



## **Response to the Scottish Government on the Scottish Planning Policy (SPP) Consultative Draft**

The Highlands & Islands Transport Partnership (HITRANS) is a statutory body covering all forms of public transport in the Highlands and Islands of Scotland encompassing not only road, rail, sea and air travel, but also cycling and walking.

HITRANS working with its five constituent Councils is charged with developing and delivering a strategy and promoting improvements to the transport services and infrastructure network that serve the region. The organisation takes an integrated and inclusive approach by consulting with the local communities and companies to achieve its objective of “enhancing the region’s viability by improving the interconnectivity of the whole region to strategic services and destinations”

HITRANS is responsible for an area of just under half of Scotland’s land mass but which has only 410,000 residents – 10% of Scotland’s population. It includes over 80 island communities, of which 20 or so are served by airports and airfields.

HITRANS particular interest and comments are made in relation to any potential impacts from the change from a specific SPP dealing with transport related development issues into a single more concise SPP document as a statement of national planning policy.

The HITRANS Board met on 5 June and considered the proposed changes to Planning Policy as it will impact on area it covers within the Highlands and Islands.

SPP17 is a substantial policy document running to 82 paragraphs. The SPP streamlines these into 13 paragraphs.

A number of key elements of SPP17 are overlooked in the streamlined section of the proposed SPP dealing with transport. These include:

- SPP17 states the importance of integration between transport planning, land use planning, economic development and environmental conservation. In particular it requires co-ordination between the Regional Transport Strategies and development planning documents produced by Local Authorities. No mention is made of this important link between the RTS and other planning documents in the proposed SPP.

- In considering the needs of remoter rural areas SPP17 states that community run transport services have an important role to play and should be encouraged. The proposed SPP does not mention rural area transport needs and innovative ways to deliver public transport in sparsely populated areas. If developers are not required to consider the sustainability of access to developments by public transport in rural areas where public transport services are infrequent or unavailable, then either these developments will be inadequately served, or a greater burden will be placed on the community sector and Councils in supporting minimum levels of access to residents. The new SPP should include reference to the need to ensure access is provided to developments in rural areas as per SPP17.
- SPP17 refers to the Strategic Rail Authority's guidance on promoting new stations and encourages developer contributions toward station improvement and new station provision. The proposed SPP states that new stations will not normally be supported, however the case for a new station will be considered where the needs of local communities, workers or visitors will generate a high level of demand, and it will be served by feeder rather than inter-urban services. This represents a change in previous planning policy and could potentially impact on efforts to encourage increased and sustainable rail commuting by provide new stations in the Inner Moray Firth area such as at Conon Bridge and Dalcross.
- While not a change in Planning Policy the continuation of the policy of setting maximum parking standards for all developments to encourage modal shift, irrespective of location, is one that HITRANS would wish to be amended to reflect the realities in remote rural areas. These areas will by their nature not for the foreseeable future have public transport services at a frequency that would allow people to access employment and services using public transport. It is therefore inherent that those living in such areas have a higher level of car usage and need to access a private car than those living in more populated areas. A policy that limits private car parking within developments in these areas is therefore one that disproportionately impacts on the viability of communities and potentially adds to the trend towards further depopulation of these areas.

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