City Plan 2030 Consultation

consultationhub.edinburgh.gov.uk/sfc/choicesforcityplan2030

Response from Spokes

We welcome the opportunity to respond to this consultation. The presentation as a series of 'Choices' is a good one, since it gives the opportunity to look at specific issues.

General
We agree with the overall goals, especially to "*address the increasing impact of climate change on our city and ensure growth is sustainable...* we have *a target to be carbon neutral by 2030;* we are committed to *building 20,000 affordable and low-cost homes over the next 10 years* ...[and] to *radically change how we move around our city."*

And since transport and housing as so closely linked, we think it's good that the Council are consulting on the Mobility Plan at the same time, and doing some cross-referencing; for example, City Plan has, as a major goal, "*a city where you don't need to own a car to move around*", expanded as "*creating places for people not cars; supporting the reduction in car use in Edinburgh; delivering new walking and cycling routes"*.

Both documents are suitably ambitious and represent a step-change from what has gone before. At the same time, we should be under no illusions that these goals will be easy to achieve; they will require substantial changes of attitude and behaviour from both individuals and businesses.

We will focus our comments on a few specific issues:

1 **Improving the quality and density of development** (Choices 2-6)

Over the past dozen years or so the city has been allowed to 'sprawl', with, especially, low-density housing schemes, on greenfield sites, too often without adequate public transport (or cycle routes), and not connected to any community; hence very dependent on car use - and therefore unsustainable.

Many planners recognise the need for more compact development and sites with decent public transport and cycling facilities. However, the recognition has often not been reflected in decisions on planning applications, or in enforcement. The *implementation* of sustainable policies is absolutely critical, regardless of the pressures from commercial land developers

Until post-war development, Edinburgh was a relatively compact city. Pre-war 4-storey tenements offer high-density accommodation and are still popular today; they make a good solution for the urban environment and can be more easily served by public transport than the low-density housing built more recently.

In future, new tenements could have lower ceilings than the original, making them easier to keep warm, and possibly including 5 storeys within the space currently taken by 4.

Public transport and cycling could be encouraged in any new or converted development through layouts which make internal walking and cycling direct and easy, with several entry/exit points, while vehicles are sent 'the long way round' and offered only a single entry point.

In future all development should be tied in with an existing community, or established as a new village or town which is largely self-sufficient and can provide all the everyday needs of its residents, within walking distance, thus avoiding the need to travel.

Developers should be required to make more contributions towards the surrounding community. At the very least they should be required to provide cycle/walk routes which integrate the site with the settlement of which it is intended to be part.

2 Ensuring the better use of land (Choices 10-12)

We strongly favour re-use of brownfield land, and we believe that possibly all our housing needs for the next 10 years, including affordable housing, could be met by re-allocation of brownfield, without taking any further greenfield land.

One way this might be achieved - and we suggest this quite tentatively - is the re-allocation, of land currently taken up as car parks, for other purposes such as housing. We are thinking of sites like Edinburgh Park, a very large area with, in places, well-spaced office blocks separated by a vast acreage of car parking. The introduction of a suitably high WPL might persuade individual site owners that this land (which currently brings in no revenue),could be re-allocated for other purposes.

The outcome would be beneficial in several ways: not just more housing, on land often already well-served by public transport and cycle routes, but also reductions in car use, and the provision of housing close to places of work, thus reducing the need to travel.

Taking this to a further stage in future, the WPL could be extended to cover *customer spaces at sites with big car parks* - supermarkets, retail parks, leisure parks - with the same intention and outcomes, viz. increased supply of land for housing, reduction in car use, and allowing residents to live close to other facilities, including work. (We appreciate this will require enabling legislation from the Scottish Government).

There are already signs that some developers are moving in this direction; for example The Gyle Centre is replacing some parking with a cinema, and Cameron Toll is proposing to do the same. Part of Hermiston Gait car-park is being reallocated. Edinburgh University has re-purposed several inner-city car parks to centres of research and teaching. Nick Whitten of JLL Property has outlined the potential for 80,000 houses on car parks in London [1].

We hope the Council will put pressure on the Scottish Government to enable WPL to be extended in order to reap these advantages; once the Government sees the various benefits accruing from the WPL, they will feel more inclined to extend it.

To achieve the desired outcomes, the WPL charges would need to be high enough to encourage site owners to take action. In the case of Edinburgh Park, the land, although technically brownfield, was formerly agricultural and does not have the contamination problems often found in former industrial sites.

The Council might consider setting up a small team to talk to owners of car parks large enough to be re-purposed (eg in Edinburgh Park), to explain the multiple benefits to be derived from doing so. This could be an efficient and effective way of gaining brownfield land.

In sum, the benefits of this approach would be:

re-use of brownfield land, and elimination (or reduction) of greenfield land-take;

residents living close to workplaces or shops (reducing the need to travel);

reduction in car use (from fewer parking spaces);

a more compact city, enabling better public transport and encouraging cycling.

Furthermore, re-use of brownfield land might bring down the cost of the land, which is always one of the biggest housing costs (70% is quoted as an average) - housing then becomes more affordable all round.

This 'compact city' approach could solve the 'town centre first' problem outlined in Choice 15. With restricted parking at out-of-town retail parks, the city centre and local town centres become the natural focus for shopping.

For these reasons we oppose the idea of the “blended” approach (Choice 12), using a mixture of brown- and green-field land. Past experience shows that developers just pick the 'easy cherries'; we should make it clear to them that no further greenfield will be available.

As a consequence, we oppose the named greenfield development sites: Calderwood, Kirkliston, West Edinburgh, East of Riccarton, SE Edinburgh. All of them, with the possible exception of West Edinburgh, are remote and poorly served by public transport. The goals of the Plan, “a city where you don't need to own a car” and “supporting the reduction in car use” would be totally thwarted by developments like these. With increased use and supply of brownfield land, these sites would not be needed, at least within time span of the 2030 Plan.

3 Supporting the reduction in car use in the city (Choice 7)

The development of a compact city using brownfield land must be supported by restrictions on car use on the existing road and street network. At present, too many streets are used as informal park+ride sites, causing congestion and nuisance to residents (indeed, in many streets cars are parked wholly or partly on the footway (though we hope this practice will be eliminated or reduced by measures in the recent Transport Act)).

To tackle this, first, *parking control zones should be extended city-wide* (Choice 7C). If drivers can't find a place to park, they are much more likely to cycle or use public transport.

Second, we strongly support *the congestion charge* mentioned in the Mobility Plan; (and see Choice 7A, which we support). The term 'congestion charge', however, should be avoided [2].

For these reasons we also support Choice 7B, the Transformation programme for the city centre.

The congestion charge on vehicle movement could also apply to residents, if at a lower rate, since a stated goal of CP2030 is to encourage residents *to live without a car* (mentioned as a primary goal in the introduction). The extension of the CPZs could also help to achieve this. In both cases, charges are being made for use of land.

A congestion charge could become a socially-progressive form of tax; small cars would pay less than SUVs; private cars would pay less than commercial (eg private hire cars); small commercial vehicles (LGVs) would pay more than cars; medium GVs more again; and HGVs the most. Thus, much of the charges would fall on commercial vehicles, which seems fair and equitable.

4 Electric vehicles

A shift from fossil to electric power is necessary, but the benefits are often over-stated, with the unfortunate result that *fuel shift* policies get priority over *modal shift*. First, it's estimated that 50% of the carbon emissions in a vehicle's lifetime arise in the *manufacture*; hence carbon savings overall are likely to be no more than one-third of fossil-fuel vehicle emissions.

Second, apart from a modest reduction in carbon emissions, electric vehicles would continue unabated all the other anti-social aspects of car use (except noise): intimidation of pedestrians and cyclists; particle emissions from tyres and brakes; heavy use of plastics in the manufacture (and consequent disposal problems); sedentary lifestyles for drivers, causing big increases in diseases like obesity and diabetes; urban sprawl; congestion; and demand for rare minerals to manufacture the batteries.

The answer in our view is an *overall reduction in the number of vehicles*, achieved partly by land-use charges as above, partly by vehicle-sharing, and partly by a modal shift to electric cycles and cargo-bikes.

5 Park+Ride (P+R)

Choice 7D wants to “support the city's P+R infrastructure by safeguarding sites for new P+R extensions, including [new] sites”

Spokes supports P+R provided that it is accompanied by corresponding tough restrictions on motor traffic within the city that the P+R is intended to protect - for example the charging of static and moving vehicles as discussed above, and road-space re-allocation, for example to cycle routes.

P+R also means sacrificing yet more valuable land - often greenfield - to the private car, without generating any revenue for the city. Some form of charging is surely in order.

6 Delivering new walking and cycling routes

Walking already has a widespread network of footways, paths across parks etc, so we shall confine ourselves to cycling. Unlike walking, cycling rarely gets its own space; on-road lanes are shared with vehicles, which often treat them as a car park; whilst off-road, paths are usually shared with walkers, dogs, joggers, roller-bladers and sundry others.

To foster modal shift, cycling requires more of its own space, to avoid the *power imbalance* (relative to motor vehicles). We agree with Choice 8A, “update our policy on the cycle and footpath network for identifying new routes”, and we approve the list of proposed additions, as detailed in 8B, but there is one big omission - arterial routes.

In our view *every arterial route into the city should be surveyed with the aim of providing for cyclists;* either cycle lanes, which must be mandatory (solid white lines) to stop parking in them; or completely segregated. (We appreciate this is covered in the Mobility Plan, but for consistency and clarity this crucial policy should be mentioned here).

One good example which has been created recently is Chesser Ave., where generous cycle lanes have replaced a traffic lane, giving cyclists lots of space and a degree of separation from other traffic.

Under 8C, “other strategic cycle links”, we broadly agree. However, additionally:

1) many main roads in the city are not 'arterial' but are needed as part of a main network for cycling; for example, Smokey Brae, Pilrig St, Craigleith Rd., and many others;

2) any list of intended routes should be flexible, ie open to additions which arise fortuitously (such as road resurfacing projects);

3) various existing off-road routes which could be a valuable part of the network, but which are often in such poor condition that cyclists avoid them, should be upgraded.

Examples are Dalmeny to Newbridge via Kirkliston, Kingsknowe to Balerno, Water of Leith Path, Bringing such routes into the remit of the Active Travel Team, rather than Natural Heritage, might help achieve this.

7 Future of the Airport

Not surprisingly, the document has very little to say on this, but there is rapidly growing concern about the climate impacts of air travel - highlighted by the recent decision that the third Heathrow runway is illegal [3], given the climate targets laid down in legislation. The possibility must be recognised that a lot of brownfield land might become available from the down-sizing of the airport, which in the current emergency seems almost inevitable. We hope the current re-allocation of airport land to the 'Crosswind' development might be a harbinger of the future.

8 General

We are concerned, given the state of the crisis and the urgent need for action, that too much Local Authority time and energy is devoted to consultations, and too little to action. There have been cases, even for quite small projects, where a series of consultations have taken 2-3 years or more, and sometimes implementation has not happened even then.

Once a framework (such as City Plan 2030 and the Mobility Plan) is agreed, that should be enough to keep consultations for individual schemes within prescribed and reasonable limits.

Finally, the urgent need to reduce carbon emissions should be regarded as a leading factor in determining consultation outcomes.

Summary

The city has embarked on an ambitious programme of change in response to the climate emergency. We support the proposals to find more urban land for housing, and a reduction in car use. Traffic management tools must contribute to the achievement of these goals - re-allocation of carriageway, and 'land-use' charges, including for parking and for vehicle movement.

We tentatively suggest that substantial pockets of urban land could be found through the re-purposing of car parks, as a possible outcome of the Workplace Levy (and subsequent extension to other sites with multiple car parking); this might yield enough housing land to avoid taking any more greenfield, and would have other benefits at the same time;:

* reducing the need to travel by locating residential units close to workspaces;

* reduction in car use (fewer parking spaces available);

* a more compact city;

* in many cases, good access to public transport and cycle routes using existing infrastructure.

Peter Hawkins, Spokes Planning Group

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Footnotes:

1 https://www.homesandproperty.co.uk/property-news/world-car-free-day-2019-80000-homes-could-be-built-on-london-car-parking-spaces-within-a-mile-of-a-a133491.html

2 'congestion charge' has negative connotations (especially in Edinburgh) and is not an accurate description - it is really a *land-use* charge; everyone understands that land, especially in the city, is a valuable commodity.

3 https://www.theguardian.com/commentisfree/2020/feb/27/the-guardian-view-on-a-defeat-for-heathrows-third-runway-a-welcome-precedent