

1. Introduction.

Transform Scotland is Scotland's alliance for sustainable transport. We campaign for walking, cycling and public transport to be the easiest and most affordable options for everyone. Our diverse membership brings together public, private and third sector organisations from across Scotland. We are politically independent and strictly science-based.

We have studied the City of Edinburgh Council's proposed City Plan 2030 closely and are pleased to submit the objections and comments set out below.

As an organisation concerned with climate change and sustainable transport, we specifically address those two related issues, with a particular focus on the section relating to infrastructure and transport policies.

There is much to welcome in the plan, such as the focus on pedestrian safety and ease of movement, the key active travel proposals to develop and expand a city-wide network of protected cycleways, the orbital bus routes, the tram line and active travel safeguards, the new active travel routes, the mobility hubs, and the support for the concept of the '20-minute neighbourhood'.

However, we have substantial objections and concerns relating mainly, but not exclusively, to private car use and the airport.

2. Areas of objection.

(i) Private cars and private parking provision (in response to 'Inf 7 Private Car Parking')

It is stated that:

'City Plan establishes the principle of maximum parking limits for new developments as well as the need for these new developments to incorporate measures to promote active travel and shared mobility to reduce car ownership', and

'City Plan 2030 is planning for a city in which you don't need to own a car to move around. Our policies aim to reduce the need to travel and promote the shift from private car use to sustainable travel modes.

These are admirable objectives but look to be undermined by certain contradictory aspects of the Plan. In this respect, parking policy is crucial. In the past, parking policies have promoted car driving and discouraged public transport use. Virtually all car trips end in a parking space and reducing parking provision reduces car use. Therefore, parking in any new developments must be at an absolute minimum so as not to contribute further to the city's climate emissions, congestion and air pollution.

There are several references in the plan to 'providing no or very limited private car parking apart from accessible parking spaces and vehicular access for servicing and deliveries' in relation to specific development sites. Elsewhere there is no mention at all of parking, for example in relation to Seafield,

Builteon Road and Edinburgh BioQuarter, or the reference to the limits on parking restrictions are much less strict. In our view, all sites must be held to

the same, higher standard.

Similarly, different rules are applied to nearby sites. For example, the Comely Bank site is to provide 'no or very limited private car parking', whilst that at the Royal Victoria Hospital is to provide only 'limited private car parking'.

Substantial car use appears to be left in place at several sites. As regards the Edinburgh Waterfront, there is talk of only 'a reduction in the influence of the car in design and layout'. The target here and elsewhere must be for the elimination of such influence.

Car priority also seems to be retained on Harbour Road, which is to 'provide segregated cycle routes "where possible' (our emphasis). To accord with the agreed transport hierarchy, such routes must be standard, not optional.

In relation to the airport reference is made to 'accessibility by public transport, pedestrians and cyclists, traffic generation and car parking and other environmental considerations'. In this regard too, car parking should be frozen or reduced. Generating further traffic where alternative provision exists makes no sense.

The Plan states that '[t]ogether with City Plan 2030, our City Mobility Plan will widen travel choice and reinforce the national sustainable travel hierarchy that promotes walking, wheeling, cycling, public transport and car sharing in preference to single occupancy car use.' However, 'travel choice' which includes the privately-owned car will always compete directly with both public and active travel. If the car remains an alternative, it will be used, and in many cases once a private car is available, it is cheaper to use it than to use public transport.

National Transport Strategy 2 puts sustainable modes of movement at the heart of the transport hierarchy with walking, cycling and wheeling at the top and private car use at the bottom. However, as we know from past experience in Edinburgh, attempts to make provision for many different modes of transport simultaneously within limited space reduces the efficiency of them all. Car use other than for limited purposes must not be part of any new developments in the city as it will merely add to existing problems.

(ii) Aviation (in response to 'Place 17 - Edinburgh Airport')

The policy relating to the airport is extremely hard to comprehend in light of the stated objectives of the Plan relating to climate change and sustainability, in particular the following paragraphs:

'Strategic enhancement of Edinburgh Airport, along with business and mixed-use development and a new National Showground facility and the Central Scotland Green Network are national developments particularly relevant to Edinburgh.'

'Supporting information will be required to demonstrate how proposals will contribute to meeting the infrastructure requirements identified for West Edinburgh. Land to the north of the existing airport boundary is safeguarded to provide a second main parallel runway, if required in the future, to meet air passenger growth forecasts. ... Proposals which would prejudice the long-term expansion of Edinburgh Airport will not be supported.'

The same is true of the numerous references to 'the long-term expansion of Edinburgh Airport'.

In fact, these are amongst the most perplexing passages of the entire plan as they demonstrate a complete disregard for contribution made by aviation to climate change. Aviation growth is framed as both desirable and inevitable and discussed as if it has no impact on the climate.

The recently published draft National Planning Framework no longer includes 'Strategic Airport Enhancements' as a National Development. There is hence both a need by The City of Edinburgh Council to recognise the increasing harm caused by aviation and to remove the safeguard for a second runway from the Plan.

3. Areas of potential improvement.

(i) Active travel

The Active Travel strategic projects and safeguards are very welcome, but we are concerned about the slow progress that has been made on planned improvements of this kind in the past. The extremely slow implementation of the City Centre West-East cycle link, for example, demonstrates that efforts must be stepped up considerably if the projects contained in the plan are to be implemented within a meaningful period.

Likewise, segregated routes such as that along Lanark Road/Slateford Road are very welcome, but many similar, connected, on-street routes are needed to be created across the city to create a network accessible to all.

(ii) Bus

There is good progress on bus provision in the City Plan, but 7/7/7 bus lanes and bus gates must form part of it.

The only way to improve travel times and reliability is by means of bus-friendly highway infrastructure. The total number and coverage of bus lanes and gates must be expanded with full enforcement to ensure that they can operate effectively.

(iii) Density

As has been known for decades, and as the plan now acknowledges, '[t]here are many benefits of higher density development – it makes efficient use of land, helps maintain the vitality and viability of local services and encourages the effective provision of public transport' and '[h]igher density development makes efficient use of land, helps maintain viability of services and encourages effective provision of public transport.'

This principle needs to be applied to all sites and not just those within the centre of the city. There needs to be a permanent end to the archetypal, car-centric housing schemes which are still being built in Edinburgh.

Good-quality dense housing will support local business and facilities and public transport in local town centres across Edinburgh. Without it, such services will not be viable and car dominance will remain.

4. General comments.

Assumptions on growth

We have some concerns as to the assumptions made on growth. Climate change, Brexit and Covid-19 have shown that few assumptions can be made with any degree of certainty.

The plan acknowledges, for example, the reduction in visitors to the city, particularly those passing through Edinburgh Airport, and the associated impact on tourism and hospitality, but assumes the sector will overcome the short-term challenges and see further growth over the lifetime of the Plan. It further assumes continuing demand for office space in the city centre, without taking account of the likelihood of permanent changes to working and work-related travel patterns as a result of the pandemic and the impact of proper implementation of 20-minute neighbourhoods.

Wording of the Plan

There are various points in the text where the objectives of the Plan are considerably weakened by its wording.

Below are just a few examples of what permeates the text (our emphasis added in each case):

- Harbour Road: 'The streetscape and travel opportunities through this area should ensure that visitors and residents can readily travel to and from the area, *preferably* using low-carbon transport methods'
- Infrastructure and Transport Policies: '*ambition* to shift car trips to more sustainable modes'; 'development that ... *reduces the reliance* on private car use;
- 'Edinburgh Park/South Gyle Development Principles a. *Where possible*, proposals should incorporate new cycle and pedestrian links through the site and consider how these connect to other uses and routes across the Edinburgh Park and South Gyle area.'
- '[Newcraighall] site layout *should* enable a bus route to be formed north-south through the site. It is *intended* that this connects to QMUC across land allocated for development in East Lothian. A bus gate at the site boundary *should* prevent general vehicular access through this route'.

There are numerous examples in the text where what is necessary to attain the Plan's objectives is undermined by vague, ambiguous or merely aspirational wording. Past experience shows that this will allow developers to avoid the measures necessary. If planners are serious about seeing the substance of the Plan actually put into practice, then the wording needs to be much stronger so as to express clear intentions and prevent evasion.

5. Conclusion.

In summary, we welcome much of the content of the City Plan 2030, which represents clear progress on previous development plans. We are pleased to see the target for the city to be 'net zero' by 2030; the acknowledgment of the causes and impacts of climate change; and the commitment to sustainable growth in future. We also welcome the very positive approach to active and public travel.

However, the Plan has some considerable flaws and we object to the inadequate approach to private car access and parking provision, and any expansion of the airport.

The Plan itself defines 'sustainable development' as 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs.' Significant parts of the plan cannot be regarded as meeting this description and need to be amended. In our view, the Plan as it stands will not succeed in fully achieving its own objectives.



Scotland's alliance for sustainable transport

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We campaign for walking, cycling and public transport to be the easiest and most affordable options for everyone. Our diverse membership brings together public, private and third sector organisations from across Scotland. We are a registered Scottish charity (SC041516).