Consultation Responses

1.   INTRODUCTION

1.1   This report provides the Members of the Board with an update on the consultations SEStran has responded to.

2.   City of Edinburgh Council – City Plan 2030 and City Mobility Plan

2.1   SEStran responded to the joint consultation on the City of Edinburgh Council's City Plan 2030 (Local Development Plan) and City Mobility Plan. Given that the two plans are inextricably linked, a single response was submitted in addition to online responses to both questionnaires. The full response is attached to this report in item B2.2.

3.1   Recommendation

The Board is asked to note the terms of the consultation response.

Julie Vinders
Project Officer
11 June 2020

Appendix:

- **Item B2.1 City Plan 2030 and City Mobility Plan** – SEStran response 30th April 2020

City of Edinburgh Council: City Plan 2030 and City Mobility Plan Consultation
SEStran response – v.1

Introduction
SEStran welcomes the concurrent development of the City of Edinburgh Council's City Mobility Plan and City Plan 2030 (Local Development Plan).
SEStran believes that their parallel 2030 horizon brings opportunities to align development and much more efficient use of transport systems. SEStran notes that both draft plans could do more to clearly demonstrate integrated thinking, and ensure the interdependencies between them is made more explicit.
As with SEStran's view that these two plans are inextricably linked, this is a single response in addition to online responses to both questionnaires. Detailed responses to both sets of consultation questions are also provided here, but where there is an opportunity for greater alignment between them, this is clearly identified, and where possible, responses set out how this should be achieved.

Context
The strategic policy context for City Plan 2030 and the City Mobility Plan includes a number of national policy documents. But above all else, both plans play a significant role in helping Scotland achieve the interim and final targets set out in the Climate Change Act 2019. This could be made more explicit within each of the plans.
Place-based principles and values underpin both plans. Sustainable places are and will be those where communities can easily and freely move in a sustainable way and access local schools, primary healthcare facilities, shops and other amenities, without requiring longer distance or car-based travel. Shared outcomes, with clear targets in both plans will help to measure the effectiveness of the approaches at 2022, 2025 and 2030.
The absence of linkage between both plans and the content of the Regional Transport Strategy (RTS) as primary strategic context - is a key weakness which needs to be amended for SEStran's full endorsement of either plan. Section 8(1) of the Transport (Scotland) Act 2005 places a duty such that "a constituent council shall, so far as possible, perform those of its functions which relate to or which affect or are affected by transport consistently with the transport strategy of the (or, as the case may be, each) Transport Partnership of which it is a constituent council". The RTS is jointly owned by City of Edinburgh as a key partner in the Regional Transport Partnership and must inform both of these emerging policy documents.
Delivery

SEStran fully support the vision contained in the City Mobility Plan and note the ambitious target of achieving a carbon neutral city by 2030.

The subdivision of the vision into periods 2022, 2025 and 2030 is not necessary as the overall vision does not change over the next ten years. The timescales do relate to how the vision will be delivered, though and each period identifies key objectives and stages on the journey to meeting the vision. This needs to be more clearly identified in the plan. Each individual objective requires a number of outcomes to be delivered and much of the detail on these outcomes and their delivery requirements are missing from the plan.

Given the level of development and planning within these objectives the timescale for a carbon neutral transport system is extremely challenging by 2030. For example, for a comprehensive city logistics system to be in place what does this means; how this will operate, the infrastructure needed, the location of creation of distribution hubs, the engagement and support of the local business communities all have to be identified and delivered. Just as importantly the City Plan 2030 has to safeguard and deliver a planning framework and policy that allow development of this system and that will meet this requirement.

The City Mobility plan will replace the current local transport strategy so as well as identifying longer term objectives it should set out what is being delivered in the short term and a programme for the delivery of the various plans required to support plan. For clarity the Plan should include details of schemes being delivered within the budget timeframes already approved by the Council.

City Plan 2030 Questions and Responses
Choice 1 - Making Edinburgh a sustainable, active and connected city
Change A – While supportive of the aspirations of a multi-functional, local, city-wide, and regional network, the proposals only address connections with certain urban areas with others having little access to quality outdoor greenspace, other than what is defined as green network which includes private estates.
Change B/C – This option is confused between a desire for all developments to incorporate green and blue infrastructure, and an option for appropriate measures as locally defined. The increased densification of developments should exemplify the need for green and blue infrastructure to be integrated to all developments in order to support biodiversity and ecosystems, improve air quality, and adapt to a changing climate.
Change D – it is unclear as to what is being proposed in this regard towards environmental changes. Current policies seek to protect trees, species, outdoor sports facilities and other open spaces in the city. Edinburgh is fortunate to have a large number of green areas which are increasingly important if densification continues. Crucially there is mention of Env 18 which allows development on open space provided it does not impact the quality and character of the local environment. Areas that are of limited value currently could be revisited in that light and made available for communities to determine a better leisure use, to ensure that all of Edinburgh's settlements have access to large areas of green space.
Change E/F – Acknowledge that much of this is specific to new developments but requirements should apply for existing developments and planning in place to provide spaces to serve these.

Choice 2 - Improving the quality, density and accessibility of development
Change B – There is no mention of a liveable floorspace in housing developments through any of the design policies. Reaching a balance between more dwellings on less land, cannot be achieved solely through reduction in dwelling size. The provision of substandard housing impacts on mental health and discourages longer tenure that can help create stability in communities. SEStran would recommend that the Council links Choice 2 more explicitly to the City Mobility Plan's mention of Mobility Hubs; through provision of structured shared mobility

with links to public transport connections, there is potential to reduce space required for private parking and increase extra floorspace within dwellings.
Supportive of the requirement for design and access statements to support development proposals.

Choice 3 - Delivering carbon neutral buildings
Change A – supportive

Choice 4 - Creating Place Briefs and supporting the use of Local Place Plans in our communities
Change A/B – Similar to previous comments this change specifically targets new development and allows communities to determine design and requirements based on these. The reality is that many new developments are tacked onto existing communities where the majority of infrastructure will already be in situ, and the transport infrastructure needed is not fully planned, or impacts fully measured. The fact that there remains a need for specific briefs addressing the necessary transport infrastructure to support all developments must be recognised.
It is vital that the appropriate skilled resources including transport are made available to support local communities when developing Local Place Plans and Place Briefs.

Choice 5 - Delivering Community Infrastructure
Education Infrastructure – The majority of housing developments have progressed in advance of additional community infrastructure. A combination of urban and greenfield
sites development would possibly help reduce this problem. However, this must be a measured response in urban scenarios where space is restricted and further development on school estate could impact on outdoor facilities for pupils. Greenfield sites as stated provide the opportunity for all, through school-based facilities for greater community use and should be encouraged so long as future development is not approved to adversely impact school capacity. A key element of any place brief, masterplan and site brief will be to ensure that parents and pupils can safely travel by active means to schools, and that active travel is a fundamental principle of school site identification and not a retrofit requirement. It would be helpful for both plans to strongly mirror the national user hierarchy for streets and the national transport strategy investment hierarchy by explicitly advocating for safe active travel as a default option when accessing community infrastructure.

Transport Infrastructure – The corridor study carried out in support of both plans helps to set the scene for a much less car-based city area, by providing better support for sustainable movement along corridors. One issue arising from an axis-based corridor system, is the lack of sustainable orbital movement options. Much of the congestion now in evidence in the city, and particularly on the City Bypass, relates to Edinburgh 'origin and destination' traffic making 'cross sectional' movements by private car where a rapid, sustainable alternative is not available. Some aspects of the tram proposals will help to address this. However, SEStran, including input from all local authorities, especially Edinburgh, retains a proposal to introduce a wider, regional level orbital public transport and active travel route - linking park and ride sites and key employability sites across an east-west arc, similar to the bypass.
The SEStran orbital public transport and active travel orbital route is a very bold and ambitious proposal, and a strategic project that spans multiple Local Authority areas, and as such, supports productivity across the region, and not just in Edinburgh. The benefits for Edinburgh in particular, however, are that it supports the reduction in car-based travel on local roads, and thereby helps protect the quality of local places. Whilst the project requires regional coordination and significant public sector led investment, SEStran would be keen to

see this project identified in both plans, with place briefs for development (especially in the south east corridor) referencing the safeguarding of land for this purpose.

Proposed change E is generally supported but whilst it clarifies developer contribution at the plan stage, it does not make it clear when infrastructure is needed. The plan should include policies to require transport infrastructure in advance.

Choice 6 - Creating places that focus on people, not cars

Change A & B – 'create a new policy...to meet our target' or 'use Place briefs to set targets'. Is there an existing policy that is integrated? Neither of these changes make that clear and are contradictory with reduced parking levels being a determinant of high public transport use. How will targets be monitored and success measured? Policies should be put in place to ensure sufficient monitoring and measurement takes place to measure success. What will be the levers to change things if mode share targets are not met? Rather than increasing parking levels, which will lock-in car use, policies should be put in place to guide interventions required to achieve higher share of public transport and walking and cycling. These policies must strictly follow the Sustainable Transport Hierarchy and Sustainable Investment Hierarchy as set out in the National Transport Strategy 2, because particularly at new developments, there is a unique opportunity to design the layout of the development for good, reliable, and sustainable transport and active travel provision.

Choice 7 - Supporting the reduction in car use in Edinburgh

Change A – Access to car clubs must also be taken into consideration when determining parking levels in developments. Having access to a car club offers a real and viable alternative to owning a (second) car, and car club users tend to walk, cycle and use public transport more. Car clubs are complementary to the mix of sustainable transport modes and with the idea of 'use it, don't own it', access to a car club helps alleviate levels of parking required and must therefore be considered when determining these levels. Furthermore, underground parking while potentially expensive for a developer, can create better opportunities for dwellings that would be raised off street level and provide space for mixed development. Where development continues towards the fringes of the city this needs to be addressed so that public transport is readily available at a frequency that would reduce the need for car ownership and also with service provision that accesses a range of amenities that don't exist in those settlements.

Change B – Council could work with developers to offer mobility management: charge a developer for each car park that is built, or allow them to use this 'allowance' to be put into providing public transport, car clubs, cycling infrastructure, etc.

Change C – incorporate car club provision in parking policies as alternative to car ownership and to reduce parking standards and reallocate space to pedestrians, cyclists, etc. EV infrastructure should be provided in a manner that does not lock-in EV ownership and policies should prioritise providing charging facilities for electric public transport, electric taxi's, EV car clubs, and EV hubs, such as Park and Rides.

Change D – The current usage of Park and Ride is impacted by congestion that builds up in the lead up to these sites. The suggestions presented are still within the extent of congestion that would be present and would lessen the benefit of such interventions. Also, there is a need not only to safeguard sites for P&R development, but also consider the potential for frequent and reliable public transport services to that P&R. Public transport operators must be consulted with in order to determine whether servicing new P&R sites is feasible and/or preferred over expanding existing P&R sites. Furthermore, these are regional Park and Ride sites catering for mode shift of commuters and visitors from mostly out with Edinburgh. This needs to be coordinated in line with the Regional Transport Strategy, and build on the findings from the SEStran Regional Park and Ride strategic study.

Choice 8 - Delivering new walking and cycling routes
Change B – An active travel route should be something that conforms to the five characteristics in Cycling by Design, and as such should accessible for use all year round, unless extreme events prevent this. This option lists a short number of possible interventions and does nothing to address missing links that exist within the city. Active travel routes should have multiple functions and not be exclusive in their purpose for leisure, making determined connections between places to promote the option for active travel. Some of these suggestions do not necessarily address these points and when tied to Maps 10-14, routes that are classified as pre-existing would not be able to stand up to these criteria. SEStran produced a strategic study of routes making connections between settlements and longer commuting routes in 2015 and have completed a review of this in 2020, which proposes greater integration of active travel routes with surrounding local authorities.

The policy update to identify criteria for new cycle and footpath routes is supported. However, there is still an element of uncertainty on what infrastructure is needed as transport appraisal for the City Mobility Plan 2030 has not been undertaken.

The need for regional coordination of cross boundary routes is not articulated in the proposal. Reference is made to changes A and B where proposals for regional cross boundary routes are made e.g. the A71 super cycle highway.

Choice 12 - Building our new homes and infrastructure
As mentioned in response to Choice 2, all new properties should meet a standard of living that is reasonable to allow for healthy lifestyles within communities. Due to the demand for housing this needs to be a shared responsibility between Developers and RSLs to design appropriate solutions for all settings. Approvals should not be granted to designs that fall below this standard.
A suggestion to an alternative option of minimised housing growth in favour of greater transport investment that can support dispersed liveable communities and encourage employment centres to spread and reduce high concentration areas in favour of local working.

Areas 1 to 5 and maps 10 to fourteen show potential greenfield sites. Reference is made to infrastructure needs supported by the Strategic Sustainable Transport Study. However, as stated previously, without a full transport assessment to identify the transport requirements of the site there is a risk that transportation infrastructure needs are not identified for inclusion in the action plan. Again, the funding and timing of the delivery of infrastructure is not discussed in any detail. Area 5 at Calderwood has not yet had a transportation study and further development above the existing West Lothian allocations and capacity restraints caused by Kirknewton Level Crossing operation would impact on site suitability.
Choice 16 - Delivering Office, Business and Industry Floorspace
Considerable work is needed to develop a policy to deliver a city-wide freight strategy of interconnected neighbourhood goods distribution hubs that integrate with the aims of the City Mobility plan and the restriction proposed as part of the LEZ proposals. Such a policy is needed to enable the criteria for site selection and safeguarding to be fully incorporated into the City Plan 2030.

City Mobility Plan
A three-stage vision (2022, 2025 and 2030)
5. To what extent do you support or oppose the vision set out for 2022? (2022 – delivering today, planning for the future)

Strongly support	Support	Neither support nor oppose	Oppose	Strongly oppose
	X			

Please use the space below for any comments or suggestions about the vision set out for 2022:

SEStran generally supports the vision for 2022 but questions the deliverability of the proposed plans within two years. Furthermore, the deliverability of much of this depends on planning and therefore requires a joint delivery plan.

SEStran would be keen to understand what improved public transport arrangements includes, and therefore through which measures the Council will ensure these changes lead to fewer car trips. SEStran would encourage the Council to consider providing additional bus priority measures by 2022 to help implement and promote the new National Transport Strategy transport hierarchy.

SEStran's Regional Transport Strategy 2015-2025 is already in place, with a statutory role in relationship to the City Mobility Plan as noted previously, under section 8(1) of the Transport (Scotland) Act 2005. It is also true that a new Regional Transport Strategy will be finalised by 2022. The new RTS will establish an updated framework for how people and goods can move across the SEStran region, in a sustainable way, the relevance of the new RTS is that it will cover the period of the City Mobility Plan.

SEStran would welcome specific proposals for prioritisation of pedestrians and cyclists to be more clearly set out – changes in town centres and around primary school streets could, for example, be achieved by 2022 and not have to wait until after the completion of the City Centre Transformation plans.

Finally, the impacts of the outbreak of the recent coronavirus and the government restrictions to prevent the virus from spreading will now need to be considered. The positive impacts, such as increased levels of cycling and walking, should be embraced and seen as an opportunity to implement measures aimed at facilitating a permanent shift to more active modes of travel. However, the potential negative impacts of the crisis on transport (public transport in particular) should be recognised and addressed as much as possible.

6. To what extent do you support or oppose the vision set out for 2025? (2025 – bolder actions)

Strongly support	Support	Neither support nor oppose	Oppose	Strongly oppose
	X			

Please use the space below for any comments or suggestions about the vision set out for 2025:

SEStran welcomes the aspiration to achieve a broader spread of mass rapid transit within the City, however, questions the realistic deliverability of the proposals, by 2030.

These milestone dates for 2022, 2025 and 2030 should focus on outcomes and impacts the Council would like to achieve in these three stages. The focus of the City Mobility Plan

should be on setting out the outcomes that are desired to deliver the vision by these dates, and subsequently identify what policies, strategies, and interventions are needed to deliver on those outcomes by 2022, 2025 and 2030 respectively. For example, the 2030 vision mentions four interchanges: plans need to be in place by 2025 (at the latest) to deliver by 2030.

Detailed plan on reallocating road space on all arterial routes must be taken forward so implementation can start to encourage modal shift and prioritise public transport along with active travel infrastructure. Also, it is important not to simply focus on arterial routes, but consider more orbital travel routes as well, which are particularly important for commuters travelling east to west to employment centres, and alleviate pressure on the city bypass.

Having a bus strategy by 2025 should not be the objective or seen as an objective in its own right. Rather, a bus strategy should be seen as a means to deliver on a vision which is for better public transport and higher usage by 2025. To enhance the bus network and address local challenges, a regional approach must be adopted and needs to fit into a regional bus operation plan. To deliver on the objective for an improved bus network by 2025, plans should be developed now.

7. To what extent do you support or oppose the vision set out for 2030? (2030 – a city transformed)

Strongly support	Support	Neither support nor oppose	Oppose	Strongly oppose
	x			

Please use the space below for any comments or suggestions about the vision set out for 2030:

SEStran welcomes the ambition within the vision for 2030. We believe the plans for a carbon neutral and largely car free city centre by 2030 needs to be carefully delivered within a regional context, considering all modes of transport and cross-boundary travel.

If the vision for a largely car free city centre by 2030 is to be achieved, better reference could be made to the National Transport Strategy 2 and the implementation of the Sustainable Transport Hierarchy and Sustainable Investment Hierarchy, through use of the existing road network and re-allocation of road space on all streets, and not just on arterial routes or iconic streets.

City logistics system: use of hubs should be encouraged and supported: CEC should develop a strategy to encourage deliveries to shops, and hubs.

Enhancing public transport

To what extent do you support or oppose the following proposals to enhance public transport:

	Strongly support	Support	Neither support nor oppose	Oppose	Strongly oppose

	Strongly support	Support	Neither support nor oppose	Oppose	Strongly oppose
Coordinate bus, tram and bike hire operations to better serve the city and wider region	X				
Expand the tram network in the city and potentially into the wider region in order to carry high volumes of people in a clean and efficient way	X				
Introduce smart contactless payment options across all public transport and operators	X				
Support the introduction of shared transport options to complement timetabled public transport – this could include community run buses, car clubs and bike hire	X				

9. Please use the space below for any comments or suggestions on what we are doing or propose to do to enhance public transport

SEStran strongly supports the proposals to enhance public transport. Providing a variety of sustainable transport choices that are reliable and provide frequent services, encourages behavioural change and modal shift. In order to really enhance public transport and the users' experience of using public transport it is important that different modes are integrated on various levels, both physically (through visible and recognisable Mobility Hubs) and digitally (through smart ticketing/RTPI/MaaS).

Particularly the integration of active travel (cycling and walking) and car clubs through the implementation of Mobility Hubs, can enhance the viability of public transport as an alternative to owning and driving a car, because public transport gets used in conjunction with active travel and shared mobility, either through multi-modal journeys, or simply as part of a range of transport options for different journeys and purposes.

Greater consideration for Bus Rapid Transit over Light Rail Transit as implementation would have potential savings and could deliver express services to the wider region with greater ease.

People friendly streets

10. To what extent do you support or oppose the following proposals to create people friendly streets:

	Strongly support	Support	Neither support nor oppose	Oppose	Strongly oppose
Create direct, segregated cycling routes along main arterial roads to provide for safe and quick journeys by bicycle	X				
To support the transition to cleaner vehicles, develop a comprehensive network of electric vehicle charging points		X			

	Strongly support	Support	Neither support nor oppose	Oppose	Strongly oppose
Minimise the number of freight vehicle trips by developing distribution centres and click-and-collect hubs across the city	X				
Develop a city operations centre to monitor and control travel, transport and road works across the city	X				

11. Please use the space below for any comments or suggestions on what we are doing or propose to do to create people friendly streets

SEStran strongly support the introduction of cycling routes that follow arterial routes as these provide a genuine alternative for users following direct routes rather than an accommodation where possible. Direct cycle routes are key for commuters who cycle to work, and expansion of such routes is needed if more commuting by active travel modes is to be encouraged.

SEStran supports the transition to cleaner vehicles, so long as this is implemented in conjunction with measures aimed at reducing the overall number of vehicles on the road. This means that EV charging points must be strategically located so that this does not generate additional vehicle miles. Opportunities should be sought to allow existing fuelling stations to accommodate for EV charging points and reduce the risk of conflict with on street furniture. This would support existing behaviours and provide logical charging locations for visitors to the city.

SEStran supports the objective to minimise the number of freight vehicle trips, but recognises the difficulty in restricting freight movements. Alternative, more sustainable solutions, such as e-cargo bike deliveries from distribution centres and click-and-collect hubs across the city should be developed and given priority/preference.

Planning new developments

12. To what extent do you support or oppose the following proposals relating to planning new developments:

	Strongly support	Support	Neither support nor oppose	Oppose	Strongly oppose
Introduce transport hubs in major new developments to accommodate public and shared transport, and to enable co-ordinated deliveries and click-and-collect hubs	X				
Control the level of parking in and around new developments and include requirements for car club, electric vehicles and bike hire provision	X				
To change travel behaviours, require travel plans for major new developments, workplaces and schools that include targets for walking, cycling and public transport use	X				

13. Please use the space below for any comments or suggestions on what we are doing or propose to do regarding planning new developments

SEStran strongly supports the integration of public and shared transport into new housing developments. SEStran also recognises the unique opportunity to encourage behaviour change by integrating good transport provision into new housing developments. Moving house involves a lot of change, and offers an opportunity to encourage sustainable travel behaviour, before car use becomes a habit. Particularly access to car club vehicles integrated at new housing developments, in conjunction with the provision of public transport and active travel facilities (such as through Mobility Hubs), can function as a real and viable alternative to the (second) private car and reduce the need for the allocation of space to cars.

There is a direct link here to the policy considerations of the City Plan 2030 which must set an appropriate policy framework and clear planning requirements to deliver hubs and access to car clubs as part of the development approval process. While these measures should be planned as part of new development, consideration should given to the way in which these can be integrated into existing developments to provide for high density developments across the city.

Managing demand

14. To what extent do you support or oppose the following proposals relating to manage travel demand:

	Strongly support	Support	Neither support nor oppose	Oppose	Strongly oppose
To create space for public transport, walking and cycling, reduce the level of on-street parking in areas well-served by public transport whilst enabling parking for residents and people with mobility difficulties		X			
Explore the introduction of road user charging within the city to reduce the number of vehicles	X				

15. Please use the space below for any comments or suggestions on what we are doing or propose to do to manage travel demand

While SEStran strongly supports the idea of creating space for public transport, walking and cycling, and reduce the level of on-street parking, the ambition to achieve this must be stronger if a carbon neutral city centre is to be achieved by 2030. The fact is that the space allocated for public transport, walking and cycling is used by a much higher number of people than parked cars or any car on the road. Particularly in a dense city centre, we must rethink how we use and allocate the limited space we have, and design our streets in line with the transport hierarchy as set out in the National Transport Strategy 2.

Alongside providing good, reliable transport alternatives to the private car, road-user charging should be explored as a financial stimulus for behaviour change and modal shift. The regional and equalities impact, as well as the availability of other transport options, of such a measure, however, must be considered.

Impact of City Mobility Plan

There are nine protected characteristics defined in the Equality Act 2010:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

16. What, if any, impact do you think the proposed strategic priorities detailed in the City Mobility Plan will have on any of these characteristics? Please consider potentially positive, negative and differential impacts, supported by evidence, and, if applicable, advise on any mitigating actions we should take.

Many objectives of the City Mobility Plan, such as improving the public transport network, seem likely to have positive impacts on many of these protected characteristics. It is essential that these groups are considered as part of the implementation of the City Mobility Plan to ensure these groups are protected not only as an objective, but also in delivery and actual outcomes that will result from the Plan.

The City Mobility Plan is about creating more space for people, rather than cars, which seems likely to have a positive impact on all groups of society. It is pertinent that any transition to a low carbon society, and a car free city centre, is just, meaning that all groups of society can benefit from these changes.