

<b>Date:</b>		
<b>Issue:</b>	<b>Policy 30 - Integrated and Sustainable Transport Network</b>	
<b>Objector(s):</b>	DW and IM Duncan	<b>Objection ref(s):</b> 0371
	Mr and Mrs MacAllister	490c
	Mr and Mrs McKechive	491c
	Mr and Mrs Hempseed	492c
	Heidi Rattray	493c
	Susan Donald	494c
	Mary Mischie	495c
	Katrina Wimbush	496c
	E J Procter	499c
	Jill Adams	500c
	Peter Gray	501c
	Aileen Mutch	502c
	Anna Hauley and Gavin Hedges	503c
	Mr I Duncan	504c
	Robert Moir	505c
	The Occupier, 18 Sir Patrick Geddes Way	506c
	Mane Fraser	507c
	A Esson	509c
	Linda Johnson	510c
	James Clark	511c
	Fred Vincent	512c
	Ian Black	513c
	Allyson Meechan	515c
	Helen Murray	517c
	Alan Henderson	518c
	Mr Myddleton	520c
	Mrs A Redland	521c
	Mr and Mrs Taylor	522c
	J Cooper & M Majzlikova	523c
	The Occupier, Roaring Stag	524c
	The Occupier, Mar Cottage	525c
	Jane Reynard	526c
	Mrs W Sim	527c
	E Black	529c
	The Occupier, Rinelen	530c
	Frances Gibson	539c

<b>Reporter</b>	Mrs Jill Moody
<b>Procedure</b>	Written representation

## 1.0 Overview

- 1.1 This statement sets out the Cairngorms National Park Authority response to the objections raised to the Deposit Local Plan as modified (CD6.12, 6.13 and 6.14) in respect of Policy 30: Integrated and Sustainable Transport Network, and supplements the response made to those objections by the Cairngorms National Park Authority in its reports to Committee (CD7.3,4 and

5). It suggests a further modification is made to the Plan in respect of this policy to clarify when the policy will be applied.

## 2.0 Provision of the Local Plan

- 2.1 Policy 30 within the Deposit Local Plan as modified gives policy guidance to allow a consistent framework for development proposals and for the assessment of applications have an impact on the integrated and sustainable transport network within the National Park. During the current transitional arrangements set out in the Planning etc. (Scotland) Act 2006 (Development Planning) (Saving, Transitional and Consequential Provisions) Order 2008, the policy is intended to provide an appropriate level of guidance to meet the requirements of SPPI (CD2.2 para 37-38) and Scottish Planning Policy (CD2.1 para 15-18) and ensure that the impact any development has on the sustainable transport network is considered in a consistent way.
- 2.2 The Policy has been modified in the 1<sup>st</sup> modifications to the Deposit Local Plan to list methods by which developments may consider making the necessary contribution. The background text to support the policy has been modified in the 1<sup>st</sup> modifications to highlight the importance of integrated transport in the Park, and to clarify the role of government guidance relating to transport. The importance of Green Travel Plans and the need to consider all options for travel are also highlighted.
- 2.3 2<sup>nd</sup> modifications to the wording of the supporting text have also been made to create a clearer link between the policy and SPPI 7 (CD2.12), PAN 75(CD4.21), and the Scottish Transport Appraisal Guidance (CD8.1).
- 2.4 In considering objection 026g dealt with through formal inquiry made to this policy, and how the policy will be implemented on adoption, it is now considered that a further modification is necessary to ensure the policy wording is appropriate and reflects the requirements to be placed on all types of development proposal.

### **Further Modification for consideration by Inquiry:**

Policy 30 – policy text 1<sup>st</sup> Para: *‘Development proposals will seek, where appropriate, to make a positive contribution ...’*

This is an officer recommendation which has not been endorsed by the CNPA Board.

## 3.0 Summary of objection(s)

- 3.1 Thirty six objections raising two issues have been lodged to this policy and the objectors wish to have their objection considered by written representation:
- The 2<sup>nd</sup> modifications have removed the policy and in doing so removed the developers responsibility to provide an integrated and sustainable transport system, to the detriment of residents of the Park who do not drive. The policy should be reinstated. (0371, 490c, 491c, 492c, 493c, 494c, 495c, 496c, 499c, 500c, 501c, 502c, 503c, 504c, 505c, 506c, 507c, 509c, 510c, 511c, 512c, 513c, 515c, 517c, 518c, 520c, 521c, 522c, 523c, 524c, 525c, 526c, 527c, 529c, 530c, 539c)
  - The approach to housing within the Plan will result in more road traffic, to the detriment of cycling. (0371)

## 4.0 Summary of Cairngorms National Park Authority Response

- The policy through the 2<sup>nd</sup> modifications has not been deleted. A degree of confusion has arisen due to erroneous numbering of policies at this stage. All policies will be numbered in sequence prior to publication. The objections relate to the deletion, and as this has not occurred, the issue will be resolved prior to publication. (**490c, 491c, 492c, 493c, 494c, 495c, 496c, 499c, 500c, 501c, 502c, 503c, 504c, 505c, 506c, 507c, 509c, 510c, 511c, 512c, 513c, 515c, 517c, 518c, 520c, 521c, 522c, 523c, 524c, 525c, 526c, 527c, 529c, 530c, 539c**)
- Additional traffic caused as a result of new development will be considered through Policy 30 to ensure where such an impact may result, the appropriate consideration is given to this impact. The policy remains committed to promoting where possible, the use of sustainable modes of transport, and is in line with Scottish Government guidance. (**0371**)

## 5.0 CNPA Commendation to Reporter

- 5.1 The CNPA commend to the Reporter that the objections to the issues raised above are rejected and the policy retained as drafted with future numbering of policies corrected to follow sequentially.

## 6.0 Assessment / Scope of Evidence

- 6.1 **0371, 490c, 491c, 492c, 493c, 494c, 495c, 496c, 499c, 500c, 501c, 502c, 503c, 504c, 505c, 506c, 507c, 509c, 510c, 511c, 512c, 513c, 515c, 517c, 518c, 520c, 521c, 522c, 523c, 524c, 525c, 526c, 527c, 529c, 530c, 539c** – have objected to the deletion of the policy and seek its reinstatement.
- 6.2 **Response:** The 2<sup>nd</sup> modifications did not delete the policy, and confusion has occurred as a result of erroneous numbering published at this stage of the consultation. The policy however remains part of the Plan.
- 6.3 Following the findings of the Inquiry and prior to adoption and publication this numbering issue will be resolved, with policies numbered sequentially as they are found in the plan. The issue is therefore considered to have been addressed.
- 6.4 **0371** objects to the impact new housing will have on transport, since additional traffic will lead to more vehicles on the roads, making cycling less attractive unless separate cycle tracks are constructed.
- 6.5 **Response:** The comment is noted and the policy is drafted to ensure that adequate consideration is given to the impact of traffic caused as a result of new proposals. The policy remains committed to promoting where possible, the use of sustainable modes of transport, and is in line with Scottish Government guidance. No further change is therefore proposed.

## 7.0 List of documents (including Core Documents)

- CD2.1 Scottish Planning Policy 2008 Parts 1 and 2
- CD2.2 SPPI The Planning System
- CD4.21 PAN 75 Planning for Transport – Transport Assessment and Implementation
- CD6.12 Deposit Local Plan
- CD6.13 Deposit Local Plan 1<sup>st</sup> modifications
- CD6.14 Deposit Local Plan 2<sup>nd</sup> modifications

- CD7.3 CNPA Committee Report Consultation May 2008
- CD7.4 CNPA Committee Report 1<sup>st</sup> Modifications October 2008
- CDP7.5 CNPA Committee Report 2<sup>nd</sup> Modifications February 2009
- CD8.1 Scottish Transport Appraisal Guidance (STAG)