



Inquiry into the relationship between transport and land use planning policies

Submission to Scottish Parliament Transport, Infrastructure and Climate Change Committee

Submission from Transform Scotland, Friday 7th May 2010

1 Question 1: “Is enough thought given to providing modern integrated transport connectivity and sustainable public transport provision when preparing strategic and local development plans?”

- 1.1 Plenty of *thought* has gone into such issues over the past decade – but *decisions* continue to favour unsustainable development. As such, we would contend that there has been effectively no progress.
- 1.2 To illustrate this, we refer to the **uncontrolled greenfield sprawl currently being planned for the outskirts of Aberdeen.**
- 1.3 Should it be built, the proposed Aberdeen western bypass (“Aberdeen Western Peripheral Route”) will despoil the western Green Belt of the City.¹
- 1.4 A foretaste of the destruction that will follow along the route of the proposed road can be seen by observing the sites currently being opened up for development on the existing southern approaches to the City.
 - All of these sites are entirely car-dependent.
 - There has been no provision of high-quality public transport provision prior to the development of these sites.²
 - There is no provision for road traffic demand management.
- 1.5 In effect, what is being *planned* is car-dependent commuter sprawl. This is not an accidental process. It is with the active support and encouragement of the two local authorities (Aberdeen City Council and Aberdeenshire Council), their strategic planning functions, and the regional transport partnership (NESTRANS). The development is also due to proceed with the active support of the Scottish Parliament itself.
- 1.6 The result will be greater car dependence and increased climate change emissions.
- 1.7 The opportunity cost is that there will also be less funds available to support the development of sustainable transport – that is, the funds used to build this project are funds that could instead be spent in the delivery of a more reliable and comprehensive public transport network for the benefit of all, not just those affluent enough to own and use cars.

¹ See Road Sense’s website for the best articulation of the damage that would result from this misguided project: <http://www.road-sense.org/>.

² Amongst other things, this would necessitate progress on the Aberdeen Crossrail scheme. Unfortunately, local politicians have made zero progress on this over the past decade, instead preferring to promote road-building ahead of public transport investment.

- 1.8 We predict that should the AWPR road scheme be allowed to proceed, and should the local authorities there continue to fail to implement their development control functions, that this will in coming decades be seen as one of the outstanding example of the failure of the Scottish political process to prioritise sustainable development in the public interest over catering for the demands of private developers.

2 Question 2: “Does the consideration of individual planning applications for significant developments take into account the need to provide appropriate transport solutions?”

- 2.1 Similarly, we would contend that there has been little progress in sustainable decision-making for individual projects. To illustrate this, we will use a current local example: **the St. James Quarter proposals**.

2.1.1 The proposed ‘St James Quarter’ redevelopment of the St James Centre in Edinburgh is an outstanding example of poor transport and land use decision-making. While the St James Centre is a generally unloved development, and one which many will be glad to see replaced, for the proposals for the redeveloped site to feature 1800 car parking spaces renders this development grossly unsustainable.

2.1.2 The site lies directly beside Waverley Station, is on most of the city’s major bus routes, and sits beside one of the key interchanges for the forthcoming tram network. It lies on main cycle routes and the main mode of accessing the site is on foot.

2.1.3 This is a city centre site, well located for all sustainable transport mode access – yet one of the outstanding features of the development is a vast increase in car parking provision. The proposed increase is in spite of The City of Edinburgh Council itself reporting that *“just opposite the St James centre the 1040 space Greenside car park nearly always has plenty of spaces”*.³

2.1.4 While The City of Edinburgh Council should be praised for its development brief for the site, which correctly prioritised improving access on foot (the main mode share for the site), it is extremely shoddy decision-making to allow such a prime city centre development to go ahead with such high levels of car parking. While the current St. James Centre is perhaps principally known for its architectural ugliness, we predict that the future St. James Quarter development will in future decades be highlighted as a textbook case of the gross failure of the development control function of Scottish local authorities in planning for sustainable transport and land use.

2.2 The St. James Quarter development is not an isolated example. Edinburgh is littered with the results of past poor locational decision-making. The relocation of the city’s main hospital (the Royal Infirmary of Edinburgh) to a greenfield edge-of-town site is well-known as an excellent example of misguided decision-making in transport accessibility terms. The site features extensive car parking provision (albeit with parking charges), but the location of the development means that public transport provision remains poor.⁴ The location of the new hospital is, as is too often the case, favourable to those that own a car, leading to a sub-standard provision of healthcare to those people who rely on public transport.

3 Question 3: “What practical steps could be taken through the integration of transport and land use policies which could help reduce greenhouse gas emissions?”

- 3.1 The outcome of planning decisions such as those highlighted above is a progression towards the situation that is common in communities and metropolitan areas across the United States of America, where sprawl has blighted the possibility of traditional communities with natural centres, and instead left the landscape

³ City of Edinburgh Council (2008): *CentrePulse Annual Report 2007*.

⁴ It is widely acknowledged that bus operators face difficulties in providing high-quality services to edge-of-town location. While attempts have been made to retrofit bus service provision to the site, public transport provision remains poor at certain times (e.g. there are no services accessing or leaving the site after around 23:30 (when taxis are the only way to reach or leave the site), and no real-time bus information available).

punctuated with expanses of road, strip malls and little or no provision for walking, the *most sustainable* mode of transport. This situation has been the result of poor planning decisions that favour the demands of the car owner rather than the need to plan to reduce the need to travel. We should instead be learning from our continental European neighbours, where there is a greater emphasis placed on the non-car user in planning decisions. This has led to many vibrant city centres, largely traffic free, which have managed to keep to retain small and independent shops, while in the UK the rise of out-of-town developments has in large part brought about the demise of our traditional high streets.

3.2 **Planning authorities should implement all of the measures described in CfIT's *Planning for Sustainable Travel***

3.2.1 The Commission for Integrated Transport (CfIT) published in 2009 a 'toolkit' for the delivery of sustainable transport through land use policies. The project sets out a wide range of measures that can be implemented, from advice on locational decision-making, through accessibility planning, to road traffic demand management measures. We support its advice and see no need to repeat its findings here. We instead recommend that members of the Committee read the summary report themselves: <http://www.plan4sustainabletravel.org>.

3.3 **We don't need more planning policies; we instead need to see implemented the ones we already have**

3.3.1 We already have a raft of local, regional, and national planning policies – most of which say positive things about prioritising sustainable development, sustainable land use decision-making, reducing the need to travel, transport hierarchies, etc.⁵

3.3.2 What *isn't* happening is the implementation of these policies. Instead we see the continuation of the status quo of consenting unsustainable development proposals.

3.4 **The Scottish Parliament should show political leadership by opposing unsustainable developments**

3.4.1 The CfIT's summary report ends with the following advice:

"Development location and transport investment decisions made today will influence travel for many years to come. More effective integration of the planning and transport disciplines – in policy, process and implementation – can help us to avoid 'building in' car dependency and instead plan for sustainable travel."

3.4.2 Unfortunately, we see little or no evidence that Scottish political decision-making is making the correct 'development location and transport investment decisions'.

3.4.3 We see no prospect of the reversal of the currently unsustainable trends in transport (most notably the continued increase in climate change emissions from the sector)⁶ until such time as the Scottish political class are prepared to refuse consent for car-dependent developments, be they individual traffic-generating developments (e.g. the St. James Quarter) or city-region scale planning (e.g. Aberdeen's greenfield sprawl).

3.4.4 The Scottish Parliament is complicit in this criticism. Its decision in 2009 to support National Planning Framework 2 despite its advocacy of airport expansion and a multi-billion road-building programme demonstrates that our political representatives are failing to hold the Government to account on its own unsustainable development plans. Indeed, we are unable to cite even one example where the Members of the Scottish Parliament have decided to oppose proposals on the grounds that the development would increase climate change emissions or increase car dependence.

⁵ And some of these (e.g. *Designing Streets*), we would even say is very good indeed.

⁶ See the Sustrans Scotland evidence paper for a more detailed description of unsustainable trends in transport.

3.5 **Specifically, the Scottish Parliament should stop making things worse by subsidising the expansion of road use**

3.5.1 The Scottish Government's road-building programme comes at vast cost to Scottish public finances, and yet all of them are deeply unsustainable:

- The M74 Northern Extension (£692 million) is currently under construction despite being *comprehensively rejected by an independent Public Local Inquiry*. The project will be of no benefit to the 59% of Glasgow households that have no access to a car. If the project has any beneficiaries, and we find this difficult to believe given the massive increase in pollution it will bring, they will be long-distance car commuters whose journeys may, if they're lucky, be hastened by five or ten minutes (at least until congestion takes hold again).
- The Aberdeen western bypass, as described above, is a deeply unpopular project, having attracted 10,000 objections. It is also a gross misdirection of scarce public funds. We wait with interest to see what the final price tag for this project comes out at – but given that the M74 trebled in price between the time of its commissioning (£245 million) and its outturn price (£692 million), we will not be surprised should the AWPR project end up cost upwards of £600 million.
- Finally, the vast price tag (£2.3 billion) of the proposed Second Forth Road Bridge will impoverish Scotland's finances for much of the next decade. Options to fix the existing Forth Road Bridge at a fraction of the cost have been deliberately neglected and downplayed in favour of the pursuit of this unnecessary, unsustainable and unpopular project. Should the project proceed, it will give a specific incentive to long-distance car commuting from south Fife and further afield into the Lothians.

3.5.2 In the context of the need to make 80% cuts in climate change emissions, and the continued rise in emissions from the transport sector, scaling back the current road-building programme is the one intervention which could both deliver on the CfIT's demand to make the correct 'development location and transport investment decisions' whilst simultaneously allowing for the alleviation of demands on the Scottish public finances.

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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
5 Rose Street, Edinburgh, EH2 2PR
t: 0131 243 2690

e: <info@transformscotland.org.uk>
w: <www.transformscotland.org.uk>