

# TRANSform Scotland

*the campaign for sustainable transport*

## Edinburgh City Local Plan draft March 2006

Consultation response to The City of Edinburgh Council

30th June 2006

### 1. General comments

- 1.1 TRANSform Scotland is the national sustainable transport alliance, campaigning for a more sustainable and more socially-just transport system. Our membership includes bus, rail and shipping operators, local authorities, national environment and conservation groups, consultancies and local transport campaigns.
- 1.2 We welcome the draft Local Plan's emphasis on sustainability and social inclusion and are encouraged by the extent to which these principles have informed the majority of the proposals, including those concerning transport. In particular, we strongly welcome the ambition to make Edinburgh "the most successful and sustainable city-region in northern Europe".
- 1.3 However, there are a number of places in the document where TRANSform Scotland would prefer a stronger, or more explicit, commitment towards sustainable and socially inclusive initiatives. Below we set out a number of specific recommendations and some detailed comments.

### 2. Climate change

- 2.1 We note that the Local Plan at no stage makes direct reference to climate change, whether policies aimed at reducing emissions (mitigation measures) or responding to the effects of climate change (adaptation measures). (At the very minimum, we would have expected *Policy Env 15 Flood Protection* to mention this issue.) This is at odds with the clear commitment to tackling climate change indicated in the document 'A Vision for Capital Growth Draft for Consultation'.
- 2.2 The section 'Introduction to the Edinburgh City Local Plan' makes clear reference to "big 'sustainability' issues" (and refers to topics such as energy use, waste reduction and transport) yet completely fails to mention what is undoubtedly now accepted as the most important issue for sustainable development policy to address.

#### **Recommendation 1:**

Add an additional bullet point to the list of objectives at Chapter 5: Caring for the Environment stating:

"To reduce city-wide greenhouse gas emissions"

#### **Recommendation 2:**

Add an additional Policy setting out how the Council will evaluate proposals against the climate change objective to reduce greenhouse gas emissions. (This Policy should be separate from *Policy Env 16 Air, Water and Soil Quality*, as this Policy deals with toxic pollutants not greenhouse gas emissions.)

### **3. Ocean Drive eastward extension**

- 3.1 We note the proposal for new road construction in Leith Docks area (eastward extension of Ocean Drive) (page 14, §3.7, bullet point at top of page, and page 99, §10.23, third sentence). We accept that there is an unacceptable volume of traffic in central Leith (in particular on Bernard Street).
- 3.2 However, given what is known about traffic generation impacts of new road construction (a topic acknowledged elsewhere in the document), we have little confidence in the contention that the proposed road “will reduce the amount of traffic on existing roads” in the longer-term, especially in the absence of traffic management and/or road space reallocation measures in the Bernard Street area. It would certainly be a wasted opportunity if “lock-in” measures were not implemented alongside the Ocean Drive road scheme, in order to ensure reductions in traffic volumes in central Leith.

#### ***Recommendation 3:***

Bring forward detailed proposals for traffic management and/or road space reallocation measures for central Leith, and in particular the Bernard Street area, in advance of the construction of the Ocean Drive eastwards extension.

### **4. Edinburgh South Suburban Railway**

- 4.1 The discussion on transport provision in the sections on ‘Craigmillar and the South East Wedge’ (page 15, §3.13-3.14) and Newcraighall North and Newcraighall East (page 51, §7.7) contains no mention of the Edinburgh South Suburban Railway (ESSR).
- 4.2 Given the current lack of progress in delivering Tram Line 3 to serve these areas, greater priority should be given to delivery of ESSR passenger services. This is consistent with the approach that the Local Plan takes with respect to the provision of rail-based public transport into the master plans for Leith Waterfront and Granton Waterfront ‘Areas of Major Change’.
- 4.3 We continue to be baffled by the low priority that CEC persists in giving to the reopening of the ESSR to passenger services. The project would allow the reopening of a significant number of new rail stations within the city for a project cost that is low compared to, for example, the various tram proposals. This proposal has had endless consultants’ reports conducted upon it, which have established, *inter alia*, a significant positive Benefit-Cost Ratio for the project. We remain critical of the lack of progress in delivering the project despite significant political (Councillor and Executive-level) support for the project. (See Capital Rail Action Group’s ‘Crossrail 2’ paper for a description of how to swiftly and inexpensively return passenger rail services to the ESSR.)

#### ***Recommendation 4:***

Add reference to the opportunities that reopened passenger services on the ESSR would provide for high-quality public transport access between these areas, interchange opportunities for Granton and Leith Areas of Major Change (by tram at Haymarket) and access to central Edinburgh (on foot from Waverley).

## 5. Home Zones

- 5.1 We strongly welcome the comments regarding Home Zones at §4.17 (page 23). However, we consider that specific reference to Home Zones should be built into *Policy Des 4 Layout Design*.

### **Recommendation 5:**

Insert extra bullet point:

"f) residential developments should seek to incorporate Home Zone principles, in particular low traffic speeds, changes in priority from cars to pedestrians, environmental features emphasising the change in status and, for existing developments, the support and involvement of local residents."

## 6. Tram safeguards

- 6.1 We strongly support *Policy Tra 5 Tram* (page 97).
- 6.2 We also welcome the Tram Route Safeguards set out at §10.15 and on the Proposals Map.
- 6.3 However, we regard the Proposals Map as being incomplete as it should include Tram Route Safeguards for Tram Line 3 to be extended to the Midlothian Council boundary in line with that set out in 'Figure 5: Transport Schemes' of the CEC document 'A Vision for Capital Growth: Draft for Consultation'.

### **Recommendation 6:**

On the Proposals Map, add Tram Route Safeguards for Tram Line 3 to the Midlothian Council boundary to protect tram alignments for future extensions of the tram network towards Dalkeith and Loanhead/Penicuik.

## 7. City centre car parking

- 7.1 We strongly welcome the commitment to an "extensively traffic-free or traffic-calmed" City Centre (Page 23-24, §4.19). However, we would contend that this objective will not be met while car access to the City Centre remains unfettered.
- 7.2 *Policy Tra 11 City Centre Public Parking* (page 100) gives us little comfort on this matter. Whilst we would welcome opportunities to shift car parking from on-street to off-street locations, this Policy leaves open the possibility of increasing the total volume of car parking in the City Centre.
- 7.3 In the absence of other traffic demand management measures (i.e. the failure to implement road pricing, and the partial collapse of the Central Edinburgh Traffic Management scheme), the failure to at least stabilise, and perhaps reduce, car parking provision in the City Centre (in particular long-stay parking) would act as an encouragement towards car use in the City Centre area. This would run counter to the Local Transport Strategy objectives on traffic reduction.

### **Recommendation 7:**

Add to the end of *Policy Tra 11 City Centre Public Parking*, after "the historic environment", the following clause:

"... , and there is no overall increase in the volume of car parking in the City Centre."

**8. Other comments:**

<b>Section</b>	<b>Comment</b>
<b>Foreword</b>	
	We have also submitted a response to the consultation on <i>Edinburgh Standards for Streets</i> . This paper is available on our website.
<b>Chapter 2: Strategy</b>	
Page 7-8	We strongly welcome the ambition to make Edinburgh “the most successful and sustainable city-region in northern Europe”.  We welcome the list of bullet points set out on page 8, and in particular the commitment to tackle the <i>demand</i> for car use.
Page 10, §2.10	This section could usefully make reference to Home Zones and/or car-free developments.
<b>Chapter 3: Areas of Major Change</b>	
Page 13, §3.6, final sentence	We strongly support the recognition that the Leith Waterfront developments be “dependent” on the delivery of tram services. Indeed, the failure to deliver new high-volume, high-quality, public transport services such as trams would leave the sustainability of the Leith and Granton Waterfront developments as highly questionable.
Page 15, §3.13	See our comments above (re. tram access to Leith Waterfront).
<b>Chapter 4: Principles for New Development</b>	
Page 22, <i>Policy Des 4 Layout Design</i>	We strongly approve of the commitment to improve conditions for walking and cycling in <i>Policy Des 4 Layout Design</i> , as illustrated by the objective to “maintain a basic level of shopping services within walking distance of all homes” (§9.18; also §9.13 and §9.27) and to make out-of-centre retail developments more accessible to non-car users (especially walkers and cyclists).  However, the Policy should be amended to include reference to cycle parking.  The Policy also makes no reference to Home Zones, despite the strong comments in favour of Home Zones in §4.17 [see our comments above].
<b>Chapter 5: Caring for the Environment</b>	
Page 29, Objectives	We strongly welcome these Objectives.  However, there is no reference to climate change, and consider that there needs to be clear reference to this matter [see our comments above].
Page 34, <i>Policy Env 9 Green Belt</i>	We strongly welcome the retention of the Green Belt as a measure against to contain sprawl.

Page 40, <i>Policy Env 16 Air, Water and Soil Quality</i>	We strongly agree with this Policy.  However, again we would point out the absence of reference to climate change.
<b>Chapter 7: Housing and Community Facilities</b>	
Page 49, Objectives / Background	This section should specifically encourage the development of Home Zones and car-free developments. (Currently all there is is a reference, in the transport section at §10.13, to the <i>opportunity</i> to develop car-free developments.)
<b>Chapter 8: Employment &amp; Economic Development</b>	
Page 66, §8.4	This paragraph should be modified to indicate that it is the Council's position that as high as possible number of these journeys should be taken by sustainable transport modes.
Page 66, §8.6	We note the reference to the findings of the 'Key Sectors Survey' that "businesses confirmed the importance of an efficient, reliable transport system to cope with rising travel needs." However, we trust that this does not reflect CEC policy on this matter: if it does then it is in direct conflict with the CEC Local Transport Strategy objectives towards traffic reduction. We would suggest that CEC policy should be consistent in tackling the trend towards "rising travel needs", especially as wise and sustainable land use planning decisions are imperative in tackling such demands.
Page 67, <i>Policy Emp 1 Office Development</i>	We welcome this Policy, and in particular the commitment to sustainable transport at sub-section (c). We support the decision to direct office development to locations at Edinburgh Park, Leith and Granton given the opportunity to service these areas by tram (sub-section (b)).
<b>Chapter 9: Shopping, Entertainment &amp; Other Town Centre Uses</b>	
Page 78, §9.11, bullet point 4	We do not support the construction of a "floor of shopping above platform level" at Waverley Station. A cursory visit to Birmingham New Street rail station should be enough to dissuade planners from following this approach. We would however support the provision of some extra retail provision at Waverley Station providing that this did not damage the attractiveness of the station to rail passengers.
Page 80, <i>Policy Ret 5 Retail Development in or on the edge of Major Shopping Centres</i>	We strongly support this policy, in particular the commitment to sustainable transport modes set out at sub-section (d).
Page 82, <i>Policy Ret 6 Out of Centre Retail Development</i>	We strongly support this Policy, and in particular the strong commitment in §9.26 to reject proposals for free-standing, car-dependent, retail developments.
<b>Chapter 10: Transport and Other Infrastructure</b>	
Page 91, Objectives	We support this set of objectives.  However, we recommend that the list should be augmented by the

	reiteration of the Local Transport Strategy objectives of (i) traffic reduction, and (ii) modal shift to sustainable transport modes.
Page 91-92, §10.2-10.6	<p>We welcome this thorough discussion of transport trends and challenges.</p> <p>However, we note the absence of reference to climate change, and consider this a serious omission.</p>
Page 93, §10.7, final sentence	Rather than specifying that Transport Assessments “should include a reference” to Local Transport Strategy targets, it would be more appropriate if this section should indicate that Transport Assessments should “indicate how they will help the Council meet” its Local Transport Strategy targets. Without this change, the Council could be seen to be allowing developers to carry out a window-dressing exercise without making serious effort to help meet the Council’s LTS objectives.
Page 93, <i>Policy Tra 1 Major Travel Generating Development</i>	<p>This Policy should be amended in accordance with our comments above: we recommend amending sub-section (b) by replacing:</p> <p>“the effect of the proposal on...”</p> <p>with</p> <p>“the ability of the proposal to help meet...”</p>
Page 94, <i>Policy Tra 2 Planning Conditions and Agreements</i>	While sub-section (a) is broadly welcome, the section includes neither (i) the specification of modal share targets as part of travel plans, nor (ii) measures to ensure compliance with travel plan agreements. We would suggest that the latter might include financial incentives towards compliance, for example the setting of a bond, refundable upon compliance with agreed travel plan targets.
	Sub-section (d) makes no sense. We know no instances of how “accomodat[ing] ... traffic likely to be generated” can be achieved without “encouraging greater car use”.
Page 94, §10.9, second sentence	We welcome this; however, we recommend that this be amended to include reference to “walking, cycling and traffic management projects” after “rail services”.
Page 94, §10.10	Whilst we welcome the recognition that “Traffic generation <i>can</i> have adverse environmental effects” [our emphasis], we can think of no instances where traffic generation <i>does not</i> have adverse impacts: this is manifestly the case in terms of increased climate change emissions.
Page 95, <i>Policy Tra 3 Private Car Parking &amp; §10.13</i>	<p>The Policy is unnecessarily negative towards car-free housing developments. The Council should be encouraging such developments not giving only grudging recognition of them.</p> <p>At minimum, we recommend deleting the clause “, in suitable locations only,” from sub-section (e).</p>
Page 96, <i>Policy Tra 4 Design of Car Parking</i>	<p>The Policy set out here seems fair to us.</p> <p>However, we consider it a substantial anomaly that the Local Plan should set out guidance on the design of car parking, yet does not give guidance on the design of sustainable transport provision (e.g. bus stops, tram stops, footway design, cycle design, cycle parking). While we accept that these issues are covered in more detail in documents such as <i>Edinburgh Standards for Streets</i> and the tram design manual, we recommend that, at minimum, the Local Plan make specific cross-reference to these documents. An alternative approach would be to</p>

	remove Tra 4 and include it in the finalised <i>Edinburgh Standards for Streets</i> .
Page 96-97, Transport Safeguards	We welcome the Transport Safeguards set out in this list.  However, the list should also specify "Edinburgh South Suburban Railway and Abbeyhill Loop".
Page 97, §10.18	We strongly welcome the commitment to high design standards for the trams, and the associated public realm. This section could perhaps also usefully make reference to pedestrian/cycle access routes into stops on the tram network (as well as routes alongside the tram routes).
Page 99, <i>Policy Tra 8 Rail Halts</i>	We support this policy.  However, the Policy is misleading in suggesting that there is doubt about the feasibility of introducing passenger services on the Edinburgh South Suburban Railway. Accordingly, we suggest replacing the phrase:  "... all sites shown on the Proposals Map on the South Suburban Line should the reintroduction of passenger services become feasible."  with  "all station sites on the Edinburgh South Suburban Railway."  [Please note that 'Edinburgh South Suburban Railway' is the correct name for this piece of railway infrastructure, not 'South Suburban Line.']
Page 99, <i>Policy Tra 9 New Roads</i>	The second sentence of this Policy makes little sense (see also our comments above on <i>Policy Tra 2 Planning Conditions and Agreements</i> ). We know of no examples in congested urban areas where "new road space for car traffic" will not "encourage greater car use". We suggest that this Policy statement will amended.
Page 100, <i>Policy Tra 10 Cycle and Footpath Network</i>	We strongly support this Policy.  However, we would welcome a more planned approach to the provision of cycle/footpath networks, rather than the reliance on extending the network "when opportunities arise" (§10.24, second sentence).

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