

Sustainable and Active Travel Guidance

Summary of comments

01 Gartmore CC/Gartmore Community Trust – Agree with the approach, support. Comments for next LDP – only make mandatory if there is sufficient financial government support.

02 Private Individual– Agree with level of ambition. Concerns over requirements for new paths/active travel routes for proposals can encounter a number of sensitivities/constraints (habitat loss) given it is a National Park. If a route is proposed/required then it must be demonstrated why it is necessary i.e. a link to a village or links a walking route to an existing car park. New routes may have result in habitat loss. Guidance should be clearer that paths and car parks would not be supported in protected areas. In relation to Transport Assessments it should be clear that any new visitor centre/café/farm shop in a rural area should have a transport assessment. Travel plans should be required for more than just larger scale developments. Travel Plans should include evidence of all available public transport and car parking in a five mile radius. Then encourage users to use existing parking within a 1.5 mile radius of their proposal rather than new car parks.

03 Kilmaronock Community Council – It is suggested that there would be more requirements for larger housing developments and less for small ones such as single homes and agricultural developments should be exempt. The guidance needs to recognise that low carbon transport options is not developing as fast as it would indicate. Car and repair of local existing footpaths/active travel routes is required. The approach will only partly address climate change as personal behaviour change is required and other measures (such as the ban on new petrol and diesel cars) in tandem with this as rural areas still need private transport in the absence of public transport.

Other measures that could be included are greenhouse gas impact reports should be mandatory. Allowances should be made for future developments such as hydrogen/solar vehicles rather than EV cars. All new car parks should be future proofed to retrofit EV charging for all spaces. Large developments should have an obligation for offsetting impacts and provide bus shelters, bicycle storage, public EV charging points.

There may be difficulties for applicants due to costs and behaviour change difficult in the Scottish weather and cycle routes are underused at present.

04 Private Individual – It is noted that not all members of a community can access sustainable and active transport if they are less able or elderly and this needs to be considered. Concerns was raised about large buses using small single track roads and options should be considered for electric mini-buses for people to transfer on to – Park and Ride shuttle bus network like Snowdonia and the Lakes. The main barrier is cost and bureaucracy. Travel plans need to consider the park and ride options, and also infrastructure such as pedestrian bridges. Industrial developments need to show how goods will be moved at a low impact and mitigate disturbance to towns and villages. If there is an implementation cost then it will not happen if not mandatory. Links to existing facilities is essential. Maintenance of cycling and walking tracks is essential. For next Plan, consultation of how

proposals will affect individual towns/villages is essential – this is partially happening via Local Place Plan.

05 Loch Lomond and the Trossachs Countryside Trust – The guidance could be more ambitious, with greater emphasis in connecting all developments to active travel and/or sustainable transport options. Bus stops and other transport interchanges should be considered as mobility hubs where a variety of travel modes and services are co-located. The poor connectivity of the gateway towns and villages into active and sustainable travel networks builds reliance on the car and it not going to change unless there are alternative options. All new development should connect into a mobility network. The difficulties would be the deficiencies of the existing public transport and safe active travel infrastructure limiting opportunities for connection and therefore development. Transport assessments and Travel Plan should be required for all developments as all developments need to indicate measures that will be taken to reduce the impact of travel by car. Travel Plan are particularly needed for those developments that create a lot of trips. Travel Plan requirements should include a recommendation for applicants to register for national accreditation programme such as Walk at Work, Cycling Friendly, Cyclists and Walkers Welcome schemes to demonstrate commitment to reducing car journeys.

Suggestions for next plan – there should be an approach using mobility hubs connecting to smaller nodes that are integrated into active travel and sustainable travel services. Key gateway towns and villages should form the major mobility hubs with interconnect ability. These should link into the strategic long distance trails, national cycle network and local cycle routes, and key routes should be accelerated to provide additional transport options. The A82 upgrade should ensure the whole of the west side of Loch Lomond has a connection to the Active Travel Network including links to Crianlarich. Further development of connections between the waterbus services and active travel networks should be supported.

06 British Horse Society – Horse riding and carriage driving or equestrians should be included. The National Park Authority are a leading voice and if equestrian travel is recognised this would set the bar for the rest of Scotland. They often get left out but potentially could be used in commuting, tourism travel where there is history of such travel. Horse riding and carriage driving is an active mode and healthy leisure and sporting activity. For road safety reasons, active travel routes should provide safe segregated ways out of traffic including equestrian use.

07 Stirling Council, Transport Development Team – The guidance could make a positive contribution depending on how stringent the criteria is applied for new development. The approach aligns with National Policy but there needs to be room for balance, discussion about solutions rather than stifle development. New developments need to take account of future needs to avoid Local Authorities facing bills to retrofit. In terms of Parking standards, any reduction needs to be carefully considered against any development proposal. Development should result in parking issues that the Council then have to deal with. It is recommended that core paths is included as this is an obligation on developers to maintain or divert, and consider temporary or permanent closures. The cost could be recovered from the developer. The document needs to be explicit with regards to 'Highest Level of Standard'

for walking/cycling routes, cycle and scooter parking in line with the updated Cycle by Design – needs to consider adaptive and cargo bikes.

There are difficulties with conditions as new/improved infrastructure tends to fall outwith the red line boundary and/or applicant's ownership. There is a cost implication and developers should not be simply passing the cost on to the end user, affecting for instance the affordability of housing.

Transport assessment for development of 10 units seems onerous, unless there is a known junction or road that is at capacity. There could still be a requirement for small and medium developments rather than an expensive TA that requires junction modelling.

Travel Plan – Stirling Council have recently moved away from requesting Travel Plans as monitoring of these often fails fairly early in the process and it is difficult to force measures onto residents. It works better for office developments. We have moved towards requesting residential travel packs which should set out the available travel options for residents when they move into a development. Also some kind of financial commitment within the travel plan ensures the developers take appropriate action, which may require after the development is delivered. Also securing a travel plan co-ordinator for larger developments to evolve the document and onus on developer to bring forward mitigation. It is key to secure a Travel Plan is delivered and doesn't become a tick-box exercise.

Suggestions for next plan –

- safe and direct active travel is essential to all development but making mandatory may make some developments difficult to deliver. The planning authority can encourage discussion about how principles can be met without being compromised.
- Stirling Council do not have an EV provision rate yet but this will be refreshed with the new LDP and will be in line with the building regulations energy standards proposed changes.
- The National Park is not like other planning areas and it should be made clear to developers that the overall ethos is of supporting and encouraging sustainable access to and enjoyment of the outdoors for all.
- Developments need to become part of the community and be linked to it by a range of ties as well as physically through walking and cycling. Measures required of any development must be part of a wider picture of supporting and encouraging sustainable travel across existing developments and communities.

08 Scottish Government Development Plans Team – A number of recommendations and suggestions:

- Lower parking numbers are supported where there is justification in line with emerging NPF4 policy.
- It should state that cycling parking should be more conveniently located than car parking.
- There would be cases where a Travel Plan is required for small-scale developments. This should be where it is judged that the development will have significant travel generating uses and where it is considered important to monitor travel patterns. So “and” should be replaced with “or” to better reflect the emerging draft NPF4 policy.

09 Sportscotland – no comments

10 Private Individual – The current LDP policy states “all proposals will make a positive contributions towards sustainable travel, improving active travel options' This is difficult in the countryside to uphold this and indeed it has not been possible to do so looking at some of the approvals over the past 5 years. Future new visitor destinations or expansion should only be given permission if a reliable public transport network is ALREADY in place, developers cannot deliver this. Ensure car parks and facilities in rural landscape is small to less impact and protect nature. Where there are designations to protect nature then this is the priority and development for tourism where transport is only by car should not be encouraged. Other policies on tranquil/quiet places and dark skies cannot be adhered to if the only transport mode to the visitor destination is by car.

Travel plans - All large scale developments should have travel plans. The only way to reduce private car is to retain/increase number of facilities accessible by public transport. Travel Plans should include how easy it is to use public transport. Proposals linking to walking/cycling routes should remain advisory until the country has a safer road and cycle network.

Recommendation for next LDP - Enhance the transport network by putting on more services and improving offer at the public transport interchanges – i.e. better cafes, cleaner streets, children’s play area, links to safe swimming/paddle boarding.

11 Luss and Arden Community Council – Generally acceptable guidance. The guidance is in the right direction but infrastructure and cost implications are extremely demanding and may require revision and significant increase to public transport.

12 Sustrans – The guidance places a lot of emphasis on EV charging. It would benefit in a shift in priority sustainable transport – i.e. if high costs of EV charging then why not invest in walking, cycling and wheeling. Electric cars are taking centre stage when it should be in line with the ambition for a 20% reduction in car km by 2030.

We support and welcome the inclusion of both long and short stay cycle parking. It could benefit from greater weight. For example, short stay parking should be located by the pedestrian entrance to buildings but long stay round the back. Cycling parking on pavements need to have dropped kerbs for access and sufficient space for pedestrians. It should also mention cargo and adaptive cycles. The guidance should strongly mention cycle parking, solar e-bike charging, bus stop shelters, seating and lockers for recreational equipment and/or deliveries.

The guidance does not discuss accessibility enough and would recommend further engagement with Mobility and Access Committee Scotland (MACS).

The guidance would benefit for greater emphasis on car-sharing and car clubs. The focus is too much on electric cars. It could include requirement for at least one car club share per X houses and cargo-bike share schemes.

For outside red line boundaries developers should make a positive contribution to the community projects via developer contributions.

NPF4 once adopted will become part of the Development Plan and the draft policies need to be considered. Routes for walking, wheeling and cycling might qualify as a National Development under the national cycling network. We encourage when developing policies locally to bear in mind that infrastructure must be accessible to all and good maintenance. The guidance should make more reference to Cycling by design to ensure all active travel incentives meet best practice.

13 Strathclyde Passenger Transport (SPT) – We have no specific comments and welcome and support the clarity they provide. SPT and Tactran are supporting the National Park Authority to take forward a transport system and options appraisal and this will help inform the transport policies of the next LDP.

14 Scottish Environment Protection Agency (SEPA) – The issues covered by the guidance are mostly outwith our remit and we don't have any specific comments. We can confirm we are supportive of the measures to promote active and sustainable travel.

15 Historic Environment Scotland (HES) – We have no comments to make.

16 Transport Scotland – We only have a minor comment to make. The text on page 6 refers to walking, cycling and wheeling as active travel and public transport, taxis and shared transport as sustainable travel. All modes are sustainable modes of travel as outlined with the sustainable travel hierarchy. While walking, cycling and wheeling are active travel, they are also the preferred modes of sustainable travel as they are the top priority of the hierarchy. It is recommend the first few sentences are re-worded to make this clear. Also another minor point – ensure the Guidance reflects the current Government law around e-scooters.