The City of Edinburgh Council Local Transport Strategy 2014 -2019: Strategic Environmental Assessment (SEA) Adoption Statement: Appendices A to D - Consultation Responses

Appendix A

Summary of Consultation Authority Responses to the SEA Scoping Report

Consultee/ Issue raised	SEA Response
Historic Scotland	
1. Introduction **2. Setting the Context** **3. The Local Transport Strategy**	
These sections provide the key facts and background to the LTS in a clear and accessible manner.	Noted
4. Relationships with other Plans, Programmes and Strategies	
Note that Table 1, which lists plans, programmes, strategies and environmental objectives which will influence or be influenced by the LTS, focuses on PPS which City of Edinburgh Council is the responsible authority. As significant effects on the historic environment are considered likely, I recommend that the LTS should also be influenced by relevant historic environment PPS. This would include the relevant national historic environment PPS, which are also applicable at a regional and local level.	PPS updated to reflect recommended policies.
For information, the following are key legislative and policy documents relating to the historic environment in Scotland: • Historic Environment (Amendment) Scotland Act 2011 • The Ancient Monuments and Archaeological Areas Act 1979 • The Planning (Listed Buildings and Conversation Areas) (Scotland) Act 1997 • The Marine (Scotland) Act 2010 • The Protection of Wrecks Act 1973 • Scottish Planning Policy	PPS updated to reflect recommended policies

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• Scottish Historic Environment Policy • Planning Advice Note (PAN) 2/2011: Planning and Archaeology • Historic Scotland's Managing Change in the Historic Environment Guidance Notes	
5. Baseline	
Note that the baseline data shown in Table 2 for the Cultural Heritage topic does not include non-designated heritage assets. I suggest that given the local nature of the LTS, non-designated heritage assets (e.g. SMR sites, non-designated historic landscapes etc) should form part of the baseline against which the potential effects of LTS options are assessed.	Baseline updated to reference to non-designated heritage assets
Table 2 identifies the significant number of listed items in the council area as a notable issue/trend. It would be useful if further commentary could be provided to explain the focus on listed buildings specifically as an issue/trend.	Provided further commentary
6. Proposed Scope and Level of Detail	
Welcome that cultural heritage has been scoped into the assessment. I note that all SEA topics have been given a 'priority rating' of 1 or 2, but am unclear how this will aid effective assessment. I am concerned that the use of 'priority ratings' implies a pre-judgment of levels of impact prior to assessment, and suggests that those topics given a priority 2 rating will be subject to a less thorough assessment than those given a priority 1 rating.	Priority ratings have been removed and this is discussed in section 2.5 of the Environmental Report.
The comments in Table 3 relating to cultural heritage observe that there may be potential impacts at a project/ site specific level, and that these will be considered on an individual project basis. It is not clear whether such site specific assessments are intended to fall within the scope of the LTS Environmental Report. As one of the purposes of SEA is to avoid impacts at project level by assessing at the strategic level, potential site specific impacts should be assessed in the LTS as far as possible. Where there is uncertainty regarding these impacts, it is important to identify these issues and to be clear how they will be taken into account at the lower level. This is particularly important for the assessment of projects which would not require Environmental Impact Assessment, and for the consideration of alternatives.	Site specific assessments are outwith the scope of the SEA however project levels EIA's may be recommended for site specific policies.
7. SEA Framework	

Consultee/ Issue raised	SEA Response
I am broadly content with the SEA objectives and assessment criteria for Cultural Heritage and Historic Environment set out in Table 4, but recommend that the second assessment criteria should be amended to read 'Will the LTS policy /action improve accessibility to local heritage features where appropriate?'.	Assessment criteria has been amended
Appendix A	
I am content with the proposed assessment matrices set out in Appendix A and particularly welcome the inclusion of text commentary sections within the matrices.	Noted.
SEPA	
General comments	
Generally, the scoping report provides clear and relevant information on the proposed scope and level of detail of the assessment and covers most of the aspects that we would wish to see addressed at this stage. Subject to the comments below, we are generally content with the scope and level of detail proposed for the Environmental Report. We provide some further detailed comments below in relation to additional references and baseline data that we hope you find helpful. For ease of reference our response follows the same structure of the scoping report.	Noted.
We note the approach to undertake the assessment in an iterative way and proposals to carry out internal and external consultation exercises, including a key agency workshop. As the environmental assessment is undertaken to inform the preparation of the Local Transport Strategy (LTS), we would be pleased to assist in any way we can. Please do not hesitate to contact me to informally discuss any aspects of this response or, as you take the assessment forward, to discuss preliminary assessment findings and recommendations.	Noted.
In undertaking the environmental assessment you may also wish to refer to the SEA guidance on how to take account of air, water and soil available at www.seaguidance.org.uk and the guidance on how to take account of climate change in SEA available at www.scotland.gov.uk/Publications/2010/03/18102927/0.	Noted
1. Introduction **2. Setting the Context.** **3. The Local Transport Strategy**	

Consultee/ Issue raised	SEA Response
We found the information provided in these sections useful in relation to the background to the Local Transport Strategy (LTS). We note that the purpose of the Strategy is to outline the Council's transport policies, plans and projects for the Edinburgh Transport System. The Strategy will "set out how the Council will deliver a strategic transport network in Edinburgh supporting economic development and sustainable travel choices, which are safe and accessible for all users". We note that the preparation of the LTS revisions will be based on the development of a Main Issues Report (MIR) approach which will be used to consider areas where there may be a change in policy direction or where there are alternative choices emerging.	Noted.
We understand that a number of elements of the current LTS will remain unchanged in the next LTS and therefore are not proposed to be covered by the MIR or the SEA. These include: the Active Travel Action Plan; the Road Safety Plan; the emphasis on promoting rail travel over road and air, and support for High Speed Rail to Edinburgh and Glasgow; support improved local access to the airport; support for the Park and Ride policy; powered two wheelers; school travel and accessibility; the approach to integrating land use and transport planning.	Noted.
The areas covered by the MIR and therefore that will be subject to the environmental assessment process are described under four headline projects: funding mechanisms; streets and street management; sustainable and accessible transport; and supporting development. Under these topics, the MIR will present a range of options across 14 key issues described in the scoping report.	Noted.
4. Relationship with other Plans, Programmes and Strategies	
The relationship with other relevant Plans, Programmes and Strategies (PPS) is summarised in Section 4 and detailed in Table 1. The assessment of relevant PPS undertaken for the Regional Transport Strategy (SESTRAN) in2007 has been reviewed and updated for the LTS SEA and we support this approach. In addition, you may also wish to refer to: a) the Climate Change (Scotland) Act 2009 which places duties on public bodies to contribute to the delivery of the targets set in the Act in exercising its functions; b) Scotland's Climate Change Adaptation Framework (2009) and its Transport Sector Action Plan. The Framework presents a national, coordinated approach to ensure that Scotland understands the risks and opportunities climate change presents and is adapting in a sustainable way. It sets out the overarching model for adapting to climate change in Scotland. The Sector Action Plan looks to existing sources of information and research to	PPS updated to reflect recommended policies.

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identify the key impacts of climate change on the sector and appropriate actions which can build our resilience to these impacts; Plan c) the Flood Risk Management (Scotland) Act 2009 which requires a more integrated and sustainable approach to flood risk management and prescribes a new responsibility for the Scottish Ministers, SEPA, Scottish Water and local authorities to exercise their flood risk related functions with a view to reducing overall flood risk; d) the Zero Waste Plan (ZWP) 2010 which aims to achieve a zero waste Scotland, where we make the most efficient use of resources by minimising Scotland's demand on primary resources, and maximising the reuse, recycling and recovery of resources instead of treating them as waste; e) the Water Framework Directive, implemented in Scotland as the Water Environment Water Services (Scotland) Act 2003 (WEWS Act) and the Water Environment (Controlled Activities) (Scotland) Regulations 2011 which place duties on responsible authorities to ensure no deterioration and enhancement in the status of water bodies (including surface waters, coastal waters, transitional waters and groundwater); promote sustainable water use; reduce pollution; and contribute to the mitigation of floods and droughts; f) the River Basin Management Plan (RBMP) for the Scotland River Basin District (2009) and, perhaps more relevant and helpful to you, the Forth Area Management Plan which includes a detailed description of the impact of human activity on surface waters and groundwater and identifies those water bodies that are at risk of failing to meet the Directives environmental objectives. It highlights the number of water bodies affected by diffuse pollution pressures from transport. The Plans can be viewed on our website at: www.sepa.org.uk/water/river_basin_planning/early_basin_planning_work.aspx); g) the National Planning Framework 2 (2009) which sets out strategic development priorities and improvement of infrastructure to support long-term development and identifies national developments; h) the Strategic Transport Projects Review (2009) which ensures the delivery of strategic outcomes identified in the National Transport Strategy.	
You may also consider cross-boundary effects with neighbouring authorities through the integration of their LTS where appropriate.	Consider cross-boundary effects with neighbouring authorities
6. Proposed Scope and Level of Detail	

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We note that all the environmental criteria within our remit listed in Schedule 3 of the SEA Act are scoped into the assessment and we welcome the clear summary of the rationale for scoping provided in Table 3.	Noted.
The relevant aspects of the current state of the environment and the evolution of the baseline without the LTS are described in Section 5 and Table 2. This information is largely based on the Edinburgh State of the Environment Report 2008, the CEC Local Development Plan MIR SEA scoping report and the CEC Transport Annual Report. We welcome the use of the State of the Environment Report as a working baseline document that is effectively used to support the environmental assessment. We also welcome the summary in Table 2 of baseline data and issues and trends and the implications for the LTS.	Noted.
In addition to the issues identified we provide some further advice below in relation to the baseline data and the possible role of the LTS in addressing some of the environmental issues identified. We hope that this advice is helpful:	Noted.
Population and Human Health We note reference to the presence of Air Quality Management Areas (AQMAs) in Edinburgh within the SEA topic "air and climatic factors". You may wish to consider the interactions between poor air quality and population and human health, since the air quality objectives were introduced to protect human health. You may find useful to refer to Defra's website for more information on the effects on health from air pollution http://uk-air.defra.gov.uk/air-pollution/effects.	Added assessment criteria on air quality to population and human health criteria.
Air and Climatic Factors You may wish to consider baseline information in relation to climatic factors, e.g. current emissions levels related to transport within the Edinburgh area (DECC 2009 Carbon Dioxide Emissions at Local Authority and Regional Level). We note that reference to elements of climate change adaptation such as flooding events and extreme weather conditions are identified within the SEA topics "water" and we welcome this. The LTS can ensure that any proposed transport development and infrastructure will remain fit for purpose under the predicted future climatic conditions.	Amended baseline information include data from DECC.
Air and Climatic Factors We note the reference to the City of Edinburgh three AQMAs and how national air quality objectives within these areas are currently not being met. Monitoring has also highlighted other areas that are exceeding the objectives and limit values, and if air quality problems are not tackled then they may in the future become AQMAs. Therefore, in the	Amended baseline information to include the two additional AQMA's and reference to commuter routes.

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environmental assessment you may also wish to consider these areas that are close to becoming AQMAs, so that air pollution problems are not exacerbated. You may also wish to consider some of the main/key commuter routes from the neighbouring surrounding areas (for example: Queensferry Road, St. John's Road, Gorgie Road and Slateford Road).	
Air and Climatic Factors Monitoring has also shown that there are existing trends showing an increase in the levels of pollution to concentrations above the health based objectives, despite the efforts and measures introduced by Air Quality Action Plans to reduce these levels. This demonstrates that air quality problems have proved difficult to address and should be as far as possible prevented. In the assessment process, depending on the nature of the proposals in the LTS, it may also be relevant to consider how issues such as street canyons and traffic routing may impact on the area's air quality.	Noted
Air and Climatic Factors As well as considering the links between transport and health, you may also wish to consider interactions between climate change and air quality in more detail in the assessment process, acknowledging the contribution of traffic related emissions and growth in commuter traffic.	Noted
Air and Climatic Factors Road traffic is the second largest emitter of greenhouse gases in Scotland and increased emissions are likely to have negative impacts on air quality and climate change. Defra and the devolved Administrations recently published a document "Air Pollution: Action in a Changing Climate" that promotes closer integration of air quality and climate change policies to promote win-win scenarios and more efficient use of limited resources. This is available at www.defra.gov.uk/environment/quality/air/airquality/strategy/documents/air-pollution.PDF. Measures to reduce greenhouse gas emissions should consider any potential impacts on air quality and measures to tackle local air quality problems should not result in an increase in the emissions of greenhouse gases. For example: diverting traffic away from a town centre may improve the local air quality, but if the traffic has to travel further, there will be a corresponding increase in the emissions of greenhouse gases.	Noted
Material Assets Consideration could also be given to the need for minimisation of use of new resources and the reuse of aggregates in transport infrastructure construction. You may also wish to include this as a SEA objective and refer in the baseline	Added assessment criteria to material assets to encourage the use of new resources and the reuse of aggregates in transport infrastructure construction

Consultee/ Issue raised	SEA Response
data to up-to-date figures on waste management for the Edinburgh area available from: www.sepa.org.uk/waste/waste_data/waste_data_reports/local_authority_annual_reports.aspx	Referred to baseline data for Edinburgh area.
Water Environment We welcome the description of baseline data for the water environment. Depending on the nature of the proposals in the LTS you may wish to consider potential effects of transport related developments on the water environment. These effects may relate not only effects on water quality from road drainage, but also physical impacts (for example: transport infrastructure may require river crossings). Consideration should therefore be given to effects on the ecological status of the water bodies which includes water quality, water quantity, ecology and physical impacts (including culverting and engineering of watercourses). You may wish to reflect this in the assessment criteria for water (Table 4) by referring to the "significant deterioration of water status".	Amended assessment criteria
Water Environment New transport schemes may also provide an opportunity to enhance the water environment by removing culverts or engineering structures or contributing to address existing transport related diffuse pollution pressures affecting water bodies.	Noted
7. SEA Framework	
We note that a preliminary SEA review will be undertaken at the MIR stage to assess the options and alternatives proposed in the MIR. This will involve a key agencies workshop including the SEA Consultation Authorities. Recommendations and consultation feedback will inform the final MIR. A second iteration of the SEA assessment will be conducted on the LTS policies and as a result of the SEA iterations key recommendations are likely to result in refinements to LTS objectives, policy wording and other aspects of the LTS. We support this iterative approach.	Noted.
Although Section 1.1 of the scoping report refers to the LTS outlining projects, it is not clear if projects will be considered as part of the assessment process. Please note that the environmental assessment should be carried out on all aspects of the Strategy that are likely to result in significant environmental effects.	Noted
We note that SEA objectives and assessment criteria described in Table 4 will be used in the assessment and the findings will be recorded in assessment matrices (provided in Appendix A). Subject to some minor comments provided	Noted.

Consultee/ Issue raised	SEA Response
above, we are generally content with the SEA objectives and assessment criteria proposed. We note that the proposed matrices will contain a column for comments and justification of the effects identified and we welcome this. We also welcome the link between the assessment findings and recommendations/ mitigation and enhancement measures.	
We welcome that the environmental assessment will aim to prevent, reduce or offset any significant adverse effects as far as possible. We also welcome that the SEA process will be undertaken alongside the initial development of the LTS, to ensure that modifications can be made at the strategic level, via alternatives and identifying issues that can be address through other relevant PPS.	Noted.
We consider that mitigation is a crucial part of SEA in that it offers an opportunity to not only address potential adverse effects of a plan, but also to make a plan even more positive than it already may be through enhancement measures. The Environmental Report should clearly set out mitigation/enhancement measures which are proposed as a result of the assessment.	Noted
It would be extremely helpful to set out all mitigation measures in a way that clearly identified: (1) the measures required, (2) when they would be required and (3) who will be required to implement them. It would also be helpful for the Environmental Report to identify any changes made to the LTS as a result of the environmental assessment.	Noted
We note that a draft monitoring framework will be developed as part of the environmental assessment. We welcome the early consideration of monitoring proposals, particularly early consideration of indicators linked to the SEA objectives. The chosen indicators may need to be targeted to monitor the potential environmental effects likely to result from the proposals in the LTS identified through the assessment process, and as far as possible should establish a clear link between implementation of the plan and the identified effects to the environment. Wherever possible and appropriate, existing monitoring frameworks and indicators can be used effectively to meet the SEA monitoring requirements.	Noted
8. Next Steps	
We note the intention to consult on the Environmental Report for a period of 6 weeks and we are content with this consultation period.	Noted.
We would also find helpful if the Environmental Report included a summary record of the scoping outcomes, and how comments from the consultation authorities were taken into account.	Noted

Consultee/ Issue raised	SEA Response
SNH	
Scope of assessment and level of detail	
Subject to the specific comments set out below, SNH is content with the scope and level of detail proposed for the environmental report.	Noted.
Table 1 Plans, programmes, strategies	
As well as the plans listed, another national/regional plan which should influence the LTS is the CSGN Vision document (http://centralscotlandgreennetwork.org/Vision/vision.html), which outlines aims for sustainable development and active travel, in the context of a green network/environment. This is summarised in the context of road and transport improvements and sustainable transport (http://centralscotlandgreennetwork.org/content/the-network.html).	Noted.
Table 2 Baseline Information – Implications for the LTS	
We support the considerations that the strategy will have for protection of designated areas and landscape and for path/cycle networks to enable people to enjoy these areas and the open space. We commend the emphasis on sustainable transport and improved public/cycling access around Edinburgh and links to new development areas emerging in the new Local Plan.	Noted.
Proposed Scope and Level of Detail	
We agree with the topics scoped in and the general priorities given to these topics. Links could be made between 'the promotion of public health and cycling' etc within Population and Human Health 'to access to open space' under Landscape.	Added assessment criteria to Population and Human Health to consider policies impact/effect on access to open space.
We note the intention to provide general standing principles under Biodiversity and suggest that consideration be given to positive impacts or enhancement measures, as well negative impacts, such as linking areas of new habitats with existing adjacent ones to improve the overall biodiversity network in the longer term. This would also link in with the promotion of public access to the open space.	Noted
Table 4 Preliminary SEA Objectives and Assessment Criteria/Proposed Assessment Matrices	

Consultee/ Issue raised	SEA Response
We support the various positive criteria of enhanced walking and cycling provisions and links, in and around Edinburgh and also between new development areas and open spaces. These are to be commended in addition to the more standard criteria of negative impacts.	Noted.
Mitigation and Monitoring	
It is noted that environmental/SEA monitoring will be included within the LTS monitoring framework, which will also align with the LDP annual monitoring.	Noted.
HRA	
We note that the requirement of a Habitats Regulation Appraisal (HRA) will be discussed with SNH. This will no doubt come out from the workshops that are proposed to discuss the issues and options for the LTS MIR. We will be happy to discuss this further as more details of the LTS emerge.	Noted.
Consultation period for the environmental report	
We note that a minimum period of 6 weeks is proposed for consultation on the draft Environmental Report and we are content with this proposed period. It is noted that this consultation will run alongside the draft Local Transport Strategy consultation. I hope that these points are of assistance to you. Please note that this response is in the context of the Environmental Assessment (Scotland) Act 2005 and our role as a Consultation Authority. We understand that we will be separately consulted on our views regarding the Environmental Report and on the LTS.	Noted.

Appendix B

Summary of Consultation Authority Responses following SEA workshop

Consultee/ Issue raised	SEA Response
Historic Scotland	
I welcome the amendment to the SEA objectives and criteria for the cultural heritage in line with my advice at scoping, and the presentation of the findings is particularly user-friendly and clear. I am broadly content with the findings of the first stage assessment, subject to the following comments.	Noted
The spatial area affected by the Strategy benefits from a particularly extensive and varied historic environment resource (both designated and undesignated). Consequently, I would suggest that, where you have identified minor effects on landscape / townscape due to issues and options potentially requiring an increase in signage / cameras, similar effects are also likely for the historic environment. Whilst I would agree that these effects do not appear likely to be significant in scale, the commentary implies that these effects have been scored post-mitigation, and it is not clear how this mitigation will be carried down to project level. In view of this you should be sure that effects are scored prior to mitigation, and may wish to consider including mitigation recommendations (for example careful consideration of sensitive siting and/ or types of signage, perhaps in conjunction with removal of redundant signs) to address and minimise these effects and to ensure that mitigation requirements are successfully carried down to, and embedded within, lower levels of the strategy.	Strategic Alternatives and Issues Assessment matrices have been amended to reflect comments i.e. effects have been amended to be scored prior to any mitigation.
SEPA	
In general we are satisfied that most of our comments on the Scoping Report have been taken into account. For the purpose of brevity, our comments on the Draft SEA assessment will focus on issues that we suggest require change. We may have additional comments once we are consulted officially on the final assessment in the Environmental Report (ER).	Noted
In general we consider that the assessment should be revised on the light of what discussed at the meeting of the 31 May 2013 and in order to change neutral effects to unknown effects or to apply new knowledge gained since the receipt of further advice and information	The assessment matrices have been amended to reflect the discussions on the 31st and the comments made below.
The Water objective does not take into account the comments we made at scoping stage: '*depending on the nature of the proposals in the LTS you may wish to consider potential effects of transport related developments on the water environment. These effects may relate not only effects on water quality from road drainage, but also physical impacts (for example: transport infrastructure may require river crossing). Consideration should therefore be given to effects on the ecological status of the waterbodies which include water quality, water quantity, ecology and physical impacts (including culverting and engineering of water courses). In addition there may be opportunities to enhance the water environment by removing culverts or engineering structures or contributing to address existing transport related diffuse pollution pressures affecting water bodies'.* You may therefore wish to reflect this in the assessment criteria for water by changing the wording to: 'Will the LTS policy/ action result in significant deterioration of the ecological status of the water bodies or provide an opportunity to enhance the water environment?' This is in line with the objectives of River Basin Management Plans and ultimately of the Water Framework Directive.	Amended water objective

Consultee/ Issue raised	SEA Response
We note that person safety and reduction of accident rates/severity has been identified as a secondary effect. We would advise to add an additional criterion in the Population and Human Health objective to cover safety. This change should then be reflected in the scoring as it is a direct effect of Population and Human Health.	Additional criteria has been added.
There is not an option for unknown scoring (?) in the legend. Some of the options and criteria for which the effects are unknown (due to lack of information at time of assessment) have been scored as neutral ('0'), which is not correct.	Scoring criteria has been changed to include an option for unknown scoring.
In addition in some cases there could be both negative and positive effects, this should not be reported as neutral but as both positive and negative effects (+/-) so that mitigation is identified to offset adverse effects and enhancement proposed for the positive effects	Where appropriate both positive and negative effects have been identified.
The '0' scoring is often commented as 'This approach is unlikely to significantly affect this objective'. We would suggest removing the 'significantly' to be consistent with the explanation provided in the legend.	Removed the word 'significantly'
We would have welcomed further level of significance in the assessment. Significant positive effects have been identified in the Air Quality section, however in terms of comparing different options it would have been more useful to introduce another level of significance	To ensure continuity throughout the assessment it was felt that another level of significance identified just for air quality may be confusing. Where 'air quality' policies have been taken forward in the Draft LTS these have been subject to a Detailed Assessment which should provide further detail.
Issue 1 - Integrated transport Criterion 8 (resources and waste) could lead to positive effects as one ticket for many journeys should result in a reduction in use of paper for printing tickets.	Criterion 8 has been amended
Issue 3 – Speed limits 20 MPH Several criteria should have been entered as unknown rather than neutral as it was unclear at the time of assessment what the effects of a speed reduction would have on the traffic. The argument of stopping and starting has been put forward however not necessarily a speed reduction will result in more stops. This scoring should be revised at the light of the information provided in our email of the 13 June 2013. Free flowing traffic emits less pollution than congested traffic, so this is key to improving air quality. New scoring will have to be applied after considering our recent advice. As a result it is not possible to say that the option present an overall neutral effect with some positive impacts. Possibly options 2 may involve less stopping and starting as it is relevant for residential streets, where speed limits seem to work better (as per our email of the 13 June).	Based on the information provided on the 13th June it still appears to be unclear as to the influence of this speed reduction on air quality. The study provided by SEPA 'An evaluation of the estimated impacts on vehicle emissions of a 20mph speed' by the Transport and Environmental Analysis Group concluded *that it would be incorrect to assume a 20mph speed restriction would be detrimental to ambient local air quality, as the effects on vehicle emissions are mixed.* This included consideration of stop-start revving. As

Consultee/ Issue raised	SEA Response
	such we have amended the assessment tables to reflect this study.
Issue 4 – Speed limits 30MPH and more See comments above about the neutral scoring.	Amended
Issue 5 – School streets a) See comments above about the neutral scoring.	Amended
b) It is not clear why criterion 7 has been scored as neutral when in fact the effects seem to be positive.	Amended
c) Criteria 5 and 7 state 'Maintaining the status quo is unlikely to achieve this objective', yet the scoring is neutral.	Amended
The summary reads 'this option is unlikely to present any benefits over existing conditions, etc., however as this option is the status quo, it represent the existing conditions. We agree that there is the possibility that this could lead to continued exacerbation of any existing problems so we are content for the negative effects.	Amended summary
Issue 6 – City Centre parking a) See comments above regarding neutral scoring.	Amended
b) As mentioned at our meeting on the 31 May, park and ride can help reduce the emissions only if they replace car use. Increasing number of parking spaces is likely to undermine efforts to encourage a modal shift to more sustainable transport option. See comments from our Air Quality Specialist in relation to park and ride and car parking.	Noted
c) Criterion 2 is scored as neutral when in fact the text refers to positive effects. Criterion 1 seems again to suggest positive effects; however we consider that the proposal of new or enlarged off street car parks on a case by case basis could lead to negative effects.	Criterion amended
d) Criterion 11 is scored as neutral but additional street parking may require additional land take and as such should be scored as negative. Design, scale and location may be used as a mitigation measure	Scoring has been amended.
e) In general we would suggest reviewing this option and break it down into more alternatives as the combined	The alternatives identified directly relate to the

Consultee/ Issue raised	SEA Response
approach does not allow for proper consideration of the impact that the different measures will have independently on the city centre car parking.	Issues for Review Document that was issued for consultation. To avoid confusion we have retained the alternatives as presented in that document.
Issue 7 – Sunday parking a) Option 1. The summary reads 'this option is unlikely to present any benefits over existing conditions, etc., however as this option is the status quo, it represent the existing conditions. We agree that there is the possibility that this could lead to continued exacerbation of any existing problems so we are content for the negative effects in some of the scoring.	Noted
b) The evaluation of all options results in the same scoring which does not help in identifying the one that brings additional benefits. The commentary for each criterion should be changed to reflect the different impacts from the different scenarios.	The commentary has been amended where relevant.
c) In the recommendation/ mitigation section the commentary reads: 'the resistance on parking charges on a Sunday may be encountered if free parking is currently available (i.e. by business and shoppers)'. We consider this issue not relevant for the purpose of SEA and therefore it should not be reflected in the scoring or affect it in any way as it is not an environmental issue.	Amended text
Issue 8 – Residents parking/CPZ a) Please revise the scoring, if necessary, on the basis of further research on the issues considered (i.e. studies and evidence on priority parking and relative effects).	Where further evidence has been identified scoring has been amended.
b) Criterion 3 – wording unclear.	Amended wording
Issue 9 – Air Quality **a)** Please see our previous comments on the title of this issue.	We are not proposing to amend the IFR title as this document was drafted to inform the Draft LTS. Within the LTS air quality has been woven through each of the chapters rather than being identified as a single issue.
b) It would be helpful to clarify how criterion 1 scores ++ while criterion 2 scores + only.	Criterion has been amended
c) In the summary text of both options 4 and 5 the text reads:' this option is overall likely to present the greatest opportunity for AQMA targets being met within the low emission zone'. Please clarify which option is best for	Option 4 has been identified as the preferred option.

Consultee/ Issue raised	SEA Response
AQMA targets.	
d) Option 5 – all scoring should be unknown rather than neutral.	Scoring has been amended
Issue 10 - Travel planning Although some of the measures considered are uncertain we consider that the scoring should be positive or at least positive and uncertain (+?).	Scoring has been amended
SNH	
No further comments provided.	

Appendix C

Summary of Consultation Responses on the Environmental Report

Consultee/ Issue raised	SEA Response
Historic Scotland	
Thank you for consulting Historic Scotland on the Environmental Report (ER) for City of Edinburgh Council's Local Transport Strategy, which was received in the Scottish Government's SEA Gateway on 28 August. I have reviewed the Environmental Report on behalf of Historic Scotland in relation to our main area of interest for the historic environment. I should make clear that this response is in the context of the SEA Act and our role as a Consultation Authority, and therefore focuses on the environmental assessment, rather than the contents of the strategy. I can confirm that in this case, Historic Scotland does not have comments to offer on the strategy itself, and will not therefore be issuing a separate response in that regard. I found that the ER sets out clearly the scope and findings of this assessment and am broadly content with the findings in relation to the historic environment. I have provided some detailed comments on the ER in the attached annex. None of the comments contained in this letter should be construed as constituting a legal interpretation of the requirements of the SEA Act. They are intended rather as helpful advice, as part of Historic Scotland's commitment to capacity-building in SEA. Please do not hesitate to contact me should you wish to discuss this response.	Noted
Non Technical summary	
I note that the NTS does not provide a summary of the findings of the assessment. I recommend that it would be good practice to provide at least a general summary of the findings within the NTS.	NTS has been updated to provide a short summary of the assessment findings and recommendations.
Assessment of Environmental Effects	
Table 5: Draft Objectives for enhancement or mitigation: I recommend that the recommendation relating to the LTS objective 'to ensure the integrity of bridges, particularly on public transport and otherwise strategic links' should be expanded to ensure that impacts on scheduled bridges, and undesignated bridges which are of historic interest or merit, are also identified and mitigated appropriately.	Recommendation has been expanded to ensure that impacts on scheduled bridges, and undesignated bridges which are of historic interest or merit, are also identified and mitigated appropriately.
Table 6: Draft policies summary of assessment and SEA recommendations: Policies Safe4-Safe6 – I welcome the recognition that additional signage may have impacts on the historic environment. In terms of mitigation of these effects, you may also wish to suggest rationalisation of signage and removal of redundant signage.	A recommendation has been included which encourages rationalisation of signage and removal of redundant signage.
Policies PubTrans11; PubTrans12; Connect 3; Connect 4 – the projects / programmes to which these policies refer may have the potential for significant effects on the historic environment, predominantly due to the infrastructure requirements which are likely. This is recognised in relation to Connect5 in relation to HS2, and so you may wish, for consistency in terms of the level of effects reported, to make reference to the potential for such effects in relation to PubTrans11, PubTrans12, Connect 3 and Connect 4. However, I am content that in this context, where the LTS policy	Level of effects on the historic environment have been amended in PubTrans11, PubTrans12, Connect 3 and Connect 4 for consistency.

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aim is to support, rather than to instigate or direct these projects, the effects of the LTS itself in this respect are not likely to significant.	
LTS Monitoring Framework	
I note that you have not yet developed indicators or targets in relation to the cultural heritage. I would be happy to discuss your draft indicators / targets for the historic environment with you prior to inclusion in the Post Adoption Statement, if that would be helpful.	We would welcome your input and will be in touch prior to the publication of the post adoption statement
SEPA	
General comments	
We are satisfied that the revised Environmental Report (ER) provides a clear and comprehensive view of the assessment of the potential significant environmental effects of the Local Transport Strategy (LTS).	Noted
In general we welcome the approach taken by the City of Edinburgh Council (CEC) of engaging with the Consultation Authorities in an informal way in order to ensure that the consideration of significant environmental effects is fully explored. SEPA was consulted informally on the Issues for Review Report (IRR) and attended a workshop on the 31 May 2013. We also provided comments on the draft environmental assessment matrix. We are pleased to note that most of our formal and informal comments have been taken into account and that summaries of the comments from the formal consultation have been provided for reference in Appendix A and B. We welcome this approach as it helps not only in the protection of the environment but also in improving the transparency of the SEA process.	Noted
In particular we welcome the revisions to the scoring of the assessment following our comments, which now differentiate between neutral and unknown effects and which makes it clearer where there are both positive and negative effects.	Noted
We note that the ER has resulted in a list of recommendations which are summarised in Table 5 (page 22). We welcome this approach at is highlights the mitigation and enhancement measures which are proposed as a result of the assessment, most of which are for the CEC to deliver. The list however does not clearly include recommendations resulting from the cumulative effects assessment. Some of the mitigation can be delivered through changes to the LTS itself, therefore we would welcome clear reference in the Post Adoption Statement to how the SEA has influenced the plan and how our comments have been taken into account.	The post adoption statement will include a summary of how the SEA has influenced the plan. This response schedule will be included within the post adoption statement to clearly show how the consultation comments have been taken on board
Please note that while we have many positive comments to make about the ER, we are going to concentrate on the improvement points in order to make the response more proportionate and focused. For ease of reference the detailed comments below follow the same structure as the ER.	Noted

Consultee/ Issue raised	SEA Response
SEPA was consulted officially on the SEA of the LTS but not on the LTS itself. We have however some comments to make on the LTS which we have submitted separately as part of the public consultation and which we have reported in Appendix 2 of this response. For further details please contact John Lamb in the SEPA Edinburgh office.	Noted. The comments identified with Appendix 2 of this response have been captured in the Local Transport Strategy Response Schedule which will be included as an Appendix of the Local Transport Strategy.
Non- technical summary	
The Non-Technical Summary (NTS) provides an adequate account of the ER and summary of the LTS. The SEA methodology has also been clearly defined, however we would have welcomed a brief summary of the environmental assessment of the different alternatives and the findings (i.e.from Section 5.1). Schedule 3 (10) of the Environmental Assessment (Scotland) Act 2005 specifically asks for a summary of all the information reported in the ER: 'a non-technical summary of the information provided under paragraphs 1 to 9'.	NTS has been updated to provide a short summary of the assessment findings.
Introduction to Edinburgh's Local Transport Strategy	
We found the introduction useful to understand how the process worked. We welcome the reference to the influence of the SEA with regards to the alternatives assessment.	Noted
Purpose of the Environmental Report	
We understand that the vision has not been assessed as part of the SEA assessment as the vision and outcomes have been taken directly from the Transport 2030 Vision published in 2010. In addition actions arising from the Active Travel Action Plan, Public and Accessible Transport Action Plan and Road Safety Plan which have been identified and delivered with a wide range of partners have not been considered as part of the SEA assessment.	Noted
Relationship with other Plans, Programmes and Strategies (PPS)	
We found this section useful and the Appendix C with the PPS review comprehensive and proportionate. We agree that the LDP and the LTS influence each other as clearly shown in the figure in section 3.2. In particular we consider significant the effects that new development from the LDP can have cumulatively on the air quality.	Noted
Current State of the Environment	
We are reasonably satisfied with this section, also supported by information provided in Appendix D, however we would have welcomed the use of maps and pictures in order to make the state of the environment clearer on a spatial basis.	Noted. While we appreciate Maps were not provided as part of this SEA, a link was provided to the Edinburgh City Council Statement of the Environment Report which does provide plans

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	where appropriate. We do not propose to provide maps at this stage in the SEA process
Table 3 – Baseline Issues, SEA Objectives/Criteria and the Likely Evolution in the Absence of the LTS. 4.2 Page 17 - the 'Water' information provided is out of date. Under the terms of the Water Framework Directive (WFD), water quality classification and parameters have changed. The most current water quality information is available via the River Basin Management Plan (RBMP) section of our website and shows that the Water of Leith is graded as being of 'Poor Ecological Potential' for much of its length; indeed the Water of Leith has been designated a Heavily Modified Water Body. In terms of specific water quality parameters, the overall classification for WB 3700 - Murray Burn Confluence to Estuary (the largest stretch of the Water of Leith which flows through the 'city' of Edinburgh) is 'Moderate'.	Water quality information has been updated in the baseline issues tables and Appendix D.
Assessment of Environmental Effects	
Table 5 – Draft objectives recommendations for enhancement or mitigation 5.1 Page 22 – We would welcome an addition in the text for the first LTS objective of the SEA Summary and Recommendation in order to consider Sustainable Urban Drainage System (SUDS) legal requirements. The text in the first box of Table 5 would therefore read: "Any new infrastructure required should be subject to detailed environmental assessments to ensure the most sustainable options are promoted, the legal requirement to provide SUDS is reflected, and environmental effects are mitigated wherever possible".	Recommendation has been amended to reflect SUDS legal requirement
Page 22 – 'To reduce noxious emissions, etc'. We welcome the reference to the EU local air quality standards. There is a statutory requirement to meet the EU limit values and as the UK is currently in breach of the annual mean and hourly limit values for nitrogen dioxide, this could lead to infraction proceedings and large fines.	Noted
Page 23 – For the LTS objective related to the integrity of bridges (the third box down) we would welcome the inclusion of the following text in the recommendation: "Any works should...are listed. Relevant statutory bodies should be consulted prior to works commencing where necessary."	Recommendation has been amended in line with both SEPA's and Historic Scotland's comments
Cumulative Effects	
In general we are satisfied with the issues identified in this section and in particular we welcome the consideration of cumulative effects in conjunction with other land use development plans. We note however that although uncertain and negative effects have been identified, a clear mitigation strategy to has not been identified. We would have welcomed the inclusion in Table 5 of recommendations from the cumulative effects assessment in order to make the	A column has been added to the cumulative impacts assessment to provide mitigation where appropriate.

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route for mitigation of adverse effects clearer and more prominent.	
We note that the water section recognises that the implementation of the new transport interventions has the potential to improve/upgrade material assets. We welcome this and would consider this to have a cumulative significant positive effect on water.	Noted
The drive to reduce traffic volumes can only cut down on diffuse pollutant loadings to watercourses receiving surface water drainage (mainly referring to the Water of Leith), and by ensuring adequate SUDS treatment is provided for new developments / retrofitted at existing sites where a specific need is identified (e.g. through Scottish Water's Q&S process) there is scope for water quality to improve.	Noted
As mentioned in the comments to the LTS in Appendix 2, the effects of developments should not be considered in isolation. Although this issue has been recognised in this section, the implementation of mitigation of these cumulative effects should be made more robust and not simply refer to 'the effective implementation of LTS etc may encourage further use of sustainable transport mode'. As mentioned before there is a statutory requirement to meet the EU limit values and the UK is currently in breach of the annual mean and hourly limit values for nitrogen dioxide, and this could lead to infraction proceedings and large fines so it is important that the LTS is effective in delivering the required changes to meet the standards.	A column has been added to the cumulative impacts assessment to provide mitigation where appropriate.
LTS Monitoring Framework	
We understand that the LTS monitoring framework will be developed to align with LDP monitoring and ongoing State of the Environment Reporting and that the final monitoring framework will be presented in the Post Adoption SEA statement. We are content with this approach, however we would welcome the opportunity to view the draft indicators prior to their inclusion in the statement.	Noted. We would welcome your input and will be in touch prior to the publication of the post adoption statement
Next Steps	
We are satisfied with the proposed next stages and timescales.	Noted
Appendices	
We welcome the inclusion of the summary of the Consultation Authorities responses to the scoping report and the SEA workshop in Appendix A and B.	Noted
Appendix D – Baseline data	Noted

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Material assets – The baseline data for waste refer to Municipal Waste from the SEPA Waste Data Flow Annual report 2007/2008 for the City of Edinburgh Council. Please note that more up to date information is available from: http://www.sepa.org.uk/waste/waste_data.aspx http://www.sepa.org.uk/about_us/official_statistics.aspx	
Appendix D – Baseline data Water - The water quality information needs to be updated. See comments in Section 4 of this response.	Baseline has been updated
Appendix E – SEA Assessment Tables Following consultation with our specialists and having considered the environmental assessment matrix in more detail, we disagree with the assessment that the LTS is unlikely to impact on water quality. Installing / retrofitting SUDS coupled with reductions in traffic volumes could significantly reduce diffuse pollutant loadings which have a direct impact on water quality. This would therefore result in positive effects which can be cumulatively significant.	Assessment tables have been reviewed and revised where appropriate to reflect this.
SNH	
General comments	
We note that our comments made at the scoping stage have largely been taken on board and assessment criteria amended to reflect these comments where relevant.	Noted.
SEA Assessment	
We broadly agree with the assessment findings and therefore have few comments to make. However we would counter the slight negative impacts predicted from the development of new cycleway and footpaths, which have been assessed as having potential impacts on habitats and species. New cycleways and footpaths should be designed to form part of the development of multifunctional green networks to deliver the Central Scotland Green Network (CSGN), particularly within and around LDP development sites. These multifunctional green networks aims to deliver biodiversity and landscape benefits as well as active travel and recreational links. The creation of these green networks would be positive outcomes.	Assessment tables have been reviewed and have been revised to reflect these comments where appropriate.
It is noted that such green network links or biodiversity improvements are recommended in some of the assessment	Noted

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findings against policies and we would be supportive of such measures.	
As we mentioned in our scoping response, the CSGN Vision document (http://centralscotlandgreennetwork.org/Vision/vision.html) outlines aims for sustainable development and active travel, in the context of a green network/environment. This is summarised in the context of road and transport improvements and sustainable transport (http://centralscotlandgreennetwork.org/content/the-network.html).	The document has been referred to while undertaking the SEA assessment and is referenced in the policy review.
Monitoring indicators	
Environmental/SEA monitoring will be included within the LTS monitoring framework, which will align with the LDP annual monitoring. This will not be available until post adoption stage and therefore no further comment can be provided at present on draft indicators. It is noted that a couple of examples of potential draft indicators are given in the ER and we would be happy to discuss indicators relevant to active travel and the outdoors, if required.	Noted. We would welcome your input and will be in touch prior to the publication of the post adoption statement

Appendix D

Phase 2 consultation comments on the LTS and CEC responses

Stakeholder	Issue	Comment	CEC response	SEA Comment
Pentlands Transport and Environment Sub Committee (Fairmilehead CC)	Accessible Transport	This is a subject of great interest to the PNP. We have many elderly and also areas of deprivation. Accessibility means not just mobility aspects but lack of transport of any description in the first place. Due to the poor public transport links it is difficult for people of all ages and circumstances to get to medical appointments, hospitals, libraries, local shops and supermarkets, community and other facilities. The majority of travel is done within the local area rather than going into the city centre. The majority of these people have to rely on public transport but it is not always available or goes to where they wish to go. It should also be remembered that there a lot of people do not drive and due to the way the bus services run on public holidays, particularly at the festive season, they find it difficult to visit relatives particularly those in hospital. This also goes for those that work at these times. This subject is surely worth more than the 2 paragraphs it receives in the Strategy. There is a need to examine this on a local basis. It may be that small local buses (remember the old C5 buses?) or small vans would be a better option than some of the specially adapted vehicles in some circumstances.	Noted. Accessible transport is being dealt with more fully as part of the Community and Accessible Transport Review.	Accessibility as a topic was assessed in the ER under SEA Objective 4. Recommendations to improve accessibility were also provided in the ER.
Deltix Consulting	Active Travel	The Council should also aim to redesign 'sweetened' curves at junctions so that they are less conductive to vehicle speed. Raised crossings, as in use along Leith Walk and Bruntsfield Place should be used along all shopping streets.	Noted. Junction design and crossing points will be among the areas addressed by the new Street Design Guidance. A meeting was held with Mr Spaven to discuss all Deltix Consulting comments.	No specific comments with regard to junction design.
Sustrans	Active Travel - Charter of Brussels	As an important high level commitment we would like to see reference to the Charter of Brussels committing CEC to a target of 15% of journeys being made by bike by 2020.	Accepted - a reference to the Charter of Brussels will be added. CEC has decided to achieve 15% of journeys to work being made by bike as a milestone on the way to 15% of all journeys being made by bike.	CEC changes welcomed.

Stakeholder	Issue	Comment	CEC response	SEA Comment
Living Streets	Active Travel - Cycling	Inevitably the successful growth of cycling activity is resulting in some increased tensions between cyclists and walkers in situations where there road or path space is constrained or there are shared space facilities. LSE wishes to register its concern that in the face of such pressures, where there are concentrations of pedestrian activity there should not be resort to the sharing of scarce pavement space between pedestrians and cyclists. Each situation concerning space allocation will need to be assessed on its merits, but the presumption should always be in favour of removing or sharing carriageway space in order to better accommodate cycling, rather than reducing or sharing footway space. A general policy statement to this effect within the updated LTS would be helpful at this stage, with more detailed considerations left to be made within the Active Travel Plan and Design Guidance contexts.	The Council accepts that areas where there are high concentrations of pedestrian activity are generally not suitable for space sharing with cyclists. We note these comments and will consider each site on its own merits.	Further action to segregate walking and cycling space on a case by case basis is welcomed, in particular to help progress SEA Objective 3 (modal shift).
Road Haulage Association	Active Travel - Cycling - Cycle4 - Cycle5	The preference towards junctions rather than roundabouts can cause manoeuvering and safety problems with longer vehicles i.e. buses and lorries turning right or left. Consideration should therefore be given to ensuring vehicles can safely negotiate routes and junctions.	Noted. The Council has a preference for signalised junctions as more favourable for pedestrians, safer for cyclists, and offering the option of selective vehicle detection for public transport. All locations have different characteristics and issues, therefore each development will be treated and assessed on an individual basis.	Proposed CEC actions welcomed.
Spokes	Active Travel - Cycling – network - Section 9.2	The Council should experiment with on-road provision physically segregated from motor traffic.	Noted. Sections of Leith Walk will have a segregated cycle path as part of the street's enhancement works. A new policy Pcycle8, has been inserted which deals with possibility of segregated cycleways.	Further action to segregate walking and cycling space is welcomed, in particular to help progress SEA Objective 3 (modal shift).

Stakeholder	Issue	Comment	CEC response	SEA Comment
Road Haulage Association	Active Travel - Cycling - PCycle3	Enabling cyclists to ignore one way traffic systems could cause safety difficulties especially for drivers of large passenger and goods vehicles.	This policy is intended to be a starting point from which designs should be approached to ensure they are in line with the ATAP strategy. All locations have different characteristics and issues therefore each development will be treated and assessed on an individual basis.	No specific comments.
Spokes	Active Travel - Cycling - PCycle8	Many householders, for example in flats, tenements and terraced housing, find domestic bike storage difficult, and there is research evidence suggesting that this reduces cycle use [the Edinburgh study by Tim Ryley for example]. The Council should seek to assist householders with domestic bike storage where this is feasible. This should include growing provision of on street secure bike storage, conditions placed on all relevant planning applications, suitable enforcement action, and lobbying of government so that garden bike sheds meeting certain criteria are counted as 'permitted development'.	The Council is currently trialling different types of secure on-street bike parking at six locations in Edinburgh. This pilot scheme will last for two years, and then the results evaluated. Depending on the outcomes of the pilot, the Council will consider formulating a policy of assisting householders with domestic bike storage.	No specific comments.
Deltix Consulting	Active Travel - cycling on pavements	Cycling on pavements should not be sanctioned e.g. at the foot of the Mound, because of this mis-match and the fact that it will encourage increasing unsanctioned encroachment of pavements generally.	CEC does not sanction cycling on pavements. A petition was presented to the Petitions Committee about this issue, and a report will be going to the Transport and Environment Committee in January.	Further action to segregate walking and cycling space is welcomed, in order to provide cycle space in addition to pavements. This should help to progress SEA Objective 3 (modal shift).

Stakeholder	Issue	Comment	CEC response	SEA Comment
Deltix Consulting	Active Travel - Development Management	The Council should adopt a more strategic and joined-up approach to individual developments in the city, in order to facilitate the seamless movement of people on foot. A good example is the Haymarket station upgrading – some 70% of passengers leaving trains here complete their journey on foot, and yet the overwhelming transport planning focus has been on interchange with tram, bus, taxi and bike. Pavements on surrounding streets with heavy peak-hour pedestrian flows (e.g. Morrison Street) are not being widened and the key crossing of Dalry Road has not been designed to optimise pedestrian passage.	CEC is supportive of this in principle. There is a need to balance the need of road-users, particularly where there are high pedestrian volumes at peak times. The emerging Street Design Guidance addresses this issue.	No specific comments
Kirsty Rosie	Active Travel - Electric Bikes	I was just interested to see if the council would consider a cycle scheme in the city allowing people to use city push bikes/electric scooters taking them from one locked location to another (system similar to Amsterdam/Barcelona). Cheap bikes for public use across the city would certainly help lower emissions and I was just keen to hear if this had even been discussed and what the issued are around this.	This has been discussed by CEC. One issue is the city's topography, and the compact nature of the touristic centre. The Council is open to bids for advertisers to supply a bike share scheme as part of the Street Furniture Contract. This is a contract for the provision of bus shelters, etc, and there may be a business case for this to extend to cycle parking or a cycle share scheme.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Living Streets	Active Travel - Funding	LSE is equally concerned that, despite policies in the LTS and the Active Travel Action Plan about improving access routes and identifying priority routes/ areas for improvements, these are still not supported by any significant budget line. Without that support any such aspirations, however modest, merely amount to and will remain wish lists. To provide a kick start we propose that there should be a commitment to allocate at least 5 or 6% of the Council's capital improvements budget to route improvements for walking. This would be in line with the existing 5 rising to 6% commitment to investment in cycling infrastructure.	This would be a matter for the Council Administration to address as part of the budget setting process. Pedestrian's routes / areas are given priority in the Capital programme for roads and footways renewal.	No specific comments
Sustrans	Active Travel - funding	While we welcome the 5% budget commitment the Council has made to cycling, we believe that more resources are still needed to make it easy to walk and cycle throughout Edinburgh. We believe even that at current levels of funding progress is still being limited by available funding and staff resources and we propose that 15% of the Council's transport budget now needs to be allocated to cycling in order to meet the targets it has set. Given that the Scottish Government has announced a large increase in Sustrans Scotland's capital budget for 2014/15 we believe now is the time for the Council to further increase funding for active travel to maximise the amount of external funding it can bring in to assist with the delivery of ATAP.	The 5% budget commitment, increased to 6% for the current financial year, and 7% for 2014/2015, is already a major increase, at a time of severe budget constraints.	No specific comments
Living Streets	Active Travel - General	Living Streets Edinburgh (LSE) is alarmed that despite this favourable policy framework, along with targets to increase walking trips, there remains no overarching statement of intent in terms of the accessibility of pedestrian networks or improvements to the quality of the pedestrian environment. Our principal concern here is not with the key city centre streets that will be covered by the Public Realm Strategy, but with local networks outside the city centre that feed into centres for local services and overlap with main roads.	The Council is developing new Street Design Guidance which will address the quality of the pedestrian environment throughout the city. There are also actions within the Active Travel Action Plan that related to improving key pedestrian routes and corridors, including access to local public transport hubs.	The development of the new Street Design Guidance is welcomed.

Stakeholder	Issue	Comment	CEC response	SEA Comment
Living Streets	Active Travel - old Walk9	A previous LTS commitment (under Walk 9), to take action to tackle pavement parking problems, appears to have been dropped, and for no apparent reason. LSE strongly urges that a reworded version should be reinstated, with CEC reiterating support for additional powers under proposed legislation, and a commitment to utilise those powers once they become available.	The Council accepts this, and will change the wording of the LTS accordingly. This action will be passed to the Parking Action Plan review project to be addressed.	No specific comments.
Deltix Consulting	Active Travel - Ped / Cyclist conflicts	The Council needs to tackle effectively the growing problem of cyclist / walker conflicts. A significant minority of cyclists (and in my experience it is almost exclusively males) cycle at a speed and/or in a manner which shows disregard for the safety and comfort of the person on foot – key examples being narrow shared-use paths such as the Union Canal towpath and those across the Meadows; red light running; cycling on pavements; and cycling without lights. It is unacceptable for the draft LTS to be silent on this issue.	The Council supports a position of mutual respect amongst all road users. A report will be going to the Transport and Environment Committee in January about the issue of cycling on pavements. Red light running and cycling without lights are matters for Police Scotland, though we accept that there is a lack of resources to address this.	Further action to segregate walking and cycling space is welcomed, in order to provide cycle space in addition to pavements. This should help to progress SEA Objective 3 (modal shift).
Deltix Consulting	Active Travel - pedestrianisation	'Complete pedestrianisation' should mean what it says. Where there are high levels of pedestrian activity, permitting cycling is not appropriate, as there is too much of a mis-match between the size, weight and speed of cyclists and those of pedestrians.	Noted. Based on internal consultation feedback, the LTS has scaled back its support for complete pedestrianisation.	No specific comments.
Deltix Consulting	Active Travel - Shared Spaces	More effort should be put into reallocating road space from cars to cyclists, in the process helping to reduce cycling / walking conflicts. There should be a presumption against shared-use footways and a total restriction within the city centre.	The Council has inserted a new policy, PCycle8 to cover the issue of shared spaces.	Policy Park10 addresses the issue of reallocating road space from on street parking to pedestrian and cycle facilities.

Stakeholder	Issue	Comment	CEC response	SEA Comment
Living Streets	Active Travel - The Vision Statement	The Vision Statement for Edinburgh's transport system lists in its expected outcomes both an accessible and an inclusive transport system. Neither of these outcomes is attainable without pedestrian networks that are fully accessible by all pedestrians, and without a firm commitment to their improvement. Without direct and accessible pedestrian routes to the stops then public transport also becomes inaccessible, quite apart from the vital importance of walk trips themselves. It is proposed therefore that a new accessibility vision statement for pedestrians should be included in the LTS, comparable to that of the road safety 'vision zero'. This would provide a clear longer term goal and the underlying basis for route and area improvement programmes across the city. We suggest the aim should be to achieve an 'access max. Edinburgh', within which all on street routes / areas would be fully accessible, for wheelchair and ambulant disabled as well as fitter pedestrians, subject to the natural limits set by topography.	The Active Travel Action Plan contains a joint Walking and Cycling Action to develop Street Design Guidance, which will set down guidelines for pedestrian areas to be fully accessible. The Council's Active Travel team will be working on strategic route and area improvements. The Walking section of chapter 9 has been modified to reflect this.	The ATAP is welcomed and in particular should support the achievement of SEA Objective 3 (modal shift).
Living Streets	Active Travel - Walk3	LSE is concerned that the Council's guardrail protocol may still be used and interpreted inconsistently, and/or in ways that would still allow guardrail to be retained or replaced where there is no evidence base to support its effectiveness. A commitment should be added to monitor the use made of the protocol and review its performance in terms of minimising the use made of guardrail.	The Council accepts this. This comment has been passed to the team developing the Council's Street Design Guidance to consider as part of their work on guardrails.	The Street Design Guidance should help to progress the SEA Objectives covering cultural heritage and landscape (objectives 12 and 13).
Deltix Consulting	Active Travel - Walk5	Policy Walk5 on raised entries should be combined with a policy to publicise Highway Code Rule 170 which states inter alia that motorists must "watch out for pedestrians crossing a road into which you are turning. If they have started to cross they have priority, so give way.	The Streets Ahead Road Safety Partnership includes a number of education and awareness raising actions to improve driver behaviour.	No specific comments.

Stakeholder	Issue	Comment	CEC response	SEA Comment
Living Streets	Active Travel - Walk5	LSE strongly supports the presumption in favour of raised entrance treatments to side roads. Such measures, allied to corner extensions and tighter bends, are one of if not the most effective individual means of improving the safety and convenience of the pedestrian environment. This presumption should be extended however to cover all entries from main roads into side streets, not just those from 'main shopping streets'. Accordingly we propose that the word shopping should be deleted from the policy statement.	Raised entrance treatments need to be prioritised, and the Council will focus treatment on entries from main shopping streets in the first instance. The policy may be reviewed in the next LTS.	No specific comments.
Living Streets	Active Travel - Walk6	LSE strongly supports the Walk 6 policy statement but its coverage is restricted to larger developments. LSE wishes to see Walk 6 supplemented by a similar statement covering expectations for improvements to the pavements etc. in the immediate vicinity of smaller developments. Opportunities for small but significant improvements, in association with redevelopments, are still all too often being missed at present.	Contributions from developers must be proportionate to the size of the development; and meet the 6 tests set down in Planning standards.	No specific comments.
Deltix Consulting	Active Travel - Walking - Street Design	At signaled road crossings, the Council should avoid the 'split crossings' (such as that to be introduced on Dalry Road at Haymarket) which interrupt the passage of people on foot.	Noted. All locations have different characteristics and issues therefore each area will be treated and assessed on an individual basis, and subject to a road safety audit.	No specific comments.
Living Streets	Air Quality	LSE supports the approach adopted in the draft LTS.	Noted.	No specific comments.
Pentlands Transport & Env Sub Comm (Juniper Grn CC)	Air Quality	There is a lack of detail on measures to combat traffic-related air pollution.	Options to combat transport related air pollution will be developed in greater detail in 2014.	Section 5.2 of the final LTS includes two policies and a series of actions aimed at reducing air pollution and increasing the use of electric vehicles.

Stakeholder	Issue	Comment	CEC response	SEA Comment
SEPA	Air Quality - Appendix 1 - Outcomes	Atmospheric pollution from road traffic and greenhouse gas emissions are inextricably linked, therefore we are disappointed to see that air quality and greenhouse gas emissions are being considered as separate issues in Outcomes 1 and 2. There may be occasions where measures to reduce greenhouse gas emissions may undermine efforts to improve air quality the need to protect human health (for example: widespread use of domestic biomass as a source of heating and increased number of diesel powered vehicles as a result of the vehicle taxation system that aims to reduce carbon dioxide emissions, but has resulted in an increase in NO_2 emissions). We therefore suggest that "improving air quality" be moved to Outcome 1. Defra and the Devolved Administrations have produced guidance document that explains why climate change and air quality should be integrated: "Air Pollution: Action in a Changing Climate" (2010).	The Council recognises this point, but Air Quality has a significant impact on health. The indicators have been taken from the Transport 2030 Vision document, approved by the Transport, Infrastructure and Environment Committee in 2010.	No specific comments.
SEPA	Air Quality - Section 5.2	The section on air quality does not include a reference to the EU limit values. There is a statutory requirement to meet the EU limit values and the UK is currently in breach of the annual mean and hourly limit values for nitrogen dioxide, and this could lead to infraction proceedings and large fines.	Accepted. The LTS will be worded accordingly.	No specific comments.

Stakeholder	Issue	Comment	CEC response	SEA Comment
Friends of the Earth	Air Quality General	The Draft Local Transport Strategy cites the 2008 Air Quality Action Plan, and the Local Air Quality Management Progress Report 2013 cites the Draft Local Transport Strategy. But nowhere between the two documents are the impacts of traffic on pollution levels quantified, or are the effects of the proposed traffic measures on air quality modelled and quantified. Somewhere between the two documents, or if not, then in the forthcoming Air Quality Action Plan, there needs to be a quantification of the contribution of traffic to air pollution, a modelling of how far traffic levels need to be reduced and eased to meet the Scottish air quality standards, a set of proposed actions which achieve the required reductions, and a timeframe for the achievement of the Air Quality Standards. There should be an additional Policy statement in which the Council commits itself to implementing transport-related measures contained in the Air Quality Action Plan and state how the forthcoming revised Air Quality Action Plan will be taken account of and implemented.	Noted. Agreed that quantification of the benefits of measures is desirable. However, there are on going uncertainties relating to the impact of population and economic growth place on demand, funding available for measures and the uptake of measures by organisations external to the Council. The Scottish Government will be carrying out a consultation on a Low Emissions Strategy for Scotland during early 2014. The actions and priorities defined by the new Low Emissions Strategy for Scotland, together with the funding available, will shape the actions to improve air quality during the lifetime of the LTS 2014 - 2019.	The LTS and actions required to comply with the Low Emissions Strategy for Scotland should help to achieve SEA Objectives 1 and 2, which relate to local air pollutants and greenhouse gases respectively.
Paths for All	Appendix 1, Outcome 2	Amending 2.1 to Proportion of journeys to school and work by walking and cycling – would provide a more robust indication of levels of walking and cycling.	Proportion of journeys to work by walking and cycling is included within our key corporate indicators (see Chapter2)	No specific comments.
Paths for All	Appendix 1, Outcome 7	An additional specific indicator that measures ease of use of walking/pedestrian networks would provide a clearer picture of the inclusivity of Edinburgh's transport systems for all users, e.g. "Proportion of junctions with fit for purpose dropped kerbs giving access to all footways."	Noted.	No specific comments.
Paths for All	Appendix 2: Plan and Programme	Active Travel Action Plan – Paths for All is a delivery partner through our part funding of the Active Travel Officer to implement the walking actions within the Plan.	Noted and accepted.	No specific comments.

Stakeholder	Issue	Comment	CEC response	SEA Comment
Pentlands Transport and Environment Sub Committee (Fairmilehead CC)	Bustracker	The bus tracker system should be increased on the periphery of the city rather than concentrated in the city centre. In the city centre people can usually get a choice of buses but on the outskirts they may be only one bus every ten to 15 minutes, or even less often. The bus tracker makes it easier to know when the next bus should be due, or indeed if you have just missed one.	The latest phase of Bustracker rollout focused on areas where there was lower bus frequency.	No specific comments.
Police Scotland	City bypass	Increased use of City Bypass to alleviate traffic congestion in the City Centre - Bypass daily suffers from congestion and only requires a breakdown or VA to impact on travelling times. If alternative routes were identified and clearly signposted this could be an option to relive pressure.	The City Bypass is mainly the responsibility of Transport Scotland. The Council's is working on wider provision of live information using the internet, VMS signs, etc, to signal locations where there is localised congestion.	No specific comments.
Police Scotland	City Centre	Increased pedestrian zones in the City Centre - access for emergency vehicles has to be maintained at all times. Delivery times would require to be specified.	Pedestrian zones would be designed to ensure access for emergency vehicles was maintained. Delivery times would also be specified.	No specific comments.
Police Scotland	City Centre	Additional training may be necessary for public service vehicle drivers who face heavier congested areas of pedestrians	This is an issue for Lothian Buses / Transport for Edinburgh, and other operators.	No specific comments.
Scottish Enterprise	City Centre	SE supports the approach proposed to be adopted in the LTS to improve the pedestrian experience in the core City Centre area and increase space for pedestrians, improve access to the City Centre, increase space for other uses (e.g. street cafes, entertainment, markets), and reduce the detrimental impact of motor vehicles on the City Centre environment.	Noted. Scottish Enterprise will be consulted further on this as part of the City Centre Vision project.	No specific comments.

Stakeholder	Issue	Comment	CEC response	SEA Comment
Sustrans	City Centre - Active Travel - Parking - 4.1 - Park 9	Finally while we are happy with the overall approach taken in the LTS we believe that some more radical policies are likely to be needed to achieve the Council's aspiration to reduce car journeys to 31% of all trips by 2020. For instance we think the Council should be more proactive in reducing on-street parking and reallocating the carriageway space for the benefit of cyclists and pedestrians. This is particularly important in the Council's plans for the City Centre as laid out in section 4.1. We doubt if the 5 bullet point objectives stated on page 12 can be met without a significant reduction in on-street parking, which is often a barrier to creating high-quality cycle facilities in urban areas. As such we believe that policy Park9 (pg 56) does not go far enough and that the Council should commit to a policy to reduce on-street parking in the city centre rather than just to "consider less on-street parking" at the same time as improving cycling and walking facilities. This is necessary to make it easy to cycle both to and through the City Centre as the Council proposes in its plans for the Family Cycle Network set out in the ATAP.	Issues relating to the City Centre, including parking, will be addressed through the City Centre Vision project. Sustrans and other stakeholders will have a chance to be consulted on the project next year.	The LTS and City Centre Vision project should help to achieve SEA Objective 3 (modal shift)
Living Streets	Clutter reduction	No policy is included in the LTS chapter on Management and Maintenance concerning the continuing need for the better management and de-cluttering of streets. This omission should be rectified, and there should be a firm commitment that this will be covered in the forthcoming review of Maintenance and Renewals. Living Streets has campaigned for improvements in the management of signage, bins, A-boards and other street furniture in Edinburgh over many years now. There have been limited improvements in some respects, but these have been offset by other increased pressures from e.g. more commercial activities and overly bin-intensive efforts to meet recycling targets. There is still little evidence that the management culture has significantly changed, or moved beyond a reactive approach responding to complaints. A clear policy commitment to a proactive and comprehensive management approach would help provide the framework for what is needed, and it should be included in the LTS.	Noted. The Roads Maintenance and Renewals Action Plan will not address street clutter, but CEC will look at this area through the Neighbourhood teams.	The work proposed for the Neighbourhood teams should help to achieve the SEA Objectives covering cultural heritage and landscape (objectives 12 and 13).

Stakeholder	Issue	Comment	CEC response	SEA Comment
Scottish Enterprise	Connectivity	Scottish Enterprise (SE) welcomes the consultation on a new Local Transport Strategy (LTS) for Edinburgh and supports the overall objective of developing growth areas of the city through facilitating provision of necessary transport infrastructure. Transportation in Edinburgh is undergoing significant positive changes following the upgrading of both Waverley and Haymarket rail interchanges, the EGIP improvements, Border Rail Connection, progress with the Tram for Edinburgh, as well as the promotion of active travel. SE supports the principle of the extension of the tram network, the creation of high speed rail connection from Edinburgh to Glasgow and for the longer term HS2 connecting Scotland to the south.	Noted and welcomed.	No specific comments.
Edinburgh Airport	Connectivity - HS2	We accept that future investment in HS2 will in the longer term reduce times by train between Scotland and London. However, we believe that this will only make a modest dent in the proportion of trips between Scotland and the south east. It will not assist international connectivity from Scotland. [...] Flying will continue to be the faster mode of transport. CAA Cap 796 found that business travellers are more time sensitive than price sensitive. Given the distance to London and other key business destinations Edinburgh Airport and the other main Scottish airports have a higher than average percentage of business travellers when compared to other airports in the UK. This percentage is unlikely to change even if rail times to London improve. Consumers do however need choice but it is important that the first two phases of HS2, which are potentially 13-20 years away, do not become a distraction particularly when the cost of the proposal is growing, as is political opposition.	The Council notes this position. Decisions regarding High Speed Rail are made by the Scottish and UK Governments, but CEC maintains its strong support for High Speed Rail. If HS2 goes ahead, it will increase capacity on the existing UK rail network, and enhance Edinburgh's and Glasgow's connectivity to the North of England, Midlands and London. Greengage21 are currently developing a response to the new cost benefit analysis and political considerations. But the Council acknowledges that the aim is for Edinburgh to have strong connectivity via all modes to a wide range of direct and indirect destinations.	No specific comments.

Stakeholder	Issue	Comment	CEC response	SEA Comment
Edinburgh Airport	Connectivity - long distance	Within the LTS policy Connnect6 promotes long-distance travel by rail, coach or sea over air travel. It is however suggested that these modes should not be given priority. Given the importance of air travel to both the Edinburgh and Scottish economy a cost benefit analysis assessment should be undertaken for any long-distance travel [i.e. trips outwith the SESTran area] initiatives to ensure that another option cannot deliver a more holistic outcome. Consumers should be free to make a choice dependent on their circumstances and journey purpose. Just under a third of passengers at Edinburgh Airport (29%) fly for business purposes and air travel is the only option that will ensure that they can travel to and from London in one day whilst still having a full working day.	The Council notes this position. Maintaining and enhancing Edinburgh's connectivity is key to sustaining the city's economy and attracting further inward investment.	No specific comments.
Spokes	Connectivity - Rail - HS2	Spokes is concerned about the massive costs of a high-speed rail corridor between Edinburgh and Glasgow, particularly when existing rail service improvements such as EGIP are being cut back and rail services between Edinburgh and the north are increasingly inadequate. The LTS should refer to these opportunity-cost considerations and not give unequivocal support to the High Speed proposal.	Noted. Decisions regarding High Speed Rail are made by the Scottish Government, but CEC maintains its strong support for High Speed Rail.	No specific comments
Spokes	Connectivity - Rail - Scottish Intercity Services	Rolling stock on these services is also inadequate in many respects, including capacity for luggage and bicycles. The Council should actively support measures to improve these services.	Noted.	No specific comments
Scottish Enterprise	Connectivity - South East Edinburgh	SE fully supports the position taken in the LTS in bringing forward Border Rail and Shawfair Station, and in advancing improvements to Sheriffhall Junction, other A1/A720 improvements, and cycling and walking improvements. For the longer terms SE supports the tram extension to Edinburgh BioQuarter and beyond (parliamentary powers permitting).	Noted.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Edinburgh Airport	Connectivity - Tourism and Scotland's Economic Strategy	The importance of Edinburgh Airports role as a gateway to the world is highlighted by the record year Historic Scotland has just enjoyed and VisitScotland statistics which state that there were 1.34 million oversees tourists in Edinburgh alone in 2011 and they spent £609 million which is over 10% more than domestic tourists who totalled 2.35 million and spent £551 million. Overseas tourists spend £454 per person compared to £234 by domestic tourists. The ease of air travel for long distance travel to Edinburgh is key to the local economy and air connectivity is essential to delivering further benefits for the Edinburgh economy given that 87% overseas visitors to Scotland arrive by air. The number of overseas visitors to Scotland is forecast to increase and we are investing substantially at no cost to the tax payer in new facilities to cope with this. For the foreseeable future arriving by air is likely to be the most popular method of accessing Scotland - given our position in Europe and the time taken to travel by alternative means. Consumer choice is key.	The Council acknowledges that the aim is for Edinburgh to have strong connectivity via all modes to a wide range of direct and indirect destinations.	No specific comments
Scottish Enterprise	Connectivity - West Edinburgh	SE considers that the LTS should more fully recognise the important role that Edinburgh Airport plays in supporting the city region and national economy. CAA figures show that just under a third of passengers at Edinburgh Airport (29%) fly for business purposes and air travel is the currently the only option that will ensure that they can travel to and from London in a single day whilst still having a full working day. Air travel is equally as important for tourism in Edinburgh and Scotland and forms an important strand of the Scottish Government's Economic Strategy. The ease of air travel for long distance travel to Edinburgh is also key to supporting the local economy and air connectivity is essential to delivering further benefits given that 87% overseas visitors to Scotland arrive by air, many spending part or all of their stay in the capital. Visit Scotland predicts that the number of overseas visitors to Scotland is set to increase, and for the foreseeable future arriving by air is likely to continue to be the most widely chosen method for accessing Scotland, given Scotland's periphery on the NW edge of Europe. SE fully supports the position taken in the LTS in support of advancing improvements to Newbridge.	The Council acknowledges that the aim is for Edinburgh to have strong connectivity via all modes to a wide range of direct and indirect destinations.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Transform Scotland	Developer contributions - Sections 4.5 and 8.5	"Off-site measures" should include pedestrian and cycle paths in the vicinity of the development, as a means of encouraging active travel to and from the development. A good example (of opportunities missed) is Kirkliston and Newbridge. Big industrial/employment schemes have been recently built in Newbridge; vast residential schemes are planned for Kirkliston North; yet the old rail line footpath connecting the two (and Queensferry High School in the other direction) remains undeveloped and hardly usable. In the past, contributions to the walking/cycling budget from developers have been minimal, and we believe much can be done to achieve an increase.	Contributions from developers must be proportionate to the size of the development; and meet the 6 tests set down in Planning standards.	Developer contributions could help to achieve SEA Objective 3 (modal shift)
Pentlands Transport and Environment Sub Committee (Fairmilehead CC)	Economic development - City Centre	It has to be realised that the car is now a part of life and a lot of the proposals in the Strategy appear to confirm that this Council and its officials are anti-car and wish to drive people out of the city centre. A lot of the people in the outskirts now no longer attempt to go into town but do their shopping at out of town centres where they are made welcome, unlike the city centre. It is a short drive from the PNP area to the Borders, Livingston and Glasgow.	This Council understands that a vibrant city centre is at the heart of a successful, prosperous, socially and culturally dynamic Edinburgh. It seeks to strike a balance between the need to maintain accessibility, manage demand, and move towards the ambitious but necessary carbon reduction targets set down by the Scottish Government and European directives.	The SEA supports the LTS aims to encourage more sustainable travel options, including walking and cycling
Pentlands Transport and Environment Sub Committee (Fairmilehead CC)	Evidence-based policies	I would be interested to see a lot of the evidence which appears to have been used to back up some of the claims in the Strategy. Accident statistics for instance don't tell the whole story. Vehicles are now a lot safer, road layouts are safer and the misconception that speed kills. Speed is way down the list of accident causation factors.	The Road Safety Plan contains a range of engineering, education, enforcement and e-safety measures to reduce the number of collisions.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Living Streets	Footway maintenance standards	LSE appreciates the fact that footway maintenance has been given higher relative priority over recent years and that some impact on the maintenance backlog was made, as seen in the figures quoted in the draft LTS text. Despite such efforts there was and is still a very long way to go to achieve a reasonably good standard of maintenance, or to approach the standards set in some other European countries. LSE is now very concerned that this and any future progress is being undermined by the budget cuts being forced upon local authorities. We hope that CEC will do its utmost to protect maintenance budgets and enhance performance under its maintenance regime, and we look forward to being closely consulted in the preparation of the Council's Maintenance and Renewals Action Plan, which we understand is underway.	Noted. Living Streets have been added to the RMARAP consultation database.	Ongoing maintenance planning should include consideration of using recycled and secondary materials wherever possible. This will help achieve SEA Objective 11, concerning protecting valuable land resources.
Transport Scotland	Freight	The Scottish Government is committed to encouraging the transfer of freight from road to rail. We welcome the Council's support for the continuing bulk movement of waste and recycling products by rail, and we are pleased with your commitment to safeguarding current rail linked terminals and rail access for current sites, as well as ensuring future developments are sufficiently accessible for rail.	Noted. These safeguards are included in Edinburgh's Local Development Plan.	The transfer of freight from road to rail should help progress the SEA Objectives, in particular SEA Objectives 1 and 2, which relate to local air pollutants and greenhouse gases respectively.
Road Haulage Association	Freight - Freight8	With the closure of the lorry park near the Forth Bridge there are no off-road facilities to the west of the city for lorry drivers delivering or passing through the Edinburgh area to take rest, refreshment or ablutions. This problem is further compounded when the road bridge infrastructure is closed due to weather or technical causes.	There is a commercial facility in Portobello and the Council would not compete with this. However, the RHA's concerns are noted. The Council would be supportive of a private sector planning application to provide this.	No specific comments
Sustrans	General	Sustrans expresses strong support for the Strategy in general, including the mode share targets, 20mph speed limits, School streets, etc. Areas where change is requested are note elsewhere in this database.	Noted.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Transform Scotland	General	"In general, this is a very forward-looking document, and we support both the general principles it is based on, and many of the specific policies and programmes. In particular, the idea of consulting initially on a specific set of topics, rather than the document as a whole, has turned out to be a very workable concept. We commented on the 'Issues for Review' document, and we were pleased to see that most of our choices (in the Options offered) were supported by the public and other consultees, and have been incorporated into the present document."	Transform Scotland submitted a number of comments many of which were expressions of support. This consultation report only contains areas where Transform Scotland's view differs from the LTS. All TS's comments were passed to the team developing CEC's emerging Street Design Guidance.	No specific comments
Spokes	Indicators and targets	It would be useful to know how progress to the targets will be measured, particularly the 'all journey' targets.	The Council is undertaking work to improve its methodology for measuring its indicators.	No specific comments
Friends of the Earth	Indicators and Targets	We suggest the introduction of an indicator on air quality that commits to Scottish air quality objectives being met by a designated time. For the Transport Strategy to succeed in delivering reductions across all air pollutants which are controlled by Scottish Policy, this section needs to be much more quantitative. It needs to: quantify how much different levels of different pollutants, especially NO2, PM10 and PM2.5, need to reduce in order to achieve air quality standards model what levels of traffic reduction would need to be achieved in order to meet the air quality objectives by a given date; show how proposed actions (including mandatory emissions control measures and/or congestion charging) will achieve the necessary reductions in traffic and in traffic emissions by the specified date.	Noted. Indicators of air quality are already defined and set under the legal framework for air quality. Agreed that quantification of the benefits of pollution reducing measures is desirable.	No specific comments
Paths for All	Indicators and Targets - 2.3	We welcome the clear, incremental targets for walking, cycling and public transport; we welcome the clear decreasing targets for driven journeys and people killed or seriously injured.	Noted.	No specific comments
Paths for All	Indicators and Targets - 2.5 - Future trends	We welcome the focus on meeting the needs of an ageing, and primarily pedestrian, population.	Noted.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Spokes	Indicators and targets - Appendix1	At present only two indicators cover cycling – school journeys and casualties. This is a totally inadequate coverage of the overall effect of council cycling policies. The absence of an indicator reflecting wider cycling policies could distort council actions on cycling, with higher priority given to actions which will support other indicators. Thus the following new indicator should be added: "6.5 Feeling safe when cycling."	The Council's modal shift targets are central to performance measurement and include cycle trips as a percentage of all journeys as well as cycle trips as a percentage of journeys to work and school.	No specific comments
Spokes	Indicators and targets - Managing and maintaining our infrastructure - section 7	This section is still very motor vehicle based, in apparent contradiction to the tables in 2.3 which have targets for considerable reduction in car traffic and increases in walking and cycling. The council's LTS targets in 2.3 should be reflected in section 7, with a section on the use of available street space, and a rebalancing of scarce street space in favour of pedestrians and cyclists. At present reallocation of space is only talked about in policy Park10.	Noted.	No specific comments
Transform Scotland	Indicators and targets - Outcomes - Reallocation of Road Space	The laudable Outcomes (2.2) and the targets for modal shift (2.3) are unlikely to be achieved without the reallocation of carriageway space, from vehicles in favour of cyclists, pedestrians and public transport. Oddly, the LTS does not mention it except in passing. It is an important principle in itself, and worthy of separate mention, perhaps in 4.5, as an extra 'Thrive'. In addition, a re-allocation to cycling should never, save in exceptional circumstances, be at the expense of the footway. Furthermore, re-allocation could be measured and monitored, and become part of the list of Transport targets.	Noted.	Policy Park10 addresses the issue of reallocating road space from on street parking to pedestrian and cycle facilities.
Central Radio Taxis	Integrated transport	TK felt that establishing taxi ranks outside Waverley Station was a positive move. TK asked for consideration of a taxi rank, or at least a dropping - off point, to serve the Bus Station.	Taxi stances will be reviewed city wide and the Council accepts that there are areas for improvement. The catalyst for change will be tram operations and need to make suitable provision close to tram.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Living Streets	Integrated Transport	LSE believes there should be greater focus on improved pedestrian access to major trip generators such as the stations at Waverley and Haymarket, the hospitals, and retail / commercial and leisure centres. LSE welcomes the focus on improving conditions for pedestrians at and around bus stops. For this to be meaningful, however, it needs to be translated into a substantial rolling programme of improvements, targeted on busier bus stops initially but geared to eventual comprehensive coverage of stops. LSE believes there should be a SMART approach to improving conditions where there are concentrated locations of vulnerable pedestrians, e.g. around care homes. This will not necessarily be on routes where overall pedestrian flows will be high.	Noted. This comment has been passed to the Active Travel Team for consideration. The Council's Walking Officer will be working on developing priority pedestrian routes.	The SEA supports the LTS aims to encourage more sustainable travel options, including walking and cycling
Pentlands Transport and Environment Sub Committee (Fairmilehead CC)	Integrated Transport	How is this expected to work as one of our bus routes, the 18 bus service, is operated by 2 operators and tickets (or seasons tickets) from one operator cannot be used on the other operators buses. There are other examples of this such as the 13 service where Lothian Buses day tickets cannot be used on it. My understanding is that legislation would require to be changed to accommodate cross ticketing so how are the Council going to implement this or do they only mean integration between Lothian Buses and the T!!!?	There are difficulties in progressing smart and integrated ticketing technology. The Council will promote existing ticketing products, such as PlusBus and OneTicket; and will also work with operators and the Scottish Government to progress integrated ticketing.	No specific comments
Pentlands Transport & Env Sub Comm (Ratho Env Gp)	Integrated Transport	Integrated Transport system is necessary for areas like Ratho and other outlying settlements where we are served by different operators, some of whose routes are at a distance from the residential areas. Otherwise there is inevitably greater use of private cars than there needs to be.	Noted.	No specific comments
Transport Scotland	Integrated Transport	We would encourage the Council to give higher regard to smart ticketing in its approach to integrated ticketing than has been demonstrated in the draft Strategy. Officials from Transport Scotland would welcome the opportunity to discuss this with the Council.	Noted. This comment has been passed to the Public Transport team.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Police Scotland	Integrated transport - ticketing	Bus and Tram schedule may not reflect shift workers' commuting times, therefore encouraging use of private cars.	Lothian Buses run an extensive service running late into the evening, and augmented by Night Buses. The Tram service is expected to run from 06:00 until midnight on Monday through Saturday. On Sunday, it is proposed that service will run from 07:00 until midnight.	No specific comments
Deltix Consulting	Maintenance / Street Design	The quality of pavement construction, and in particular maintenance, is poor in Edinburgh compared to continental standards – and this has aesthetic, comfort and safety impacts. Decent standards need to be set out and enforced, improving the quality of the walking environment not just in the city centre 'public realm' but right across local service centres which generate high volumes of walking (and have the potential for even more, given the right conditions).	The Council's emerging Street Design Guidance deals with issues of standards of materials in the public.	Ongoing maintenance planning should include consideration of using recycled and secondary materials wherever possible. This will help achieve SEA Objective 11, concerning protecting valuable land resources.
Transport Scotland	Maintenance and Utilities	TS welcomes the approach taken by CEC in respect of the development of a Roads Maintenance and Renewals Action Plan and the decision to review the methodology for renewals/repair prioritisation. We would welcome sight of the completed document for our interest.	Noted.	
Paths for All	Managing and maintaining our infrastructure	Amendment of the 3rd objective to - To ensure that the street, footway and cycle networks are of a standard suitable for safe and comfortable movement by people of all abilities – would ensure that previous recognition of the need to consider less able users was sufficiently addressed in objectives, and consequently by specific actions.	Accepted.	
Paths for All	Managing and maintaining our infrastructure - Streets7	We commend the council's commitment to inspect 100% of road reinstatements following utility road/street works. Reinstatement to an acceptable standard will make a huge difference to the walkability of Edinburgh's streets for all users.	Noted.	

Stakeholder	Issue	Comment	CEC response	SEA Comment
Pentlands Transport and Environment Sub Committee (Fairmilehead CC)	Managing and maintaining our infrastructure	A lot more emphasis should be placed on road engineering and traffic management. Automatic traffic signals are, or appear to be placed, not to control traffic but to cause the maximum inconvenience to traffic and road users, including pedestrians. I could give many examples where ATS work against each other instead of with each other. As a result traffic is not allowed to flow freely which leads to congestion and frustration. It should be a condition of service that every official in the transport department spends some time on points duty at busy junctions to give them some understanding of how traffic should flow.	Noted. The Council aims to maintain a well co-ordination traffic signal network, and would be interested to learn of sites where the Fairmilehead CC think this could be improved.	No specific comments
Motorcycle Action Group (Scotland)	Motorcycling - safety	Certainly motorcycling is perceived as having a poor safety record with stats consistently indicating users are at higher risk of injury than car drivers. This said injury rates have been reducing and risks associated with this mode are broadly equivalent per mile travelled to cyclists. Whether that will continue to be the case is debatable given the raft of measures seeking to improve cyclists safety and the almost complete lack of comparable measures aimed at motorcycle or scooter riders. Indeed some measures proposed or already implemented have the effect of forcing PTW into diminishing general road space significantly increasing risk of collision with other traffic, and consequentially as vulnerable road users, risk of significant injury. The council has a duty of care to the safety of all road users groups and this imbalance in treatment between different vulnerable road user groups is not acceptable. Where measures are proposed seeking to enhance cyclists safety very careful consideration needs to be given to ensure that pedestrian and PTW safety is not adversely affected.	Comments have been passed to the Road Safety team for consideration.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Motorcycle Action Group (Scotland)	Motorcycling - access to bus lanes	Permitting access to Bus lanes is finding increasing favour in towns and cities in England, Wales and Northern Ireland. The evidence where such access has been permitted has been that there are no significant problems and that as well of increasing PTW safety other vulnerable road user's, cyclists and pedestrians also experience fewer collisions. Access to Bus lanes is particularly of benefit to those of limited riding experience or those using lower powered PTW, and despite concerns by some in the cycle lobby, granting PTW access has not been an impediment to increased cycle usage.	Noted. The Council's stance re bus lanes has reviewed before and approved by the Transport Committee; there are no plans to change this.	No specific comments
Motorcycle Action Group (Scotland)	Motorcycling - general	In summary as drafted the strategy fails to show a balanced consideration of the needs of all road users, being skewed heavily towards the interests of cyclists a minority of the travelling public at the expense of others. Specifically despite the contribution that they could make towards reducing congestion, emissions and land use PTW have been lumped in with cars, suggesting that they are part of the problem, rather than part of the solution. The LTS fails to recognise the contribution that motorcycling could make to optimising the use of the city's limited road space, and no real encouragement or targets for growth of this mode is given. The Council should show a willingness to consider the benefits motorcycling can bring as a mode.	Motorcycles receive free parking in recognition of their low road-space consumption. Cycling contributes to other objectives, chiefly health and wellbeing.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Motorcycle Action Group (Scotland)	Motorcycling - parking	Simple inexpensive measures to increase the security of parking, such as provision of adjacent fixed railings next to dedicated Motorcycle Bays, goes a considerable way to increase confidence among owners that their vehicle will not be stolen and that they can be safely used for commuting or shopping trips. Consideration is also needed of means of providing security in peripheral parking zones, where dedicated motorcycle bays are not the norm. Additional ground anchors or other immovable objects that machines can be secured to are essential, to provide long term security, particularly for small bikes and scooters, that are frequently targeted by young bike thieves (a cause of a great deal of the anti-social behaviour previously noted). With regards to parking as well as encouraging motorcycle parking provision in new developments, Park and Ride sites and on-street a commitment to provide means of secure parking at all dedicated Motorcycle Bays by 2020 needs to be included. An undertaking should also be given to investigate suitable means of providing a similar level of security in peripheral areas, in a similar manner to the consideration currently being given to cycle security.	This comment is noted, and will be fed into the forthcoming Parking Action Plan review.	No specific comments
Living Streets	Parking - City Centre	LSE supports there being less on-street parking as part of projects to enhance the city centre environment and improve conditions for pedestrians, cyclists and public transport; opposes new net off street parking capacity in the city centre; and believes the City Council should seek powers to introduce charges for the off-street workplace parking spaces in the city centre.	Noted.	No specific comments
Pentlands Transport & Env Sub Comm (Ratho Env Gp)	Parking - CPZ	Historical areas in Rural West Edinburgh were built before cars and garages were invented to parking is inevitable on the street. CPZ in these areas cannot be imposed.	Noted.	No specific comments
Living Streets	Parking - off street - Park4	LSE is opposed to the introduction of any new net off-street car parking capacity within the city centre. Its provision is in conflict with the overall policy framework and the wish to reduce unnecessary car travel.	Noted.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Police Scotland	Parking - off-street	The report suggests that multi parking zones are being under-used and the reconstruction of St James Centre will produce many more spaces – however this may impact on the vision of less private cars in the City Centre. If streets are to be pedestrian only, how will cars access car parks – this may only lead to further congestion on surrounding City Centre roads.	The Council proposes where possible transferring on-street parking to off- street. Moving parked cars off-street greatly assists public transport operations and makes walking and cycling more.	Off-street parking could potentially help to achieve the SEA Objectives covering cultural heritage and landscape (objectives 12 and 13), depending on the design of proposed off-street parking areas.
SEPA	Parking - Park and Ride - Air Quality	Whilst SEPA is fully supportive of sustainable transport options, Park and Ride sites remove a relatively small number of cars (compared to the total number of vehicles that enter the city each day) and increase the number of buses. Buses and HGVs have been shown to emit disproportionately high levels of nitrogen dioxide in the urban centres. It is therefore essential that only buses with the highest EURO spec or equivalent low emission technology be used on the busy commuter routes that pass through street canyons within the Air Quality Management Areas (AQMAs).	The Council has a commitment to explore emission reduction measures for the city centre, and Euro standards for buses is one option. There will be further dialogue with SEPA in 2014/15.	No specific comments
Living Streets	Parking - Park16	LSE strongly supports the provision of bus boarders. The presumption in favour of bus boarder provision should be extended to locations where restricted pavement space is causing problems for pedestrians.	This comment was passed to the Street Design Guidance team for consideration. Bus boarders allow smooth pulling in/out for buses, with the minimum loss of parking spaces. However, bus boarders are not favourable to cyclists, or, in some circumstances, to taxis and general traffic.	No specific comments
Living Streets	Parking - Residents' / CPZ	LSE regards the retention of strategic controls over controlled parking as essential. Extensions to the CPZ targeting commuter pressures for example could be utilised to help encourage modal shift.	Noted. Living Streets will have further opportunity to comment on this as part of the Parking Action Plan Review.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Greenside Parish Church	Parking - Sunday	'Welcomes the decision not to impose parking charges'	The details of how to implement a policy to increase the turnover of parking spaces in the City Centre on a Sunday have not yet been drawn up. This will require further investigation and consultation.	No specific comments
Greenside Parish Church	Parking - Sunday	A potential scenario at Royal Terrace could be free parking on the north side of the Terrace and a combination of permit parking and a single yellow line restriction on the south side. The rationale for this is unclear, especially given the broad roadway.	The details of how to implement a policy of increased parking restrictions have not yet been drawn up.	No specific comments
Greenside Parish Church	Parking - Sunday	Difficult to justify introduction of restrictions, given the intrusion and cost, except in areas where there is a clear congestion problem during Sunday traffic flows.	The Council notes this position. Any restrictions would have to be clearly understandable, and too many localised exceptions could create a 'piecemeal' effect. There will be further consultation on any proposed restrictions.	No specific comments
Living Streets	Parking - Sunday	LSE strongly supports the introduction of a parking and loading controls regime and supports enhanced Sunday bus services from Lothian Buses; but is concerned about the potential for more clutter and believes that additional signage can and should be avoided.	Noted. The Council would endeavour to strike the optimum balance between legibility and visual impact.	No specific comments
St John's Church	Parking - Sunday	It is important ... that our congregation [has] good access on Sundays, principally but not exclusively in the mornings. That is particularly important for those with limited mobility or for whom there is no adequate public transport option. And for all members of the congregation who currently come by car, whatever their mobility, there could be potential problems from, for instance, the enforcement of loading restrictions and the application of residents' parking bays on Sunday mornings, and the impact of any charges which may be introduced.	The Council notes this position. There will be further detailed consultation on any proposed restrictions	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Augustine United Church (Kathleen Ziffo)	Parking – Sunday - community involvement / hours of activity	On George IV Bridge where my own church Augustine United is situated, the traffic build up on Sundays does not occur till around 1 pm. We have always acknowledged that public transport should be used where possible, and despite the welcome introduction of a Family Sunday All Day ticket, Sunday morning bus services on some routes are absent, or have a less frequent service than on week days. Our people sometimes require to bring a considerable amount of items to church, and to be there fairly early – by 9.30 or 10 am – such as yesterday for our Harvest Festival and church congregational lunch afterwards. We also needed two cars to take away the amount of contributed tinned and dry food items which went to Fresh Start, the organisation which gives practical support to those people being re-housed by the Council.	This is noted. The Council acknowledges the large contribution that Edinburgh's worship centres make to civic and community life.	No specific comments
St John's Church	Parking – Sunday – consultation	Much will depend on precisely how the Council propose to take forward the general ideas in the draft Strategy. We therefore urge the Council to take into account our comments above when considering its plans; and we ask to be consulted when specific proposals emerge.	The Council notes this request. It is planned to hold further detailed consultation on this issue.	No specific comments
Essential Edinburgh	Parking – Sunday - Economic development	Essential Edinburgh note that nowhere in this report does it refer to the Cities agreed objective of bringing people from in and around Edinburgh into the City Centre. The days when this needs to happen are Saturday and Sunday. In recent years Saturdays have been declining in importance to retailers and Sundays growing. It is crucial that this progress on Sundays is not stalled by the introduction of stringent parking changes that act as a further message to visitors that "you are not welcome" . The outcome of this will be to drive business to other cities and out of town shopping centres. This will cost jobs, especially amongst young people and potentially increase car mileage with its negative environmental impact. Improvements in bus services will be required if measures are taken to stop employees using the free parking as many cannot get in by public transport at the moment. Targeted measures to keep the main routes clear and traffic flowing make sense and are supported.	It is planned to hold further detailed consultation on this issue. The Council will hold dialogue with key stakeholders and public transport operators with regard to a) parking controls and b) service timetabling.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
St John's Church	Parking - Sunday - public transport	In relation to public transport, we welcome the idea ... that Sunday bus services might be improved. That would be an important complementary measure to any introduction of parking controls on Sundays, providing the increase in services was sufficient to meet the needs of people living throughout the City. We look forward to seeing more concrete proposals for that.	Sunday parking controls should deliver efficiencies for bus operators, which creates an opportunity for improving bus services. However, service timetabling is a matter for operators. The Council will hold dialogue with operators with regard to a) parking controls and b) service timetabling.	No specific comments
Augustine United Church (Kathleen Ziffo)	Parking - Sunday - request for later hours of operation	If roads which at present do not have parking restrictions on Sunday mornings are to have restrictions imposed and "No Parking", and charges are imposed for parking at other streets nearby, then the hope is that there are sufficient parking spaces, that the charges might not come "into effect" until after 1 or 2 pm, and that the charges are not at a hugely high rate.	At present, the proposed approach is to prepare detailed proposals for the extension of Sunday parking controls, in discussion with the Council' Transport Forum and other groups. The starting point for these discussions would be: The introduction of waiting and loading restrictions on main roads on Sundays, all day, but starting later than on other days; Options for increasing turnover of public parking and reducing car commuting to the city centre and considering the extent that residents' parking controls will need to operate.	No specific comments
Road Haulage Association	Parking - Sunday Parking - Park12	Sunday and 7 days per week loading/unloading restrictions seem contrary to the statements recognising the importance of efficient road freight delivery/collection operations in Edinburgh. (See 13.1-Freight). Our sector requires ready access to premises enabling when and where necessary 7 days per week delivery and collection services to both our benefit and that of the city's continuing economic prowess.	Noted. The Freight sector will be consulted by the Council when more detailed proposals are drawn up. It is however possible that parking controls could have a beneficial effect on Sunday freight operations.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Parking	Parking - Walk1	Walk1 – this will have a financial impact. Pedestrianisation will result in a better pedestrian environment, but will initially mean a drop in income, which will mean less investment in transport improvements.	N/a	No specific comments
Augustine United Church (Kathleen Ziffo)	Parking -Sunday - elderly and infirm	Parking, particularly for old and infirm people close to churches is very important.	The Council acknowledges the need for old and infirm people to park near churches, and that this applies especially to people who may be old and infirm, but who do not qualify for a Blue Badge.	No specific comments
Transport Scotland	Protecting our environment - 5.2.1	The Council may wish to make reference to Switched On Scotland: A Roadmap to Widespread Adoption of Plug-in vehicles, which was published on 12th September http://www.transportscotland.gov.uk/files/Switched%20On%20Scotland%20.pdf which contains a comprehensive summary of the actions all stakeholders can take to advance the adoption of plug-in vehicles. For example, plans for Transport Scotland to work with local authorities and planning authorities to progress opportunities to use local planning, parking and traffic management powers to promote plug-in vehicles, and also plans to offer evidence-based analysis of public sector fleets to create new opportunities for the deployment of plug-in vehicles. We will be speaking to COSLA and SCOTS about this in the first instance but we will be seeking input from specific local authorities in time. It is important to note the provision of funding for charging infrastructure to install charge points in local authority premises, but also more recently funding has been provided to local authorities to enable charge points to be installed within their areas, such as at park and ride sites, and also every 50 miles on the primary road network. Funding is also available for the installation of domestic charge points and commercial workplaces - so the council could take a proactive role in promoting these offers to local residents and businesses.	Noted. The LTS will be reworded accordingly.	Policy Env2 is aimed at increasing the uptake of electric vehicles and should help to achieve SEA Objectives 1 and 2, which relate to local air pollutants and greenhouse gases respectively.

Stakeholder	Issue	Comment	CEC response	SEA Comment
Friends of the Earth	Protecting our Environment - Actions	We would be keen to see additional actions which address how electric charging points will be rolled out and how the pricing scheme for parking permits will encourage the purchase of low emissions vehicles.	Noted. The Council has been working with its Community Planning Partners (NHS Lothian, Edinburgh University, Queen Margaret University and Police Scotland) to deliver public-access electric vehicle charging infrastructure in Edinburgh, utilising the government- funded Plugged in Places programme. The latest round of funding will shortly deliver 25 public-access electric vehicle charging points, including Rapid Charge units at Ingliston, Hermiston Gate and Straiton park and ride sites. These will be in addition to 24 charging points already installed at Council buildings through the earlier part of the Plugged in Places programme. Once installed, these public access charging sites will be added to the 'Charge Your Car' (chargeyourcar.org) open-access network, enabling people to locate and use public-access electric vehicle charging points throughout Edinburgh, Scotland and the rest of the UK. The Council's existing "Park Green " charging system for residents' parking permits is designed to encourage the use of low emission vehicles.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Friends of the Earth	Protecting our Environment - Actions	We would suggest that the Council looks again at Road User Charging. After congestion charging was introduced in London in 2003 there was an initial 30% reduction in cars and lorries in the central charging zone.5 Although levels have since crept up, this could be because the charge itself has not risen as much as public transport fares. Stockholm estimates a 19% reduction in traffic in its inner city as a result of its congestion charge.6 If the Council is not going to propose a re-examination of congestion charging, it needs to demonstrate that its package of alternative measures is as effective in reducing pollution and congestion.	Noted. There are no plans at present to reconsider Road User Charging.

However, a range of options to reduce emissions in the city centre will be drawn up in 2014, and this will be complemented by the Council's new Travel Planning function. | No specific comments |
Friends of the Earth	Protecting our Environment - Env 2	We welcome the Council's support of increased use of low emissions vehicles but think that this should form part of a suite of policies which first and foremost encourage cycling and walking, using public transport, and discourage unnecessary vehicle use.	Noted. The Council has an Active Travel Action Plan to encourage walking and cycling and a Public and Accessible Transport Action Plan in place. The Local Transport Strategy generally aims to encourage alternatives to private car use.	No specific comments
Friends of the Earth	Protecting our Environment - Env1	We would like to see the Council go further and express support for mandatory emissions control measures including Low Emissions Zones. [… Research shows that mandatory measures are more effective....] Low Emissions Zones were mentioned in the Issues for Review document and we are concerned that these stronger Low Emissions Zones options are not included in the Local Transport Strategy.	The potential for Low Emissions Zones will be one of the options appraised in 2014. Pursing this option will be in the context of the Scottish Government's new Low Emissions Strategy for Scotland.	The LTS and actions required to comply with the Low Emissions Strategy for Scotland should help to achieve SEA Objectives 1 and 2, which relate to local air pollutants and greenhouse gases respectively.
SfC Environmental Assessment	Protecting our Environment - Objective 2	There are misinterpretations in this statement and the words 'noxious emissions' are not defined in any local air quality context. It is strongly recommended that it be amended as " to reduce pollutant emissions in order that the city meets statutory Scottish Air Quality Standards" (NB these standards have evolved from but are not always equivalent to European standards).	Accepted.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Friends of the Earth	Protecting our Environment - Objective 2	However, this air quality objective should go further: It should include the need to achieve Scottish and UK air quality standards, not just those contained in European legislation, because in some instances the Scottish and UK standards are more stringent. It should include the need to meet standards for all relevant pollutants rather than just state "noxious emissions" which is potentially vague. For example, whilst the Air Quality Management Areas in Edinburgh are only currently declared for Nitrogen Dioxide, PMs remain cause for concern, and traffic levels remain a dominant source of PMs. For instance, Salamander Street exceeded the Scottish daily mean limit 13 times in 20124. The number of exceedences allowed under the Local Air Quality Management system is 7 and this standard was to be achieved by 31 December 2010.	Agreed.	No specific comments
Friends of the Earth	Protecting our Environment - proposed	We would like to see the Council run a public campaign to raise awareness about the fact that pollution levels in many parts of the city centre are excessively high, and around the health and environmental impacts of air pollution and traffic congestion. [...] We point out that at least 10 times more people are killed from pollution than from road traffic accidents in Scotland: in 2012, there were 170 road traffic accidents,7 and over 2000 people die annually from the effects of air pollution. Therefore, it would seem logical for the Council to extend the scope of its outreach work on Road Safety to include communicating the causes and effects of air pollution. Launching a public campaign on air pollution would have a positive impact on encouraging people to support measures which might otherwise be unpopular, including mandatory emissions control measures and road user charging. It would also encourage people to cycle, walk, and take public transport.	Noted.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Road Haulage Association	Protecting our Environment - Section 5.2	With regard to references to the level of exhaust emissions attributable to the road freight sector, major and costly improvements to vehicle design and construction over the last few years mean much cleaner, quieter and efficient lorries are being utilised. We therefore wish it to be noted that our sector is contributing to better air quality as best we can at this point in time.	Noted.	No specific comments
SfC Environmental Assessment	Protecting our Environment - Section 5.2	Recommend removing "and noxious emissions" from header, and also from Actions sub- header.	Accepted.	No specific comments
SfC Environmental Assessment	Protecting our Environment - Section 5.2 - Actions	It is also recommended that reference is made to the statutory requirement for the Council to produce a specific Air Quality Action Plan (AQAP) and that government guidance requires clear alignment of the AQAP and policies in the LTS where there is potential to improve local air quality, such as Travel Planning, Traffic Management, Active Travel Action Plan etc. Note Government guidance for an AQAP requires it: 'works towards' delivering emission reductions and AQ improvements contains an identified and quantified set of measures states estimated completion dates for the individual measures details indicators that will be used for assessment tracks progress made.	Accepted.	The LTS and AQAP should help to achieve SEA Objectives 1 and 2, which relate to local air pollutants and greenhouse gases respectively

Stakeholder	Issue	Comment	CEC response	SEA Comment
Spokes	Protecting our Environment / Thriving City / Putting the Customer First	Regarding the Built Environment, a balance must be struck between the Council's Planning and Transport policies/actions. Too often they are in separate silos and there are numerous examples where planning policies or decisions have impacted very negatively on transport objectives, particularly in relation to cycling development. We fully appreciate that a balance has to be struck, but that is what we are seeking – a balance, not a total neglect. [Spokes list a number of examples] In conclusion, a new paragraph, policy, and effective actions are required. The policy statement could be on the following lines... " Policies, objectives and practices between the planning and transport functions will be closely coordinated at high level and at operational level, to ensure a holistic, balanced approach from the outset in all relevant decision-making."	These comments, including the specific examples, have been passed to Planning. Transport accepts that it needs to work more closely with other Council services.	Close co-ordination between the planning and transport functions at CEC could help to achieve various SEA Objectives, for example by reducing the need to travel long distances between dwellings and places of employment
Police Scotland	Public transport	Corporate rates might be a suggestion for workers in the City Centre, encouraging the use of public transport by reasonable ticket pricing.	This is an issue for Lothian Buses / Transport for Edinburgh, and other operators. As such it will be raised with them.	No specific comments
Transport Scotland	Public Transport - Bus	The LTS for Edinburgh sets out specific aims for public transport, which is currently of a high standard, which is ambitious but achievable. The aim seems to be to facilitate a bus and tram network that is reliable, convenient and accessible. The will maintain the bus lane network and enforce compliance via the use of cameras. This will help deliver a better relative bus: car speed in the city which is important for growing patronage.	Agreed.	No specific comments
Parking	Public Transport - Bus Lanes - PubTrans10	The argument that allowing private hire cars to use bus lanes would encourage ordinary cars to use them doesn't stand up. What is the Glasgow experience?	n/a	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Road Haulage Association	Public Transport - Bus Lanes - PubTrans10	We suggest that consideration be given for trialling commercial vehicle utilisation of Bus and High Occupancy lanes to increase delivery/collection efficiencies and reduce intrusion times and pollution. (P trans 10) gives priority to buses and trams over all other motorised vehicles which includes freight movements. Perhaps a trial of 'Priority Vehicle' lanes to include lorries might demonstrate increased efficient use of available road space.	Noted. The Council's stance re bus lanes has reviewed before and approved by the Transport Committee; there are no plans to change this.	No specific comments
Road Haulage Association	Public Transport - Bus Lanes - PubTrans10	Anecdotal evidence of aggressive behaviour by bus and Taxi towards other road users utilising Bus/Taxi lanes during periods of 'non-operation' has been brought to our attention. Should this be the case 'frightened' drivers will not make full use of available road space adding to congestion and delays affecting in our case, delivery and collection schedules.	CEC has not been aware of any anecdotal evidence suggesting this happens.	No specific comments
Living Streets	Public Transport - PubTrans5	The wording of PubTrans5 needs to be modified to make it clear that a good waiting environment at bus stops would be accessible to disabled users and would provide seating and sufficient passing space for pedestrians as well as shelter and information.	Accepted.	No specific comments
Spokes	Public Transport - Rail - 10.7	The Council should actively seek out and support the provision of Dutch-style Bike Hubs, including staffed bike storage, minor repairs and bike hire, at both Waverley and Haymarket.	The actions contained in the Active Travel Action Plan take highest priority when making decisions about the Cycle budget.	No specific comments
Spokes	Putting the Customer First	Spokes's comments here relate to two past projects, where consultation was deemed insufficient.	Transport will be adopting the Council's Corporate Consultation Framework. The specific comments have been passed on to the Cycle Team.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Transport Scotland	Rail	In the new ScotRail franchise, due to commence on 1 April 2015, the Scottish Government is asking bidders to provide innovative plans that will enable more bicycles to be conveyed to destinations offering cycle experiences. There will also be a requirement for staff to be trained in an appropriate manner to provide a flexible service where possible (e.g. cycle carriage in vestibule area) whilst ensuring that it remains safe for all passengers. The shape, form and number of cycles that can be carried on-train will be the responsibility of the Franchise Operator in conjunction with their on-train policy which should balance the needs of both non-cyclists and cyclists. Scottish Government officials would be keen for City of Edinburgh Council to share information on the progress of the trials to support carriage of cycles on the Edinburgh Trams to learn lessons for the future.	CEC welcomes these elements of the new ScotRail franchise. We will certainly share info with TS re progress and outcomes of any pilot of cycle carriage on Trams.	Increased carriage space for cycles on trains could help to achieve SEA Objective 3 (modal shift)

Stakeholder	Issue	Comment	CEC response	SEA Comment
Transport Scotland	Rail	The Scottish Government remains committed to the Edinburgh Glasgow Improvement Programme and the electrification of the Scottish rail network. The first phase of the delivery programme announced in July 2012 will deliver faster journey times, improved reliability, enhanced stations and increased capacity, meeting passenger demand well into the next decade. Decisions regarding the timing and specification of future phases will be considered alongside our ambitions for a High Speed Rail link, the latter of which could see a sub-30 minute rail link between Glasgow and Edinburgh by 2024. Following the completion of EGIP, the Scottish Government is committed to a rolling programme of electrification of the rail network of 100 track kilometres per annum following completion of EGIP, with the railway line to Stirling, Alloa and Dunblane due to be electrified by the end of 2018. In addition, the Highland Main Line Improvements project is being taken forward as one of the Scottish Government's three priority rail projects. The long-term goal of the project is to achieve a fastest journey time of 2 hours 45 minutes between Inverness and the Central Belt with an average journey time of 3 hours and hourly service by 2025. Another project included in the High Level Output Specification for development in Control period 5 (2014-2019) for delivery in CP6 (2019- 2024) is the Aberdeen to Central Belt Rail Enhancement scheme, which will seek to deliver faster services and improved connectivity between our cities.	Noted. CEC welcomes the benefits that greater electrification will being to Edinburgh, the SEStran area, and Scotland as a whole.	No specific comments
Sarah Johnston	Ratho - Baird Road	It is not safe to walk or cycle along Baird Road. The section just before the bridge over the M8 going into Ratho is particularly bad. Is it possible to continue to have a bus along this route post-tram implementation? Is it possible to upgrade the road to make it suitable to walk/cycle safely?	No upgrade of Baird Road is currently programmed, but this comment was passed to the South West Roads Office for information.	No specific comments
Sarah Johnston	Ratho - Canal	I have cycled along the canal from Edinburgh to Ratho a number of times (it took me about 45mins) and I believe it would be possible to commute into Edinburgh if the section from to Ratho was upgraded. I think this reduce the time to commute and make it an attractive option. Are there any plans to upgrade this section of the canal?	There are no plans to upgrade this section of the canal at present.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Sarah Johnston	Ratho - Hermiston	It is too far to walk to Hermiston for commuting purposes. It is possible to cycle but the roads aren't ideal. Is it possible to have a bus to connect Ratho with Hermiston Park & Ride? This would also give all the students at Herriot Watt access to Ratho climbing centre.	This was passed to the Public Transport team to consider in the context of the overall network; though subsidised services are prioritised according to a set methodology.	No specific comments
Transport Scotland	Road Safety	We are encouraged to note that the Road Safety Plan is aligned with Scotland's Road Safety Framework and refers specifically to it, and it's also good to see the commitment to road safety education, and "....exploring new opportunities to work with schools and local communities to initiate safety awareness.....". In terms of specific initiatives, we were of course aware of their proactive approach to implementing 20 mph zones / limits more widely across Edinburgh, as we assisted with the evaluation of the pilot project. We will also be interested to see the outcome of the proposed trial of closures of school streets for short periods around 20 to 30 minutes at school start and finish times.	Noted.	No specific comments
Pentlands Transport & Env Sub Comm (Ratho Env Gp)	Road Safety - Ratho	Rural West Edinburgh residents inevitably undertake numerous car journeys due to problems highlighted above. In the interests of road safety and to cut down accidents consideration needs to be given to road safety improvements such as the Dalmahoy Road/A71 Junction at the Dalmahoy Country Club as a high priority for both vehicular traffic and pedestrians crossing busy main roads.	This was passed to the Road Safety team for noting. Accident Investigation and Prevention schemes are decided on a prioritised methodology.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Living Streets	Safe2	The policy statement on enforcement refers only to maintaining the existing camera enforcement network and monitoring needs elsewhere. This surely needs to be strengthened to make it clear that camera enforcement, using fixed and mobile cameras, will be deployed wherever they are needed most, subject to resource constraints. In particular we would anticipate a need for new camera based enforcement actions on main roads where 20mph speed limits are introduced. In the extended coverage of 20mph zones it is unreasonable to expect any routine police activity to enforce speed limits, anymore than we have such activity in regard to 30mph limits at present. It will be important however that some targeted enforcement efforts are made, in response to complaints and evidence of continued speeding. At present these can only be undertaken by the police, in collaboration with the CEC. The Council should be lobbying central government for additional devolved powers over certain moving vehicle offences, including speeding, so that in the longer run it can itself take effective enforcement action.	Noted. Over the course of 2014, the Council will have dialogue with the Police regarding issues around enforcement, and social marketing.	No specific comments
Living Streets	School Streets	LSE strongly supports the implementation of part-time 'school street' closures (option 1). There is also great potential for more permanent improvements to be made by redesigning the streets outside many school entrances. This potential should be acknowledged and a programme to initiate such improvements should be supported in the updated LTS.	The Council's proposed policy is to pilot School Streets at up to five schools. It would be premature to consider permanent redesign until the outcomes of the pilot are known.	No specific comments
Paths for All	School Streets	The council's plans to close streets around schools on request is particularly interesting and we look forward to hearing the outcome of this pilot in due course.	Noted.	No specific comments
Police Scotland	Schools streets	Closing school streets at peak times will reduce risk of children being involved in collisions outside schools, however the impact on surrounding streets, with parents parking, children exiting vehicles, and walking to school create further issues. Increased crossing patrols on surrounding streets from schools to facilitate safe passage may be necessary.	The road network around the pilot schools participating on a School Streets scheme would be managed on a case by case basis.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
SEPA	School Streets - Air Quality	We welcome the decision to trial the closure of school streets. Monitoring has shown that roadside concentrations of pollution are highest in the morning when children are travelling to school, thus increasing the risk of exposure to harmful pollutants. The school roads closure programme may help to reduce this risk.	Noted.	No specific comments
Sustrans	Schools streets - IBikes	Given we have introduced innovation in this area through our I-Bike scheme we would like to see this reflected in the LTS. We ask that you change the text on pg 39, section 9.3 to the following to include I-Bike "encouraging walking and cycling to school through the Safer Routes to School programme, School Travel Plans and I- Bike (the latter delivered in partnership with Sustrans Scotland)".	Accepted. LTS will be changed accordingly.	No specific comments
Brian Goode	Speed Limits	I am aware how supportive you are of the 20mph limit on many of South Edinburgh's streets and that this is something you are considering extending. I live near to Comiston Road which for the majority of its length has a 40mph limit although it travels through residential areas with a 20 mph limit. Comiston Rd is not a dual carriageway and I understand that council policy is that all such road should have a maximum of 30mph. Many children and old people cross this road each day and I feel that for safety and environmental reasons the limit should be dropped to at the most 30. I do not know of any similar roads in Edinburgh with such a high speed limit. I did raise this matter some years ago with the council and local councillor but made no headway. Things have moved on and I feel that more than ever it is unjustifiable to have such a high speed limit in a residential area, the new Cala development at Fairmilehead will make the road even busier.	Noted.	Speed limits of 20mph are likely to create a safer and more inviting pedestrian environment, encouraging people to use more active modes of travel in these areas.
Police Scotland	Speed limits	Concerns that additional signage impacts on Heritage sites, however road users must be clearly informed and instructed on new legislation and restrictions.	The Council would endeavour to strike the optimum balance between legibility and visual impact.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Living Streets	Speed Limits - 20mph	LSE supports the option included in the draft LTS. The intention should be to work towards a 20mph default speed limit becoming the norm throughout Edinburgh, with other higher speed limits signed where applicable. LSE is concerned that there should be full recognition of the need for a follow up programme, to make the revised limits more effective where speeding persists in causing problems. Traffic calming and a range of appropriate enforcement measures will need to be deployed as appropriate. It is also concerned that, in rolling out extensions to the coverage of 20mph zones, priority should be given to those areas and sections of main roads where speed reductions are most needed and would be of greatest assistance to pedestrians and other vulnerable road users.	Noted.	Speed limits of 20mph are likely to create a safer and more inviting pedestrian environment, encouraging people to use more active modes of travel in these areas.

Stakeholder	Issue	Comment	CEC response	SEA Comment
David Spaven	Speed limits - 20mph	1. Effective 20mph zones are crucial to transforming the environment for people on foot – and generally these have to be based on 'full traffic calming', namely integrated packages of engineering, enforcement and education measures. The draft LTS contains no statistics to demonstrate that the 'signage only' 20mph trial zone in the Southside has achieved worthwhile speed reductions. In my own experience walking daily in the Southside zone it is clear that vehicles still routinely travel in excess of 30mph. 2. Proper observance of the 20mph limit is crucial in public policy terms, as the outcome for a pedestrian of being hit by a vehicle at 20 mph versus 30mph is substantially different in terms of severity of injury / likelihood of death. This is an issue of great concern if 'signage only' zones bring such speed limits into even greater disrepute / disregard. 3. The draft LTS refers to market research demonstrating strong support for 20mph limits, but it is unclear whether people were asked for a preference between 'signage only' zones and those with proper engineering, enforcement and education measures. 4. The draft LTS makes no reference to how any speed reductions secured in the Southside trial 20mph zone compare with those achieved with more traditionally traffic- calmed zones and indeed with international best practice. I understand that some reductions were achieved, but I would be interested to understand what methodology was used in the analysis. 5. It is unclear what 'self-enforcing road design' means and how effective such designs are in practice.	More information about the signage only trial can be found at http://www.edinburgh.gov.uk/meetings/meeting/3067/transport_and environment committee (item 7.3)	Speed limits of 20mph are likely to create a safer and more inviting pedestrian environment, encouraging people to use more active modes of travel in these areas.

Stakeholder	Issue	Comment	CEC response	SEA Comment
David Spaven	Speed limits - 20mph	6. 21. Option 3 in the 2013 LTS Consultation (extend 20mph speed limits to priority residential areas only, with speeds controlled wholly by physical traffic calming) is the preferable way forward to secure significant reductions in speeds and casualties, provided it is not severely limited in geographical coverage. However, if resources do not presently permit widespread introduction, then Option 1 (extend 20mph speed limits to all residential streets, to shopping areas, including the city centre, and to main roads with high pedestrian activity – mostly achieved using signage, with limited traffic calming (eg road humps) where necessary) is supportable as a positive way forward – provided that (a) worthwhile speed reductions can be achieved, and (b) it is formally recognised as just the first step in a programme moving towards full traffic calming. Only the latter will secure the transformative comfort and safety changes needed in the walking and cycling environments.

7. A related issue is the need to question the evident operational decision taken by Police not to prioritise the enforcement of 20mph and 30mph speed limits. Should this not be a decision-making process which in part at least reflects democratically-decided policies on environment, road safety, etc? | The 20mph pilot in South Central Edinburgh demonstrated that speed reduction can be achieved without resort to physical traffic calming. Point 7) is a matter for the Police. | Speed limits of 20mph are likely to create a safer and more inviting pedestrian environment, encouraging people to use more active modes of travel in these areas. |
| Spokes | Speed limits - 20mph - 6.5.1and 6.5.4 | Locations where traffic management schemes are in any case planned should be considered for early implementation – e.g. Leith Walk. | Accepted. | No specific comments |
| Sustrans | Speed limits - Safe5 | Similarly we support the policy to reduce the speed limit of urban 40mph roads to 30mph. Under this action we would like the wording of policy Safe5 clarified to reflect the fact that cycle lanes will not be introduced solely as a traffic speed reduction measure but that they are also an important behaviour change tool, i.e. they encourage people to cycle. | Accepted. Wording changed. | Lowering speed limits is likely to create a safer and more inviting pedestrian environment, encouraging people to use more active modes of travel in these areas. |

Stakeholder	Issue	Comment	CEC response	SEA Comment
Transform Scotland	Speed Limits - Safe7 - Section 6.5.3	We are pleased to see that the Council propose to reduce speeds on 40mph roads, with measures such as more cycle lanes, and pedestrian islands; though it is important to avoid creating cycle pinch points, where islands are introduced. For both 20mph and 30mph streets, we feel it is also necessary to use enforcement measures when new limits are introduced, perhaps for a limited period, to ensure better compliance. Speed cameras are probably the most effective means of achieving this. We are not convinced that the measures could be "self-enforcing" (Safe7, 6.5.3).	The 20mph pilot in South Central Edinburgh demonstrated that speed reduction can be achieved without use of cameras.	Lowering speed limits is likely to create a safer and more inviting pedestrian environment, encouraging people to use more active modes of travel in these areas.
Peter Hawkins, Spokes	Speed limits - 20mph zones	Mr Hawkins forwarded a press release from 20's Plenty announcing that the City of London had voted for 20mph across the Square Mile. The press release cites an air quality impact report showing no negative effects and a very marginal increase in journey times. 8/32 London Boroughs will soon have 20mph limits.	Noted.	Speed limits of 20mph are likely to create a safer and more inviting pedestrian environment, encouraging people to use more active modes of travel in these areas.
Living Streets	Speed Limits - 30mph +	LSE supports the option included in the draft LTS.	Noted.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Spokes	Speed limits-policies and actions - 6.5.3 and 6.5.4 - Safe5 and Safe6	We are very seriously concerned about policy Safe5 and the second bullet of 6.5.4 – they should be completely rewritten, taking into account the following… Government statistics [RAS 30018] show that 'A' roads are the location of disproportionate numbers of killed and seriously injured cyclists. Whilst traffic speed reduction is a very worthwhile objective, and will assist safety, the provision of safe and welcoming cycling conditions on such roads should be a top priority – not purely a consequence (if possible) of lower traffic speeds. First, there is no mention of segregated cycle infrastructure, whereas this should always be investigated as a favourable option. Second, 6.5.3 & 6.5.4 suggest that the primary purpose of cycle lanes is to slow motor traffic. This is very disturbing – they should be primarily to promote cycle use, cycling safety and the perception of safety, with car speed reduction being a side-benefit. If designed primarily to slow traffic they may end up unsatisfactory for cycling – for example too narrow in places, ending prematurely, not providing safe travel through junctions, badly cambered, and so on.

Furthermore it should be explicitly mentioned that central islands, depending on road. | Sections 6.5.3 and 6.5.4 will be reworded to remove the ambiguity with regard to the purpose of cycle lanes. Any central islands would be subjected to a safety audit prior to installation. The Council's position with regard to segregated infrastructure is set down in the Active Travel Action Plan. Spoke's comment with regard to Safe6 have been noted. | No specific comments |
| Living Streets | Speed limits - Safe4 | The statement is not strong enough in terms of 20mph limits on main roads. It needs to be made clear that 20mph limits will be applicable on sections of main roads wherever there are concentrations of pedestrian activity and 20mph speeds are deemed appropriate; regardless of whether or not they are regarded as 'main shopping streets', or whether they are within or outside the city centre. Some of the greatest potential for collision and casualty reductions from speed reductions is likely to be on sections of main roads away from the city centre; where they pass through local centres of retail/ leisure/ commercial activities with concentrations of pedestrian activities and vehicle turning movements, and where speeds are higher than they are on city centre streets through much of the day. | There will be further detailed consultation on the form of the 20mph network. | Speed limits of 20mph are likely to create a safer and more inviting pedestrian environment, encouraging people to use more active modes of travel in these areas. |

Stakeholder	Issue	Comment	CEC response	SEA Comment
Living Streets	Speed limits - Safe7	LSE strongly supports this policy and would wish to see the maximum possible done to achieve safe speeds by means of self-enforcing design and re-design. It is suggested that a statement to the effect that… 'All new and redeveloped residential areas will be designed for and subject to 20mph speed limits'… should be added to the Safe7 policy statement. This would provide clarity to developers and reinforce design guidance.	This comment as been passed to the Street Design team, and the text of Safe7 changed accordingly.	Speed limits of 20mph are likely to create a safer and more inviting pedestrian environment, encouraging people to use more active modes of travel in these areas.
Pentlands Transport & Env Sub Comm (Ratho Env Gp)	Speed reduction	Traffic calming would be welcomed in our village. Signs would have to be considered carefully in a Conservation Area. Full surveys need to be carried out to incorporate the views of the residents. Road widening and yellow lines do not help traffic calming. Parked cars can slow traffic down. Local residents have better ideas of traffic flow and problems than do planning officers.	Noted.	Lowering speed limits is likely to create a safer and more inviting pedestrian environment, encouraging people to use more active modes of travel in these areas.
Pentlands Transport & Env Sub Comm (Ratho Env Gp)	Speed reduction	What about the rural road network? Clarity is required on whether this or any speed limit would lead to an assumption of the extension of the settlement boundary for planning purposes for the building of new houses in a built up area.	It would not lead to any such assumption re development areas.	No specific comments
Road Haulage Association	Speed reduction	We recommend the most up to date lorry and bus dimensions and weights (as per Construction and Use Regulations) be taken into account when planning physical measures to manage speed and safety.	Noted.	No specific comments
Spokes	Speed reduction	Would like the Council to consider reducing speeds on rural roads on the family network to 40mph.	Noted.	Lowering speed limits is likely to create a safer and more inviting pedestrian environment, encouraging people to use more active modes of travel in these areas.

Stakeholder	Issue	Comment	CEC response	SEA Comment
Transform Scotland	Street Design	In practice, it is too often the case that developers of large schemes pay lip service to Government policies, and present schemes at the Pre-Application (PAN) stage which look very good. These schemes then get watered down at a later stage, and most developments end up with traditional street layouts, which do nothing to favour active travel, and everything to encourage use of the private car. The Council must be more vigilant, and only grant planning permission when compliant initial designs are adhered to in the construction phase. The principles we wish to see enacted here are enhanced accessibility and permeability for active travel modes, and a reduction in vehicle accessibility – the Dutch notion of offering pedestrians and cyclists the most direct routes, where vehicles have to go the long way round. In many cases, this means the developer working in co-operation with neighbouring schemes, to achieve pedestrian/cycle access from one scheme into the next. Such access could, for example, benefit residents by reducing the distances to bus stops, or by giving more direct access to a cycle route. The targets for increasing active modes	Noted.	No specific comments
Transform Scotland	Street Design and Placemaking - 4.2.1 and 4.2.2 -	The problem is that too many streets and road junctions etc. are still being designed by roads engineers whose principal interest is in designing for maximum traffic flows, rather than for any other kind of user. The result is streets, and junctions, which are complete anathema to any sense of 'place' or of user-friendliness to any except vehicle users. Not only are these totally lacking in 'place', they also miss the opportunity for other and better uses of the land. The land-take required for constructing them could have gone to affordable (or any other) housing. Urban land is highly valuable, and Edinburgh works well as a city because it is mainly compact. In this context, some of the proposals in the LTS give cause for concern – in particular, the road capacity increases envisaged for West Edinburgh (4.2.1) and SE Edinburgh (4.2.2). On the other hand, the Waterfront proposals, with its 'Promenade' as an east-west pedestrian/cycle route, look better (4.2.3).	The Council supports this in principle. The new Street Design Guidance document will help to address this.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Transform Scotland	Street Design and road capacity increases - Streets3 - 7.2.3	Quite apart from the double negative implied in the last bullet point, these caveats are wholly inadequate. Instead, the question should be: "How user-friendly (to non-motorised users) would the proposed layouts be?" If we are serious about encouraging modal shift, it should become very difficult to justify any road capacity increases, where 'capacity' means 'vehicles'. A much stronger form of wording is needed here (and without double negatives!)	Noted. The wording of Streets3 has been modified accordingly.	No specific comments
Living Streets	Street Design and Road Network Management	LSE would like to see greater emphasis on the application of the 'Designing Streets' approach in Edinburgh. It is concerned that in the balancing of multiple priorities and interests on streets the approach should be more closely aligned with the 'Designing Streets' philosophy, with place prioritised over movement within urban areas. For instance, the impact and cost of proposals for adjusting traffic lights for late-running buses should be assessed and compared with the many other measures applicable to improve the bus network. Traffic light settings are not a primary cause of late running and can have only marginal effects upon it. The main delays arise at stops, and Lothian Buses has demonstrated a complete lack of concern over these, by converting its fleet from double to single door operation in recent years.	The Active Travel Action Plan contains a joint Walking and Cycling Action to develop Street Design Guidance, which is in harmony with the 'Designing Streets' approach. The Council has no influence over Lothian Buses fleet. Traffic light settings may not be the primary cause of late running, but can be effective in countering it.	No specific comments
Living Streets	Streets7	LSE strongly supports the commitments made to inspect all reinstatements by utility companies and to seek to raise the standards of their reinstatements. This inspection regime should also cover signage deployment and temporary pedestrian route provisions however. Excessive and unnecessary signage provision is still commonly associated with utility road works and it is often located in obstructive positions on pavements. The ERWAA revamp in 2014 should include specific requirements in regard to the elimination of excessive signage and the proper location of the signage that remains.	CEC accepts this. This comment has been passed to the team development the Roads Maintenance and Renewals Action Plan.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Living Streets	Supported Bus Services	LSE supports the option included in the draft LTS. It believes this must be focused on maintaining an integrated Lothian Buses network. Additional support available for bus services should be concentrated on enhancing the off-peak levels of service, in the evenings and on Sundays.	Noted.	No specific comments
Pentlands Transport and Environment Sub Committee (Fairmilehead CC)	Supported bus services	A report has gone to the TIE Committee on this subject and while the continued support for the services is to be welcomed, particularly those that effect the PNP area, it is noted that many of them are operators other than Lothian buses. Yet there appears to be no mention of integrated ticketing. With the renewal of contracts would this not have been in ideal time to have this included?	Because of difficulties with regard to technology and revenue allocation formulas, as well as procurement guidelines, it is not possible for the Council to require integrated ticketing.	No specific comments
Pentlands Transport & Env Sub Comm (Ratho Env Gp)	Supported bus services	Supported Bus Services are required to a greater extent in rural areas as journeys to centres for shopping and work are lengthy if not done by car. Integrated Transport might lessen the need for such support in the long term as smaller buses could serve to reach main routes. Ratho needs a service into town which will not take 1 hour and 15 minutes.	Noted. This comment was passed to the Edinburgh Bus Service Development Operators Group for consideration. The methodology for prioritising funding for supported bus services is due to be reviewed in 2014.	No specific comments
Transform Scotland	Supported Bus Services - Public Transport - Bus Lanes - Parking	On bus services, we supported Option 1, which favours increased funding to maintain levels of service. In particular, we agree that revenue from extra parking charges should be used to support public transport. We believe there should be stronger enforcement of bus lane discipline, and the fines from these cameras, along with parking fines, should be used to support better bus services.	Noted.	No specific comments
Central Radio Taxis (Tony Kenmuir)	Tariff Revision.	TK noted that taxi fares are revised every 18 months. In the past the revisions were based on the cost of living and a basket of expenditure items associated with taxi operations. TK understood that the revisions are now related to the Consumer Price Index, but was concerned that there had been no communication confirming this change.	Noted.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Central Radio Taxis (Tony Kenmuir)	Taxi numbers	TK stated that number of taxis was governed by surveys of unmet demand, commissioned by the Council and carried out by Halcrow Group Limited. He was concerned about survey information being collected at Hogmanay and suggested that taxi operators should have an input to the process.	Noted.	No specific comments
Central Radio Taxis (Tony Kenmuir)	Taxi Ranks	TK would like clarification of comment in LTS. He suggested that taxi ranks should have the same status as bus stops. TK noted that there were 1316 taxis served by an estimated 83 stances, offering 270 spaces for London Taxi sized vehicles. He added that newer, seven seat, taxis are longer than the traditional "London Taxi" design vehicles. Therefore more stances are needed.	TK agreed with BS's suggestion that the issue be referred to the Taxi Working Group.	No specific comments
SEPA	Taxis - Air Quality	We welcome the commitment to ensure that noxious emissions from the taxi fleet are kept to a minimum, as these vehicles are likely to operate within the Air Quality Management Areas.	Noted	No specific comments
Spokes	Textual amends	Spokes provides a number of detailed proposed textual changes.	These have been considered and accepted where appropriate. And all Spokes comments have been passed to the Cycling Team for info.	No specific comments
SEPA	Thrive1	We acknowledge a requirement to meet the movement needs of new developments, but we advise that if a single development is assessed in isolation, the impact of this development will appear to be insignificant. But when the same development is considered alongside other developments in the city and neighbouring local authority areas, the cumulative impact is likely to be far more significant. A subtle (but significant) growth in the volume of traffic has resulted in congestion at numerous pinch points throughout the city. A means of assessing cumulative impact is therefore required, particularly in view of the predicted increase in residential properties in Edinburgh and neighbouring environs.	This is covered through the Strategic Development Plan.	It is vital that cumulative environmental effects are considered in all strategic and project level planning

Stakeholder	Issue	Comment	CEC response	SEA Comment
Spokes	Thriving City	We do not feel that the LTS sufficiently prioritises the objective of minimising the need for car use, particularly at the rate which is needed to improve the city and reduce carbon emissions.	CEC wants to strike a balance between serving all road users and achieving its objectives to support the economy, reduce carbon emissions, and making the city attractive and accessible to all.	No specific comments
Living Streets	Travel Planning	LSE supports travel planning but believes the objectives might be best served by making greater use of existing skills in the Council, and in other public and third sector organisations.	Noted. Transport is undergoing an internal service review at present. A business case for travel planning will be put together, and this will include a consideration of options for partnership working with both internal and external partners.	No specific comments
Pentlands Transport & Env Sub Comm (Ratho Env Gp)	Travel Planning	A facility is required to assist residents where public transport is infrequent so that journeys can be planned. It should be noted that not all residents have access to new technology so that different modes of delivery of this service should be available.	Noted. The Council's Public and Accessible Transport Action Plan contains a commitment to update its Public Transport Information Strategy.	No specific comments
Spokes	Travel Planning / Thriving City also for Car Parking after section 12.4	We suggest the Council sets a lead to other organisations in the city by removing what we believe to be free parking concession for some Council HQ senior staff. We suggest adding to section 4.5: "The availability of large numbers of parking spaces at retail, leisure and workplace destinations is a serious drag on policies to promote modal shift. The Council will lobby government to provide powers to charge operators for the numbers of parking spaces over a certain minimum at retail, leisure and workplace destinations and any other appropriate destinations with large numbers of parking spaces."	This is something that will be considered by the team developing the Council's new Sustainable Travel Plan next year.	No specific comments
Roadworks Commissioner	Utilities - Streets 7	It is not possible to withhold permission to utilities to carry out work on the road.	This is accepted, and reference to this has been deleted from Streets7.	No specific comments

Stakeholder	Issue	Comment	CEC response	SEA Comment
Transport Scotland	Utilities	Welcome the re-launch of the Edinburgh Road Works Ahead Agreement (ERWAA) and commend CEC's approach as an example of good practice. In respect of the inspection of reinstatements, we would make the following comments: the Council is within its powers to conduct inspections at the 100% rate and any failures uncovered will be subject to the defect inspection regime involving remedial works and further chargeable inspections. However, the main concern regarding Streets7 is the statement that consent for future works could be withheld where an undertaker has failed to reinstate a road to a sufficient quality standard. The Council cannot withhold consent for an undertaker's works as they have a statutory right to undertake such works, nor can the Council impose penalties in connection with the quality of an undertaker's reinstatement. For clarification, the current sample inspection regime fee for a defective reinstatement is not a penalty. The fees charged in this connection are effectively a recharge of the cost of the inspection and are not punitive measures. Furthermore, there is no offence for a failed inspections where a Fixed Penalty Notice (FPN) can be issued.	The LTS has been reworded accordingly. This comment has also been passed to the team drafting RMARAP for consideration.	No specific comments
Scottish Enterprise	Waterfront	SE fully supports the position taken in the LTS in identifying future projects in support of the renewal of the waterfront, including infrastructure to meet the requirements of the offshore renewable industry, and in the longer term, potentially extending the Tram to Leith and Newhaven.	Noted.	No specific comments