

## Comments

### Main Issues Report (21/07/15 to 30/09/15)

<b>Comment by</b>	Spokes - Lothians Cycle Campaign (Dr Peter Hawkins)
<b>Comment ID</b>	1053
<b>Response Date</b>	29/09/15 16:19
<b>Consultation Point</b>	Question 1 The Vision ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support the:</b>	Preferred Option

**Please explain your answer. You may also suggest any changes.**

With some reservations. For example 'new developments ... in accessible locations on transport corridors' should not mean more trunk roads or motorways but should mean cycling and public transport.

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<b>Comment by</b>	Spokes - Lothians Cycle Campaign (Dr Peter Hawkins)
<b>Comment ID</b>	1063
<b>Response Date</b>	29/09/15 16:24
<b>Consultation Point</b>	Question 2 A Strategy for Edinburgh and South East Scotland ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support</b>	None of the Options

**Please explain your answer. You may also suggest any changes.**

The disadvantages of Options 1 and 2 are clear, but the disadvantages of Option 3 have not been set out. They are, that transport corridors are extended way beyond their existing boundaries, meaning people have to travel further to work, bus schedules are more difficult to maintain, cycling becomes less of an option.

Option 1, a concentrated city, is our preference, but not at the expense of losing Green Belt. More effort can and should be made to use brownfield land. If all brownfield available were brought into use, there would be no need to develop the Green Belt, transport corridors would be more compact, and commuter cycling is a strong possibility.

Housing has become expensive because of land prices. Developers can buy land and 'bank' it, without building on it. The more greenfield land made available, the more this will happen. Current policies are a complete failure. There has to be a system where, if a LA wants to make land available, the price is then 'frozen' at agricultural prices. There isn't room here to go into detail - you should employ Andy Wightman as a consultant on this issue - he has a deep understanding of how the system works, and of why the current system is a total failure. The German model is far better.

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<b>Comment by</b>	Spokes - Lothians Cycle Campaign (Dr Peter Hawkins)
<b>Comment ID</b>	1054
<b>Response Date</b>	29/09/15 16:20
<b>Consultation Point</b>	Question 3 The Principles for Development ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support the principles for development?</b>	Yes

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<b>Comment by</b>	Spokes - Lothians Cycle Campaign (Dr Peter Hawkins)
<b>Comment ID</b>	1064
<b>Response Date</b>	29/09/15 16:25
<b>Consultation Point</b>	Question 4 ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support the above approach to direct LDPs to deliver high quality places?</b>	Yes

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<b>Comment by</b>	Spokes - Lothians Cycle Campaign (Dr Peter Hawkins)
<b>Comment ID</b>	1056
<b>Response Date</b>	29/09/15 16:21
<b>Consultation Point</b>	Question 6 The Visitor Economy ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web

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**Version** 0.1

**Do you support the preferred option?** Yes

**Please explain your answer. You may also suggest any changes.**

With the proviso that visitor taxes should be introduced to provide funds for LAs, especially Edinburgh, to maintain and improve the infrastructure. Visitor taxes are normal all over Europe. LAs desperately need additional sources of income, and a diversity of sources.

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**Comment by** Spokes - Lothians Cycle Campaign (Dr Peter Hawkins)

**Comment ID** 1057

**Response Date** 29/09/15 16:22

**Consultation Point** Question 10 Housing Land across the SESplan Area ([View](#))

**Status** Submitted

**Submission Type** Web

**Version** 0.1

**As the basis for deriving the housing supply targets and housing land requirements within SDP2, do you support the** None of the Options

**Please explain your answer. You may also suggest any changes.**

Current policies based on rising land values, and giving developers opportunity to buy land, have failed. The housing has not materialised. And all housing should be affordable, but it's the cost of the land which makes houses unaffordable. A radical change of approach is needed, for example as is done in Germany (see earlier comments). Policies of specifying amount and locations of land, as currently, only make matters worse. SDP should certainly consider reducing the specification of housing and land requirements.

**Should SDP2 consider housing land supply targets that are lower than the housing need and demand estimates?** Yes

**Please explain your answer.**

Targets play into the hands of developers, and fail to achieve the housing needed. A more radical approach is needed (see above), which relies on keeping the price of the land low. In addition, if available brownfield land were used, Edinburgh's housing needs could be met.

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**Comment by** Spokes - Lothians Cycle Campaign (Dr Peter Hawkins)

**Comment ID** 1065

**Response Date** 29/09/15 16:25

<b>Consultation Point</b>	Question 12 A Generous Supply ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support the</b>	None of the Options

**Please explain your answer. You may also suggest any changes.**

As noted earlier, setting of supply is counter-productive; it plays into the hands of developers, and does not achieve the targets of houses at affordable prices which the city needs. Current policies have only led to higher land prices, and often, no housing. A radical change of approach is needed.

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<b>Comment by</b>	Spokes - Lothians Cycle Campaign (Dr Peter Hawkins)
<b>Comment ID</b>	1058
<b>Response Date</b>	29/09/15 16:23
<b>Consultation Point</b>	Question 15 Town Centres ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Are there specific actions that SESplan should take to support strategic centres and Edinburgh city centre?**

SESplan should encourage LAs to introduce parking charges at out-of-town retail centres, in order to restore the balance in favour of town centres. The charges would go to the LAs to improve public transport and cycle networks.

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<b>Comment by</b>	Spokes - Lothians Cycle Campaign (Dr Peter Hawkins)
<b>Comment ID</b>	1066
<b>Response Date</b>	29/09/15 16:25
<b>Consultation Point</b>	Question 17 LDP Transport Policy Direction ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support</b>	Preferred Option

**Please explain your answer. You may also suggest any changes.**

Very much support preferred option, and welcome the mention of the priority to reduce the need to travel, as well as the emphasis on public transport and cycling. It might be well to add a requirement for LDPs to be prepared to re-allocate road space, to reduce vehicular traffic and promote cycling.

**Should SDP2 set out housing density requirements for large developments to promote sustainable transport, walking and cycling?**

Yes. Housing density is a key factor in a sustainable town or city. Car parking space allocation should be reduced; not every house needs a parking space, and provision of spaces simply increases the number of cars. Households could be given incentives to not have a car.

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<b>Comment by</b>	Spokes - Lothians Cycle Campaign (Dr Peter Hawkins)
<b>Comment ID</b>	1059
<b>Response Date</b>	29/09/15 16:23
<b>Consultation Point</b>	Question 18 Regional Walking & Cycling Network ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Have the correct routes to be developed as regional routes been identified in Figure 5.2 (Regional Walking &amp; Cycling Network)?</b>	No

**Are any routes missing? Should routes be removed? If so, please indicate which routes and why they should be included or removed.**

It's impossible to tell from Fig 5.2 which routes are for cycling and which for walking. While tourism and leisure routes are valuable, the main emphasis in SESplan should be on commuter cycling, in particular into/out of Edinburgh, and on providing routes for this to happen.

Standards for any network of commuter cycle routes should be set. They should be tarmac surface, free of obstruction, direct, minimum width 3m, and preferably separated from motor traffic. LAs should be encouraged to re-allocate road space from vehicles to cycles.

There is already evidence of substantial numbers of cyclists crossing LA borders to commute to/from Edinburgh, particularly from West and East Lothian; routes from Midlothian are poorer, and less well-used. Data comes from Strava, among other sources (regular cyclists record their routes). The cross-border routes need to be upgraded as a priority, and should certainly be a pre-requisite of any new development.

Commuter cycle routes should be shown as a separate category (eg on a map), and given priority. They will do more than anything to increase physical activity and reduce car dependency, thus contributing to health as well as the environment.

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<b>Comment by</b>	Spokes - Lothians Cycle Campaign (Dr Peter Hawkins)
<b>Comment ID</b>	1067
<b>Response Date</b>	29/09/15 16:26

<b>Consultation Point</b>	Question 19 Prioritising Strategic Transport Infrastructure ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support the</b>	Preferred Option

**Please explain your answer. You may also suggest any changes.**

Many of the items in the preferred option are welcome, but not the road building ones. It's not clear if the list itself is prioritised, but we would put A720 "improvements" at the bottom of the list. The Government's transport hierarchy, and that of most LAs, is firstly to reduce the need to travel, and secondly to put cycling and public transport at the top of the hierarchy and private car at the bottom. How does that square with, for example, a flyover at Sheriffhall?

The problem is there are no restraints on car use, other than congestion. Until alternatives to discourage car use are introduced, congestion - blockages - are the only means. It's very crude, and unworthy of 21st century society. Money allocated for road projects is money not available for much needed public transport - rail and tram, as well as cycling.

A fully dualled A1 is totally unjustifiable; the money would be far better spent on high-speed rail. An M9 junction at Winchburgh would also only increase car use.

**What transport priorities should be identified and how should transport infrastructure be prioritised? Please indicate any other strategic interventions which you consider should be included in Table 5.1.**

The existing national and local transport policies make the priorities quite clear. But national and local spending priorities tell a different story - virtually turning the hierarchy upside-down, giving priority to roads and road building. If we must spend money on roads, it should be on improving the roads we already have. The surfaces of our roads in towns and cities can only be described as appalling. They discourage cyclists and pedestrians. To pay for improvements, the national transport budget should be devolved to the regions; Transport Scotland gets far too much money to spend on trunk roads, when a far greater need is for local roads to be improved.

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<b>Comment by</b>	Spokes - Lothians Cycle Campaign (Dr Peter Hawkins)
<b>Comment ID</b>	1060
<b>Response Date</b>	29/09/15 16:24
<b>Consultation Point</b>	Question 20 Infrastructure Delivery ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you support the</b>	None of the Options

**Please explain your answer. You may also suggest any changes.**

The preferred option is very flawed, and the alternative just as bad. Our experience with developers is that they will not fund anything that lies beyond their site. Contributions to public transport and cycling

would be welcome, but no way should developers fund additional road capacity. The emphasis should be on contributions for local connections rather than regional. For example, developers should be required to fund links from their site to the local cycle network - they certainly won't do that at the moment - and for larger schemes, better cycle routes in the locality. Example: vast new housing schemes at Kirkliston. We asked for improvements to the old rail line Newbridge-Kirkliston-S Q'ferry, linking these new residential areas to schools (SQ), and to places of employment (Newbridge, SQ). We got nothing.

**Should such a fund be established at the SESplan level, to maximise economies of scale and leverage, or piloted first in an individual SDA or growth corridor?**

It's not clear if "economies of scale and leverage" would apply to cycle routes, and giving the money to a higher-level organisation runs the risk of seepage through bureaucracy.

**Where should the balance lie between public funding and contributions from development and how can risks be equitably shared between sectors?**

In Germany, the local authority buys land for development at local 'farm' rates, and the price is frozen. The LA then spends money putting in infrastructure. It then sells the plots to individuals for development - NOT to developers. It recoups infrastructure costs from these sales. Everyone wins - except the corporates.

**Should a new system of developer contributions be introduced which, within the current legislation, enables contributions to fund measures which are needed to implement the strategy but may not be directly related to an individual development's impact.**

Not likely to work. A more radical system needed (see above). Regions must put pressure on government to achieve changes in legislation.

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<b>Comment by</b>	Spokes - Lothians Cycle Campaign (Dr Peter Hawkins)
<b>Comment ID</b>	1068
<b>Response Date</b>	29/09/15 16:26
<b>Consultation Point</b>	Question 23 Climate Change Adaptation ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Do you think SDP2 could do more to help the area adapt to climate change? Please explain your answer.**

Transport accounts for around 25% of all carbon emissions. SDP should do what it can to reduce need to travel, and re-allocate road space, introduce parking charges, offer incentives to choose other modes, and any other measures to reduce car use. And it's not just emissions that's bad about cars - they induce sedentary lifestyles, obesity, stress, cause congestion, put pressure on the environment in their manufacture etc, so reducing car use is a win-win policy in many areas.

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<b>Comment by</b>	Spokes - Lothians Cycle Campaign (Dr Peter Hawkins)
<b>Comment ID</b>	1069

<b>Response Date</b>	29/09/15 16:26
<b>Consultation Point</b>	Question 24 Development Planning and Community Planning ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Do you consider that development planning and community planning in Edinburgh and South East Scotland could be better aligned? If so, please suggest ways in which this could be achieved.**

It's very disheartening to see planning permission being given for housing schemes that are remote from any facilities, and consist of nothing but houses. It's a recipe for more car use, when the nearest shop, school, medical centre etc is over 2kms away. The distance 'allowed' for remoteness from public transport is 400m. How likely is it that a resident will walk 400m to a bus to get to a local shop, rather than get the car out?

New housing can only be sustainable if it's close to an existing community with some amenities, or if new amenities are built along with the housing. That's why brownfield land is so appropriate, since it is usually within an existing community.