

City Plan 2030 - Proposed Plan's Period for Representation

Response from Spokes, December 2021

This response considers the proposals shared on consultationhub.edinburgh.gov.uk on 5th November 2021

The Council has prepared Edinburgh's proposed new local development plan called 'City Plan 2030'. In time, it will replace the existing Local Development Plan that came into force in November 2016. This response is based upon the information in the following documents;

- *City Plan 2030 - Proposed Plan (September 2021)*
- *City Plan 2030 - Transport Appraisal Technical Note*
- *[Online Map](#) of City Plan 2030*

City Plan 2030 - Proposed Plan (September 2021):

Spokes welcomes the broad aims of the City Plan 2030 especially the mentions in Part 2 – City Plan 2030 Strategy and Aims 2.36; that Edinburgh will be; "A sustainable city which supports everyone's physical and mental wellbeing" and "A city where you don't need to own a car to move around".

Spokes supports the mention of the following in City Plan 2030;

- *20 Minute Neighbourhoods*
- *City Mobility Plan*
- *City Centre Transformation Strategy*
- *Edinburgh's Low Emission Zone*
- *Net Zero targets*
- *2030 Climate Strategy*
- *Sustainable Transport Hierarchy*
- *Edinburgh Strategic Sustainable Transport Study*

The embedding of these strategies will help to deliver these over the timescale of the plan, albeit some of the above need strengthening – for example the LEZ proposals.

These principles will be needed to support the Scottish Government's commitment to a 20% reduction in the distance travelled by car by 2030 and the Council's 30% commitment.

The above commitments are extremely ambitious, given that car use has been on a long-term rising trajectory, and now the pandemic has resulted in shift from public transport to car, resulting in car travel now approaching or exceeding pre-pandemic levels despite the reduction in total travel. Therefore, to meet the commitments, it is vital that all development must work towards meeting the required reduction in car trips and see emissions reduce and air quality improve. To help achieve the sustainable mode share targets and deliver in line with the sustainable transport hierarchy.

Site Specific Active Travel Improvements:

In the Transport Assessment document Spokes is encouraged to see the following active travel improvements as part of development projects;

- *Norton Park - Off road cycle paths from RBS Gogar to Ratho*
- *Land East of Riccarton - Murrayburn Road to Hermiston / Heriot Watt University*
- *Land South East of Gilmerton - paths around Drum farm to Sherifhall / Shawfair*
- *Seafield - Kings Rd junction with links to Portobello & Meadowbank*
- *Leith Docks - No specific active travel connections proposed*
- *Leith / Bonnington Cluster - what looks like an LTN style network of quiet paths*
- *Royal Victoria Hospital / Crewe Road South - Orchard Brae to Crewe Toll roundabout & other routes around Fettes Police Station site*
- *South West Edinburgh Cluster - Gorgie & Longstone Links*
- *Broomhouse Terrace - it is not clear if there will be a link to Longstone over Calder Rd (A71)*
- *Redford Barracks - Colinton Road active travel provision with other links through / to site*
- *Astley Ainslie Hospital - east / west links on Newbattle Ter & Canaan Ln*
- *South East Edinburgh Cluster - Kirk Brae active travel connection via Ellen's Glen*
- *Edinburgh bioQuarter - connection avoiding the Wisp*
- *East Edinburgh Cluster - Portobello High Street connection & King's Rd junction.*
- *West Edinburgh - improvements focused around Edinburgh Gateway*

However, it is not clear that all development proposals have been sufficiently fully assessed for active travel potential. Just to give two examples...

- *Leith Docks - No specific Active Travel connections proposed*
- *Broomhouse Terrace - it is not clear if there will be a link to Longstone over Calder Rd (A71)*

Furthermore, whilst it is positive to see these proposals there appears to be a disconnect from these and wider active travel network connections and integration of active travel along arterial routes. All active travel proposals should be designed not just as standalone projects, but integrated into a safe, welcoming and connected city-wide network which includes convenient and direct access to such development areas.

Active Travel Mobility Hubs:

Spokes supports and would like to see more information on these hubs identified in the City Plan 2030;

- *Broomhouse Terrace mobility hub*
- *Redford Barracks mobility hub*
- *Astley Ainslie mobility hub*
- *Granton mobility Hub*
- *Granton Square mobility Hub*
- *Bonnington mobility hub*
- *Seafield mobility hub*
- *Fettes Avenue mobility hub*
- *BioQuarter mobility hub 1*
- *BioQuarter mobility hub 2*

However these do not appear to be in the city centre, public transport hubs or at other major development sites such as Western Harbour, International Gateway or retrospective to existing areas where active travel could be further encouraged and enabled. Thus helping to achieve the City Mobility Plan objectives and modal share targets for active travel.

Active Travel Access Point Safeguards:

Whilst it is good to see this as an action within the City Plan 2030 mapping, there are only two shown. One at West Granton and the other from Yeaman Place (Polwarth) to Union Canal which is already a popular active travel route which shows capacity is needed for walking, wheeling and cycling on parallel routes.

Spokes could suggest the following Access Points for assessment for inclusion but would like CEC to review all brownfield sites for integration into the existing and newer 'Travelling Safely' (SfP) active travel routes;

- *Ferry Road Morrisons supermarket on the NEPN near Ainslie Park*
- *Sauchiebank to Roseburn (for continuous Roseburn to Canal route)*
- *64 Gilmerton Dykes Street (Kilngate Brae to Gilmerton Dykes Street connection).*
- *Blackford Glen Road to King's Buildings*
- *Cramond Road South to the Blackhall Path*

We think there should be more of these, can officers please check the proposed sites for suitable locations.

Road Improvements:

Without details these appear to be car focused and not prioritising active travel as per the sustainable transport hierarchy. Spokes would prefer to see junctions citywide being retrospectively improved to embody the transport hierarchy, prioritised for safety and VisionZero design principles. These concerns are elaborated on below.

Major concerns over aspects of the plan

Spokes however is concerned at aspects of the following in City Plan 2030, as outlined in the paragraphs below;

- *Sheriffhall Grade Separation*
- *Gogar Link Road*
- *Roseburn Path Tram Routing Option*
- *Airport Expansion & Dualling of Eastfield Road*
- *Greenfield developments for housing*

Sheriffhall Grade Separation:

On p58 of the Transport Assessment | 5.5 Transport Impacts: South East Edinburgh | 5.5.3 Committed Infrastructure the following is stated;

“Significant road network upgrades and new connections are proposed in this area. The key trunk road network upgrades include the grade separation of Sheriffhall Roundabout. This will provide significantly increased capacity for movements between areas north and south of the City Bypass.”

It seems completely contradictory for the ambition of Edinburgh being a city “where no one needs to own a car to get around”, that an increase in capacity for motor vehicle movements on and north/south of the City Bypass would be proposed and supported in City Plan 2030. This policy will induce more private car trips, increase congestion and create a harder task in meeting the commitment to 20% and 30% reduction in car km’s, unless mitigation measures are used at the same time.

Although Sheriffhall is to be funded by the City Deal, the Deal can be modified. For example we understand (Herald 10.12.21) that Glasgow City-Region Deal is being revised at the request of East Renfrewshire Council, to delete a major planned link road from the Deal and replace it by a new rail station, Country Park improvements and some smaller road upgrades.

Gogar Link Road:

As part of the West Edinburgh Transport Infrastructure Programme, there are proposals for; *‘Intelligent traffic signals at Newbridge / Gogar / Marbury’*.

Whilst this package includes safeguards for active travel & public transport improvements that Spokes supports, it should be noted these should be prioritised and even be in place before the improvements that benefit car users. The proposals for Eastfield Road will again induce more car based journeys to and from the airport and make public and active travel modes a less attractive alternative.

Roseburn Path Tram Routing Option:

Spokes supports further investigation into the options of an on-road tram route as seen in *‘Tram route safeguard TR1-11’*, or using the historic railway corridor. We understand that use of the former rail corridor would include a high quality active travel route (Active Freeway) alongside the tram. However this is not stated in the draft plan, and it must be made 100% explicit, together with an indication of what *‘high quality’* would mean – for example 4m minimum width and the avoidance of significant gradients. The Roseburn viaduct, for

example, could be treated by a build-out or by tram single-working for that short distance. Spokes consider a major advantage of using the rail route for the tram would be to bring movement and light to the path, together with external on-tram & tram stop CCTV, thus making the path far safer and more attractive to the many users who are deterred from using it by the attacks and intimidation which are experienced there periodically. There is no doubt that there is a major deterrent effect. Furthermore a road route for the tram could very likely rule out in perpetuity the prospect of segregated cycling provision on a major road artery into the city centre, and would mean a designed-in conflict with cyclists and tramlines on the narrow Dean Bridge. Finally, the road route could be significantly slower for the tram, reducing its potential to cut car use, given that its main patronage is expected to be from Granton/Leith rather than the intermediate existing lower density residential areas. On the other side of the argument, the Roseburn route is a very valuable quiet area and nature corridor. If it were to become the tram route, then every effort must be made to preserve the nature corridor aspects.

Airport Expansion & Dualling of Eastfield Road:

Spokes does not support expansion of airport capacity.

In addition to that major and over-riding objection, the proposed second runway site would compromise the Newbridge / Kirkliston / Dalmeny cycle route whilst also increasing carbon emissions and unsustainable transport.

Greenfield developments for Housing:

Spokes supports the ambition to tackle the housing crisis in Edinburgh, however there are concerns with City Plan 2030 proposals to release more greenfield land for housing development. Such land is typically used for low density, high cost, suburban sprawl development that locks in car dependent transport. Spokes therefore supports brownfield land development close to and within existing urban centres.

Omissions in the draft City Plan

Spokes is very concerned at the lack of mention of the following in City Plan 2030;

- *Cycling by Design*
- *Workplace Parking Levy (WPL) and wider premises levy*
- *Active Freeways*
- *Minimal reference to Edinburgh Design Guidance*
- *Background data*
- *Bringing planning approvals into line with Council policies*
- *Coastal Path East - West*
- *South Suburban Railway Stations*

Cycling by Design:

Spokes would like to see greater reference to the recently published update to Transport Scotland 'Cycling by Design' document in City Plan 2030. Many of the recommendations and guidance are applicable to City Plan 2030 helping to make Edinburgh a "A city where you don't need to own a car to move around".

Workplace Parking Levy:

In the Transport Assessment document [p140 | Appendix A: Reference Case and City Plan 2030 Assumptions | 3. Transport Assumptions], there is no mention of a 'Workplace Parking Levy' being implemented, whilst the Low Emission Zone (LEZ) is. This is very concerning as a WPL can complement the LEZ agenda - as stated in [City](#) of Edinburgh Council's response to the Scottish Government's consultation on WPL's.

Furthermore, the Council has previously asked the Scottish Government to extend the WPL powers to a full *premises levy*, which would in particular encompass large customer car parks at out-of-town (and in-town) retail and leisure complexes. These should be local rather than national decisions, and they would make it much easier to move towards the traffic reduction commitments. The City Plan should commit the Council to continue seeking such powers and based planning based on it being in place as soon as possible.

Active Freeways:

Active Freeways are being promoted by [Transport Scotland](#) and will complement and go beyond prior commitments on Active Travel. It seems odd that CEC City Plan wouldn't mention these as Edinburgh Council's City Mobility Plan states; *Edinburgh seeks to develop a "strategic network of cycle and walking routes [that] will open up safer, healthier and more active travel for people and families"*. They are mentioned in the SEStran Strategic Network (2020) and Active Freeways will provide attractive and convenient choices for many urban residents' everyday journeys.

Minimal reference to Edinburgh Design Guidance:

Spokes is concerned the good standards set out in Edinburgh's Design Guidance should be embedded into City Plan 2030. There are only three mentions of the Guidance in the document and the City needs action on these key measures to improve existing and new streets.

Data:

It is also concerning that there is a lack of information available to help inform an Active Travel forecast of the proposals in the City Plan 2030. In section 2.5.2 of the City Plan 2030 Transport Assessment, “*Active Travel Forecasting Approach*”, it states the assessment “*does not provide any estimates of total demand for use of any existing or proposed links on active travel networks*”; and that “*much more comprehensive baseline data than is currently available would be required for this*”.

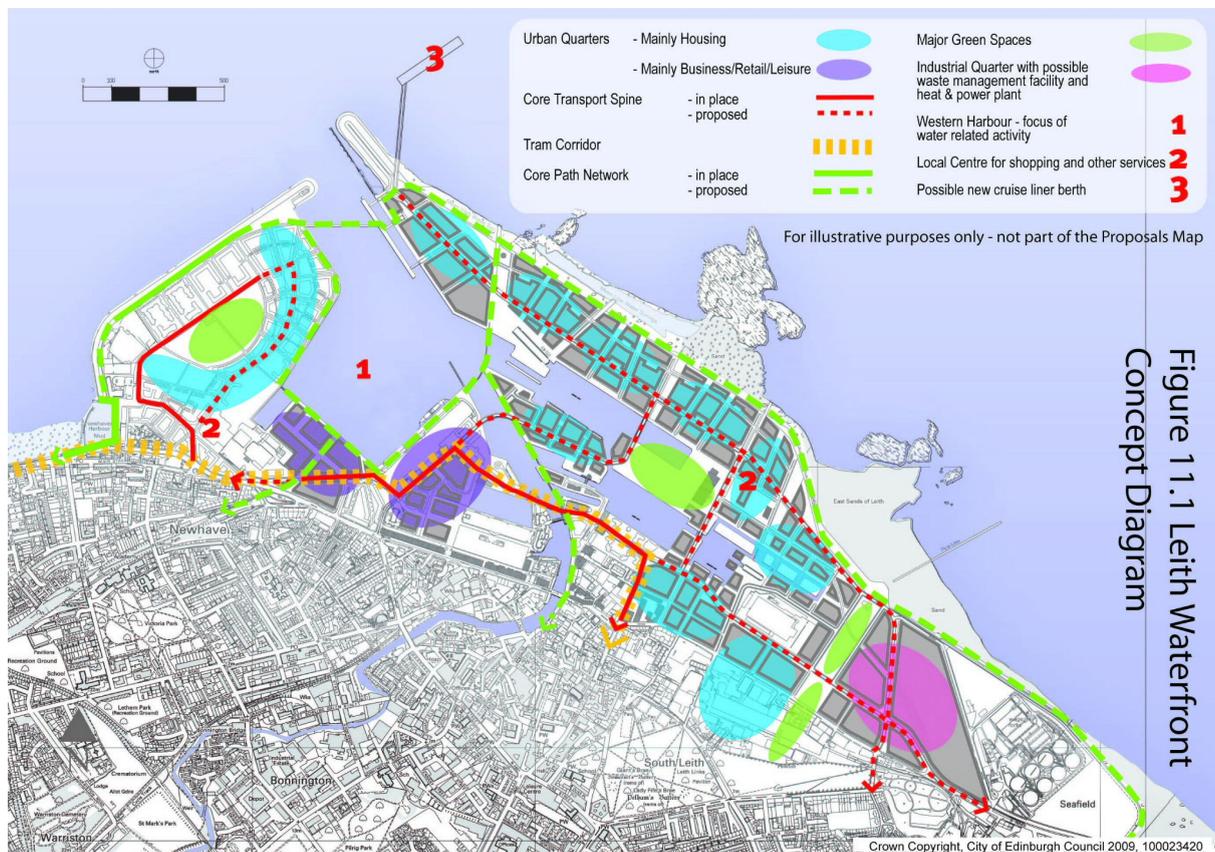
Planning applications which contradict City Plan aims:

We are very concerned that current practice and guidance leads to officers recommending approval of planning applications which run counter to City ambitions. Drive-through coffee outlets, for example, which clearly run counter to both Council and Government traffic reduction commitments, are nonetheless recommended for approval on the most tortuous grounds, in order to avoid the risk of an appeal and costs to the Council.

The City Plan should commit to the revision of regulations, guidance and/or practice which leads to such absurd outcomes. This may of course entail taking up the issue with the Scottish Government.

Coastal Path East - West:

The connection around Leith Docks appears to now be omitted. This is removing the ambition for a continuous off-road coastal connection between Western Harbour and Seafield. This would be an attractive leisure, tourism and also utility for many essential journeys away from busy port traffic. This was proposed in the 2010 City Plan;



Edinburgh City Local Plan 2010: Figure 11.1 Leith Waterfront - Concept Diagram;
<http://edinburghcouncilmaps.info/dev/plans/eclp/chap11.htm>

South Suburban Railway Stations:

The reopening of stations on the South Suburban railway line would provide greater access to rail by bike as well as reduce car dependency in areas to the west, south and east of Edinburgh. Whilst it is good to see on the digital map the provision for stations retained / protected, it would be good to see this reflected in the Transport Assessment assumptions learning from Edinburgh Strategic Sustainable Transport Study & informing the soon to be announced STPR2 outcomes by Transport Scotland.