

SPOKES

The Lothian Cycle Campaign

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SESplan Main Issues Report: response from Spokes

INTRODUCTION

Whilst there is much detail that we support in this document, overall the policies and proposals do not represent full sustainable development - sustainability sometimes feels more like an add-on than an integral foundation to the document. The report also fails to reflect the urgency of the environmental and related problems faced by the world, the nation, and in turn South East Scotland.

A Strategic Development Plan (SDP) should show how our economy can evolve as rapidly as possible from unsustainable traditional economic growth to a genuinely sustainable model.

Official government advisers the **Sustainable Development Commission**, in their 2009 report "*Sustainable Development: Third Annual Assessment of Progress by the Scottish Government*" include the following statements [bold represents our emphasis] ...

*"This is a critical time for sustainable development in Scotland. **The unprecedented challenges ahead** will demand an **unprecedented commitment** to developing **only** those policies which balance the needs of present and future generations with safeguarding the natural resources on which we – in Scotland and around the world – all depend."*

*"**We remain a long way from sustainable development.** Opportunities to flourish are not open to all; our ecological load is too great; and our economy is not resilient or sustainable."*

*"**Many challenges are also urgent.** Climate science shows us that we may be nearing the tipping point in the climate system beyond which change is rapid and severe."*

"Sustainable development is by nature a highly interconnected way of thinking. It reaches into planning, built environment and policies pertaining to transport, agriculture, food and waste to name but a few. Government has made some moves towards greater integration but far more is required."

Moreover, in all three of its annual assessments the SDC has pointed out that **transport** (including linkages such as with land use) is one of the weakest areas in current policy.

Although the SDC reports are to government, much of the above is equally applicable to SESplan, and indeed many parts of the SESplan proposals reflect government policies and requirements (the additional Forth Road Bridge being one particularly obvious example).

The SDC is far from alone in emphasising the seriousness and urgency of these issues. For example, the **Lloyds insurance market** and the **Institute of Strategic Studies** warn of "*catastrophic consequences*" for businesses that fail to prepare for a world of increasing oil scarcity – they warn of possible oil prices over \$200 a barrel as early as 2013 [Guardian 12.7.10]. How functional would be the SESplan scenario with oil prices at that level, and rising - *just 3 years from now*? Given the seriousness of such warnings, surely SESplan must lay out the reasoning behind its implicit optimism about future trends.

The Scottish Government's *Scottish Planning Policy* [Feb 2010] sets out the broad framework of a move to sustainability and the parameters under which local/regional plans should be formulated. Relevant to SESplan, SPP sets out a hierarchy of land use, putting brownfield urban reclaimed land at the top and greenfield rural at the bottom; and the need to contain our towns and cities within existing boundaries, reject urban sprawl, and make maximum use of land and best use of existing transport networks. We do not believe that the SESplan report in its actual policies follows this guidance sufficiently closely.

Our response concentrates mainly on transport (including particularly its relationship with planning). In line with Scottish Government *policy* - albeit not always the same as Scottish Government *practice!* - as expressed in *Scottish Planning Policy* and in the *National Transport Strategy*, SESplan should in transport terms fully adopt the hierarchy below in all relevant policies. Again the plan does not currently follow this guidance closely enough.

reduce the need to travel
active travel (cycling and walking)
public transport
car sharing
single-occupant car.

RESPONSES TO SPECIFIC QUESTIONS

Note – we only respond to those questions relevant to our concerns. Our responses share many concerns with those of the submission from the CTC, although in parts we have differing ideas and emphases.

Question 1: *Do you support the proposed vision for the SESplan area? Do you have any preferred alternatives? What are your reasons for your view?*

Question 2: *Do you support the proposed key aims for the SESplan area? Do you have any preferred alternatives? What are your reasons for your view?*

The SESplan proposals for the area embrace 5 key **aims** [section 5.4 of the report]...

- grow the economy
- meet housing demand and need, and encourage community facilities
- promote improved infrastructure and connectivity to meet the needs of future development
- encourage sustainable development, and
- promote conservation & enhancement of the built and natural environment and of green networks.

We do not support the aims as they stand. The top aim is to achieve economic growth, followed by, in effect, to undertake predict and provide in various respects. Only as a fourth aim will SESplan even 'encourage' sustainable development. This seems to contradict section 7.3 which says that sustainability will be 'built in' to the whole document.

It is often argued that traditional economic growth and genuine sustainable development are incompatible. If that is the case, then SESplan's aims suggest economic growth is the priority for south east Scotland. Instead, the plan should discuss how far these aims are compatible and which has priority when they are not.

In our view, the main aim should be to *achieve a sustainable, resilient economy and sustainable development*. Sustainability must be intrinsic and fundamental to policy, not an add-on to be 'encouraged.'

The reasons for our view are encapsulated in the quotes in the introduction above from the Sustainable Development Commission, from the Lloyds insurance market and from the Institute of Strategic Studies. It is arguable whether the existing statement of aims is *desirable*. However the plan needs also to justify whether it is even *achievable* given the external factors and uncertainties highlighted by the above bodies - or whether it should instead as its top aim be seeking to ensure an economically resilient and environmentally sustainable local economy.

The wording of the **Vision** is necessarily very short, but a higher emphasis on sustainability and economic and environmental resilience would be welcomed, in line with aims revised as above.

Question 3: *Is the preferred approach to the scale of future development, on the basis of the 'market recovery' scenario related to economic growth areas, appropriate? If not, should the SDP identify land sufficient to meet the 'high growth' scenario? Is there another approach that the SDP should follow and if so, why?*

Broadly we support the preferred approach, but greater emphasis should be placed on meeting housing needs through better use of the existing stock. This could include...

- maintaining and adapting existing housing
- giving owners/occupiers incentives not to leave properties unoccupied over long periods
- giving owners/occupiers incentives to move to smaller properties where appropriate

This approach also has the advantage of promoting and enhancing compactness of towns and cities and the resulting enhanced local accessibility to jobs and services, reduced energy use, etc.

Question 4: *Is the preferred approach to sustainable development appropriate? Are there other approaches that the SDP should follow and if so, why?*

The preferred approach [7.3] is "to encourage overall sustainability within the SDP and to embed the principle throughout the plan content as opposed to a standalone section, recognising its influence on defining the development strategy."

This wording embodies something of a contradiction, with sustainability on the one hand to be 'embedded' throughout the plan, but on the other only to be 'encouraged.' As mentioned under Q1/Q2, sustainability should be integral to the plan, not merely something to be encouraged. The issues raised in our introduction need fully addressed.

However, whatever the wording, the fact is that sustainability, whilst encouraged in many parts of the plan, is *not* embedded – and indeed some parts of the plan represent the opposite of sustainable development. The five aims under Q2, as discussed above, certainly do not suggest fully embedded sustainability, with the top emphasis on economic growth, followed by 'predict and provide' for housing. Further examples appear throughout our response.

Question 5: *Is the approach to linking future development to the provision of essential infrastructure and seeking contributions towards essential infrastructure appropriate? If not are there alternative mechanisms for contributions which the SDP should explore and why? What are these?*

Clearly development does not make sense without the essential infrastructure to support it, and if that infrastructure is not present then the development should be expected to contribute substantially or entirely to it. However, all proposed development needs judged on sustainability grounds, and the fact that a private or public developer is willing to fund related infrastructure does not mean that the development should necessarily proceed.

Question 6: *Is the preferred approach to guide development towards accessible locations appropriate? Should the SDP follow another approach and, if so, what and why?*

On the whole this approach is appropriate, but new development should be in locations which are well served by public transport **and** are internally and externally easily accessible by walking and cycling [the document says 'or' not 'and'].

Paras 2.2 and 7.34 outline a number of major projects (mainly transport) within our area, mostly (including all those in 2.2) designated as national developments within the NPF2 framework. Even though these projects may go ahead under national direction, SESplan should comment on each from the sustainability perspective, and point out where they fall short or run counter to that. Otherwise, how can it be said that sustainability is 'embedded' in the plan?

In particular, it would appear that the economic growth objective has largely or wholly over-ruled the sustainability objective in projects such as...

- Forth Replacement Crossing
- High Speed Rail Link to London
- Strategic Airport Enhancements
- Improvements along the M8 and M9 [depending on whether this is big capacity growth or structural maintenance]

We also note that the list in 7.34, whilst including a number of public transport projects which we support, only has one significant initiative relevant to active travel, the Central Scotland Green Network. The Network is of course very welcome, and could provide many local active travel opportunities - but overall it is more a leisure than a utility facility. However, active travel opportunities for everyday transport purposes need to become an integral part of all our towns and cities, with tough targets to grow cycle use for work, shops and other local everyday journeys – not merely 'encouragement' [para 7.35].

Thus the plan should include a proposal for phased cycle-friendly-town development throughout the Region, and similar for city-areas within Edinburgh. Several infrastructure projects in 7.34 and 2.2 cost many £100m - and some of this expenditure is even detrimental to sustainability. Yet a project costing perhaps one or two £10m's, at the forefront of sustainability, and enhancing local accessibility and public health for a big proportion of the population, is not considered.

***Question 7:** Is the preferred approach to promote strategic economic growth areas appropriate? Is the alternative approach appropriate or should the SDP follow other approaches and if so, why?*

This section focuses entirely on developing greenfield land – surely SESplan should follow the guidelines in *Scottish Planning Policy* – for example SPP paras 38 and 80 - to concentrate first on land available within existing industrial and business areas. Whilst there can be considerable costs in regenerating existing brownfield land, this has to be set against the costs of new greenfield infrastructure – and even more so against the benefits of compact and sustainable development.

Secondly, land use is highly related to transport policy - and current development and policies require large amounts of land for car parking (and for consequent roads infrastructure). Policies should be introduced to charge for workplace parking spaces, whilst large retail and leisure developments (including in-town as well as out-of-town) should be charged according to the number of car parking spaces.

Were policies such as the above already effectively in operation, it would be easier to argue the case for greenfield development. As it stands, however, it is difficult to see how SESplan can claim to 'embed sustainability' when it directs large areas of development to greenfield sites before ensuring best use of existing developed areas.

***Question 8:** Is the preferred approach to identify a strategic retail hierarchy based around Edinburgh City Centre appropriate? Is the alternative approach appropriate or should the SDP follow other approaches and if so, why?*

See our suggested measures in Q7 above. Such measures would encourage a higher degree of local shopping and improved local accessibility by cycling, walking and local public transport, and would greatly benefit local town centres.

The plan should also recognise the growth of internet shopping, which comes with both positives and negatives in terms of sustainability and local community. For certain purposes such as supermarket shopping it can be particularly beneficial. However, steps should be taken to foster the integration of local production and sales into internet-based shopping and delivery.

To the extent that specialist and tourist-based shopping is also required we *in principle* support the preferred approach to concentrate on Edinburgh city centre, given its excellent public transport accessibility and wide range of other economic and visitor uses and attractions. However *in practice* this is being taken to mean encouraging more car access as well as improved public transport. SESplan should make it absolutely clear that it does *not* mean growing Edinburgh in a car-based direction. For example, it should explicitly oppose current development directions in Edinburgh such as the massive planned St James Centre car park - right next to Waverley Station, a tram stop, many bus routes, and high existing pedestrian and cyclist use. *Documents such as SESplan tend to highlight environmental positives such as the new tram whilst conveniently forgetting to mention the increasing provision for car use.* See Q23 below for more comment.

Question 9: *Is providing housing land supply across the SESplan area as set out in Figure 12 appropriate? If not, should the SDP identify land sufficient to meet the high growth scenario? Is there another approach that the SDP should follow and if so, why?*

As in our response to Q7, surely SESplan should follow the guidelines of *Scottish Planning Policy* – for example SPP paras 38 and 80 - to concentrate first on land available within existing built-up areas, which is likely to provide far better connected and accessible opportunities and less need for new infrastructure.

Specifically on housing, Scottish Planning Policy also states [para 79] ... “*New housing developments should be integrated with public transport **and** active travel networks, such as footpaths and cycle routes, rather than encouraging dependence on the car. New streets should connect well with existing streets and with walking and cycling networks, and allow for links into future areas of development.*”

This is far more achievable in existing built-up areas than in greenfield development.

The approach therefore should be first to critically examine existing opportunities in towns and cities - such as brownfield sites, undeveloped urban land, and existing 'sprawl-based' modern development areas containing large unused areas of land. Examples in Edinburgh include Craigmillar and Leith Docks. Only then should we move to major new development, which should then be edge-of-town rather than remote from existing towns. Furthermore, all new development should be built in a compact way, minimising walking and cycling journey distances – this has not been done in many development areas (e.g. Edinburgh Park) and these should now be assessed with the objective of being made more efficient in terms of land use and accessibility.

Question 10: *Is the preferred approach to continue to support the redevelopment of brownfield land appropriate? Should the SDP set a target and if so, why? Are there other alternative approaches that the SDP should follow and if so, why?*

We support the preferred approach. However, this is valuable land in sustainability as well as financial terms. New housing should therefore be built in a compact fashion, with a lower proportion of the land devoted to roads and car parking than has been traditional.

Question 12: *Is the preferred approach to protecting and enhancing South East Scotland's natural heritage and landscapes appropriate? Is there another approach that the SDP should follow and if so, why?*

We support this. Additionally, the plan should aim to maximise accessibility to and within such areas on foot and by bicycle.

Question 13: *Is the preferred approach to designating the green network appropriate? Are the opportunities for the development of the green network appropriate? Are there other strategic opportunities which should be identified? Are there other approaches that the SDP should follow and if so, why?*

We support this initiative. We also support the CTC call for two cross-region, east-west long distance routes (Glasgow to Edinburgh and beyond, in each direction) with north-south links between the routes at numerous points, both for local connectivity and to enable recreational and tourist trips of varying length. The northern route would be the Union Canal and Forth-Clyde Canal, which together run the whole way across Scotland, from east to west. The other route would be NCN75, which runs Edinburgh to Glasgow by

a more southerly route, passing through different centres of population. As suggested by CTC, it is important that Figure 13 should include these routes.

Question 14: *Is the preferred approach to broadly maintaining the Green Belt appropriate? Are there other alternative approaches that the SDP should follow and if so, why?*

We are unhappy about Green Belt land being released for development. This should not be considered until the steps in our responses to Q7 and Q9 above have been implemented.

Question 15: *Is the preferred approach to controlling development in the countryside appropriate? If not, what approach should the SDP follow and why?*

The preferred approach as worded suggests that new housing is acceptable in the countryside as long as it looks nice and is very energy-efficient – but there is no mention of transport issues. Rural towns and villages need to be compact, and also safe in traffic terms, so that local trips can easily be undertaken on foot and by bike. Even isolated settlements should, as far as possible, be accessible to any town or village services within a few miles radius by at least one slow-speed safe route.

Question 16: *Is the preferred approach to climate change and energy appropriate? If not, what should be changed or are there other approaches which the SDP should follow and if so, why?*

We very much agree with the first sentence of the preferred approach [the second sentence is outwith our main area of interest]. It is unfortunate that some other parts of the plan do not live up to this sentence, as shown in our responses to various questions.

Question 18: *Is the preferred approach to forestry appropriate? Are there other approaches that the SDP should follow and if so, why?*

We agree with the preferred approach.

Question 23: *Is the preferred approach of continuing to support the continued development of the City Centre appropriate? If not, what alternative approach should the SDP follow and if so, why?*

See our comments under Q8 above. In principle the preferred approach could be excellent, but we cannot accept its present wording. In practice, development is not always happening in a sustainable way, yet the phrase 'continued development' implies that current practice is acceptable.

The wording of the preferred approach should be modified to prevent the type of major car-based developments which are still happening, even in the very heart of the city and adjacent to probably Scotland's best public transport opportunities and to extensive existing and potential walking and cycling activity. Such car-based development is wasting precious horizontal and vertical space right in the city centre. It is also obliterating the option of European-style cycling and walking opportunities. The Picardy Place proposed gyratory system, and the accompanying adjacent massive proposed St James car park, provide an unfortunate currently planned example.

We note that the plan (8.11) refers to the above developments but omits to mention the excessive car parking included – another example where the plan skirts over the embedding of sustainability into its wording. It is just not good enough for the plan (rightly) to laud the tram and other public transport proposals but at the same time to conveniently forget to mention the continued provision for high car use.

Finally, despite Edinburgh Council's policies on cycling, its hugely ambitious 'Charter of Brussels' target, and its equally ambitious (draft) Active Travel Action Plan, there is no mention of city centre cycling accessibility in paras 8.8-8.18. Nor is it mentioned in Fig 14 (although bus lanes do qualify to be included).

Question 24: *Is the preferred approach to continuing to support the redevelopment and regeneration of Edinburgh Waterfront appropriate? If not, what approach should the SDP follow and why?*

We very much support the CTC comments here: the preferred approach is broadly appropriate, and the Promenade notion is excellent, but from what has been built already it is clear that, in the public realm, the principle of keeping land use to a minimum has not been followed. Land has been used wastefully, for example in over-engineered roads and over-provision of roads, thus encouraging cars to become the mode of choice. The plan's wording needs seriously tightened up to avoid such types of development.

Question 25: *Is the preferred approach which promotes housing alongside the nationally important business proposals in West Edinburgh appropriate? Should the SDP follow another approach?*

We support many of the CTC concerns on the West Edinburgh Planning Framework (WEPF) as expressed in their submission – urban sprawl, loss of green belt, high distances for cycle access (let alone walking), and particularly the airport expansion.

However on the assumption that this is going ahead regardless, then it is probably sensible to include a housing component. If so, this needs to be a compact settlement with local facilities, right on the main public transport and cycle routes, with an incentivised car club option, and with built-in incentives (preferably financial) for residents to be those who work in the area. This should be made explicit in the plan, as otherwise the savings in reduced work travel will probably be completely offset by increased car trips for shopping, schools, leisure etc.

Question 26: *Is the preferred approach to further expand South East Edinburgh appropriate? If not, what alternative approach should the SDP follow and why?*

Again, this development is already well underway and likely to continue, even though ideally it would not be considered until major brownfield areas such as Granton are fully utilised. The present approach of allowing greenfield development before it is necessary leads almost inevitably to development which is sprawly and gives over to car access and parking a high percentage of what should be precious land.

This area will include a much greater residential component than in Q25. Criteria such as those in our Q25 response should be intrinsic to the housing in this entire development, and this should be very explicit in the plan – reference in the descriptive text to planned public transport spines alone is certainly not enough. Unfortunately the preferred approach as currently worded is merely predict and provide and economic expansion.

Question 27: *Is the preferred approach [to the East Cost Corridor] appropriate? Is the alternative approach appropriate or should the SDP follow other approaches and if so, why?*

Developments which require increased A1 commuter capacity (thereby also impacting seriously on traffic conditions in Edinburgh – a negative synergy not mentioned in what needs to be a joined-up plan) are not sustainable and should not be included.

In those settlements where expansion does make more sense the criteria in our response to Q25 should be requirements.

Question 28: *Is the preferred approach [to the Fife Forth Corridor] appropriate? Is the alternative approach appropriate or should the SDP follow other approaches and if so, why?*

We support the CTC comments here: “The Fife-Forth corridor has large elements of brownfield land which should be given priority for any developments in housing and businesses, and this should be stressed in the Plan, along with the need to build around existing communities so as to minimise the need to travel and maximise the opportunities for walking and cycling. Development should also be focussed around rail stations.” Criteria such as in our response to Q25 should be included in relation to any substantial new housing areas.

Question 29: *Is the preferred approach to development appropriate [Midlothian and Borders Corridor] and if so, why? Is the alternative appropriate? If not, what approach should be adopted and why?*

As in our response to Q27, developments requiring enhanced trunk road capacity are not sustainable and should not be included.

As in our response to Q26, the fact that new public transport spines (rail openings/upgrades) are to be developed is welcome but is certainly not sufficient to ensure genuinely sustainable development. Criteria such as in our response to Q25 should be included in relation to any substantial new housing areas.

Question 30: *Is the preferred approach [to the West Lothian Corridor] appropriate? Is the alternative approach appropriate or should the SDP follow other approaches and if so, why?*

As in our response to Q27, developments requiring enhanced trunk road capacity are not sustainable and should not be included. As the CTC response says, “Millions have and are being spent on roads infrastructure in places like Heartlands, with the same depressingly wasteful use of land, dual carriageways, vast roundabouts every 100 metres etc – the whole development completely car-oriented, and dependent on a new junction with the M8 motorway ... Such developments in parts of West Lothian are an environmental disaster.”

As in our response to Q26, the fact that new public transport spines (rail openings/upgrades) are to be developed is welcome but is certainly not sufficient to ensure genuinely sustainable development. Criteria such as in our response to Q25 should be included in relation to any substantial new housing areas.

We also support the following West Lothian concerns in the CTC response...

a. **Linlithgow to Livingston/Bathgate via Bathgate Hills** - the narrow winding rural roads over the Hills are unsuitable for commuter or fast traffic, whilst the bus route is indirect and slow. The Plan should consider radical solutions such as peak-period closure of these roads to all traffic except buses (and certain permit-allowed vehicles) together with a frequent and direct peak period bus.

b. **Livingston path network** - Livingston has an excellent network of off-road paths covering the whole town, but currently little used. Most inhabitants are probably not even aware of their existence, as they are not visible from the roads. Raising awareness of this network could be part of the Plan, as part of a more general travel awareness package.

c. **Vision for Livingston** – the town has two rail stations, but neither is near the centre. Eventually the tram should be extended to Livingston and to its main employment centres. The tram would allow some roads to become tram/pedestrian/cycle only, with close links to the path network to encourage active travel. It is regrettable that West Lothian Council opposed the city's proposed congestion-charging scheme which would have funded this tram extension. However charging for workplace parking, and charging car-based retail and leisure centres for car spaces, would provide for extensive public transport improvements whilst also reducing car use. Land currently used for car parking and travel could then be re-allocated for housing and business, leading eventually to a more compact town based on public transport and active travel for many journeys.

d. **West Lothian Core Development Areas (CDAs)** These plans pre-date the seriousness with which concerns about sustainability should now be taken. Some are looking increasingly unsustainable, involving urban development of essentially rural areas (eg between Broxburn and Winchburgh), using greenfield land, and land which is not part of the existing public transport network or amenable, because of distance, to active travel. SESplan should call on West Lothian to critically re-examine its CDA program, to ensure genuinely sustainable development, including looking at making Livingston more compact as above.

End of submission

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