

<b>Issue 13</b>	<b>Supporting Non-Car Travel</b>	
<b>Development Plan reference:</b>	<b>Supporting Non-Car Travel, page 55</b>	<b>Reporter: [Note: For DPEA use only.]</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Mr Keith Bedborough (856480) Ms Alison Bowden (029896) Cockburn Association (037249) Corstorphine Community Council (040316) Cramond and Barnton Community Council (803443) Denholm and District Community Council (040612) Esk Valley Trust (037349) Gullane Area Community Council (037068) Liberton and District Community Council (790396) Linlithgow and Linlithgow Bridge Community Council (930033)	Mactaggart and Mickel (038949) Mrs Mirabelle Maslin (928549) Midlothian Tourism Forum (790754) National Trust for Scotland (040626) NHS Lothian Public Health and Health Policy (840024) North Berwick Community Council (035522) Roslin and Bilston Community Council (790524) RSPB Scotland (031480) Scottish Government (034404) Shawfair LLP (039940) Shepherd Offshore (Scotland) Ltd (038954) Mr Charles Strang (907037)	
<b>Provision of the Development Plan to which the issue relates:</b>	A better connected place – supporting non-car travel, including walking and cycling.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Mr Keith Bedborough (856480)</u> SDP should provide far clearer guidance on how development will support sustainable transport, in particular cycling. Developers provide at best lip service to provide the minimum facilities rather than genuinely trying to provide integration into the broader sustainable transport network.</p> <p><u>Ms Alison Bowden (029896)</u> The Dalkeith area is highly populated, with future housing planned, but there is little cycle provision that is safe and suitable for those wishing to commute into the city. Cycle provision should be planned for this area.</p> <p><u>Cockburn Association (037249)</u> Support statements on density of development and ensuring that transport infrastructure is in place instead of development. The implications for the ongoing development of vehicular technology will have implications at a local level, including reducing some of the perceived adverse effects of commuting by car. This creates more flexibility for the location of new housing e.g. not always close to existing</p>		

settlements. In relation to walking and cycling, representation supports network enhancements, and highlights that designating / constructing the network is important, but so is its effective management for the benefit of all users.

Corstorphine Community Council (040316)

Support inclusion of Non Car Travel and transport hierarchy in SDP. Wish to increase budgets for active travel from currently low levels to deliver routes. Support reference to CAPS in paragraph 6.5 and requirement for integrating walking and cycling in LDPS (paragraph 6.8). Designing streets is six years old and is no longer best practice in guidance for development. The current Scottish cycling design standards have done little to create modal shift to cycling as per the recent CAPS update. Designing streets also conflicts with definitions of strategic routes which refer to off-road routes whilst designing streets prefers on road. Support definition of functional active travel routes (6.6), but the definition must be clearer. Expect to see planning / design guidance attached to functional and recreational routes as per section 6.2 for new developments, but it is not referenced which is detrimental to ensuring high quality provision of functional and recreational walking and cycling routes.

Cramond and Barnton Community Council (803443)

Need to include a strategic functional walking and cycling route connection between Gyle / Maybury and Barnton thereby extending the orbital route around the City and connecting Cramond and Barnton to the Gateway Transport Interchange and retail and business activities at the Gyle and Gogar and identified West Edinburgh Business Cluster.

Denholm and District Community Council (040612)

Concern raised over lack of recreational routes included in Southern Borders.

Esk Valley Trust (037349)

Support policies on walking and cycling. Figure 6.1 - add North Esk Way as a recreational route.

Gullane Area Community Council (037068)

East Lothian LDP conflicts with para 6.3 regarding location of large scale housing development as it allocated large sites in small rural communities. They don't have good access to town centres and employment locations by walking, cycling and public transport. Plan should ensure the provision of safe walking and cycling, and particularly cycling, routes between the main villages in our community council area and the railway stations at Drem and Longniddry.

Liberton and District Community Council (790396)

Support statements in plan but question whether they will be implemented based on LDP experience. Need to consider use of former rail lines for public transport proposals. Support walking and cycling proposals.

Linlithgow and Linlithgow Bridge Community Council (930033)

Schools, town centre, commercial centre and public transport nodes in every settlement should be accessible by a safe footpath and cycleway. This should be mandatory for any new development (residential or commercial). Specific to West

Lothian there should be a new road, footpath and cycleway linking Linlithgow to Livingston (its regional centre).

Mactaggart and Mickel (038949), Shawfair LLP (039940), Shepherd Offshore (Scotland) Ltd (038954)

Proposed Plan and LDPs must take current as well as future planned transport needs into account to ensure the timely delivery of transport infrastructure. Alignment between key parties is central to removing constraints on development and allows housebuilding to take place at a rate which meets demand in areas of demand. The Plan directs that 'Local Developments Plans will ensure that large-scale housing development is located where there is good access to town centres and employment locations by walking and cycling routes and by public transport. The use of the present tense 'where there is' does not allow for future or planned improvements or investments in associated with planned development.

Mrs Mirabelle Maslin (928549)

Sustainable transport improvements should not risk public safety. Support 6.3 and 6.4 but need assurance that this will be delivered based on experience in Midlothian. Question how development, delivery and safeguarding requirements of paragraphs 6.7 and 6.8 will be enforced.

Midlothian Tourism Forum (790754)

Need to connect Vogrie Country park with deprived communities in Midlothian which have no active travel access. Plan should include Proposed Recreational Cycle Routes linking Vogrie to Dalkeith, Newtongrange and Gorebridge. The building of 6,392 houses (committed and proposed) within a five mile radius of Vogrie will create yet further demand for such "non-car access " - which in turn is a recurring theme throughout the Plan.

National Trust for Scotland (040626)

Active travel is not sufficiently addressed in the plan, rating only one mention. Regional planning should be a tool to help ensure that economic activity, recreation and residential provision are suitably located to make active travel possible.

NHS Lothian Public Health and Health Policy (840024)

Development across the region is likely to increase the number of car journeys. There are eleven Air Quality Management Areas in south east Scotland already. There should be a clear statement about problems with Air Quality in the SESplan area to emphasise the importance of developing an active travel and carbon-neutral public transport infrastructure. Support paragraph 6.2 but wording needs strengthened. Support direction to 'ensure that this [transport infrastructure] is delivered ahead of, or as part of, new development. Section 6.3 Suggest that a) 'as part of' is refined to say 'before 50% of development is complete' so that developers cannot wait until house building is finished before providing infrastructure.

North Berwick Community Council (035522)

Need to consider local and area wide walking and cycle routes around North Berwick.

Roslin and Bilston Community Council (790524)

Need for a highly effective and complete network of transport, including cycle / walking paths and lanes, for business and leisure use. This needs to connect safely and effectively with our roads. Not an easy task because of the bad state and narrowness of our local roads. What can be done to help? We need this now, before any more development takes place. How can it be funded?

RSPB Scotland (031480)

Support the improvement of infrastructure for walking, cycling and train travel, but believe that more could be done than what is outlined in the plan e.g. more designated space on trains and stations for bikes and more bike-rental scheme.

Scottish Government (034404)

Text should be included at paragraph 6.1 or 6.2 stating 'Significant travel-generating uses should also be sited at locations which are well-served by public transport and be subject to parking restraint'. This would help to address the requirements identified in paragraph 278 of SPP.

Text should be included within the Walking and Cycling section (paras 6.5 – 6.8) to state 'Local authorities are encouraged to develop at least one exemplar walking and cycle friendly settlement to demonstrate how active travel routes could be improved significantly.' This would help to address the requirement of NPF3 paragraph 5.14.

Mr Charles Strang (907037)

Paragraph 6.4 - While a Strategic Development Plan, it would surely be transparent and appropriate to provide guidance on the actual meaning of higher development densities. Paragraph 6.6 - there might be a potential strategic walking and cycling route as part of safeguarding the line of the Berwickshire railway from Tweedbank to Berwick. Figure 6.1 - at the very least there should be linkages from Kelso along the Tweed to Berwick, and from Kelso to Yetholm and the Northern end of the Pennine Way.

**Modifications sought by those submitting representations:**

Mr Keith Bedborough (856480)

SDP should provide far clearer guidance on how development will support sustainable transport, in particular cycling.

Ms Alison Bowden (029896)

Modify Figure 6.1 to include cycle route from Dalkeith to Edinburgh.

Cockburn Association (037249)

Paragraph 6.1 - Insert statement of requirement to monitor improvements in vehicle emissions and related opportunities for more flexible options to locate housing land.

Paragraph 6.6 - Insert new sentence and after 2nd sentence: 'Provisions for good management of shared networks should also be made'.

Corstorphine Community Council (040316)

Paragraph 6.2, 2nd sentence - replace 'should' with 'must'.

Paragraph 6.2 - Remove reference to designing streets and replace with up to date

guidance such as London Cycling Design Standards or Design Guidance Active Travel (Wales) Act 2013.

Paragraph 6.5 - Insert statement that infrastructure developments for rail, bus, tram and vehicular access should also have good quality walking and cycling access.

Paragraph 6.6 - modify definition of strategic functional route to reflect that pedestrians and cyclists should be separated for strategic travel corridors as per London policy guidance.

Paragraph 6.6 - delete reference to varying quality under definition of recreation route. Replace statement that all new routes and improvements should be of good quality and accessible to all.

Paragraph 6.6 - include reference to Welsh and London best practice guidance in order to ensure high quality walking/cycling design standards and provision.

Cramond and Barnton Community Council (803443)

Show functional link between Gyle / Maybury and Edinburgh Gateway Interchange and Barnton.

Denholm and District Community Council (040612)

Figure 6.1 should include circular recreational route travelling through all parts of the Scottish Borders.

Esk Valley Trust (037349)

Figure 6.1 - add North Esk Way as a recreational route.

Gullane Area Community Council (037068)

Insert following statement to paragraph 6.3: "Ensure that the scale of housing developments in rural locations which have inadequate transport infrastructure is proportionate to the size of the existing communities."

Liberton and District Community Council (790396)

Paragraphs 6.2 or 6.3 insert statement stating that "disused rail (etc.) routes will be evaluated to see if they could contribute to delivering off-road public transport services e.g. bus and light rail / tram services and associated park and ride facilities (e.g. the Waverley Line to Loanhead rail route could tie in two potential park and ride facilities on the Gilmerton and Lasswade roads.)"

Linlithgow and Linlithgow Bridge Community Council (930033)

Modify paragraph 6.3 so that it applies to all development, not just housing. Add to Figure 6.1 a walking and cycling route between Linlithgow and Livingston.

Mactaggart and Mickel (038949), Shawfair LLP (039940), Shepherd Offshore (Scotland) Ltd (038954)

Line 1, Paragraph 6.3 - Modify 'Local Developments Plans will ensure that large-scale housing development is located where there is good access to town centres and employment locations by walking and cycling routes and by public transport' to allow larger scale housing development to be located where good access will be created by future and planned improvements associated with planned development.

Mrs Mirabelle Maslin (928549)

Paragraph 6.3, replace all instances of 'will' with 'must'.

Paragraph 6.4, replace all instances of 'should' with 'must'.

A new paragraph, after 6.4, should be added to say that development that does not accord with the previous two paragraphs will not be granted planning permission.

Midlothian Tourism Forum (790754)

Diagram 6.1 - modify to include Proposed Recreational Cycle Routes linking Vogrie Country Park to Gorebridge, Newtongrange and Dalkeith (including Mayfield and Easthouses).

National Trust for Scotland (040626)

Increases the number of references to active travel in the plan.

NHS Lothian Public Health and Health Policy (840024)

Include clear statement about problems with air quality in the SESplan area to emphasise the importance of developing an active travel and carbon-neutral public transport infrastructure.

Paragraph 6.2 - change 'should' to 'will' in third sentence.

Paragraph 6.3 - add 'before 50% of development is complete' after 'new development'.

North Berwick Community Council (035522)

Include strategic walking and cycle routes to North Berwick.

Roslin and Bilston Community Council (790524)

In paragraphs 6.3 and 6.4, replace 'should' with 'must'.

In paragraph 6.3 and 6.4, insert requirement that walking and cycle routes should be in place before development.

In paragraphs 6.5 to 6.8, insert statement as to how routes will be funded.

RSPB Scotland (031480)

Include reference for need for bike rent schemes and more spaces at stations and on trains for bikes.

Scottish Government (034404)

Paragraph 6.1 or 6.2 - add text stating 'Significant travel-generating uses should also be sited at locations which are well-served by public transport and be subject to parking restraint.' □

Walking and Cycling, paras 6.5 – 6.8, add text stating 'Local authorities are encouraged to develop at least one exemplar walking and cycle friendly settlement to demonstrate how active travel routes could be improved significantly.'

Shawfair LLP (039940), Shepherd Offshore (Scotland) Ltd (038954)

Line 1, Paragraph 6.3 - Modify 'Local Developments Plans will ensure that large-scale housing development is located where there is good access to town centres and employment locations by walking and cycling routes and by public transport' to allow larger scale housing development to be located where good access will be

created by future and planned improvements associated with planned development.

Mr Charles Strang (907037)

Paragraph 6.4 - include guidance on the actual meaning of higher development densities.

Paragraph 6.6 and Figure 6.1- include strategic walking and cycling route as part of safeguarding the line of the Berwickshire railway from Tweedbank to Berwick.

Figure 6.1 - include routes from Kelso along the Tweed to Berwick, and from Kelso to Yetholm and the Northern end of the Pennine Way.

### **Summary of responses (including reasons) by Planning Authority:**

#### **Active Travel**

Mr Keith Bedborough (856480)

Disagree with proposed modification. The plan is intended to be a concise, visionary, map based document which will inform LDPs. SESplan supports the vision that by 2020, 10% of all journeys in Scotland will be taken by bike. The Spatial Strategy section of the plan makes a number of references to reducing commuting by road, improving non-car travel and also identifies a number of Strategic Transport Improvements. This is supported by the Placemaking Principles which make clear reference to the importance of, and need to enhance, walking and cycling networks. The Supporting Non-Car Travel and Walking and Cycling sections of the plan go on to make a number of clear directions to LDPs, including paragraph 6.2 which directs that 'Development should take account of the needs of people before the movement of cars'. Figure 6.1 Strategic Walking and Cycling Routes also identifies a number of existing and proposed priority functional walking and cycling routes, giving a clear strategic commitment to infrastructure improvements for walking and cycling. This commitment within the plan is also reflective of the visions of NPF3 and SPP which set out the policy framework for reducing carbon emissions and adapting to climate change. **No modification proposed.**

Ms Alison Bowden (029896)

Disagree with proposed modification. Figure 6.1 Strategic Walking and Cycling Routes shows an indicative proposed functional route connecting Dalkeith with Edinburgh. This continues to Gorebridge with a view to providing an important functional walking and cycling route along the A7 corridor. **No modification proposed.**

Cockburn Association (037249)

Disagree with proposed modification. In relation to management of shared networks, stakeholder leads and relevant partners are identified in the Action Plan. **No modification proposed.**

Cramond and Barnton Community Council (803443)

Figure 6.1 Strategic Walking and Cycling Routes identifies priority strategic functional and recreational routes. A proposed Edinburgh Orbital Strategic Functional Route has been represented in Figure 6.1, in addition to a proposed functional route linking Barnton / Cammo to Gogar / Maybury - this has been included in the Proposed Plan with a view to addressing congestion on these key transport corridors and providing linkages between public transport interchanges.

Figure 6.1 identifies priority strategic functional and recreational routes – there will be some local or shorter active travel routes which may not be identified in this diagram. It is not the purpose of this section of the Proposed Plan to identify all routes. In the meantime, local routes will continue to receive support at LDP level. Paragraph 6.8 directs that ‘Local Development Plans will safeguard local routes and the route alignments needed to expand the local network.’ There is potentially a route which will be developed alongside Edinburgh LDP housing sites. **No modification proposed.**

Denholm and District Community Council (040612)

Disagree with proposed modification. Figure 6.1 Strategic Walking and Cycling Routes shows existing and proposed strategic functional and recreational routes and also identifies the Peebles to Kelso multi-use path. This has been included to increase connectivity between west and central Borders towns as well as providing a more sustainable route to the rail stations at Galashiels and Tweedbank. Leisure walking and cycling along the Tweed Valley will also be supported. Local routes will continue to receive support at LDP level. The plan also contains a clear directive that ‘Local Development Plans will safeguard local routes and the route alignments needed to expand the local network.’ **No modification proposed.**

Esk Valley Trust (037349)

Disagree with proposed modification. SESplan recognises the North Esk Way, and the River Esk Path has been included in the plan in recognition of its role as a cross-boundary recreational route, running from Musselburgh at the coast to Penicuik, with a separate branch along the South Esk to Gorebridge. Table 5 of the Green Network Technical Note contains a full list of strategic walking and cycling routes included in the Proposed Plan (ASD59). **No modification proposed.**

Liberton and District Community Council (790396)

Disagree with proposed modification. Scottish Planning Policy (paragraph 277 ASD06) already makes a clear policy guideline to Local Development Plans on disused railway lines and their potential for contributing to active travel networks. SESplan reflect the visions of Scottish Planning Policy and NPF3. The Proposed Plan also makes clear in paragraph 6.8 that ‘Local Development Plans will safeguard local routes and the route alignments needed to expand the local network’. SESplan would consider that this provides sufficiently clear guidance to member authorities. The former Waverley Line from Edinburgh to Loanhead is also safeguarded in the City of Edinburgh LDP and could potentially contribute to orbital bus proposals. **No modification proposed.**

Linlithgow and Linlithgow Bridge Community Council (930033)

Disagree with proposed modifications. Consider that text in paragraph 6.4, which clearly relates to all development and gives a clear direction to reduce the need to travel by car, is sufficiently clear without need for modification. Paragraph 6.3 intentionally relates to housing. North-south and east-west routes through the Bathgate Hills serving the settlements of Linlithgow, Bathgate and Livingston were examined at Main Issues Report stage. These routes remain desirable in the longer term, but were not carried forward into the Proposed Plan owing to the routes being largely on road which does not fit with the strategic functional route definition. A full list of existing, planned and proposed / aspirational Walking and Cycling routes,



along with reasoning for their inclusion or exclusion in the Proposed Plan following consultation during the Main Issues Report stage, can be found within the Green Network Technical Note (October 2016 ASD59). In addition, West Lothian Council have published an Active Travel Plan 2016 – 21 which acts as a framework to identify priorities for investment and to increase opportunities for active travel across West Lothian (ASD82). **No modification proposed.**

Midlothian Tourism Forum (790754)

Disagree with modification. Figure 6.1 identifies priority strategic functional and recreational routes. Local routes will continue to receive support at LDP level. Paragraph 6.8 directs that 'Local Development Plans will safeguard local routes and the route alignments needed to expand the local network. SESplan member authorities will ensure that Local Development Plan Action Programmes and walking / cycling plans set out how these local routes will be delivered.' The plan also contains clear direction in Paragraph 6.3 which states 'Where new infrastructure is needed to enable this access, Local Development Plans will ensure that this is delivered ahead of, or as part of, new development.' **No modification proposed.**

National Trust for Scotland (040626)

Disagree with modification. SESplan is intended to be a concise, visionary, map based document. SESplan would consider the Spatial Strategy, Placemaking Principles, Supporting Non-Car Travel and Walking and Cycling sections of the plan all provide a robust framework which promotes sustainable development and active travel. Active Travel is also a central theme in the plan's allocation of Strategic Green Network Priority Areas. **No modification proposed.**

North Berwick Community Council (035522)

Disagree with proposed modification. Figure 6.1 shows an existing recreational route connecting North Berwick with Edinburgh. Local networks are the responsibility of East Lothian Council and their LDP. **No modification proposed.**

RSPB Scotland (031480)

Disagree with modification. SESplan would consider these to be service rather than land use issues that should be assessed by the network operator in accordance with local levels of need and demand. **No modification proposed.**

Scottish Government (034404)

Disagree with proposed modifications. SESplan would consider the text in existing paragraph 6.4, which relates to all development, would sufficiently address the points raised without need for modification. The requirement for member authorities to develop 'exemplar' walking and cycling friendly settlements is already referenced in NPF3 paragraph 5.14 (ASD40) – SESplan do not consider the need to repeat this in the Proposed Plan. It is not the role of SESplan to identify such settlements. **No modification proposed.**

Mr Charles Strang (907037)

Disagree with proposed modifications. It is not considered that 'higher development densities' is an overly technical phrase which requires additional information regarding its definition. Figure 6.1 identifies priority strategic functional and recreational routes – there will be some local or shorter active travel routes which

may not be identified in this diagram. It is not the purpose of this section of the Proposed Plan to identify all routes. Local routes will continue to receive support at LDP level. Paragraph 6.8 directs that 'Local Development Plans will safeguard local routes and the route alignments needed to expand the local network. SESplan member authorities will ensure that Local Development Plan Action Programmes and walking / cycling plans set out how these local routes will be delivered.' The Scottish Borders LDP also seeks to safeguard former railway lines in the Borders in light of their potential to be used for walking, cycling and recreational routes. **No modification proposed.**

### **Infrastructure Delivery, Transport and New Housing Development**

#### Cockburn Association (037249)

Disagree with proposed modification. Vehicle emissions are not the sole factor in promoting the resource efficient location of housing land. Placemaking Principles should still apply to new development for reasons of resource efficiency, making best use of existing infrastructure, re-use of brownfield land and health benefits associated with an increase in active travel. Any increase in car based commuting may exacerbate congestion and lengthen journey to work times on an already stressed road network. **No modification proposed.**

#### Gullane Area Community Council (037068)

Disagree with proposed modification. The spatial strategy of the plan and Key Areas of Change South East outline areas identified for growth, including areas of strategic growth and long term growth corridors. The plan also contains a clear direction that all development will take into account the Placemaking Principles set out in Table 3.1, which includes the following guidelines: 'New development should be located near existing public transport hubs, or in locations where there are planned infrastructure projects to enable easy access to the public transport network'. Paragraph 6.3 goes on to issue clear direction which states 'Where new infrastructure is needed to enable this access, Local Development Plans will ensure that this is delivered ahead of, or as part of, new development.' **No modification proposed.**

#### Mactaggart and Mickel (038949), Shawfair LLP (039940), Shepherd Offshore (Scotland) Ltd (038954)

Disagree with modification. The second line of paragraph 6.3 clearly states: 'Where new infrastructure is needed to enable this access, Local Development Plans will ensure that this is delivered ahead of, or as part of, new development.' This has been written in the interests of preventing delays or bottlenecks in the provision of essential infrastructure in tandem with housing development, and is intended to ensure that future housing development is well connected to local centres and centres of employment, including walking, cycling and public transport. **No modification proposed.**

#### Roslin and Bilston Community Council (790524)

Disagree with proposed modification. In relation to ensuring there is walking and cycling infrastructure in place before new development, the plan contains a clear direction that all development will take into account the Placemaking Principles set out in Table 3.1, which includes the following guidelines: 'New development should be located near existing public transport hubs, or in locations where there are

planned infrastructure projects to enable easy access to the public transport network'. There is also a clear direction in paragraph 6.3 which states: 'Where new infrastructure is needed to enable this access, Local Development Plans will ensure that this is delivered ahead of, or as part of, new development.' In relation to funding, Strategic Walking and Cycling Routes are included in section B of Table 6.1 and therefore part of the potential list of projects that will be funded by the contributions framework. Details of delivery of individual projects is more appropriately addressed in the Action Programme. **No modification proposed.**

### **Policy**

Corstorphine Community Council (040316), Mrs Mirabelle Maslin (928549), NHS Lothian Public Health and Health Policy (840024), Roslin and Bilston Community Council (790524)

Disagree with proposed modifications. Wording – plan's use of 'should' vs 'must': wording is intended to give member authorities a degree of flexibility where necessary. **No modification proposed.**

Corstorphine Community Council (040316)

Disagree with proposed modifications.

- Replacing Designing Streets with Welsh and London best practice guidance – SESplan will seek wherever possible to reference Scottish planning policy and guidance, and this will continue to be the point of reference until policy guidance is reviewed by the Scottish Government.
- Infrastructure for transport developments – there is clear direction at paragraph 6.4 which applies to all development, and states that 'Developments should be designed so that the density, use and layout helps reduce the need to travel by car. Developments should include clear and direct links to public transport nodes and good access to walking and cycling networks.'
- Modify definition of strategic functional routes, and delete reference to varying quality of recreational routes – following responses received at Main Issues Report stage, it was considered helpful to differentiate between functional travel routes (e.g. commuting to work, school, accessing shops) and more recreational routes.

**No modifications proposed.**

Mrs Mirabelle Maslin (928549)

Disagree with modification. The plan has made clear that all planning applications must be determined in accordance with the Development Plan, namely the Local Development Plan and the Strategic Development Plan (and any relevant supplementary guidance). This is made clear in The Vision section of the plan (page 8). Specific statements relevant to development management are highlighted in bold and begin either 'Development should...' or 'Development must...' **No modification proposed.**

NHS Lothian Public Health and Health Policy (840024)

Disagree with proposed modifications. Air quality – the plan already contains clear commitment to reducing travel by car, enabling more journeys by walking, cycling and public transport and reducing transport related carbon emissions. This is reflective of the visions of NPF3 and Scottish Planning Policy which set out the policy

framework for reducing carbon emissions and adapting to climate change. Air quality was addressed in the Main Issues Report and SEA and has informed the spatial strategy of the Proposed Plan. It is not the purpose of the proposed plan to repeat context. **No modification proposed.**

24 representations of support for this section of the Proposed Plan are noted.

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]