

Transport	
Summary of Comments Received (respondent ref in brackets)	Council's Response
Add footnote to paragraph 2.2 to read "A different mechanism applies in relation to developer-funded improvements to the trunk road network – see DTLR Circular 04/2001 (<i>Control of Development Affecting Trunk roads and Agreements with developers under Section 278 of the Highways Act 1980</i>)" (15)	The SPG has been amended to include the footnote.
Greater clarity required in the absence of minimum standards or targets (28)	An additional table of information has been added..
Contributions should only relate to improvements required to accommodate additional movements where the existing transport infrastructure cannot cope (27) There should be scope for the contributions to relate only to specific improvements (27) Paragraph 2.4 should recognise existing allow a discount to contribution calculation arising from existing schemes already receiving funding through the LTP or other development. (23)	Contributions should reflect the range of impacts arising from a proposal.
Guidance should recognise that redevelopment of brownfield sites is likely to reduce the number of vehicle movements in peak hours.(27)	This is not considered realistic. Redevelopment frequently results in more intensive forms of development which change and add to travel demands.
Cost of auditing travel plans should be included in the contributions (2)	A reference to the monitoring of travel plans has been added at paragraph 3.2
Contributions towards walking & cycling measures should be allocated to a wider area to better facilitate a fully connected network of cyclepaths and footpaths (2)	This is noted but it is necessary for contributions to comply with the advice in Circular 1/97.
Paragraph 2.2 should refer to funding " <i>the running of a service made necessary by the development</i> " (23)	It is agreed that the text should be redrafted to read 'the running of a service made necessary by the development'.
Paragraph 2.2 does not reflect fully the tests set out in Circ 1/97 and should be amended. (14)	The Council considers that this paragraph is fully consistent with the Circular and case law.
There is disparity within the document between commercial and residential development. The threshold levels favour commercial development because 200 sq.m of offices would be expected to generate approximately 3 to 5 times more traffic than a single	The thresholds for securing contributions have been amended and the contribution relates to the impact created.

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dwelling. (12)	
Contributions should be targeted at specific relevant improvements (14)	Contributions would be related to the development and targeted accordingly
Documents referred to in paragraph 4.1 should be made available (12)	The Local Transport Plan and Bus Strategy are public documents which are readily available.
Thresholds	
Paragraph 1.1 as drafted suggests any level of impact would require an ameliorative condition or obligation, This exceeds Circ 1/97 advice for obligations to be necessary. Paragraph 1.1 should reflect the Circular. (14)	It is not considered that the wording is inconsistent with Circular 1/97. The topic paper needs to be read in conjunction with the Core Guidance paper which indicates thresholds.
Support for approx. £500 per dwelling for developments up to 14 dwelling (14)	The Council notes the support
For developments of 5 to 14 dwellings (para 2.4), the requirement to meet the transport element of the contribution in addition to providing transport measures deemed necessary as a direct result of the proposal is considered unfair as the mitigation works may also bring forward some "wider" highway benefits. (12)	The Core Guidance Paper has been amended to remove the basic level of contribution and to indicate the residential developments of 1 dwelling or more will be assessed for contribution.
Para 4.6 should be clarified to make clear whether or not it is proposing a public transport 'levy' on sites of 15 – 200 dwellings. (12)	It would be appropriate for smaller residential developments to contribute to the improvements of alternative modes of transport.
Object to the "arbitrary tax" on development of sites of 1 – 14 dwellings which is contrary to Circ 1/97 (1)	These provisions have been removed from the draft SPG.
Processes	
Maintenance payments should be time limited and not required in perpetuity, in line with guidance in Circ 1/97. Paragraph 2.2 should be amended accordingly. (14)	It is not considered necessary to amend paragraph 2.2 as it is consistent with the Circular and case law.
It is impractical to enforce a green travel plan at the outline application stage (3)	Further details may emerge at the reserved matters stage but it is important that the requirement to produce a green travel plan is included within the legal agreement connected to any relevant outline planning application.

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Requiring travel plans where a proposal which cumulatively with others in the locality would be a major travel generator is unworkable (3)	It is considered appropriate that a travel plan could be sought in such circumstances. However, it is proposed to amend the table to read 'A Travel Plan may be sought below these thresholds...'