

Deputation to Transport and Environment Committee meeting to be held on 19 February 2021 regarding item 7.1 City Mobility Plan

The New Town and Broughton Community Council (NTBCC) welcomes the City Mobility Plan (Plan). The Plan is well structured and makes a positive contribution to addressing the significant transport issues affecting Edinburgh. As always there are some areas where greater detail and clearer targets would be beneficial if only as a means of allowing the Council and others to monitor progress against the Plan. The lack of confirmed funding for much of the Plan raises significant concerns. Without the necessary investment it will not be possible to deliver the modal changes anticipated in the Plan.

We provided comments to the earlier draft of the City Mobility Plan last year. Many of the comments we made at the time still apply and therefore have been attached for ease of reference. In addition, we would make the following comments:

- We would have liked to see greater efforts to retain the positive changes resulting from the pandemic including increased active travel, reduced congestion and lower levels of atmospheric pollution. We are encouraged though by [‘an increased focus on local trip-making as part of the 20 minute neighbourhood’](#) which is consistent with our approach to Broughton Street and aligned with the ‘Totally Local’ concept.
- We are disappointed that the Plan does not seek to reverse the decision to increase the number of pay and display parking spaces let alone seek any reduction in such spaces. We are concerned that the new parking at the St James Quarter when it opens this year will result in increased traffic resulting in more congestion and atmospheric pollution. The delay in introducing the workplace-parking levy is a lost opportunity to encourage businesses to allow continued home working for many of their staff.
- We would have expected to see a commitment to accelerate the switch to EVs, especially buses, taxis and delivery vehicles but instead the roll-out of EV chargers has been delayed and there is no specific target for the number of charging points to be installed over the life of the Plan.
- We note that there is no specific goal in Policy Measure MOVEMENT 6 – Fleet Enhancement to improve the environmental performance of the City’s own fleet of buses. Nor is there any plan to reduce the number of tourist buses that add significantly to the congestion in the City Centre. We understand that the Council does not have the powers to limit the number of such buses and consider that the Plan should have set out the steps to establish such powers.
- It is noted in the Plan that the number of light goods vehicles has risen by 20% over the 10 years to 2018; a trend that has probably accelerated during the pandemic given the increased number of home deliveries. Although the Plan includes Policy Measure MOVEMENT 26 – Managing Deliveries and Servicing, it lacks any definite goals. We suggest that reducing the number of delivery journeys and the resultant atmospheric pollution would have very positive benefits for the City’s residents.
- We are disappointed that implementation of the LEZ have been delayed and that there is no commitment in the Plan to accelerate the introduction of the LEZ or to expand the area covered by the initial City Centre LEZ as we had suggested. We note that the Strategic Environmental Assessment also highlights the negative impact of displaced traffic on atmospheric pollution

levels in areas adjacent to the LEZ (as shown in the following extract from the SEA below). The lack of any action to address this issue is concerning.

“Depending on potential displacement of traffic, there may be locations outside of the LEZ boundaries where air quality is made poorer by a change in the quantity and types of vehicles passing through. Initial transport modelling shows that roads outside the LEZ boundary are likely to see an increase in traffic volumes.” It is critical to the success of the LEZ, the ECCT, the CMP and the City Plan that poor air quality is not moved from one area to another. It is essential that analysis identifies the scale and location of impacts of displacement and effective measures are identified and implemented to avoid these impacts.” - SEPA

- The focus of the section relating to atmospheric pollution is on Carbon Dioxide emissions that contribute to global warming but are not regarded as having health-related impacts. There are already 6 Air Quality Management Areas (AQMA) in Edinburgh where pollution currently exceeds the present statutory levels for Nitrogen Dioxide and particulates. We suggest that meeting existing targets for atmospheric pollution is too conservative and that there should be a goal to seek further reductions in the levels of NO₂ and particulate emissions supported by more effective monitoring and mitigating actions.
- We welcome the decision to more clearly identify separate goals for Walking and Cycling, and to recognise ‘Wheelers’ as a special category but disagree that this term should only apply to people using wheelchairs. This is contrary to other national active travel guidance that states ‘wheeling is any mode of wheeled transport such as wheelchairs, mobility scooters, adapted bikes, hand-cycles, scooters, prams etc.’ Anyone pushing a child’s buggy knows how difficult it can be to negotiate cluttered pavements or access public transport.
- We are disappointed that there is no commitment made to eliminate shared use space (pedestrians and cyclists). This issue received a number of negative comments in the earlier consultation and is widely recognised as being undesirable. Instead there is a Policy Measure to mitigate conflict through infrastructure design, signage and awareness campaigns. It would be better to set a target to reduce such space rather than just mitigate the consequences.
- There is nothing in the Plan to ensure the effective enforcement of the 20mph speed limits beyond continuing to work with Police Scotland on this issue. Speed of traffic was one of the key concerns raised in the Commonplace mapping exercise and is recognised as being one of the most important factors affecting the safety of cyclists and pedestrians. There should be a clear target to reduce traffic speed through more effective enforcement of speed limits and through the introduction of traffic calming measures.
- As noted in our comments last year, the ‘mass rapid transport system’, as conceived, is not comprehensive or rapid enough to deliver a ‘car-free’ future. In particular, options for light rail should be urgently explored with potential partners. There are no plans to make use of the southern suburban railway line, as many people have suggested nor are there any plans to reactivate suburban stations on existing railway lines. The Plan merely commits the Council to maintain engagement with Network Rail on these options. The Plan is not sufficiently ambitious in its goals for mass rapid transport and will result in Edinburgh falling further behind other comparable European cities.

- We strongly support the need to undertake Bus Network Review but believe that this should take place sooner. As noted in the Plan, there are too many buses crossing the City Centre resulting in an over supply in this part of the City at the expense of others which are under serviced. In order for people to be able to transfer from one bus to another or to other modes of transport, there need to be well-designed transport interchanges as well as an integrated fare structure and timetable. Currently these changes will happen too late to produce the desired transport and behavioural changes.
- We note that Appendix 3 'Edinburgh Strategic Sustainable Transport Study Phase 2 Summary Report' states that '[stakeholder engagement to date has been limited to handful of external bodies...](#)' and goes on to say that '[it will be necessary to engage with a select number of external stakeholders. These may include Spokes, Living Streets, Edinburgh Access Panel...](#)'. There is though no mention of Community Councils or any of the heritage groups such as Edinburgh World Heritage or the Cockburn Association. We suggest that this is a serious oversight and trust that Community Councils and Heritage groups will be involved in the next phase of the Strategic Sustainable Transport Study but also the development of specific plans and targets outlined across the Plan. We suggest that the Transport Forum referenced in the Committee report could be expanded to provide an appropriate forum for such a wider engagement.