



Response to the City of Edinburgh Council Consultation

Edinburgh: connecting our city, transforming our places

28 October 2018

1. The Role of Living Streets Edinburgh

1.1 Living Streets Edinburgh is the local group of Living Streets, the national charity for everyday walking. We aim to promote walking as a safe, enjoyable and easy way of getting around Edinburgh.

1.2 To achieve this we want to see:

- Walking given the top priority over other forms of travel in all council transport and planning policies
- Reduction in the volume of motorised traffic and its impact on people using the street
- Better designed and maintained pavements, road crossings and other pedestrian facilities
- More effective and joined-up monitoring and inspection of the walking environment by Edinburgh Council
- Planning policy which encourages dense, sustainable housing over car-dominated development
- More effective implementation of pro-walking policies 'on the ground'.

1.3 Within this context we respond to consultations by the City of Edinburgh Council on plans and policy that impact on the walking environment and we also comment on planning applications.

1.4 The publication of the prospectus “*Edinburgh: Connecting Our City, Transforming Our Places*” is the most significant consultation that the Council has ever carried out in terms of:

- Its timing against a backdrop of international, national and local acknowledgement that climate change and human health issues must be addressed **now** and cannot be left for future generations; and
- As a consequence, the scale and nature of change required to our streets and public spaces, transport infrastructure, and the behaviour of everyone using them if Edinburgh is to be a city that truly has people at its heart.

1.5 Living Streets Edinburgh Group therefore wholeheartedly welcomes this consultation, the opportunity to contribute to the discussion, and looks forward to working with the Council and others towards meaningful change in our city.

2. Response to the Prospectus

The Big Picture

- 2.1 Sometimes bold decisions are required.
- 2.2 Now is such a time for the City of Edinburgh Council following publication of the Prospectus “Connecting Our City, Transforming Our Places”.
- 2.3 It won’t be the first time that a radical decision and change of direction has been taken to improve life for the people of Edinburgh and allow the city to prosper. The 18th century saw the city fathers embark on the New Town development in response to overcrowding, poor quality buildings and insanitary conditions. Not only did this improve the lot of citizens, it enabled the city to maintain its place amongst its European counterparts during the Age of Enlightenment, a time when Voltaire said *“we look to Scotland for all our ideas of civilization.”* One wonders if he would say that if he walked around Edinburgh today.
- 2.4 Having created one of the most outstandingly beautiful cities in the world we have, since the advent of motorised transport, increasingly eroded the ability and opportunity for people to enjoy it. Not only that, we have created an environment that is crowded, unsafe and unhealthy. The very attributes that the New Town sought to address.
- 2.5 In 1895 there were 15 motor vehicles in the whole of UK, by the 2011 census there were 181000 cars owned by Edinburgh residents alone. Factor in additional commuter/visitor traffic, HGVs/commercial vehicles, buses and the scale/nature of the problem is apparent.

Instead of using the motor vehicle as a tool to be managed for the greater good, it has been allowed to dominate and shape our environment and dictate our relationship with it. Some of us use cars, but *all of us* are pedestrians. Yet people are directed to move around the streets and public spaces in a way that minimises disruption to traffic flow – motor vehicles remain in charge. This is a far cry from the philosophy of Patrick Geddes, who contributed so much to Edinburgh and the world and recognized the fundamental relationship between folk and place.

- 2.6 Our statutory planning system has now been in place for 70 years, yet this situation has been perpetuated across the country, including Edinburgh, and continues in the face of widespread evidence of the negative impacts and the existence of Scottish Planning Policy, which clearly prioritises travel modes - walking, cycling, public transport, and cars in that order. Despite being Scottish Government policy, this hierarchy has yet to underpin the local development plan and decisions on planning applications.
- 2.7 Disregard of the hierarchy and the need to change our behaviour is borne out by analysis of 2017 Household Survey Data for Transport Scotland that shows Edinburgh has experienced a sharp decline in walking as the main mode of commutes under 5 miles to work. This is in contrast to the position in Glasgow and Scotland as a whole where walking has at least remained more or less constant.

- 2.8 There has been a realization elsewhere in Europe and further afield that this is no way to plan for cities and towns. Slowly, but surely, streets and public spaces in many cities are being reclaimed for the people who use them, a process that in some cases has been underway for decades. If municipal authorities in cities as diverse as Melbourne, Copenhagen, Ghent, Bologna, Utrecht, Madrid, Oslo and New York are able to face up to the challenge and pursue a transformational agenda that benefits people and local economies, then surely Edinburgh can do likewise. It could be the beginning of a New Age of Enlightenment focused on people and place.
- 2.9 People and place: *people* are designed to walk, so provide *places* conducive to walking and the benefits that follow are significant. Not only in terms of health, but also by facilitating people coming together, fostering a sense of community and helping to address social exclusion. More than that, it is better for the local economy with greater footfall more likely to spend than those who drive past. Look to Jan Gehl whose starting point has always been to design and plan for human proportions and speed of travel. The Council is directed to the Living Streets report "*The pedestrian pound - The business case for better streets and spaces*".
https://www.livingstreets.org.uk/media/1391/pedestrian_pound_fullreport_web.pdf
- 2.10 It is accepted that the initial decision will require courage by the City of Edinburgh Council in the face of inertia, vested interests and fear of change. But other cities have done it, Edinburgh has in the past, and can do so again. Take a lead from the Spanish city of Pontevedra where a new mayor provided the catalyst to swiftly address longstanding problems and in a very short time radically

transformed the historic city on the basis that cars don't have an automatic right to occupy public space. As César Mosquera, that city's head of infrastructure so eloquently put it: *"How can it be that the elderly or children aren't able to use the street because of cars? How can it be that private property – the car – occupies the public space?"*

- 2.11 Taking a wider perspective, the climate change agenda requires positive action at every level from Government down to the individual; we are all in it together. However, with transport we are going backwards.
- 2.12 The independent Committee on Climate Change reports on Scotland's progress towards meeting emissions targets, as requested by Scottish Ministers under the Climate Change (Scotland) Act 2009. The most recent report found that transport emissions had actually increased by 2% in 2016.
- 2.13 The City of Edinburgh Council air quality monitoring identifies an overall reduction in vehicle pollutants, but acknowledges that there are many locations within the monitoring areas where safe levels are actually being exceeded. Anyone experiencing Edinburgh streets as a resident or pedestrian knows that air quality is poor within the city centre and along several other routes in the city.
- 2.14 The Intergovernmental Panel on Climate Change recently published a Special Report on Global Warming of 1.5°C. The report finds that limiting global warming to 1.5°C would require "rapid and far-reaching" transitions in land, energy, industry, buildings, transport, and cities. Closer to home the UK Government has committed to having zero

emission new cars by 2040 and in light of latest evidence is under pressure to bring this forward to 2032.

- 2.15 Against this background, the consultation is timely and Edinburgh has an opportunity to once again be at the forefront of city planning. As Councillor Lesley Macinnes says in her foreword to the Prospectus:

“Reducing congestion and vehicle-borne air pollution, improving journey times by public transport, realising the lifelong health benefits of walking and cycling, and creating streets and public spaces that support city living for all are key to sustaining our inspiring capital city.”

- 2.16 No one would argue with that and the case contained within the Prospectus clearly points towards the need for a radical change in direction. The Prospectus states unambiguously that *no change is not an option*, but then offers *business as usual* and *a strategic approach* as choices which in effect amount to *no change*, given the scale and nature of the circumstances that face us.

- 2.17 Thankfully, *transformational change* is presented as the third option and it is clear on reading the document that this is really the direction the authors and Council consider to be necessary and hope to pursue if they receive support. The Prospectus states that a transformational approach would involve a radical rethink of how the city moves and operates. Well, a radical rethink is exactly what is required; the time for tinkering around the edges and ignoring the evidence has long since passed.

- 2.18 The Prospectus sets a date of 2050 for achieving the kind of city we aspire to. In light of the issues facing us as a city, nation and planet this is not nearly ambitious enough. Once the decision has been taken to pursue transformational change, a date of 2030 should be set. This will enable everyone involved to focus on planning and realising actions within a timeframe we can all relate to and benefit from.
- 2.19 Transformational change is an overarching decision of principle that should then provide a framework and context for the Mobility Plan, Low Emission Zones, Local Development Plan and other strategies/plans that follow.
- 2.20 Whilst it is appreciated that work on information gathering and identification of potential allocations has to continue, it is disconcerting to hear that the next Local Development Plan is currently being prepared in parallel with this Prospectus rather than taking a lead from it. Transformational change will necessitate a fundamental rethink on, for example, movement patterns and infrastructure and the location of allocated sites. It makes better sense for this to be reflected in the Main Issues Report (MIR): consequently publication/consultation on the MIR should not take place until the fundamental decisions on transformational change and likely range of consequential actions have been taken.

Comments on the Themes and Ideas

- 2.21 In broad terms the 3 themes and 15 ideas in the Prospectus should of course all be pursued, although there will be instances where the detail will need revision or adjustment to reflect the position of walking at the top of the movement hierarchy and to reflect comments in

this submission. One fact is abundantly clear; all of this can only be realised by transformational change. In many ways the ideas therefore have to be more radical.

- 2.22 In terms of the position of walking in the movement hierarchy, and to reflect that this is a citywide aspiration, Idea 1 should simply refer to *A Walkable City* as the intention, with recognition in supporting text that the city centre has particular issues that must be urgently addressed. In this regard, Living Streets Edinburgh has adopted a 10 point plan for the city centre (**Appendix 1** attached) which should be taken on board as part of the transformational change project.
- 2.23 The opening words of Idea 1, “*reducing the dominance of vehicular traffic*”, effectively constitute an overarching objective which will in turn enable the realisation of the other ideas in the Prospectus. Recent actions such as the reconfiguration of Picardy Place and re-opening of Leith Street accommodate and perpetuate the dominance of vehicular traffic – so the Council really has to markedly change direction to show it is serious about this Prospectus.
- 2.24 A relatively straightforward early demonstration of intent would be the phased removal of a significant amount of on street parking. The local transport strategy has a target of reducing car commuting from 42% to 29%. The new St. James Centre will have parking for 1700 cars, so there is off-street parking available. The removal of on-street parking, in and around the city centre in the first instance, is an action wholly within the Council’s control. A similar programme is well underway in Oslo and has led to an increase in walking and wider active travel. The removal of on street parking will in turn allow for the

creation of wider pavements, on street cycle lanes and associated reconfiguration of streets to remove vehicle priority. These actions will complement other measures taken under Idea 14, Controlling the Impact of Commuter Parking.

- 2.25 Although it may be implicit in sections of the Prospectus, it is suggested that the document would benefit from a section on equality and the application of the Equality Act (2010) setting out how proper consideration has been taken during work on the Prospectus itself and how it will be intrinsic to the plans and actions that follow. This is critical as transformational change has to benefit the whole community, including those who have been previously been forgotten when designing simple details for pavements, street furniture, pedestrian crossing times etc.
- 2.26 Under Idea 3 *Strengthening our town centres*, the economic benefits that tourism brings could be distributed more evenly by encouraging accommodation and associated provision across the city, with enhanced public transport and walking routes for people to get to the popular destinations. This would alleviate pressures on the city centre, which, in tandem with prioritising walking in line with the Scottish Government hierarchy, would contribute to the wider transformation agenda.
- 2.27 Buses are a strength and a real success story for Edinburgh compared to other cities. The Council should recognise this and build on it. Idea 4 as written runs counter to this and potentially to Ideas 5 and 11. There will certainly be scope for some rationalisation and route modifications as part of prioritising the city centre for pedestrians. However, great care has to be taken to

maximize the scope for through routes, as having to change buses will be a disincentive for many users and will run counter to the intention of Idea 4 to create better accessibility.

- 2.28 Contrary to what is implied in Idea 4, buses are not in themselves the problem. Given the air quality challenges and emission targets, it is better to concentrate on transforming the whole bus fleet to zero or low emission. This along with some rationalisation, removal of cars and reduction in commercial traffic will help secure the improvements required in the city centre.

Conclusion

- 2.29 Transformational change requires the City of Edinburgh Council to state unambiguously that movement across all of Edinburgh will be based on the hierarchy set out in Scottish Planning Policy, with walking the first option, and that this will be reflected at all levels of decision making.
- 2.30 In preparing and consulting on this Prospectus the City of Edinburgh Council has taken an important step in securing transformational change for residents, visitors and the local economy. It is critical that momentum is maintained and the transformational change becomes a reality, thus maintaining the tradition that started with the New Town, continued with being the first Scottish local authority to appoint a Medical Officer of Health in 1862, and more recently the implementation of smoke control areas, ban on smoking in enclosed public spaces, and the introduction of 20mph speed limits across the city.

- 2.31 Living Streets Edinburgh would very much like to sit down with the City of Edinburgh Council and others to work on the detail of the various ideas and a full implementation programme for bringing about transformational change by 2030.
- 2.32 Thank you again for the opportunity to contribute to this discussion. When the responses to the consultation are reported to the Council, Living Streets Edinburgh respectfully requests that this submission be reported in **full** without editing or précis.

Living Streets Edinburgh
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