



for sustainable transport

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City of Edinburgh Council  
City Development Local Development Plan Team  
Waverley Court  
G:1  
4 East Market Street  
Edinburgh  
EH8 8BG

Dear Sir/Madam,

### **Comments on Main Issues Report of Edinburgh Local Development Plan**

Transform Scotland welcomes the opportunity to respond to the consultation relating to the Local Development Plan and finds itself in broad agreement with the approach taken. We are impressed by the thoroughness of the work undertaken to date and the quality of the supporting environmental and other data.

In response to the twenty questions included on various issues, we support the Preferred Option in every case as being the most sensible and most likely to lead to successful outcomes. However, we would like to make the following comments relating to various topics that are of particular interest or concern to Transform Scotland because of their direct or potential impact on travel related issues.

#### **Section 3 - Housing**

New housing should be linked closely to availability of good public transport so as to minimise car use for commuting to work and school. Developers should be required to include cycle paths on all new housing schemes so that, eventually, they can link to a city-wide cycle network. The Scottish Government has an aspiration to increase cycling to 10% of all journeys by 2020 and experience throughout mainland Europe indicates that increased cycling can only be achieved through the provision of safe segregated cycle routes.

Our preference for new housing would be to make use, where possible, of brownfield sites and retain better quality land for green space. Brownfield developments have the potential to enhance an otherwise unappealing area providing the development includes tree belts and other features to reduce the monotony resulting from too many houses together.

Social housing is becoming a more important national issue as a result of the loss of huge parts of the housing stock caused by right to buy legislation. A priority should be to increase the numbers of houses at affordable rents to provide secure homes for families on low income.

#### **Section 4 - Infrastructure Provision**

Developer contributions to infrastructure improvements, such as the tram network, are relatively modest and efforts should be made to increase the income from such sources. During times of national spending constraints, private developers should be expected to include significant infrastructure costs as part of their development rather than passing the cost onto the local taxpayer.

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## Section 5 - Economic Growth

Edinburgh has shown good resilience during the downturn mainly due to the city's favorable combination of business services and skills. To a great extent, this success must be attributable to the fact that Edinburgh is a fine city with good quality built environment and many cultural institutions. It also enjoys relatively good transport modes, which will shortly be enhanced by the introduction of the tram. This success reflects well on the CEC and decisions taken in the past to invest in such things as Greenways, Park + Ride, and the tram — despite considerable, and misguided, opposition at the time against each of these improvements.

## Section 6 - Quality of Space

Transform Scotland believes that one of the main factors responsible for the decline in local shopping in many parts of the city is the massive expansion in supermarkets with about eight major players each having several stores within the city and, in some cases, in close proximity to one another. It seems perverse to spend millions regenerating city centres throughout the UK while allowing the continued expansion of superstores with which small shops cannot compete.

Shopping malls contribute to car congestion by encouraging the use of the car during shopping and providing free car parking space. In addition, the requirement for access to these car parks actually exacerbates congestion by requiring traffic lights to allow the shoppers easy entry and exit.

Princes Street has also suffered as a city centre shopping area because many of the same shops are replicated in several malls around the city. Princes Street has fewer high quality and specialist shops compared with comparable sized cities in mainland Europe. One way to counteract this would be, as suggested in the report, allowing the bringing back into use of vacant shop units for other uses such as cafes or by the creation of markets dealing in specialised goods.

## Section 8 - Climate Change and Environmental Resources

We strongly support the various initiatives to reduce the emission of greenhouse gases because we firmly believe that climate change is one of the most serious medium to long term issues imaginable. Already, the global costs from weather-related events that can reasonably be attributed to global warming due to man-made emissions represents a vast sum in terms of insurance claims and costs to infrastructure repair.

It is therefore important that we green our energy sources as rapidly as possible by moving to sustainable forms of production such as hydro, wind, and wave and tidal with appropriate backup. Renewable sources can then be used to power low emission modes of transport such as electric trams, battery buses and low carbon vehicles. We therefore agree with the preferred option of setting carbon reduction targets as the most effective way of moving to a low carbon economy.

## Section 9 - Other Possible Changes

Given that transport is a major contributor to greenhouse gas emissions, strenuous efforts should be made to reduce these as far as possible through measures that are relatively inexpensive and deliver fast results. The results of the Transport Planning Society recent annual survey of its members reveals what these experts regard as the most viable options available to tackle traffic related issues:<sup>1</sup>

*“Of the 16 options rated, changing the way we travel to consume fewer resources, but through the “Smarter Choice” approach rather than pricing, is still number one spending priority – as it was last year. Support for walking and cycling has risen to second place...”*

*“For local fund raising, changes were even more modest, with the top 3 choices the same as last year: a transport levy on new development 1st; followed by workplace parking levies; then charging for all parking, including retail.”*

<sup>1</sup> See <<http://www.tps.org.uk/main/news/id/0406/>>.

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Transform Scotland has consistently argued in support of all of these policies over the last decade and is pleased to see that they are gaining almost universal support as the sensible ways ahead.

As highlighted under Section 3, promoting cycling in an incremental way has the potential to effect big changes in commuter practice as has been demonstrated in many Northern European countries where a policy of developing a cycling culture has been introduced. Investment in city-centre safe cycle lanes can promote this change at low cost compared with road build. The promotion of Smarter Choices is another way of introducing modal shift to travel patterns within cities and should be an area for major effort by the CEC.

The tram network will almost certainly develop after the opening of the first section so it is important to retain ownership/control over former railway lines especially within the city boundary so that they can provide easily reopened routes for tramway extensions and other rail development solutions. For example, the South Suburban line could be reopened to commuter traffic so serve some of these proposed new developments using light or heavy rail as well as existing residents. The Abbeyhill Loop could also be reopened and other orbital former rail lines such as Roseburn made use of in future.

Yours faithfully,

John Webster  
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