

Connecting our City, Transforming our Places¹

Response from Spokes

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A. Introduction

Spokes welcomes the current consultation. While responses are requested through a questionnaire, we here provide more extensive comments on the proposals.

We state from the outset that, of the three possibilities outlined in the Prospectus, we support the *Transformational Change* option rather than the *'Business as Usual'* or *'Strategic Approach'* options. The Prospectus itself offers justification; it states:

'By 2040, Edinburgh's population will be close to 600,000, an increase of 100,000, and the city-region is also growing, accounting for a quarter of the Scottish population. This growth and the potential strain on the transport network and city spaces needs to be managed to improve access to public transport, increase journeys on foot and by bike, and prevent unsustainable increases in car travel. We must join cities like Copenhagen, Oslo, Barcelona and other leading cities in reshaping how our city works and we must become synonymous with urban innovation if we are to meet the economic, social and environmental challenges we face.'

In this context, it is clear that there is both a requirement and a commitment by the Council to make a break from the traditional car-based approach to development and put people first.

B. The questionnaire

The questionnaire which forms the main element of the Consultation has some very inspiring suggestions within it, but one which underpins many of the choices appears towards the end - Q20:

Q20. What impacts on fairness and equality, if any, might result from introducing any of the ideas discussed previously?

The notions of *fairness and equality* are fundamental, simply because current uses of our streets are so unfair, so biased towards the traffic which dominates them. The fundamental change we seek is one which balances the needs of *people* rather than vehicles.

¹ <https://consultationhub.edinburgh.gov.uk/sfc/connecting-our-city-transforming-our-places/>

Land-use is a major element of this. All vehicles, both moving and stationary, occupy land. Land is a valuable commodity, and inner-city land is especially valuable. Our streets should be treated as land, but most vehicles use most of our streets without paying at all for the privilege (except where parking controls are in place). If a vehicle had to pay something like the real costs of the land it takes up, this would not just be fair, it would be a powerful incentive to choose other more friendly modes of travel.

Land-take is not the only kind of subsidy vehicles currently enjoy. *Bad air quality* from emissions is estimated to cause around 2000 premature deaths in Scotland alone; *congestion* costs businesses (and others) millions of pounds per year; the *sedentary lifestyle* induced by car use puts a huge strain on the health services and hence incurs major costs; and the contribution which emissions make to *climate change* is yet another 'externalised' cost of vehicle use.

In terms of fairness and equality, we might therefore answer Q20 thus:

- 1 Why should those who don't run a car have to breathe the pollution of those who do?
- 2 Why is public land allowed to be used for (mostly free) vehicle parking?
- 3 The sedentary lifestyle of car users has major costs for the NHS - how fair is it that those costs should be borne by everyone?
- 4 Is it fair that buses are held up in congestion caused largely by private cars?
- 5 Children can't play in our streets any more - because of traffic.
- 6 The private car makes a big contribution to climate change; we're all paying for that right now; and future generations will continue to pay for what we are pumping out now.

This key notion of *fairness and equality* underpins the answers we propose for many other items in the questionnaire. We take some of these in turn:

Q4 The amount of general traffic in the city centre and town centres should be reduced to improve the experience for people who live, work and visit

We "strongly agree"; this can be done by introducing charges for traffic and parking, in line with the notion of 'fairness'. The money raised can be used to improve the public realm, road maintenance and sustainable transport, to benefit everyone.

The 'experience for people' would be improved through reduced danger, fear of traffic, noise and pollution, all of which undermine ones ability to interact with other people and to appreciate local surroundings and facilities.

Q5 By creating a safe, attractive, accessible, connected network of walking and cycling routes, more people would choose to walk or cycle for short journeys rather than use a car

We "strongly agree", but while better cycle infrastructure is essential, we believe that infrastructure alone can never achieve its true potential without accompanying *disincentives* to car use. Physical restrictions and charges for use of roadspace (moving and static) deter vehicle use and raise awareness that other choices are available.

*Q9 The Scottish Government and the Council are committing to implementing Low Emission Zones (LEZ) in Edinburgh. LEZs would restrict vehicles from entering a zone by imposing a monetary penalty where they do not meet minimum emission standards. Please tell us your views on the following statement:
Restricting access for the most polluting vehicles to the city centre and the wider city is one way to control and improve air quality*

Again, we “strongly agree”; these measures would go some way to restoring 'fairness'. We would like to see the whole city centre declared a Low Emission Zone, but LEZs would not be confined to the centre; any streets whose quality fails to meet the standards should be treated the same way, and this would probably include most of the 'suburban' centres, which we are pleased to see are listed within the consultation - areas such as Tollcross, Bruntsfield/Morningside, Gorgie/Dalry and others further out from the centre.

Q11. Thinking about your last visit to the city centre, overall how satisfied were you with your enjoyment of the streets and public spaces?

Our answer, sadly, would be “dissatisfied”. The City Centre displays all the disadvantages of excessive vehicle use. But it's not just private cars - buses, tour buses, tourist coaches, HGVs and LGVs all play a role, and all can be improved in a variety of ways.

Q13. To reduce traffic in the city centre and town centres, create a more welcoming and healthy environment for people and business, and to protect its heritage and culture, how much do you support the following ideas?

a) The creation of permanently vehicle free streets within the city centre

Strongly support. Furthermore, any city centre streets which did retain traffic would nonetheless have restrictions, physical and/or financial, to minimise unnecessary traffic.

b) A reduction in the availability of on-street parking

Strongly support. This should reduce the incentive to drive into the city centre. Furthermore, outside the centre, parking zones should be introduced more widely, and charges increased, in order to encourage take-up of other modes.

c) Reducing the number of bus services passing through the city centre

Support, with reservations. With through-ticketing, the tram could become the main east-west cross-city travel mode. Buses would turn at each end. As well as improving the city centre environment, service reliability should improve, by avoiding congestion.

d) Introducing and enforcing controls to manage access for large delivery vehicles by size, weight and time

Strongly support. Commercial vehicles especially should pay for the use of street space. High charges would encourage trans-shipment to smaller and less-polluting vehicles, including e-cargo bikes - and this would provide new employment for small operators.

e) Investing in freight depots around and within the city and supporting delivery within the city by smaller, cleaner vehicles

Strongly support. See d) above.

f) Investing in technology to better manage traffic congestion and improve safety:

Strongly support. Especially for measures to charge for use of street space, to encourage take-up of eco-friendlier travel modes.

Q14. The Council has to do more to ensure the air we breathe is healthy for us all. In five of Edinburgh's six Air Quality Management Areas legal standards for nitrogen dioxide are regularly exceeded. These are the City Centre and the West End, St John's Road, Inverleith Row, Great Junction Street, and Glasgow Road (Newbridge).

Strongly agree. Very pleased to see mention of locations outside the city centre. Only *one* year should be allowed - these emissions are killing and injuring the innocent public, and nothing has been done for far too long. And the costs to the NHS must be substantial.

Q16. Where businesses in the city provide free parking spaces for employees, how much would you support charging the business to fund a higher quality public transport system? (workplace parking levy)

Strongly support, but this is insufficient. It is just one aspect of the principle of making vehicles pay for the space they consume. The levy should in fact include *all private non-residential parking provision* (PNRP) over a certain minimum number of spaces, including not just workplace spaces, but spaces at supermarkets, leisure centres etc.

At present local authorities do not have such powers, but a letter² from Transform Scotland and many other organisations (including Spokes, and Edinburgh Council adviser Prof Tom Rye) has urged an amendment to the Transport Bill to give Councils PNRP powers. Furthermore, speaking at a recent Transform public meeting, Sue Flack, an architect of the Nottingham Workplace Parking Levy (WPL) recommended full PNRP powers rather than the purely WPL powers available in England. We are encouraged that the City Council's Transport Committee has requested a report on PNRP, not just on WPL.

Whilst a WPL has the dual benefits of deterring unnecessary car use and raising funds for sustainable transport, the PNRP retains both these benefits but additionally helps support town and city centres against out-of-town competition.

Q17. Some neighbourhood streets in Edinburgh are used by people to park on the street for free. To reduce the impact of this on local residents, should the Council extend parking controls across the city?

Definitely. Where controls are not currently in place, streets are too often used as 'park and ride'. The objective of the charges is to encourage modal shift and turn our streets into people-friendly public areas.

Q18. Overall, having considered the range of ideas, how ambitious do you think Edinburgh needs to be to deliver a city that works for you?

Edinburgh needs to take a radical approach. Our streets have been dominated by vehicles for too long. Fairness and equality have to be restored. Currently externalised costs of vehicle use must be internalised (Q20 above) - and this applies especially to land-take, but also to congestion and air quality. Particularly relevant is how the transition away from fossil-fuelled vehicles (FVs) is managed and encouraged – see (19d) below.

A fully environmentally-friendly city is needed, to maximise the benefits to residents and visitors alike of the city's unique heritage.

The city has excellent bus services but there are too many buses through the city centre. For some routes, quality bus/tram interchange should be provided, with passengers transferring to tram across the centre, using a through-ticketing system.

Q19. Do you have any other ideas, big or small, about how Edinburgh can support its economy, connect its communities and transform its streets and public spaces?

a) **Better planning.** Traditionally Edinburgh has been highly sustainable because of its high density; but the city is now being allowed to sprawl, making transport links harder to sustain, and in some cases making car the only realistic travel option for many journeys.

² <http://www.spokes.org.uk/wp-content/uploads/2018/03/1802-Premises-Parking-Levies-Letter-20-Feb-AS-SENT.pdf>

b) **Private non-residential parking levies (PNRP)** – discussed in 16 above.

c) **Comprehensive network of protected cycle routes.** At present, improvements are happening incrementally and at too slow a pace, with too many delays. At the same time active travel could become better integrated with public transport, including also a joined-up approach to transport accessibility for people with physical or other difficulties.

d) **E-Mobility integrated policy.** A phase-out of fossil-fuelled vehicles (FVs) is essential. However, for reasons of environment and of integration, and in view of its tough modal shift targets, the Council's policy must be to fully include modal shift within its fuel-shift policies. In other words, an *e-mobility policy*, not just an *EV policy*. We are encouraged that the Council has decided to move in this direction see 8(6) in the minutes³ of the 7.12.17 Transport Committee, although what this means in practice remains to be seen.

In particular...

- Council publicity encouraging the public and local businesses to shift away from FV should *always* present the option of mode shift. For many people in cities this is now a realistic option given the effectiveness and congestion-busting potential of e-bikes and e-cargobikes, especially when combined with the car club and public transport options, yet it is an option of which few people are truly aware.
- The Council should demonstrate the use and potential of e-bikes and e-cargo bikes in its own internal travel and transport. We are encouraged to see that Councillors Macinnes and Brown are already doing this in a very public way⁴ in their individual capacities, but wider demonstration, based on Council internal transport of goods and people is important!

We note that a direct 1-1 shift FV->EV for all current car owners would retain many externalised costs - congestion, sedentary lifestyle, street 'clutter', intimidation of the non-motorised, etc. Furthermore, around half of a typical EV's lifetime CO2 emissions are from its manufacture, whilst toxic pollution from brake and tyre wear remains a deeply troubling public health issue. These reasons all very strongly reinforce the need for an e-mobility policy as above, rather than the largely EV-only policy which is usually seen elsewhere and which results from silo thinking.

e) **Old Town policies** The Community Council has produced a 13-page document⁵ outlining the problems and suggesting what might be done. Their main concerns are: City Tour buses; tourist coaches; delivery vehicles, including HGV and LGV; A-boards; road maintenance; and adequate enforcement.

Spokes feels this document has many valuable ideas, and we endorse many of its recommendations. Street space is at a premium in this part of the city; it is vital to establish the principle of 'user pays' as the basis for a modal shift towards active travel, to reduce congestion, and to create a cleaner, less polluted centre.

This Old Town document makes frequent mention of *hotels* - both the benefits and the drawbacks. Hotels have immense servicing requirements, which currently put many 'white vans' onto our streets. Much of this servicing could be done by e-cargo bikes, thereby reducing the impact of the vehicles as used at present.

3 http://www.spokes.org.uk/wp-content/uploads/2018/02/171207-Minutes_07.12.17.pdf

4 <http://www.spokes.org.uk/wp-content/uploads/2018/10/Fsht-ebike-pall.pdf>

5 <http://web14.extendcp.co.uk/edinburgholdtowncc.org.uk/wordpress/wp-content/uploads/2018/02/Our-Streets-2.pdf>

C. The 3 themes and 15 ideas

The Prospectus includes a section of “ideas,” based on three themes, which we are invited to comment on:

“Here we set out **fifteen ideas** linked to further information on each, grouped under three themes. *We would like your views and thoughts on these ideas* as well as any others you have that will help shape the change we need and lead to a fairer, healthier and better-connected Edinburgh.” (Prospectus, p.8)

Theme 1 - “A fair and inspiring capital city”

We are pleased to see the notion of 'fairness' given prominence.

We agree with the idea that “neighbourhoods based around walking and cycling” will strengthen town centres and “support local business”, a notion which needs to be better promoted, since many shopkeepers still appear to believe that shoppers only come by car.

We also support 'making it easier to use public transport' and 'creating better accessibility' by developing a wayfinding system that “signs people around the city”.

Theme 2 - “a healthy city and environment”

Improving air quality' and 'encouraging clean vehicles' are concepts we have already endorsed.

'Giving people in new developments healthier transport options' is valid, but the *location* of development is even more critical - too often, 'new developments' means greenfield sites with low-density housing, the very opposite of what a sustainable city looks like. If development is concentrated on brownfield sites, these are often well connected to public transport for historical reasons, and are often close to cycle routes since the latter are mainly, in Edinburgh, built on old railway lines which were built to serve the brownfield 'works'. Development there can also be high density, given good planning. We should remember that “reducing the *need* to travel” is the most eco-friendly option of all.

Theme 3 - “a smart and thriving city”

This includes two ideas which have considerable potential:

(a) “**creating freight hubs to reduce the impact of large vehicles on the city centre**” could be given impetus if, as we suggested earlier, vehicles had to pay for the space they take up, whether moving or stationary. Larger vehicles would pay the most, which would also encourage trans-shipment to smaller (electric) vehicles. E-cargo bikes have a significant role here, considering that one of these can easily carry up to 80kg.

This system of trans-shipment would also provide employment to the small operators, and, if the charging system were set up fairly, the net costs to a business might be little different to now, given the reduced congestion problems when using cargo bikes and small EVs.

(b) “**controlling the impact of commuter parking**” would be highly beneficial in all aspects, both by extending parking controls to most streets to stop them being used as cheap 'park and ride' venues; and by introducing PNRP levies (see 16 above).