

TRANSform Scotland

the campaign for sustainable transport

'Edinburgh & The Lothians Structure Plan Review 2020 – consultation paper May 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 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 Thank you for inviting us to comment on the above document. In particular, we welcome the acknowledgement of climate change as a factor that cannot any longer be treated as an optional extra (page 12). Climate implications must be a key consideration in all land use and transport planning and we recommend that this is made clearer throughout the document.
- 1.3 Policies that make the region's population less dependent on private car use would also make an important contribution to the reduction of social exclusion. As we argue in our policy briefing *Socially-Just Transport*,ⁱ this applies as much to households that cannot afford to have a car as to individuals who are prevented from driving by their state of health or their age.

2. Questions 1 to 7

- 2.1 We have no strong views on these topics. We would however support 2020 as an appropriate end date for the structure plan review (Question 4).

3. Question 8 'The lack of commitment to strategic infrastructure investment is considered to be a major constraint which is holding back developments across the Lothians. How can this be overcome?'

- 3.1 We would also suggest that, as general rule, more priority needs to be given to ways of tackling *demand* for new infrastructure. In the case of sustainable transport policy, investment in infrastructure is only one valid policy response, alongside the other policy measures of (i) information and persuasion, (ii) regulations, (iii) technical improvements, and (iv) economic incentives.
- 3.2 *There has been no progress in developing economic incentives to discourage unnecessary car use,*ⁱⁱ and, there has been very limited progress in the other areas. These are issues that will have to be addressed as a priority by the new regional transport partnership SESTRAN as well as the constituent local authorities.
- 3.3 We would however agree that in some instances there has been unnecessary delays on behalf of the Scottish Executive and the UK Department for Transport in securing investment in sustainable transport infrastructure.ⁱⁱⁱ
- 3.4 In particular, we find it unacceptable that the Edinburgh tram system is in danger of being scaled back because of funding shortages, whilst in other areas of Scotland grossly unsustainable transport infrastructure projects have secured Scottish Ministerial guarantees that they will be delivered in full. For example, in the case of the proposed M74 Northern Extension or Aberdeen Western Peripheral Route road projects, there has been no consideration of these projects being scaled back in any way; this contrasts with the various proposals to cut back the extent of the Edinburgh tram lines or the Borders Railway.

- 3.5 We would suggest that Edinburgh and the Lothians needs to invest in its campaigning influence on sustainable transport policy.
- 4. Question 9 'What role should central government play in funding and coordinating the infrastructure needed to underpin nationally important growth in the Lothians?'**
- 4.1 The Scottish Executive is currently preparing a National Transport Strategy and is in the early stages of developing a 'Strategic Transport Projects Review', while, as noted above, the recently-formed SESTRAN has been charged with developing a Regional Transport Strategy by early 2007. We would suggest that efforts should be made to influence these processes so that they prioritise sustainable transport investment rather than socially and environmentally damaging projects.
- 4.2 Given how important a role sustainable transport services would play a potential growth scenario in the region and in the modernisation of Scotland's transport system we would expect the Scottish Executive to be a major source of funding. The most obvious way to secure funding of the order required for this vision would be the abandonment by the Scottish Executive of urban motorway projects such as the M74 Northern Extension and the Aberdeen western bypass.
- 5. Question 12 'Is it reasonable for development in one local authority area to provide affordable housing for people who live in another local authority area within Edinburgh and the Lothians?'**
- 5.1 We do not support this approach. This approach would appear to encourage long-distance commuting.
- 6. Questions 15 'What policy support should the structure plan give to maintaining and enhancing the role of Edinburgh City Centre? Does the role of the regional and the sub-regional centres need to be more clearly defined?'**
- 6.1 The structure plan should endorse the City of Edinburgh Council proposals for public transport investment (including tram lines) and policies aimed at achieving road traffic reduction and modal shift to sustainable transport modes.^{iv}
- 7. Question 17 'Do you think that the Edinburgh city region should plan for significant growth between 2020 and 2040?'**
- 7.1 We have as yet no settled view on this matter. We are not minded to view the growth in the city-region as a good in and of itself, and are not as yet convinced that steps should be taken to seek a major expansion in the geographical or population size of the city.
- 7.2 We would however accept that if the city is due to grow because of exogenous factors (for example, housing or labour market shortages) then the structure plan would be remiss not to master plan the growth of the city-region.
- 7.3 Whilst we are not opposed to growth in the city-region in principle, we would like to see it discussed in conjunction with potential growth in other parts of the Central Belt, notably in Greater Glasgow. Given how closely located the latter region is to Edinburgh and the Lothians, we would, in fact, be reluctant to compare Edinburgh to Stockholm, Helsinki or Oslo (which are comparatively isolated as centres of population growth and economic development). Unlike Scotland, each of these cities are the largest cities of their respective countries, while none of these cities have a large conurbation such as Glasgow (1.9 million inhabitants) within forty miles.^v
- 8. Question 18 'If there is to be growth, should the emphasis be on concentrating it around Edinburgh, dispersing development around the city-region or some other approach?'**
- 8.1 Should growth be necessary, then we broadly welcome the 'Concentration of growth' model (page 14), and as set out in the CEC document *A Vision for Capital Growth – Draft for Consultation* (April 2006). That is, a model based on the Copenhagen 'Finger Plan' comparison. This model is widely held to have been successful at master planning city development.

- 8.2 In line with our comments above (§3.1-3.2), we would however note that the Copenhagen Finger Plan is not just about public transport investment. As Robert Cervero concludes in the book *The Transit Metropolis: A Global Inquiry*:^{vi}

"Copenhagen is not just a story of building rail-oriented new towns along fingers. The municipality has strengthened the integration of transit and urban development by enhancing the viability and aesthetic qualities of the traditional city core. Streets and curbsides have been dedicated to pedestrians and bicycles. Most transit users today reach central city train stations by bike and foot."

- 8.3 Cervero also highlights the policy of "managed congestion": restrictions on road space, reductions in car traffic levels, and high parking fees. Denmark also retains a high national purchase tax on new cars.
- 8.4 So, in conclusion, while we find the 'Finger Plan' model attractive, development along these lines would have to include demand management measures as well as public transport investment.

9. Question 19 'How can we ensure that development on the ground is delivered as sustainably as possible and its full environmental impact assessed and mitigated?'

- 9.1 We welcome the commitment to tackling the environmental impact of future development and, in particular, the awareness of climate change impacts expressed in the document.
- 9.2 The best way to ensure that the external impacts of road traffic is mitigated remains the application of cost internalisation measures: in essence, for transport, road pricing. In light of successful schemes in other parts of Europe and beyond (London, Stockholm, Trondheim, Singapore) road user charging will be needed as a major part of a responsible transport strategy.
- 9.3 Enlightened and responsible politicians at a local and national level should be encouraged to show more leadership in this area (cf. Ken Livingston's role in the promotion of a more sustainable London).

ⁱ Document available on the TRANSform Scotland website.

ⁱⁱ In particular the dropping of proposals for an Edinburgh congestion charge, or for a variable road user charge on the Forth Road Bridge.

ⁱⁱⁱ Infrastructure investments must encourage transport modes that are sustainable beyond the period covered by the structure plan. Climate change-related constraints and the price implications of declining oil and gas reserves imply that priority must be given to developing rail-based transport (involving or allowing for electrification) and active transport (walking and cycling) not reliant on fossil fuels.

^{iv} Our views on these matters are set out in more detail in our response to the CEC Edinburgh City Local Plan consultation draft (June 2006).

^v We have for some time considered that a more relevant comparison for Edinburgh, especially on transport grounds, might perhaps be with Zürich.

^{vi} Cervero, Robert *The Transit Metropolis: A Global Inquiry* (The Island Press, Washington D.C., 1998).

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