



**RESPONSE TO CONSULTATION ON EDINBURGH CITY MOBILITY PLAN
APRIL 2020**

KEY POINTS

- **Revise the plan to take account of changes following the COVID-19 pandemic. Implementation will need to be reassessed, and there are likely to be opportunities to make faster progress towards some of the long-term objectives**
- **Ensure a safe infrastructure for cycling, but prioritise pedestrians and public transport at all stages**
- **Revise transport and economic priorities so the health benefits of lower emissions in the lockdown are retained in the long-term; introduce restrictive measures to maintain lower volumes of traffic in city streets**
- **Any increase in private car use, because of lower risk of infection, should be carefully managed: ensure the focus remains on delivering the CMP's long-term environmental and health benefits**
- **Accelerate the switch to EVs, especially buses, taxis and delivery vehicles**
- **Revise the parking proposals: reverse planned increases, and cut spaces in the centre and surrounding areas to encourage a lower level of private car use and take account of more people working from home**
- **The 'mass rapid transport system', as conceived, is not comprehensive – or rapid – enough to deliver a “car-free” future: it should be more ambitious**
- **In particular, options for light rail should be urgently explored with potential partners**
- **The LEZ proposal should be expanded to extend the greatest protection from harmful emissions to residents beyond the central business and tourism district, and should include Queen Street and York Place**
- **A robust and radical approach is needed to enforce the 20mph speed limits**
- **We support pedestrianisation of streets – but only if an effective framework is put in place to protect them from over-use by events or activities of a commercial or tourist nature**
- **There should be no return to the unsustainable levels of tourism and commercial exploitation of public space of recent years: diversify the economy away from over-dependence on these, and limit use of public space to the existing small number of established large-scale events.**
- **Focus instead on local businesses and economic sectors which bring sustainable, long-term added value to the city economy**
- **We ask all parties on the Council to work together to deliver consistent planning decisions which ensure that private sector activity aligns fully with the city's long-term environmental and economic aims**

1 - Put pedestrians and public transport first

Transport policy should prioritise pedestrians and public transport over cycling. Partnership with Sustrans should be balanced by a stronger relationship with Living Streets. The proposals carefully refer to “walking and cycling” in that order and we ask that this priority should be observed in the planning and implementation of all three stages of the vision.

2 - Fewer vehicles, lower levels of harmful emissions

There is a possibility that as lockdown restrictions ease, private vehicle usage – as a mode of transport with a lower risk of infection – returns to or exceeds pre-pandemic levels. It is likely this mode of transport will be advised at least for vulnerable groups. If there is an increase, we believe the Council should seek to manage it very carefully so that the environmental and health benefits promised in the CNP are still delivered in the longer-term.

In the short-term, travel restrictions, working from home and the growth of local delivery networks have radically reduced the number of private vehicle journeys in the city. The Council should introduce restrictive measures to maintain these lower levels of traffic, and also reduce parking capacity in the centre and surrounding areas.

The Parking Action Plan (voted through the month before lockdown) would expand private car-parking capacity in central Edinburgh to what must be the highest levels since restrictions were introduced; together with the 1600 spaces in the new St James’ Centre, this could only lead to an increase in vehicle journeys to the city centre. We believe the Council now has an opportunity to reduce parking and support the development of delivery networks on a faster timescale than envisaged in the CMP.

The parking plan runs counter to the aims of the National Transport Strategy (“*we will design our transport system so that walking and cycling and public and shared transport take precedence ahead of private car use*” ... “*alternatives to car use must be encouraged*”). It also conflicts with the Council’s own ‘Transformation Strategy’. We suggest that the Council confers with the city’s MSPs to ensure that this contradiction is resolved. The NTBCC submitted an objection to TRO/19/29 on these grounds (26 November 2019) and we ask for a response to this objection from the Council.

There is clear evidence that the lockdown has resulted in lower levels of harmful vehicle emissions. The Council should reconsider its transport priorities to ensure that these healthier levels become an accepted norm in future.

There should be greater emphasis on the use of electric vehicles in the city centre area, particularly electric buses, taxis and delivery vehicles. In light of a possible increase in private car use as people seek to minimise the risk of infection, we suggest that the EV charging infrastructure be increased and introduced more quickly to make it easier for residents to switch to EVs.

3 - Use the time to develop a fully thought-through ‘mass rapid transport system’

We support the ambition to develop a “comprehensive mass rapid transport system” (MRTS) “by 2025” however we should be clear that a bus + tram system is not a rapid transport system and this option needs a great deal more work.

The suspension of much of council activity during the pandemic offers CEC an opportunity to give this crucial element of the CMP a detailed re-think.

Most European cities of Edinburgh's size have a wider mix of transport options (subways, trains, trams and buses) which between them make it possible to plan for a car-free future. Only Manchester and Bordeaux rely on buses and light rail (trams) but these both have much larger and more extensive light rail systems than Edinburgh. We believe Edinburgh should explore suburban rail/light rail much more vigorously, as the only practical option for offering truly rapid transport to the city centre from population centres across the wider Lothian/Fife catchment area. Neither trams nor buses can offer sufficiently rapid movement within this wider area.

We therefore strongly support the extension of tram or light rail links to the RIE and Musselburgh. But options for developing light rail combined with reopened former suburban lines should also be urgently developed in collaboration with Network Rail.

The Council should work with relevant partners to create integrated fare structures across the various public transport systems serving the city and city region.

3.1 The LEZ proposal

As the wider city area will be unable to reduce dependency on cars until an effective MRTS is in place, the main priority for now should be to remove pollution and reduce CO2 emissions. This is why we believe it is necessary for the LEZ proposal should be more ambitious and extend the highest levels of protection beyond the central business and tourism district to a much higher proportion of the city's residents. Increased working from home would make this both a higher health priority, and easier to achieve.

NTBCC objected to the Council's LEZ proposal (July 2019) asking that the proposed "central" zone be widened to include the Northern New Town, and objecting to the designation of Queen Street and York Place as "alternate routes" for non-compliant traffic, a proposal which can only increase pollution on these streets. We ask again that these streets, and also Regent Road, be included in the central LEZ zone.

The Council should also use its leverage with Lothian Buses, and other operators, to ensure that all fleets operating in the Edinburgh city region meet Euro 6 standards as soon as possible. In redesigning bus routes, careful consideration should be given to the air and noise pollution, and potential structural damage, caused by routing a disproportionate number of bus journeys through any one residential street, as has been happening in East London Street. We ask that the Council work with Lothian Buses to ensure that city residents are not exposed to an excessive level of hazard in this way.

3.2 Other traffic reduction measures

- We support plans for a workplace parking levy on employers (not staff, and excepting provision of disabled spaces) to raise income for investment in public transport.
- Transport interchanges should be convenient for users and comfortable and pleasant to use like the successful rail/tram/bus interchange at Haymarket.
- We support the ambition to expand bus priority corridors and to extend operating hours especially to suburban areas some of which have very infrequent services in evenings and weekends.

- The Council should work with neighbouring local authorities to enlarge park and ride facilities and parking capacity at railway stations within commuting distance of the capital.
- Legislation to prevent parking on pavements, already passed by the Scottish Parliament, should be fully utilised by the Council as soon as it comes into force.

3.3 Congestion charging

Congestion charging based on the current CPZ should be introduced but should – unlike the failed 2005 scheme – include sensible consideration for car owners who live in the residential centre.

4 - A safe infrastructure for cyclists

Much more could be done to make roads safe for cyclists. Traffic congestion, speeding, oversized vehicles and poor surface maintenance are strong disincentives for cyclists and it is little surprise that many people consider Edinburgh's roads too dangerous for cycling.

Reducing congestion, enforcing speed limits, regulating the size of commercial vehicles and repairing roads would greatly reduce the demand for separate cycle lanes.

5 - Put pedestrians first

We welcome pro-active measures to improve conditions for pedestrians such as traffic-calming, allowing longer crossing-times for pedestrians at lights, enforcing the 20mph speed limit, pedestrianising streets (with the proviso below, section 6), and reducing the number of street activities which take up pedestrian space.

5.1 Non-observance of speed limits

Radical and robust action should be taken to enforce speed limits as levels of non-observance remain significant, and the police can only allocate limited time to enforcement. We suggest that the Council investigates possibility of using traffic wardens to monitor speeds and enforce limits.

6 - Reclaim public space from commercialisation

The city should redirect commercial activity away from streets and public places and focus it back into commercial premises, locally-based businesses and emerging economic sectors more likely to bring sustainable, long-term added value to the city and regional economy.

Existing public recreation spaces such as Princes Street Gardens and Calton Hill should be protected from development and should not be used for more than a small number of established large-scale events.

We support the pedestrianisation of streets only on condition that the Council puts in place a clear and effective framework to ensure that the space regained is not then monopolised by events and/or activities of a commercial or tourist nature.

Where significant changes are proposed, the Council should model the likely effects on surrounding streets.

6.1 Over-dependence on tourism

Edinburgh is and should remain the global destination acknowledged by its World Heritage Site status. However it has failed to manage this optimally in recent years.

The aftermath of the pandemic will be an opportunity for Edinburgh to reset its policies on tourism. We ask that these be recalibrated to a level consistent with sustainable economic development, avoiding over-dependence on tourism and protecting permanent residents from its ill-effects.

The travel/tourist sector will revive but likely in a different form, offering the city an opportunity to reset its framework for the visitor economy. This should focus on bringing as much of the existing built environment as possible into sustainable economic use where economic activity can be properly regulated and return real added value to the city economy. Some of CEC's attempts to regulate commercial partners (e.g. Underbelly) have manifestly failed. Streets and recreation areas should be better protected than they have been from damage, pollution, clutter and litter. The activities of bodies such as Underbelly and the 'Quaich project' should be closely monitored by officials and councillors to ensure that public space is not degraded or effectively monopolised for commercial purposes.

We agree that streets should be safe, attractive and healthy, but it is not clear what the Council intends when it says that streets need to be "interesting". We agree that they should be unobstructed and well-lit, with convenient seating where appropriate; free from clutter and commercialisation; and free from the disruption involved in what has been a near constant cycle of setting-up and dismantling for events. With the international economy operating at a lower, perhaps more sustainable level following the pandemic there will be opportunity to set a more equitable balance between the needs of Edinburgh citizens and those of events organisers and visitors.

6.2 Sustainable tourism

Commercial tourist buses are major causes of pollution and congestion and we suggest that CEC consider restricting their use to those with specific mobility requirements. Tourist routes using a mix of public transport facilities and walking and/or cycling could be designed, and tourists then directed towards the use of these.

7- Mobility needs

The needs of neurodiverse people and others with particular mobility needs should be built into planning and implementation at all stages. Housing, transport, planning and economy officials should work closely with health and social care specialists to ensure this is achieved.

Accessibility must be a priority throughout planning and implementation. Where relevant and appropriate, every aspect of design should conform with the needs of those with protected characteristics.

8 - Longer-term aims of the Plan

We support the longer-term aims described in the 2030 vision with the exception of the Waverley Station Masterplan.

This plan appears to offer no public transport improvements, and appears to be essentially a further expansion of retail space. The thinking behind this plan seemed ambitious before the pandemic, and we believe it should be completely reassessed in the context of the likely recession. We recommend that the Council should work with Network Rail to divert available investment into improving rail links for the long term. As noted above, we strongly support the extension of tram or light rail links to the RIE and Musselburgh.

9 - Planning and development

The Council has overseen some valuable planning work in recent years but there have also been some significant failures, a continuation of which could threaten delivery of the aims of the CMP.

All new private developments should be carefully scrutinised and if necessary changed to align with and actively support the ambitions in the CMP vision. The Council cannot deliver the plan it on its own and will need to ensure that private sector activity supports the vision and does not detract or divert from it.

Developers should not be permitted to exploit weaknesses in the planning framework to defeat the vision for their own ends. The planning framework gives councillors adequate scope for discretion to achieve this, but we believe that higher levels of scrutiny, and greater cohesion of intent from councillors in different parties, are also required. We suggest that the controlling coalition should create a project to ensure a unified approach to planning and development to ensure that all private sector activity supports and enhances the CMP vision.

This will require courageous leadership from the Council. Many of their planning professionals possess the skills and experience to deliver this – but can only do so if they have the respect and support of politicians of all parties. It is for the politicians to put in place a culture in which public outcomes are more important than bureaucratic procedures, management targets, or pressure from developers.

On behalf of New Town & Broughton Community Council, April 2020