



City of Edinburgh Council Local Transport Strategy consultation, August 2013

Transform Scotland consultation response

13 October 2013

1 Introduction

- 1.1 We welcome the opportunity to comment on the draft LTS.
- 1.2 In general, this is a very forward-looking document, and we support both the general principles it is based on, and many of the specific policies and programmes.
- 1.3 In particular, the idea of consulting initially on a specific set of topics, rather than the document as a whole, has turned out to be a very workable concept. We commented on the 'Issues for Review' document, and we were pleased to see that most of our choices (in the Options offered) were supported by the public and other consultees, and have been incorporated into the present document.

2 Bus Services

- 2.1 On bus services, we supported Option 1, which favours increased funding to maintain levels of service. In particular, we agree that revenue from extra parking charges should be used to support public transport. We believe there should be stronger enforcement of bus lane discipline, and the fines from these cameras, along with parking fines, should be used to support better bus services.

3 20mph Limits

- 3.1 We welcome the finding that a majority of consultees support Option 1 (Ch.6.5.1), for 20mph limits in residential areas, shopping streets, and the City Centre; this was the option we supported.

4 30mph Limits

- 4.1 Likewise, our support for Option 1 on 30mph also found favour with the public; we are pleased to see that the Council propose to reduce speeds on 40mph roads, with measures such as more cycle lanes, and pedestrian islands; though it is important to avoid creating cycle pinch points, where islands are introduced.
- 4.2 For both 20mph and 30mph streets, we feel it is also necessary to use enforcement measures when new limits are introduced, perhaps for a limited period, to ensure better compliance. Speed cameras are probably the most effective means of achieving this. We are not convinced that the measures could be "self-enforcing" (*Safe7*, 6.5.3).

5 School Streets

- 5.1 We welcome the Council's intention to trial 'school streets' (6.4.3), and the other supporting actions, such as street 'corridors' around schools, to improve conditions for all road users.

6 **Air Quality**

- 6.1 We supported Option 2 in the consultation, so we are pleased with the proposal that “the Council will develop options for emission control measures for Edinburgh during 2014”, and the policy Env1:

“Env1 The Council supports the use of noxious emission control measures as a means of working towards the air quality standards set down in European legislation.”

7 **Transport - Planning Integration: Street Design**

- 7.1 We welcome the discussions on Street Design (7.1), where CEC is revising its Guidance to align better with Scottish Government policies in this area. Street Design is relevant to Planning policies as well as Transport, and it is essential that the two CEC departments work together closely on this.
- 7.2 In practice, it is too often the case that developers of large schemes pay lip service to Government policies, and present schemes at the Pre-Application (PAN) stage which look very good. These schemes then get watered down at a later stage, and most developments end up with traditional street layouts, which do nothing to favour active travel, and everything to encourage use of the private car. The Council must be more vigilant, and only grant planning permission when compliant initial designs are adhered to in the construction phase.
- 7.3 The principles we wish to see enacted here are enhanced *accessibility* and *permeability* for active travel modes, and a reduction in vehicle accessibility – the Dutch notion of offering pedestrians and cyclists the most direct routes, where vehicles have to go the long way round.
- 7.4 In many cases, this means the developer working in co-operation with neighbouring schemes, to achieve pedestrian/cycle access from one scheme into the next. Such access could, for example, benefit residents by reducing the distances to bus stops, or by giving more direct access to a cycle route. The targets for increasing active modes and reducing vehicle use, welcome as they are, will not be achieved unless these goals are worked on proactively, by ensuring the best street designs, including permeability, in all new developments.

8 **Developer Contributions**

- 8.1 We welcome the mention in the LTS of contributions from developers towards transport infrastructure, including off-site, thus:
- “The Council will therefore require planning agreements to include contributions from developers towards appropriate off-site transport measures” (4.5, p.16), and:
- “The Council will seek appropriate funding contributions from developers towards off-site measures required to address the transport impact of developments...” (8.5, p.35)
- 8.2 “Off-site measures” should include pedestrian and cycle paths in the vicinity of the development, as a means of encouraging active travel to and from the development.
- 8.3 A good example (of opportunities missed) is Kirkliston and Newbridge. Big industrial/employment schemes have been recently built in Newbridge; vast residential schemes are planned for Kirkliston North; yet the old rail line footpath connecting the two (and Queensferry High School in the other direction) remains undeveloped and hardly usable.
- 8.4 In the past, contributions to the walking/cycling budget from developers have been minimal, and we believe much can be done to achieve an increase.

9 **Road Schemes and the Notion of 'Place'**

9.1 We very much welcome CEC's wish to see residential streets become more user-friendly, for users other than car drivers, thus:

“...for much of the past 50 years, emphasis has been placed on the role of these streets for movement rather than as places. Recently this has changed. The Council wishes to take this further by adopting policies and actions that will gradually transform the city's streets which are predominantly residential into places that are mainly for walking, cycling, meeting, socialising and for children playing, while still allowing car access” (4.5, p.15), and:

“Speed is not only a safety issue. Lower speeds contribute to place-making – streets with slower traffic are more attractive to residents, pedestrians, cyclists and children and can improve the environment for business and social interaction.” (under 'Speed Reduction', 6.5, p.24).

9.2 The problem is that too many streets and road junctions etc. are still being designed by roads engineers whose principal interest is in designing for maximum traffic flows, rather than for any other kind of user. The result is streets, and junctions, which are complete anathema to any sense of 'place' or of user-friendliness to any except vehicle users.

9.3 Not only are these totally lacking in 'place', they also miss the opportunity for other and better uses of the land. The land-take required for constructing them could have gone to affordable (or any other) housing. Urban land is highly valuable, and Edinburgh works well as a city because it is mainly compact.

9.4 In this context, some of the proposals in the LTS give cause for concern – in particular, the road capacity increases envisaged for West Edinburgh (4.2.1) and SE Edinburgh (4.2.2). On the other hand, the Waterfront proposals, with its 'Promenade' as an east-west pedestrian/cycle route, look better (4.2.3).

9.5 Further cause for concern is given in 'Streets3' (p.28):

“Road capacity increases, including new roads, are sometimes proposed in existing developed areas or as part of new development. In considering the case for such a scheme, the Council will apply a two-part test as set out in **Streets3**.

“**Streets3** : Before approving any road capacity increase, the Council will seek to ensure that all viable measures for shifting vehicle trips to walking, cycling, public transport and car sharing, or for managing demand have:

- been fully adopted; and
- been found not to meet modal share or demand reduction needs.” (7.2.3)

9.6 Quite apart from the double negative implied in the last bullet point, these caveats are wholly inadequate. Instead, the question should be: “How user-friendly (to non-motorised users) would the proposed layouts be?” If we are serious about encouraging modal shift, it should become very difficult to justify *any* road capacity increases, where 'capacity' means 'vehicles'. A much stronger form of wording is needed here (and without double negatives!)

9.7 Constrained road junctions, and consequent congestion, are a necessary evil, as an incentive to drivers to adopt other modes of travel. In all cases, we should, in principle, be seeking capacity *reduction*.

10 **Reallocation of Road Space**

10.1 The laudable Outcomes (2.2), and the targets for modal shift (2.3) are unlikely to be achieved without the reallocation of carriageway space, from vehicles in favour of cyclists, pedestrians and public transport. Oddly, the LTS does not mention it except in passing. It is an important principle in itself, and worthy of separate mention, perhaps in 4.5, as an extra 'Thrive'.

- 10.2 In addition, a re-allocation to cycling should never, save in exceptional circumstances, be at the expense of the footway.
- 10.3 Furthermore, re-allocation could be measured and monitored, and become part of the list of Transport targets which would be counted under 'achievements' and 'progress to date'.

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Transform Scotland is the national sustainable transport alliance, campaigning for a more sustainable and socially-just transport system. Our membership includes bus, rail and shipping operators; local authorities; national environment and conservation groups; consultancies; and local transport campaigns. Transform Scotland Limited is a registered Scottish charity (SC041516).

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