

Introduction.

Transform Scotland welcomes the publication of the City Mobility Plan (CMP) draft for consultation by the City of Edinburgh Council. The plan sets out an ambitious vision for Edinburgh's transport system to become more integrated, less reliant on the use of private cars and seeks to increase public transport ridership and active travel by making these forms of travel more attractive.

We agree that the challenges described in the 'Case for Change' section of the CMP require a decided and timely response. Edinburgh faces significant challenges through high levels of congestion in its city centre but also on peripheral roads and on roads leading into the centre. Given the population growth that is forecast for Edinburgh and its surrounding area, these problems will only increase without significant intervention and mitigation measures. The modal shift from private cars to public transport and active travel that this plan aims to facilitate is therefore desperately needed and long overdue.

We also commend the focus on better integrating isolated communities into the public transport network and the plan to improve accessibility of public transport services and walking and cycling networks for users with mobility issues.

However, while the goals set out in the CMP are commendable, we have reservations as to whether these goals can and will be achieved in the 2020 to 2030 timeframe. There has been change towards more sustainable transport policies in Edinburgh over the past years and there has been progress on goals set in the predecessor strategy of the CMP, the Local Transport Strategy 2014-2019, but many of the targets from this previous strategy have not been achieved. We have therefore summarised our concerns regarding the City Mobility Plan in five main points below:

1. Lack of urgency.

In their foreword to the CMP Councillors Lesley Macinnes and Karen Doran recognise that 'we cannot spend another twenty years building a single tram line' and call for 'bolder more transformational action'.¹ Transform Scotland strongly supports this call for bold action. Edinburgh's residents have been promised transformational change for the past decades and this change is long overdue. Particularly in the context of the climate crisis and Edinburgh's aim to become carbon neutral by 2030, implementing the vision for Edinburgh's transport system set out in the CMP is essential to prepare Edinburgh for the future.

Past experience has shown though that while the Council has shown willingness to commit to these ambitious goals, it has not always been able to deliver on these promises. Unfortunately, the new City Mobility Plan does not show any indication of how the implementation of this plan might differ and be more successful than its predecessors. Additionally, many of the larger and more transformational projects are not due to be implemented until the second half of the decade. This leaves little time to achieve the behaviour change and modal shift that will be necessary to become carbon neutral by 2030 and to effectively address the challenges that the growth in demand on the transport network will already pose within the next few years.

2. Lack of funding.

The changes to Edinburgh's transport system described in the CMP will require significant public investment over the next decade. While we believe that this money would be well spent on creating a more sustainable transport network, we are not confident that the CEC will be able to finance these plans, which 'will be challenging' by its own admission.² Without a robust funding strategy many of the plans, especially the large infrastructure projects, described in the CMP are likely to remain a vision rather than being implemented by 2030.

3. Expanding Public Transport.

Public transport is key to developing a sustainable transport network and we welcome the central role that Edinburgh's public transport network plays in the CMP. We support the plan to upgrade public transport infrastructure, including the proposed development of more bus priority measures and the expansion of the tram network.

However, it should be noted that it is not clear whether the timeframe set out in the document regarding bus developments will be adhered to, especially given that it is unclear whether the Council has the power to enforce a review and restructure of bus networks. Additionally, the comprehensive review of the bus strategy, scheduled for 2025, should precede any decisions made on bus access to the city centre under the 'to not through' philosophy proposed by the Council.³

While the CMP envisions the expansion of the tram network from Newhaven to Newbridge and adding a north-south line, there still does not appear to be a city-wide tram strategy, particularly as regards expansion to the suburbs and new developments where the benefits in terms of removing private car traffic would be very significant.

In addition to local public transport, heavy rail services bring many people into Edinburgh at Waverley and Haymarket stations and this should be considered as an important part of the transport mix. The Council needs to influence how these services might be expanded so that more people can use rail services direct to the heart of the city. Rail services should also be included in the integrated ticketing scheme that is proposed in the CMP, making the interchange between regional and national and local public transport easier.

4. Earlier delivery for active travel.

The CMP outlines a very positive vision for cycling and walking in the city by 2030. We welcome the plans to support mass commuting by bike along arterial routes, increased pedestrianisation of the city centre and improvements of strategic walking and cycling routes.

However, many of these projects could be delivered earlier or be more comprehensive. For instance, the CMP schedules the plan for sustainable neighbourhoods to begin delivering traffic calming measures in residential areas, such as modal filters that would benefit pedestrians and cyclists in 2025. These low cost and small-scale interventions could be delivered within a much shorter timeframe. In addition, the CMP envisions all arterial routes to the city centre to be used for mass commuting by bike by 2030. However, without a commitment to provide high quality, segregated cycling infrastructure, it is unlikely that this can be achieved on busy transport corridors. For pedestrians, the Council's flagship City Centre Transformation project aims to provide more car-free spaces by pedestrianising several streets in the city centre. As we have already emphasised in our response to Council's consultation on this project in 2019,⁴ we believe that these measures could be implemented within a much shorter timeframe as well.

If mode share targets for active travel are to be achieved, these projects will have to be delivered earlier than the currently projected timeframe, be more comprehensive and treated with the highest urgency in the planning and construction process.

To improve the feasibility of delivering active travel projects more quickly, the Council should also take an active role in urging the Scottish Government to make changes to the TRO process to enable

democratically-elected local authorities to push ahead with schemes without being delayed by vexatious objections, as has been the case with a number of active travel projects in Edinburgh in the past.

5. Reducing reliance on private cars.

The plan sets out the laudable aim of reducing congestion and improving journey times, but this must be to the benefit of public and active transport alone, and not private vehicles. The aim should be to ensure that public transport is always as fast as, or faster than, private car use. If we continue to provide for general private vehicle access across the city, alongside sustainable transport, the sustainable means of transport will continue to be severely hampered and rendered less efficient. There is no problem with people choosing between sustainable forms of transport, but any choice which includes the private car as the norm (for able-bodied people) undermines general mobility for the majority.

In addition, the CMP repeatedly references Edinburgh's projected population growth and recognises the impact this will have on congestion in the city if no measures are taken. However, the CMP primarily focuses on increasing the number of trips made by public transport and active travel. In a city with a rising population, this in itself is unlikely to directly bring about a reduction of private car trips. In addition to measures to improve public transport and active travel the CMP should be much more forceful in taking action to reduce private vehicle traffic and actively set targets to lower the number of trips made by private car. These measures should include private non-residential parking levies, road pricing and/or reducing on-street parking in the city centre. Another important planning measure to decrease demand on road space will be to decrease residential parking both in new and existing neighbourhoods and developments.

Next to reducing congestion, the CMP also aims to improve available infrastructure for EVs. However, EVs pose many of the same problems as conventional cars. Support for EVs should therefore primarily focus on public transport, delivery and service vehicles and new EV infrastructure should be provided in existing road space and not interfere with walking, cycling or public transport routes.

Overall, Transform Scotland supports the vision set out in the City Mobility Plan but believes that the plan requires more urgency, stronger commitment to implementing the required measures within the coming decade and a robust funding structure to be successful in transforming Edinburgh's transport system.

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1 City Mobility Plan; Connecting people, transforming places (February 2020), Foreword

2 Ibid, page 25

3 Ibid, page 17

4 <https://transformscotland.org.uk/blog/2019/07/07/edinburgh-city-centre-transformation-very-welcome-but-overdue-and-unfunded/>

**Scotland's alliance for
sustainable transport**

Transform Scotland
5 Rose Street, Edinburgh, EH2 2PR
t: 0131 243 2690
e: <info@transformscotland.org.uk>
w: <www.transform.scot>

transform
scotland

We campaign for walking, cycling and public transport to be the easiest and most affordable options for everyone. Our diverse membership brings together public, private and third sector organisations from across Scotland. We are a registered Scottish charity (SC041516).