

Strategic Development Plan (SDP) for South-East Scotland (SESplan)

Response to the Consultation on behalf of Spokes (the Lothians Cycle Campaign)
and CTC Lothians, Dec. 2011

Executive Summary:

The principal problem facing all planning is sustainability. Our current lifestyle, in Scotland, is unsustainable by a factor of about three. To live sustainably means cutting our consumption of resources to one-third of what it is now.

The aim of a Strategic Development Plan (SDP) should therefore be to move to sustainability as the goal for the next 20-30 years and beyond, to set the parameters for this for the public sector at least, and to show how our economy might evolve from unsustainable, old-fashioned “economic growth no matter what the consequences for the planet”, to a sustainable model which might even not grow but just maintain stability, yet still provide what we all need – especially jobs.

The Plan mentions the demands of the Government's SPP priorities in the broadest terms, and recognises the need for significant change in the coming 20 years. The detailed proposals for transport however are too devoted to traditional infrastructure – road and heavy rail. They say almost nothing on promoting active travel, and far too little on the potential for a tram network. If SE Scotland is to compete with other regions of Europe in attracting business and commerce, it has to offer a modern public transport network. At the moment, the Plan's proposals hardly bear comparison with travel developments elsewhere in Europe.

The final document should in our view devote at least 10% of its coverage to active travel, and generally follow the SPP hierarchy in its allocation of coverage, by emphasising measures to reduce the need to travel, by including trams under public transport, and by putting road schemes at the bottom of the hierarchy.

The constituent Local Authorities should be asked to revise their wish-lists in accord with these principles, while the larger public transport schemes should be guided by the regional authority, and funded nationally; together, these could then form the basis of a more sustainable regional Plan.

Note: We shall respond mainly to the implications for travel and transport. Our response takes in the main document (the Plan), and two associated documents, the Action Programme, and the Transport Technical Note (TTN).

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1 The Plan

1.1 Aims:

The Plan begins with a list of aims.

Among the 8 stated aims (Plan, 17) we welcome in particular the following:

“(3) Integrate land use and transport, reduce the need to travel and cut carbon emissions by steering new development to the most sustainable locations.

(4) Conserve and enhance the natural and built environment.

(5) Promote green networks including through increasing woodland planting to increase competitiveness, enhance biodiversity and create more attractive, healthier places to live.

(6) Promote the development of urban brownfield land for appropriate uses.

(8) Contribute to the response to climate change through mitigation and adaptation and promote high quality design / development.” (our numbering)

We welcome also the recognition that recent economic events have a significant influence on the Plan's proposals:

“It is evident that completions of housing developments have been reduced by the economic downturn, with the programmed effective five year housing land supply significantly reduced as a result.

The issue is one of delivery rather than supply.

There will continue to be major challenges to the delivery of housing and other elements of the Plan both in the short and medium terms, *since the resources available for both development and the supporting infrastructure will continue to be constrained*” (Plan, 23, 24) – our italics.

The reference to limited resources for infrastructure is significant, because resources spent on cycling are not just cheap compared with roads and rail, but also extremely good value for money.

1.2 Strategic Infrastructure

Figure 2 (p.10 of Plan) summarises the proposed Strategic Infrastructure, most of which is transport related. Despite the reference in the Aims to “reduce the need to travel, cut carbon emissions,... promote green networks etc,the Strategic Infrastructure not only includes expansion of the airport, but also an alarmingly high number of road schemes, especially outside the 'Regional Core' (ie outside Edinburgh), which raise questions of the commitment to climate change, and to what extent the claimed 'sustainable economic growth' is any different from traditional economic growth.

This is not entirely the fault of the SDP, since many of the schemes are promoted by the Government under NPF2. The latter is itself extremely flawed. Biassed as it is towards road and air schemes, it can be said to belong to a previous era. Only one of the 14 NPF2 schemes (the Central Scotland Green Network) could be called sustainable. If the SDP really believes in sustainable development, its role should thus be to challenge NPF2, rather than just accept it.

Although sustainable economic growth is given a definition, the document fails to outline how it is to be achieved, and the kinds of changes to lifestyle etc that might be involved. This is a major omission.

1.3 Road, rail – and trams?

The Plan is a document for the region. As such, it's surprising there is so little focus on tram development. Most comparable European city-regions have either developed a tram network already or are well advanced in the planning thereof. If SE Scotland is to compete with similar regions of Europe for trade and business, tourism etc, is a modern public transport network not essential?

Trams have many advantages over both road and rail – they can penetrate to the heart of the town, they can run where people have easy access to them (ie along main roads), they are fast, quiet, and emission-free, carry larger numbers of passengers than buses, take road space which would otherwise be taken by cars; etc.

Given these advantages, surely by 2032 we should be entitled to expect trams running from the city to all the main towns that could be connected – Dalkeith, Musselburgh, Penicuik, Livingston, perhaps Dunfermline? Why are these not in the Plan? Why are we apparently hidebound to outdated road and heavy-rail? If it's objected that the region could never afford such schemes, our response would be that, in European terms, the whole of Scotland would be a single region, and major urban transport schemes would be funded nationally. Funding currently allocated to roads could be better used to build a 21st century public transport network.

1.4 The Transportation Section (117-9)

Transportation issues as a section in the Plan are covered surprisingly briefly, perhaps because the Plan finds itself unable to reconcile the conflict between the traditional 'build more roads' approach and the new priorities of reducing the need to travel, and of putting walking and cycling at the top of the transport hierarchy and the private car at the bottom. (The SDP is not alone in this: the Government has also failed to reconcile the conflict – or rather, it has avoided the implications, by paying lip service to the latter, while directing all spending to the former.)

Evidence of this conflict is manifest in nearly every paragraph of the transportation section of the Plan. For example, the very first para:

“117 Reducing the need to travel and promoting use of sustainable modes of transport are key principles underpinning the Spatial Strategy for the SESplan area. Meeting the identified level of housing need and economic growth aspirations will have implications for the transport network. The network is already heavily constrained and some stretches and junctions will come under further pressure even without any further development.” (Plan, 117)

The first two sentences are fine. At the end of the second, “...the transport network” could include everything – bus, rail, tram, cycle etc. But then the last sentence gives it away. By “the network is already constrained” it is immediately obvious that the reference is to the ROADS network. (There's no “constraint” on rail, bus, cycling, or walking!). The implication is that 'transport' means 'roads'.

“118 Travel demands resulting from new development should be met, as far as possible, by sustainable forms of transport including public transport. SESplan supports the enhancement of accessibility and travel choice for all sectors of the community. In the first instance, development will be guided to areas that are capable of being well served by public transport and that are accessible by foot and cycle to reduce the need to travel by private car. “ (Plan, 118).

This is excellent (except that 'travel choice for all sectors of the community' could be code for 'most people want to travel by car'). But then:

“119 LDPs should make provision for the priority strategic interventions detailed in Figure 2 (Strategic Infrastructure) and in the accompanying Action Programme.” (Plan, 119)

As we have already pointed out, the majority of these 'priority strategic interventions' in Figure 2 are roads schemes or airport expansion. So para 119 is in direct conflict with the laudable aims of para 118.

And these 3 paragraphs, 117-9, are virtually all this section has to say about Transportation. Given that walking and cycling are put at the top of the transport hierarchy, it is very disappointing that the Plan has nothing to say about the need to enhance existing cycle routes and build new ones. It is clear, too, that cycling at least has a regional (cross-border) dimension, since, for example, commuting into Edinburgh from West Lothian, Midlothian, and East Lothian, and even from Fife, is not only possible, but already happening.

And in other towns, such as Livingston, the active travel modes could gain a much higher modal share through promotion of excellent existing off-road and on-road networks.

The City of Edinburgh has already shown how this can be achieved. Pro-cycling policies over a number of years have resulted in big increases in cycling numbers. 'Spokes' undertakes twice-yearly counts of cycles and other traffic. These show regular increases in cycling, and, quite regularly, a decrease in car use – exactly the sort of modal shift we should aspire to everywhere.

This is not to say that more can't be done, but the Plan should have at least several paragraphs devoted to what has been achieved for cycling in Edinburgh, and how the lessons learnt can be applied more widely across the region.

It is interesting that, according to the Plan, a 1.5% annual increase in car traffic “exacerbates existing congestion hotspots ... the A720 city bypass, the A701 and A7 in Midlothian, the western approaches, the A92 through Fife” etc – and requires expensive remedial measures, such as grade separation at Sheriffhall – but a 1.5% annual increase in cycling not only makes no demands, but passes entirely unnoticed in the Plan!

1.5 The SPP Travel Hierarchy

Government policy on travel does not (to our knowledge) appear in the main Plan (though it should be on the front page) but is found in the Transport Technical Note, and is reproduced here:

2.16 The choice of the most relevant measures to use should be directed by existing policy. **Scottish Planning Policy**⁵ suggests that opportunities for personal travel should be prioritised

by mode in the following order: walking, cycling, public transport, car, and other vehicles. An assessment of development locations should therefore reflect this modal prioritisation and, from a transport perspective, development should therefore be focussed on areas which:

- minimise the overall need to travel;
- maximise opportunities for active travel;
- maximise the potential for the use of public transport; and
- minimise associated car travel.

On this basis, should the Plan not be organised so as to take each of the above in order of priority, starting with discussions on how the overall need to travel is to be reduced, and then on how walking and cycling are to be increased?

1.5.1 Minimise need to travel:

To its credit, the Plan does contain numerous references to the importance of development location, as above, in reducing the need to travel. But there is much more to it than that. It should be allied to the need to regenerate our High Streets, which could be retail centres of excellence within walking and cycling distance of residential areas. To achieve this, out-of-town retail “parks” would have to be discouraged, for example by making drivers pay to park there. Although traffic management is broadly the remit of the Government, Local Authorities (LAs) do have some scope for managing demand, and the Plan should not only be setting out how this will be done, but also encouraging its constituent LAs to take up these measures.

1.5 2 Maximise opportunities for active travel:

As regards cycling, the Plan should at least be mentioning CAPS, the Cycle Action Plan, which sets a target of 10% of journeys by cycle by 2020. This is a national target, so the regional Plans should, at a minimum, be adopting this target, and discussing ways in which it is to be achieved. Indeed, City of Edinburgh has set a target of 15% modal share for cycling by 2020, and is investing accordingly. On present showing, the target might be reached, so long as proper funding continues.

Since the Plan is for 20 years, to 2032, a reasonable modal share by then might be 20%, but there has to be investment, and that should be in the Plan, and should start now.

The means for increasing the modal share of cycling have their own hierarchy (outlined in the DfT's LTN 1/08). This is, broadly:

- Reduce traffic speeds
- Re-allocate road space in favour of cycling (and, in towns, walking)
- Improve infrastructure at critical points, such as roundabouts
- Maintain better road surfaces
- Increase and upgrade off-road provision

The rationale for the hierarchy is that cyclists and non-cyclists alike cite 'danger from traffic' as the major deterrent to cycling, which can be addressed to some extent by reducing traffic speeds, to make them more equal to those of cyclists.

Putting 'off-road provision' at the bottom of the hierarchy does not reduce its importance. It merely signals that off-road provision can never be a total solution – it would be virtually impossible to construct an off-road route for every on-road equivalent; therefore cyclists have to be accommodated on the existing road network.

The role of the 10% figure:

It would be reasonable to seek, from the Plan, a minimum of 10% of its transportation coverage to be devoted to cycling. This is because CAPS is calling for a modal share of 10% by 2020; (and since the Plan looks forward to 2032, an even higher cycling target can be expected by then); in addition, a consortium of about 100 authorities, led by the Association of Directors of Public Health (ADPH), are calling for a minimum of 10% of the transport budget to be devoted to Active Travel (walking and cycling).

Cycling schemes as value for money: the health perspective:

The involvement of the ADPH is significant, because the major *economic* benefits of a switch to cycling lie in the field of health. There is growing evidence of the advantages of combining travel (to work, school, shops, leisure activities etc) with a daily dose (or two) of much-needed physical activity. The evidence is UK-based, but should apply with particular force to Scotland, whose record of obesity and lack of regular physical activity is among the worst in Europe.

The health evidence is well summarised in a CTC Briefing:

http://www.ctc.org.uk/resources/Campaigns/11_Cycling-and-Health_brf.pdf

and supporting evidence can be found at:

http://www.ciltuk.org.uk/download/Cycling_Health_Full_Report.pdf

A summary of the economic benefits of cycling is at:

<http://www.nici.org.uk/downloads/planning-for-cycling-exec-summary-10-3-09.pdf>

Cycling offers flexibility of travel in the same way as the car does – unlike public transport, it is normally a door-to-door solution – obviously for shorter distances, but totally viable in towns and cities. One great advantage is that the required changes in infrastructure are relatively cheap, especially compared with the road and rail programs in NPF2, and even the additional schemes outlined in the SDP's Action Programme (which we return to later). For the straitened times in which we live, this is very significant.

1.5.3 Maximise the potential for public transport:

That would include a discussion of the advantages of trams over road and heavy rail, and plans to promote the former (see 1.3 above).

1.6 Generally, the Plan appears to have little understanding of the implications of the travel hierarchy outlined in 2.16 above, which puts walking and cycling at the top, and the car last. This is illustrated by the very next paragraph:

2.17 The over-riding objective here from the SEStran / Transport Scotland perspective is to minimise the negative impacts of new development on the transport network, principally congestion and vehicle kilometres travelled (which contributes to emissions / accidents). This should be seen in the context of the current transport networks and known congestion 'hot spots', which are generally focussed on the area's key junctions. The impacts of varying development strategies on the operation of the network is planned to be systematically assessed using the SEStran Regional Transport Model.

In the first sentence, note the conjunction of the "SEStran perspective" with that of 'Transport Scotland' – an unholy alliance if ever there was. The latter has little interest in,

or understanding of, the benefits of the Active Travel modes at the top of the hierarchy, but great understanding of, and sympathy with, the mode given the lowest priority. The rest of the para is all about congestion – ROADS congestion – which unfortunately sets the tone for the Plan, and its associated documents.

2 The Action Programme

This is a subsidiary document, whose purpose, in brief, is as follows:

“The Action Programme will address the ‘how’, the ‘when’ and ‘by who’ and has the following legal requirements:

A list of actions required to deliver each of the Plan’s policies and proposals;

.....

The timescale for carrying out each action; and,

Consult and consider the views of:

o The key agencies;

o The Scottish Ministers; and

o Those responsible for actions identified in the Action Programme.

1.2 The purpose of the Action Programme is to set out how the SDP will be implemented, and which actions are related to specific SDP policies.”

Since active travel is top priority according to SPP, the 'key agencies' here should include the major cycling organisations in Scotland, such as Cycling Scotland, Sustrans, CTC, and perhaps the biggest campaign group, Spokes, as well as pro-walking groups like Living Streets.

The Action Programme begins with relevant NPF2 actions, of which there are 38 in all. Of these, only four can be considered to be truly sustainable; 20, 'promote active travel'; 21, *investigate potential for a National Coastal Trail* (our italics - note the wording: not the 'develop, design and deliver' wording accorded to the roads actions); 19, 'promote increased use of canal network' (sustainable insofar as towpath use is now the biggest use of the canals); and 23, 'create sustainable communities'.

This is followed by a list of 'Actions' for each of the sub-regions in turn. For the 'Regional Core', ie Edinburgh, there are 25, beginning with 6 rail-related, 5 tram-related, and 3 bus-related. 5 of the actions are road improvements or car-based, like Park and Ride. Active Travel is mentioned twice. And this is for a city which leads the way in providing for and supporting active travel in Scotland!

The Actions for the other sub-regions are even further away from the hierarchy of travel priority. West Lothian for example has 9 car-oriented actions, 2 on buses, 2 on rail, while active travel doesn't even get its own action, it is lumped in with 'bus priority' (item 116).

Taking the figure of 10% mentioned earlier, this should be applied to the Action Programme. We need to know what specific actions are proposed, regionally and for each sub-region, to promote the most sustainable travel modes, namely active travel.

In addition , there could be actions aimed at *combining* the modes. It is a 'given' that bus and rail will be combined with walking, since the public transport modes do not and cannot offer a door-to-door travel solution; what is not so obvious are the ways in which public transport and *cycling* can enhance each other – bike parking at stations (bus stations too); bikes on buses – excellent for making rural buses viable – and bikes on trains, and indeed on trams; schemes for hiring bikes at stations; bike 'hubs' offering an all-in service for cyclists in combination with public transport.

The list goes on – but where is it in the Action Programme? And why is it not there?

The Action Programme has presumably been compiled from a 'wish list' of (mainly road) schemes put forward by each of the constituent LAs in the region. **We believe the compilers should go back to each LA and ask them to come up with a wish list of a) schemes for reducing the need to travel, and b) schemes for promoting walking and cycling, over the next 20 years.** These could then be given suitable prominence in the Action Programme, and would go some way towards fulfilling the 10% document coverage these modes deserve.

3 TTN and the MVA Accessibility Analysis

Another associated document, the Transport Technical Note, includes an 'Accessibility Analysis' undertaken by MVA Consultancy. Again the overall emphasis is on congestion and road schemes, but towards the end, some of their conclusions are very revealing:

“3.22 However, the impacts [of road schemes] on traffic levels and congestion are small when viewed at the regional level. This is in the main due to the large amount of suppressed demand for car travel in the area. Additional road capacity provided, or made available through modal shift, is taken up by this suppressed demand.” (p.29)

This conclusion follows a 'do-something' list of expensive schemes, including road schemes. It is a damning admission that costly schemes do not succeed in reducing congestion.

“3.23 The forecast is based on standard WEBtag assumptions and the MIR land use / demographic scenario suggests that road traffic would continue to grow at 1.2% per annum over a 25 year period. The high level emissions analysis suggests that, in order to meet the 2020 emissions reduction target, traffic levels would in fact have to *reduce* by around 1.5% per annum.” (ibid.)

So the expensive schemes not only fail to reduce congestion, but also increase emissions, in a scenario where we are all supposed to be committed to their reduction.

“3.24 In response to this, MVA then considered a 'radical' scenario which modelled a significant escalation in fuel prices and the implementation of parking charges across the SEStran area to reflect the Regional Parking Strategy. Whilst the full details are contained within Information Note 6 Version 6.2 (appendix 2), the analysis suggests that a policy package such as this would have a significant impact upon tempering traffic growth, and allied to vehicle efficiency improvements could go a long way towards meeting emissions reduction targets. MVA do note however, the scale of the measures required to invoke changes of this magnitude.” (ibid.)

Perhaps not surprisingly, the Plan itself makes no reference to this 'radical scenario', which is 'buried' in a Technical Note most people will not read. To be fair, MVA admit that such measures are 'outside the scope of the SDP':

“4.7 The MVA analysis demonstrates that the SDP allocations accounting for existing committed improvements, and proposing further improvements also results in a suboptimal solution, not addressing the congestion on the network. A further 'radical scenario' demonstrates the scale of the measures required to have a demonstrable impact upon congestion on the network. Such a scenario was modelled in order to demonstrate the extent of interventions required to have an impact on reducing congestion and in practice, the fuel price and parking charge variables modelled within the radical scenario would sit outside of the scope of the SDP or associated

Action Programme.” (TTN, p.31).

The conclusion is, nevertheless, that big road (and even rail) schemes do not offer value for money; whereas we cycling organisations have evidence that small schemes to promote walking and cycling usually have a very high cost-benefit ratio (CBR) (up to 10 times higher than any road scheme), and are also relatively cheap. The problem is, under current methods of evaluation such as the STAG principles, cycling schemes have never been given a fair assessment, which might incorporate factors such as health, reduction of carbon emissions, and reducing the demand for land-take (among many other benefits of cycling, which are also never included).

Re the last point (land take), the Plan does, to its credit, point out the relationship between transport and land use, but still fails to register the continued impact of the private car, and of car use, on land take – the fact that the car takes up space wherever it is, either moving or stationary, whether parked by the home, at work, at a supermarket, at retail or leisure 'parks', etc – and that the amount of land required and dedicated to the car is mostly valuable urban land, which could be better used. Electric vehicles, sometimes advocated as a panacea, would still have the same negative impacts on land, even if the electricity comes entirely from sustainable resources.

Further information, in an appendix of the MVA study, mentions the role that could be played by Smarter Choices schemes:

“Smarter Choices

5.6 'The Effects of Smarter Choice Programmes in the Sustainable Travel Towns' was published in February 2010³ and reports on three extensive demonstration projects of Personalised Travel Planning in medium-sized English towns.

5.7 In outline terms, the report suggests that car driver km was reduced by 5%-7% compared to a fall of around 1% in the control areas (attributable to the recession). As such its probably fair to assume that a SEStran area-wide PTP programme could cut car-km by around 5% in the medium term, although this figure could potentially be higher. (TTN, p.23)

And the 'radical scenario' which mentions fuel prices is explained as follows:

Fuel Prices

5.8 A key issue in determining travel behaviour and mode choice in recent decades has been the relative cost of transport by mode. The key point is that the cost of motoring has been reducing in real terms whilst the cost of travelling by train or bus has been increasing in real terms as shown below. [Fig 23 shows this in graphic form]

5.9 A significant rebalancing of the cost of travel by mode would have a major effect on modal choice. For example, there is a good consensus in the literature that the elasticity of fuel prices per litre to vehicle kilometres travelled is around -0.3.4

5.10 In order to meet the 2020 climate change targets, based on the March 2010 WebTAG assumption, traffic levels would have to reduce by around 15% from the 2007 base to 2020. Stable traffic levels would bring only a 20% reduction in emissions.

5.11 The figure below shows the forecast traffic levels for the modelled Reference and Test Cases (identical below) together with the adjusted profiles assuming the smarter choices and fuel prices changes below. This suggests that a combination of a higher fuel price reducing demand together with the technological improvements envisaged would reduce the forecast demand in a way which is consistent with the 2020 climate change targets.” (TTN,p.24)

MVA also modelled the introduction of parking charges, and concluded:

6.6 This suggests that a policy package such as this would have a significant impact on tempering traffic growth. Allied to vehicle efficiency improvements, this could go a long way towards meeting emissions reduction targets.

So in the wider context, the emissions targets could be achieved by including some or all

of these measures. It seems perverse that the main Plan does not mention these as a possibility.

4 Conclusion:

SPP puts walking and cycling at the top of the list of travel priority, reflecting its importance for health, the environment, land use, and much else.

CAPS has set a target of 10% of modal share for cycling by 2020. The Association of Directors of Public Health, supported by many other organisations, have called for 10% of transport spending to be devoted to active travel. Based on this, we call for the Plan, and associated documents including the Action Programme, to devote 10% of its coverage to active travel, including the types of infrastructure changes that will be needed, plus other supporting measures, in each LA.

The Plan is commended for recognising the importance of public transport, and for its honest acknowledgement of the current economic situation, though it could extend the latter to a recognition that all projections, including those of traffic increases, are based on trends of the previous decade, and might have to be revised substantially downwards in view of a recession that could last for years.

The focus of the Plan, which is still dominated by Transport Scotland and the NPF2, needs to be shifted towards active travel and public transport. Cycling and walking schemes offer excellent value for money, and their implementation is cheap by comparison. Road schemes are very expensive, and might not even be needed if traffic levels are in decline.

The Plan has very little to say on the important role that could be played by a tram network, and the advantages of trams over traditional road/heavy rail schemes. Yes, Edinburgh might be having a bad experience, but we need to raise our sights and see what is being achieved in the rest of Europe. Funding allocated for roads should be re-directed to public transport.

The Plan offers a unique opportunity to accept that what has happened in the past cannot continue, and that our lifestyles have to be nudged towards greater sustainability. It thus bears a considerable level of responsibility. In the field of transport at least, the Plan has not, in our view, met this obligation – there is far too much emphasis on the car as the favoured mode. We have suggested ways in which we feel the Plan's orientation can be improved. We have suggested that LAs should be asked to draw up a wish list of cycling/walking schemes, which could be included in the Action Programme to make it better balanced.

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Spokes, the Lothians Cycle Campaign, has over 1000 members in Edinburgh and the Lothians
CTC, the national cyclists' organisation, has about 1100 members in Edinburgh and Borders

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