecting and improving access to them. Other measures included recognition of the role of the Universities and tourism as well as cultural events like T in the Park. There was also suggestion for waste management/energy activity.
22% suggested other locations	
6% disagreed	
44% no opinion	



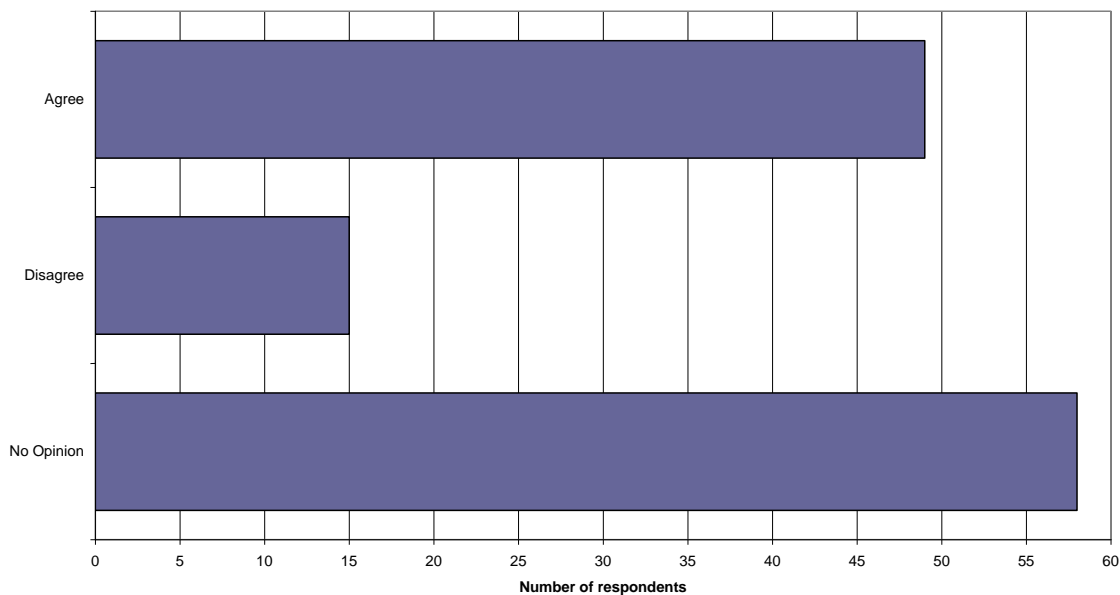
**Q4: Do you agree that the retail hierarchy in Main Issue F is the right one to deliver Scottish Government objectives to concentrate comparison goods retail in town centres?**

- Agree, Disagree, No Opinion
- If disagree, Please say what it should be instead

**Response to Question 4**

With regard to question 4, it is noted from chart 4 below that 49 respondents agreed 15 disagreed with the retail hierarchy and the remainder had 'no opinion'.

Whilst the majority of respondents had no issue with the retail hierarchy, it should be noted that Fife Council and Dundee Council have both recommended changes to the retail hierarchy and that further consideration should be given to Scottish Government policies.



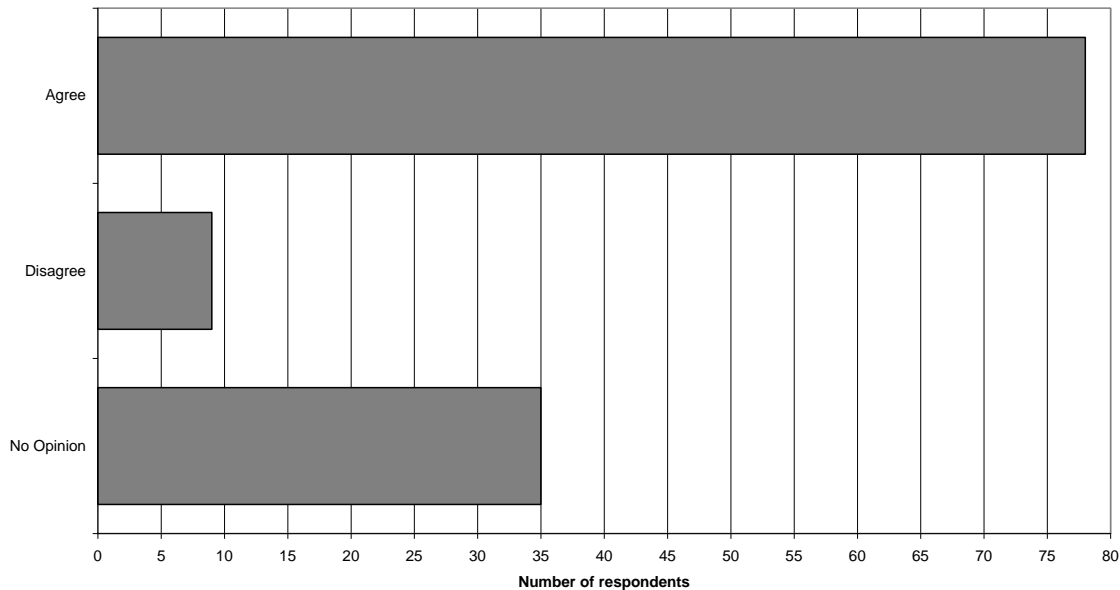
**Q5: Do you agree that the Proposed Plan should require Local Development Plans to identify a supply of effective employment land?**

- Agree, Disagree, No comment
- If disagree, Please say what it should do instead

**Response to Question 5**

64% Agreed	These were made up of local authorities and government bodies, community bodies, developers/land owners/businesses and the general public. Some suggestions included the Strategic Development Plan requiring Local Development Plans to set out types for a range of users and the review of sites which have not been taken up for some time. Others considered the role to be to ensure sufficient effective employment land. Some suggested this ought to prevent rural employment sites being taken up by housing and lost as employment sites.
7% Disagreed	These included one developer with several responses, each for different sites. The responses did not present alternative approaches.
29% no opinion	

- Fife Council has suggested rewording the text in relation to the provision of employment land in close proximity to settlements.



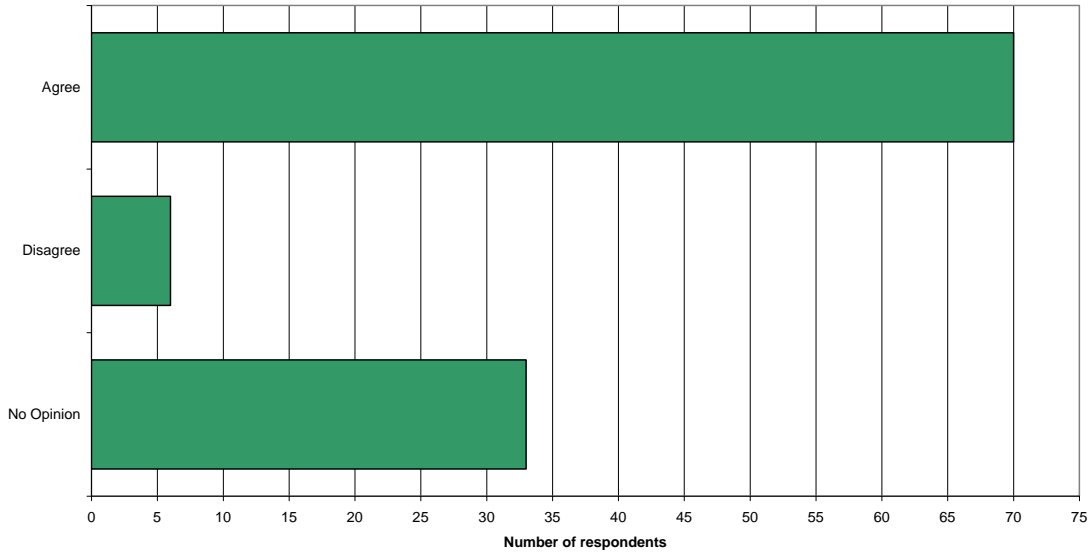
**Q6: In order to reduce resource consumption in development do you think the Proposed Plan should require high resource efficiency standards in development and that TAYplan should work with local authorities to develop a consistent framework for these requirements?**

- Agree, Disagree, No opinion
- If agree – what should it consider
- If Disagree – why and what should it do instead

**Response to Question 6**

64% agreed	These represented a mixture of government, business and the general public. They put forward a range of measures which included deploying particular technologies and locations like settlements. Some concentrated on the practicalities and need to consider every aspect of resource management.
6% disagreed	These represented a mixture of government, business and the general public. They considered the measures to be covered elsewhere by building regulations or by national or local planning policy. This shows broad consensus in favour of setting out an approach but offers some caution about how this is expressed, the level of detail and what it could cover.
30% No opinion	

- Dundee City Council and Angus Council feel that this is a matter for the Local Development Plan rather than the TAYplan.



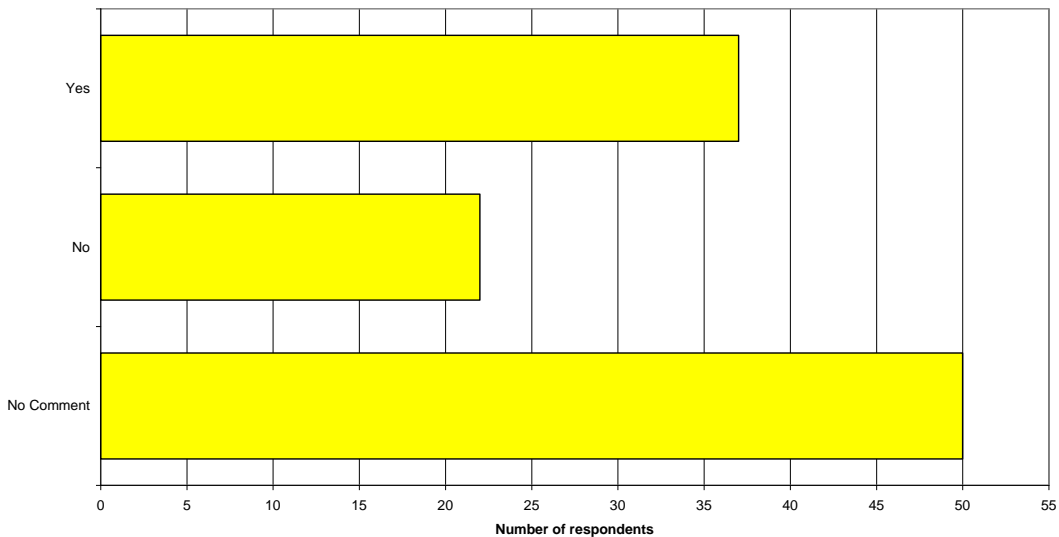
**Q7: The Proposed Plan could require the designing-in of waste collection/management for new development to be agreed between the local authority and the developer/operator. Should the Proposed Plan adopt this approach?**

- Yes, No, No comment
- If no, what should it do instead?

**Response to Question 7**

33% Agreed	These recognised the importance of considering waste and resource recovery from the outset.
22% Disagreed	These overwhelmingly suggested this was a role for the local development plan.
45% No opinion	

- Angus Council, Fife Council, Perth & Kinross Council and Scottish Environment Protection Agency (SEPA) felt this should be dealt with in Local Development Plans.



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

**Response to Question 8**

There was a mixture of views ranging from outright protection by banning development to the suggestion that there is plenty of agricultural land so some could be released for development. The majority view supported protection and suggested that this should be part of a wider series of considerations based on the appropriateness of location and availability of land elsewhere.

- Fife Council felt it is not necessary to include this issue in the TAYplan.

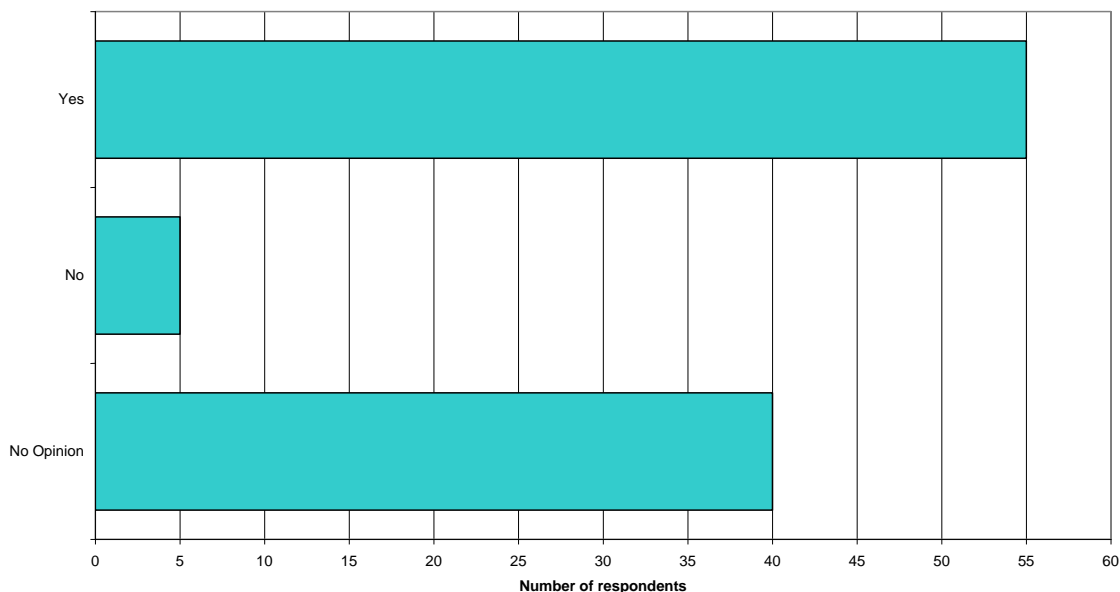
**Q9: Do you think that the Proposed Plan should set out a framework to ensure that renewable energy and waste management development are located in the most appropriate locations?**

- Yes, no, no opinion
- If yes, what practical considerations do you think this should include?
- If no, why not?

**Response to Question 9**

50% agreed	They considered location, need, accessibility and impact to be important. Some suggested certain technologies close to the user or the source. Others suggested identifying areas of search.
5% disagreed	They considered the issue to be not strategic or were concerned about the level of detail and how it might affect flexibility.
45% No opinion	

- Angus and Fife Councils were concerned that the approach being advocated by TAYplan could conflict with proposals for renewable energy development in their areas.
- Scottish Enterprise also raised the same concern.
- The Scottish Government agreed that the proposed plan should set out a framework and suggested there could be a spatial strategy developed for renewables.

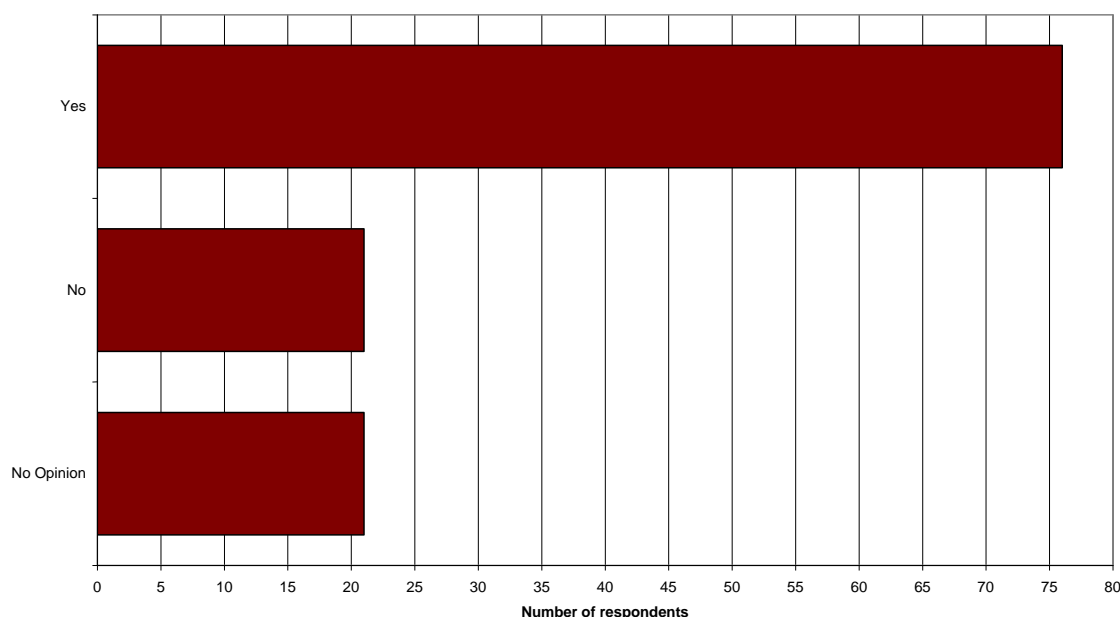


**Q10: Do you think paragraph 8.2 sets out the right objectives for the vision?**

- Yes, no, no opinion
- If no, what should they be instead?

**Response to Question 10**

64% agree	These were made up of developers, land owners, businesses, the public, community groups, local authorities and government bodies. In some case they had also suggested additional points.
18% disagree	These were made up of developers and land owners with some members of the public and community groups. One third of these were made by one consultant on behalf of several clients. The key points related to greater prominence for a given area of interest such as tourism, clean technology or housing. Others were more fundamental suggesting a better balance between the need for development and environmental protection.
18% no opinion	



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

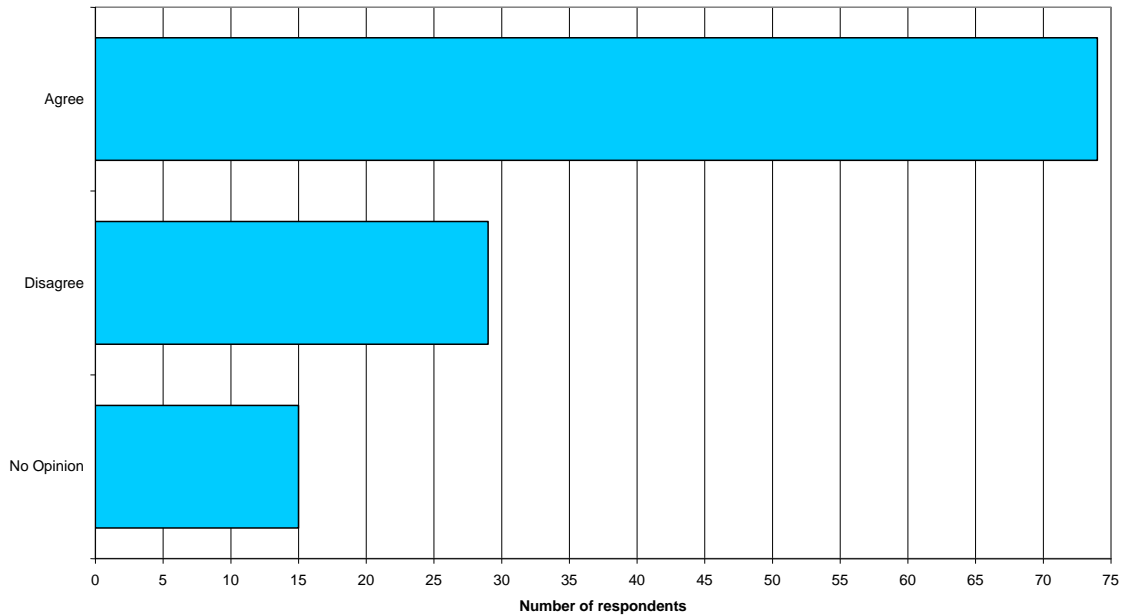
- Agree, Disagree, No opinion
- If disagree, how it should be changed and why?

**Response to Question 11**

63% agreed	These were made up of developers, land owners, businesses, the public, community groups, local authorities and government bodies. They were wholly or largely supportive, in some cases suggesting slight changes to how the vision is expressed.
24% disagreed	Some expressed similar points to those who agreed for minor changes. The remainder, largely developers, land owners and members of the public said that it was too Dundee focussed at the expense of elsewhere. Again about one third of disagreeing parties were represented by one consultant.
13% no opinion	

It is clear that the overall majority agreed with the proposed TAYplan vision.

- SNH agree with the vision but suggest some minor changes in emphasis regarding, geodiversity, Dundee regeneration, and environmental capacity to absorb change.
- Scottish Government suggests that the latter part should be expressed more positively.



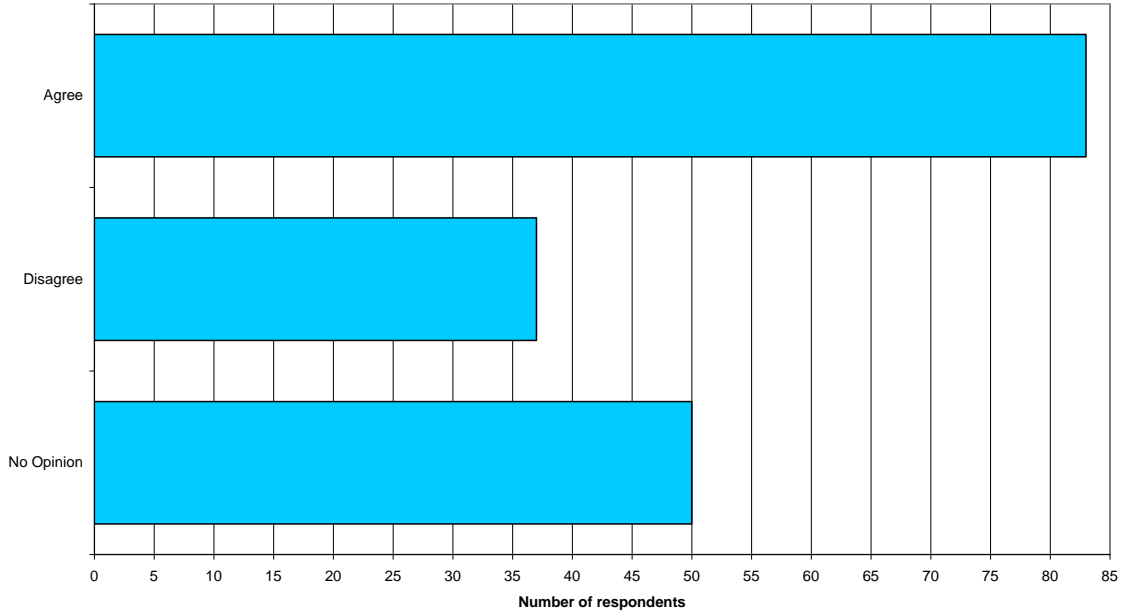
**Q12: Do you agree that the settlements identified in figure 9.1 are the region's Principal Settlements?**

- Agree, Disagree, No Opinion
- If disagree, what should they be instead?

**Response to Question 12**

49% agreed	These were made up of local authorities, government bodies, land owners/developers, community bodies and the public. These supported the identification of core areas and the approach that was taken. Some who agreed and disagreed both suggested that some settlements were in the wrong tier.
22% disagreed	These were made up of largely developers, many of whom were represented by the same consultant expressing the same views. They questioned the justification of these settlements and were concerned that this would prevent development in other locations including on rural brownfield sites. Others argued that some settlements not included in the hierarchy ought to be.
29% no opinion	





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

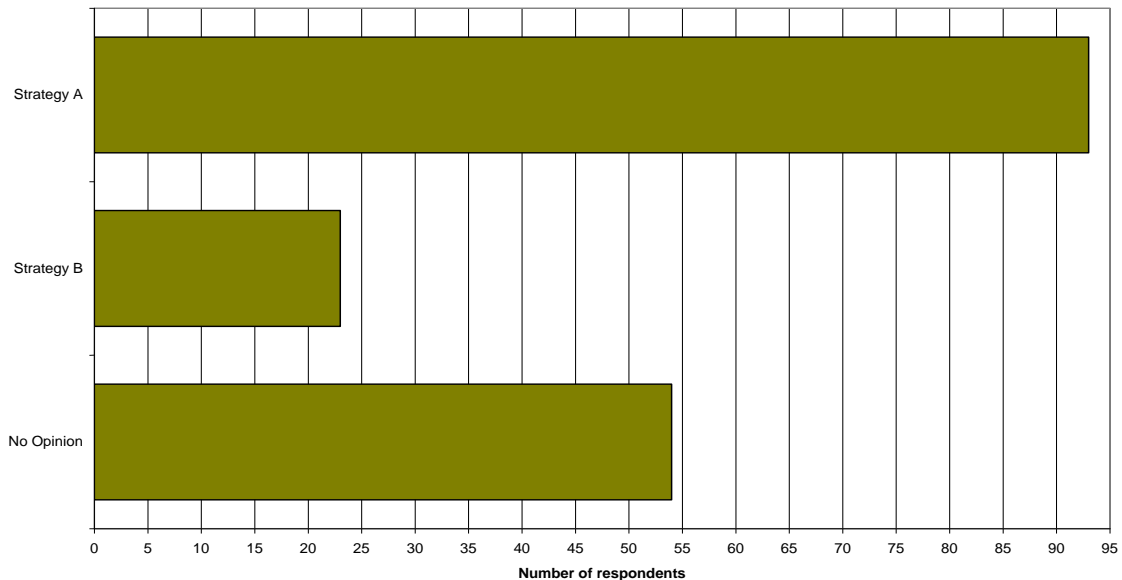
- Strategy A, Strategy B, No Opinion
- Please tell us why you have chosen this option

**Response to Question 13**

55% strategy A	These were made up of local authorities and government bodies, developers and land owners, community bodies and the public. Support was given on the basis that it was most sustainable with lowest travel demand and best fitted with infrastructure and resources. It was considered to offer the best chance of reducing carbon dioxide emissions and avoiding flood risk as well as boosting settlements and protecting the countryside. It was specifically regarded as supportive of regeneration in Dundee and reflecting the roles of Dundee and Perth as economic drivers.
14% strategy B	These were almost all developers and land owners. Most were clients of the same consultants and supported growth in the Carse of Gowrie or other locations due to their land interests. Other respondees considered that an alternative strategy was required which does not prevent growth in other locations.
31% no opinion	

- Dundee City Council feels that there may be an issue regarding the land release in the Greater Dundee Housing Market Area.
- Angus Council suggest a more flexible approach to the scale of development within the tiers and that there should be a different scale between the tiers.
- Fife Council feel that there should be greater emphasis on Dundee's city region role and Perth's strategic role and commented on the tiers of the settlement hierarchy.
- Perth & Kinross Council feel that there should be an increase in the Perth Core Area to the north and west and that there should be no expansion to the east.
- SEPA suggested consideration should be given to incorporating green infrastructure.

- The Scottish Government recommended that there should be an explanation to the approach to housing in rural areas, and that Transport Scotland has been unable to comment due to lack of information, as there is no Regional Transport Model.



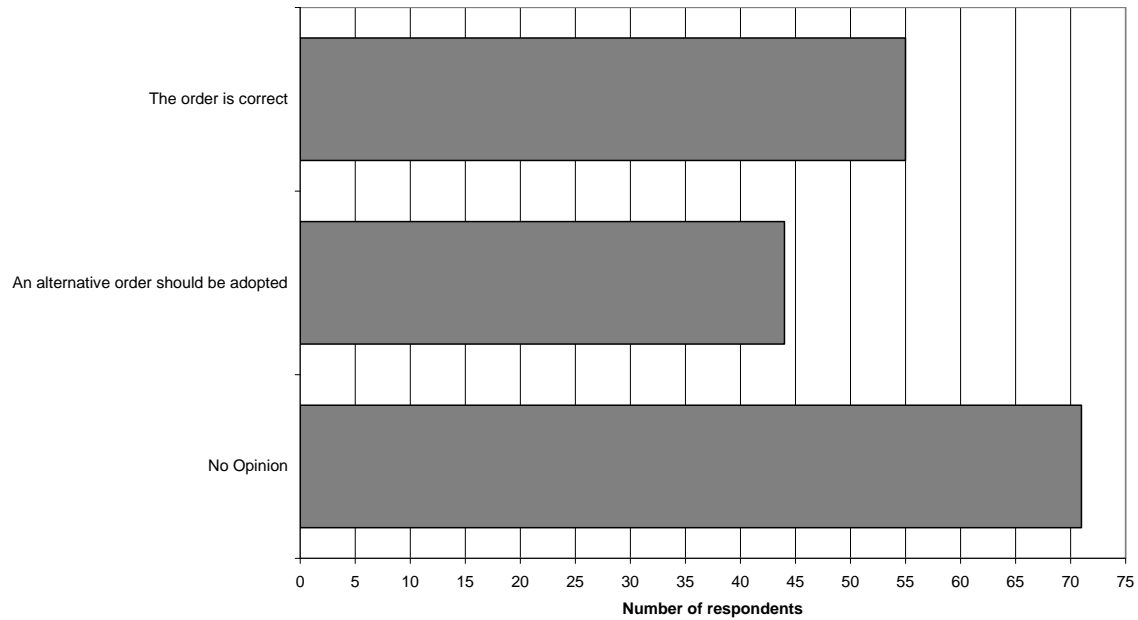
**Q14: Main Issue N sets out priorities for sequencing the release of land for the TAYplan area. Do you believe:**

- The order is correct, An alternative order should be adopted, No Opinion
- If an alternative, Please tell us what the alternative should be and why?

**Response to Question 14**

32% agreed	These were made up of local authorities and government bodies, developers and land owners, community bodies and the public.
26% disagreed	These were made up almost entirely of developers/land owners. There was also a local authority, a government body and some community councils. Several considered the approach unrealistic and were concerned about the exclusion of other settlements. Others wished to see greater prominence given to new settlements. Conversely some wanted to see greater consideration of the natural environment or the omission of new settlements altogether.
42% no opinion	

- Fife Council has recommended that an alternative order should be adopted and that new settlements should be ruled out and not form part of the sequential approach.
- SNH has suggested using an alternative order which would include natural heritage.



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

- **Affordable Housing**
- **Minerals**
- **Wind Energy**

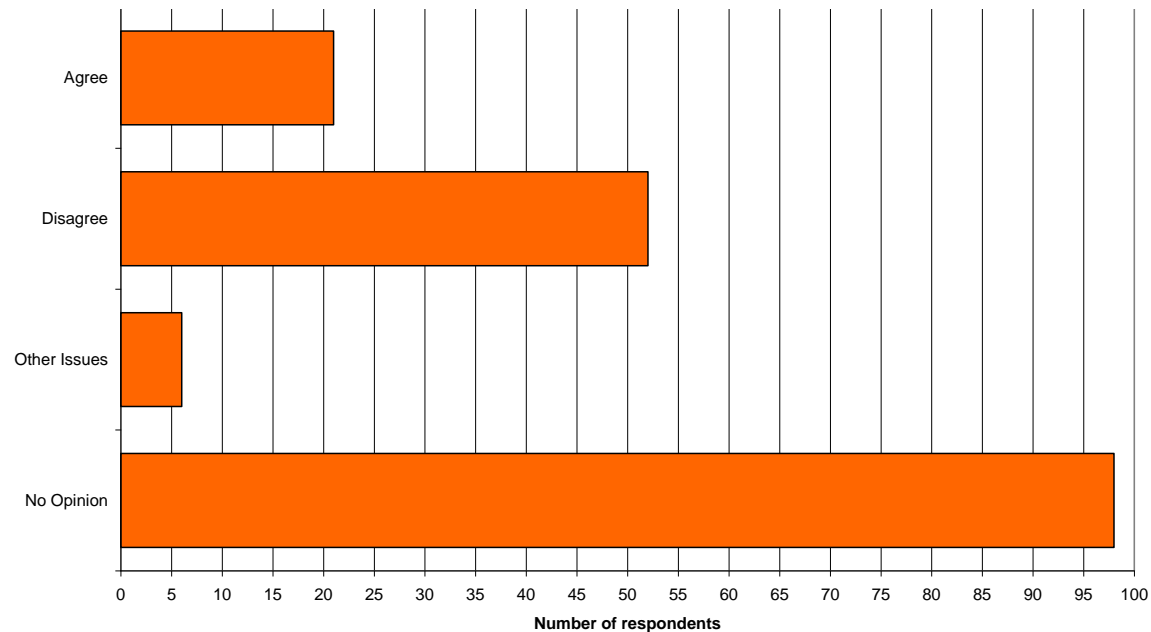
Agree, Disagree, No Opinion. If disagree, please say why?

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

**Response to Question 15**

21 respondents agreed that the issue of Affordable Housing, Minerals and Wind Energy do not need to be covered by the Proposed Plan. 52 respondents disagreed, 6 respondents felt the Plan should cover these issues and 98 had 'no opinion'.

- Dundee City Council suggests that minerals should be included.
- Fife Council suggests that the TAYplan should set a broad policy framework for affordable housing for the Local Development Plans to take forward in detail.
- Angus Council agree with the TAYplan proposal they have commented that the Housing Land Requirement that enables affordable housing needs to be met through the development plan.
- SNH disagree feel that the TAYplan should comment on minerals and wind energy.
- SEPA suggests that the TAYplan should include guidance on wind energy proposals in terms of need and location. Fuller consideration should also be given to climate change impacts on flood risk.
- The Scottish Government have said that affordable housing should be included as part of the overall land requirement and that an approach to minerals and wind energy should also be addressed in the Plan.



**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?**

**Response to Question 16**

- Perth & Kinross Council feel that town centres raise cross boundary issues and as a result the TAYplan should provide guidance.
- SNH has suggested that coastal areas, strategic green infrastructure and environmental capacity should have a greater role in the Plan.
- SEPA has commented that reference needs to be made to the National Air Strategy and newly issued guidance and more consideration should be given to addressing traffic generated air quality issues.
- The Scottish Government have suggested that a number of other issues such as renewable energy developments, convenience retail and the timing of infrastructure delivery should be included.

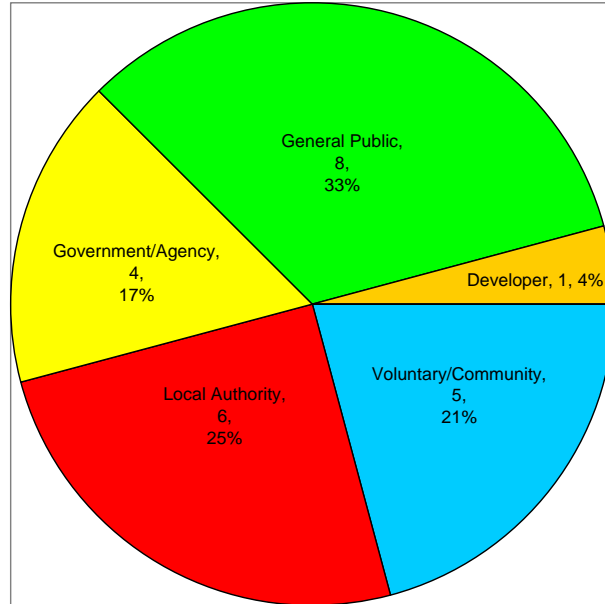
**Q17: If you would like to make any other comments please do so.**

**Response to Question 17**

The majority of responses to question 17 elaborate on earlier questions or inform us about sites that are of interest to particular developers or land owners.

## Responses to Environmental Report Questions

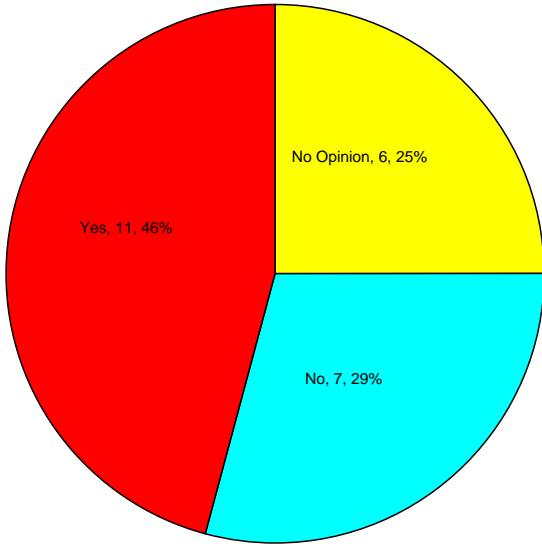
The comments received on the Environmental Report of the Strategic Environmental assessment (SEA) were from the following sources:



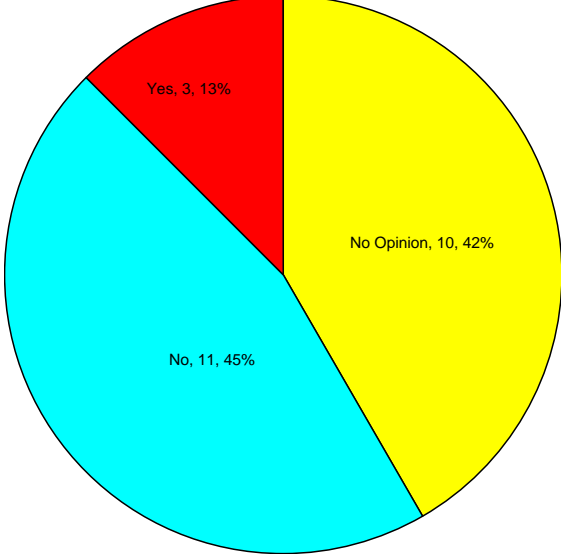
The Environment Report posed 6 questions as set out below

Do you agree with our understanding of the baseline environment in the TAYplan area?	Do think there are there any other plans, policies (in addition to those listed in the Environmental Report) or wider environmental objectives that should be taken into account? Please summarise the details here																								
<table border="1"> <thead> <tr> <th>Response</th> <th>Count</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Agree</td> <td>11</td> <td>46%</td> </tr> <tr> <td>No Opinion</td> <td>6</td> <td>25%</td> </tr> <tr> <td>Disagree</td> <td>7</td> <td>29%</td> </tr> </tbody> </table>	Response	Count	Percentage	Agree	11	46%	No Opinion	6	25%	Disagree	7	29%	<table border="1"> <thead> <tr> <th>Response</th> <th>Count</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Yes</td> <td>11</td> <td>46%</td> </tr> <tr> <td>No Opinion</td> <td>8</td> <td>33%</td> </tr> <tr> <td>No</td> <td>5</td> <td>21%</td> </tr> </tbody> </table>	Response	Count	Percentage	Yes	11	46%	No Opinion	8	33%	No	5	21%
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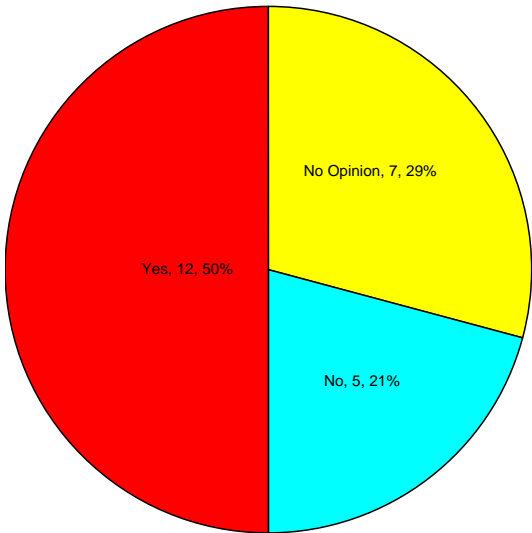
**In your opinion have we identified the most important or significant environmental problems affecting the TAYplan area? Please comment below**



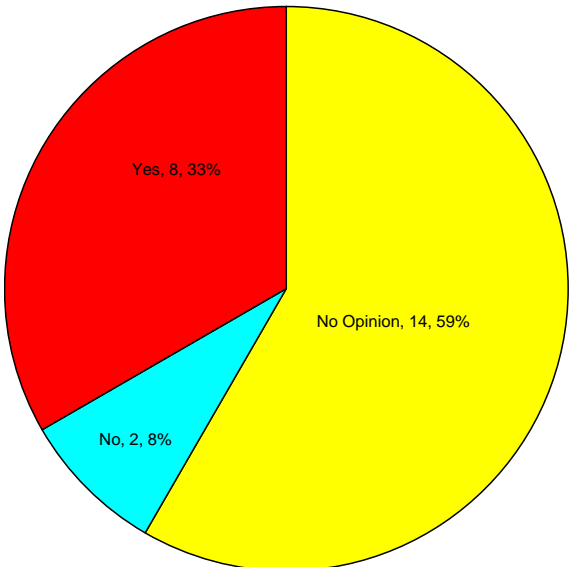
**Do you disagree with any of the assessment questions? If so please identify which ones and why. (Please back this up with additional baseline data and explain your reasoning)**



**Do you have concerns about significant or cumulative environmental effects on particular parts of the TAYplan area or on particular environmental features? If yes, please give details below.**



**Do think there are there further, relevant positive aims and aspirations for the environment that the Strategic Development Plan could deliver in the long term? If yes, please give details below.**



Scottish Environmental Protection Agency (SEPA) highlighted the need to undertake a Strategic Flood Risk Assessment (SRFA) to fully inform and support the Strategic Development Plan (SDP) and further information on the proposed mitigation measures particularly those that will be delivered by Local Development Plans. It is not considered

that the SRFA is required as an addendum to the Environmental Report but it may be necessary to inform either the SDP itself or the Local Development Plans below it. The purpose of the SRFA is to ensure development does not take place in areas of flood risk. The role of the Environmental Report at least as far as it relates to flooding is to ensure that the SDP does not affect the capacity of the environment to provide flood storage or management opportunities. For example, woodland habitats can slow the passage of water into water courses, thereby contributing to the 'ecosystem regulating service' of flood protection.

Scottish Natural Heritage (SNH) does not consider that the Environmental Report provides sufficient detail on mitigation measures and on cumulative effects. SNH suggests that the post adoption statement should take account of these concerns and if possible inform the development of Local Development Plans.

Other comments from the Consultation Authorities suggest changes to correct small inaccuracies, omissions or use of technical terminology but it is emphasised that these do not affect the overall acceptability of the assessment.

The comments received from individuals complemented those from the Consultation Authorities and provided a valuable insight to the environmental issues of the area and these will be helpful in developing the Proposed Plan. Some comments, while informative were more about how the plan should develop. Other comments were about uses of land over which the Strategic Development Plan or the land use planning system has no control e.g. farming or land management practices. Nonetheless, the importance of these land uses to the environment is recognised and the protection of species and habitats dependent on them has been recognised both in the baseline and in the assessment undertaken.

Finally, it should be noted that following approval of the Proposed Plan an SEA post-adoption statement will be prepared setting out how environmental considerations have been integrated into the Plan together with how the measures taken to mitigate or enhance the effects of the Plan have been incorporated and how the significant environmental effects of the implementation of the Plan will be monitored.

## **Responses to draft Equalities and Human Rights Impact Assessment Questions**

### **Question 1: Do you have any comments on the draft Equalities and Human Rights Impact Assessment**

Those who commented on the Equalities and Human Rights Impact Assessment were found to be predominantly female members of the public in the 45-54yrs age group.

The responses were broadly supportive of the approach. One comment suggested greater emphasis on the role of human rights in future iterations.