

Spokes written deputation to [Transport and Environment Committee 2 February 2023](#)

Our deputation is relevant to all the *draft CMP delivery plans*, but most specifically **Item 7.3, Active Travel Action Plan 2023**

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1. Introduction

Spokes strongly welcomes the new set of City Mobility Plan (CMP) draft delivery policy and action documents (listed & linked in the appendix below).

The ambition “*to create a city where you don’t need to own a car to get around*” mentioned in several of the documents (e.g. Parking Action Plan, p8) is to be applauded for reasons of climate, public health, congestion and equalities. Such an ambition is also essential if the Council is to achieve its ultra-ambitious target to reduce car-km 30% by 2030.

We also support the forthcoming ‘en bloc’ consultation, rather than a drawn out series of consultations on individual documents. We hope this will give officers more time to ensure much speedier implementation than has been the case in recent years, and will also assist interest groups such as ourselves in avoiding the need for ongoing repetitive responses.

This early Spokes submission follows a brief initial look at the documents and is to highlight points that we are particularly pleased to see, alongside some concerns. Detailed comments will follow during the forthcoming consultation.

NOTE: *Italics* denote quotes from the documents.

2. Active Travel Action Plan 2023, ATAP

The Plan states...

*“The (off road) traffic-free routes will continue to play a vital role, and we will seek to improve their comfort, safety and security. However, we now plan to develop a joined-up network of routes that **feel safe to everyone at all times of day**. This network will need to use **segregated cycle tracks on main roads**, as well as unsegregated on-street routes that have low volumes of motor traffic.”* [ATAP, chap 5]

The three highlighted phrases above [our emphases] neatly summarise important major developments, which we strongly welcome, in the Council’s approach to cycling policy, and we urge determined implementation.

Specific commitments we particularly welcome for their importance and/or innovation include the following. And this is far from an exhaustive list! However, given the Council’s past history of project delay, implementation, together with the requisite adequate staffing levels, is a critical issue.

- **A8 Roseburn to Gogar** - segregated cycling [presumably extending CCWEL westwards]
- **A70 Juniper Green to Dundee Street** - segregated cycling
- **Gilmerton to Cameron Toll and City Centre** - segregated cycling [existing plan now extended outwards to Gilmerton and inwards to city centre]
- **Portobello to Musselburgh** - segregated cycling
- **Lothian Road Boulevard** (including West End & Tollcross junctions) *“we’ve started work”* – what does this mean? Appendix 3 states implementation “after 2026.” Note that the West End junction is a priority action in the City Centre Transformation document, following the fatality.
- **Travelling Safely main road ‘covid’ routes** – *“making permanent and improving junction infrastructure, subject to current ETRO experimental process”* NB non-junction needs improved also!
- **Dalry & Portobello town centre schemes** *“by 2026”* – these will be a true test of how far the Council decides to prioritise active travel and ‘place’ over motorised traffic. Ditto the current **Leith Connections** project.
- *“Sub 20mph limits would require amendments to national regulations and signage. With this in mind, we propose to explore the potential for pilots with the Scottish Government”*
- **“Action J6: Implement the Major Junction Programme”** - a rapid and transformative approach would be a real tribute to the three cyclists killed at major Edinburgh junctions in recent years, and whose deaths helped instigate this project
- **“Continue to engage with the Scottish Government to ... remove (legal) barriers to efficiently delivering Active Travel infrastructure”** including Automatic Number Plate Recognition (ANPR) for enforcement, *low cost zebra crossings*, and tackling arcane *Traffic Order processes*.
- **Traffic light innovation** including... *“radar (to) detect the person cycling approaching and call the crossing or lights to go green”* and *“software at major junctions on (bike bus routes) that allow the lights to be held on green, giving the bike bus enough time to pass through in one go.”* (we understanding this is already used in Glasgow)
- **Active-Travel bridges** (action J11) funding opportunities to be sought, e.g. for major problematic locations such as Slateford aqueduct and the main line rail at Roseburn and at Waverley.

We also have some significant concerns, including...

- In our [Circulation Plan comments](#) we have already expressed the concern that main road segregated routes may be replaced by less satisfactory facilities in some locations where space is at a premium. The draft ATAP does attempt to ameliorate such negativities, but any breaks which deter less confident cyclists from using a particular section of route are likely to mean they will choose not cycle the entire journey, and use a different transport mode instead.
- We greatly welcome the intention that **main road segregated routes** should become the core of the Edinburgh Cycle Network. However, this important change in *policy* must be reflected early on in the *implementation programme*, even though this may entail modifying the existing [Active Travel Investment Program \(ATINP\)](#). Given the increasing availability of government AT cash it should be possible to add to or modify ATINP. We recognise that work on the A7, Cameron Toll to Bioquarter, is due soon, and CCWEL is underway, but to demonstrate the new intent we urge *early work* on at least one other main road route such as the A70 (Lanark Road to Dundee Street), the A199 (Portobello to Musselburgh) or extending the A8 CCWEL westwards to Corstorphine.
- ATAP implies a major step up in Council activity on active travel. **Will staffing be adequate to ensure rapid and quality delivery?** - particularly given the many other CMP delivery elements. Secondly, will staff across the Council, in all areas of activity (such as Planning, Housing, Education) be sufficiently cognisant of active travel and other sustainable transport policies to ensure that all relevant Council actions are compatible with and support the transport programs?

- **Joining up journeys with public transport** This section covers rail only but should also include cycle parking at bus & tram stops, as well as safe and attractive routes to them. This, and bike carriage on buses, also need attention in PTAP (discussed in 4 below) as well as ATAP.
- For the forthcoming consultation, much higher resolution, ideally digital, maps will be important.

3. Demand Management

Research is clear that ‘carrots’ (such as improved bus, bike and walk facilities) alone will not bring about anything like the transition needed to achieve hugely ambitious targets such as the Council’s 30% traffic reduction by 2030, or the Scottish Government’s 20%. A combined carrots/sticks approach, with demand management including forms of charging, is vital. Charging, of course, also assists the investment required for active and sustainable transport.

We are very concerned that the draft CMP delivery plans, such as PTAP, ATAP and the Parking Action Plan are inadequate in not integrating this issue sufficiently.

Responding to questions on the government’s Climate Change Plan at a [Scottish Parliament Committee](#), Chris Stark, CEO of the [UKCCC](#), stated [20.1.21] ..

“The Scottish Government has notably moved towards the carrot approach as its major way of encouraging people out of cars. However, all the evidence suggests that some sticks are needed too.”

Prof Iain Docherty of Stirling University, and renowned expert on Scottish transport policy, stated..

“The first stage is for the culture of carrot-ism in the transport debate to end, and for some very straight talking to be done.” [article “Tell It How It Is” in [Transport Times, Oct 2020](#)]

Edinburgh City Council’s draft policy documents fall into a similar danger. Yet it is vital that demand management, including charging, is built into the transport strategy from the outset, so that everyone from the council, to developers and the general public is aware that it is an integral part of the overall picture. Measures such as charging are less unpalatable if they are part of an **overall package** including much improved public and active travel, with public understanding and expectation of the entire package built in from the outset. A policy of ‘introduce carrots then wait and see if charging is needed’ is a recipe for conflict and failure at that later date.

The Mobility Plan, CMP [pages 42-44] does have a section on demand management, but this concentrates very heavily on **parking controls** – which are indeed vital but are only one part of the story.

Roadspace reallocation is not mentioned in the CMP demand-management section, although that is probably inadvertent since it is clearly intended, given what is said elsewhere, and the contents of PTAP and ATAP.

The **Workplace Parking Levy** is covered (policy M38) although no firm decisions have yet been taken. The administration and the parties who support WPL need to find a solution which tackles any realistic concerns (noting Nottingham’s success) and move forward rapidly on this.

Despite the CMP content, there is little mention of WPL in the draft CMP delivery documents – it is mentioned briefly in the **Parking Action Plan** (p20 & p27) but CMP policy M38 is only referenced in the introduction (not in the relevant table on p21) and a starting date of ~2027 is suggested – making it a likely controversial issue at the next Council election, rather than an issue for this Council. If this date is correct, it is also a **significant backslide** from the Council’s **Business Plan** (Action 9e) which proposes WPL implementation in year 2 of that plan, i.e. 2024.

Road User Charging appears not to be mentioned in any of the new draft CMP delivery documents – although it is particularly crucial in relation to **PTAP** at commuting times. Speaking at a [Spokes public meeting](#) shortly after taking office, Transport Convener Cllr Scott Arthur outlined an intention for a combined commuter package of greatly improved bus corridors into the city, together with road user charging, to deter car commuting into the city. This he had already raised at SEStran with, apparently, initial support from surrounding Council representatives.

Again, road user charging is covered as a serious option in the Mobility Plan (policy M39 and page 44), and there is a passing reference in the Business Plan [end of action 9e] to assessing charging opportunities. However, as far as we can see policy M39 is not referenced even once in any of the new draft CMP delivery documents such as PTAP. This appears to be a second **significant backslide**.

4. Public Transport and other CMP delivery documents

Apart from the above concerns, Spokes generally strongly welcomes all the delivery documents

Parking - controls and enforcement are vital for safe and convenient travel by bike. The existing levels of blatant and illegal or antisocial parking on footways and cycleways, in particular, is a source of endless comment, complaint and danger. The Council must also increase pressure on the Scottish Government to improve enforcement options, including use of ANPR and allowing higher penalties for illegal parking.

Public transport - alongside tough demand management (3 above) quality public transport is vital to help drastically reduce unnecessary motor use, with its consequent impact on congestion, emissions and the enjoyment of local streets. A few initial specific comments...

- **PG3** – Consultation on **7-7-7 bus lane hours** should be only as part of the Traffic Order process, given that there has already been [wide consultation](#), to avoid another year of delay
- **PR5** – The **design of tramline layouts** must cater *far better* for cycling safety – a major council failure in the past, [contributing](#) to many unnecessary injuries and, arguably, a death. This is so essential that it should be *in the policy statement*, not just in general text
- **PT1 – Cycling to public transport** should be recognised, adding the word ‘cycling’ in this policy
- **Bikes on buses**, especially for longer-distance and rural routes, needs included to cater for and encourage joined-up bus/bike travel. In particular, we urge a review by Lothian family company bus services, noting the successful bike-carriage schemes by Borders Buses and Ember.

Road Safety – also vital. As regards cycling, whilst deaths and injuries in total and per km have declined over the years, despite rising bike use, every injury remains a family and workplace tragedy – not to mention deaths still occurring once or twice most years.

Circulation Plan – we have already submitted [initial comments](#). Whilst welcoming the concept, our top concerns are potential breaks in segregated main road routes, which would render sections of the Edinburgh Cycle Network not ‘suitable for all’; and the need for more detail on the creation of traffic-reduced areas through features such as bus gates and modal filters. Encouragingly, for the city centre, the Feb 2023 Circulation Plan update says that such restrictions “*could now be considered*” for the Bridges, Lothian Road, Lauriston Place and Cowgate.

5. Appendix – Council draft CMP delivery documents

- [Active Travel Action Plan](#) ATAP
- [Public Transport Action Plan](#) PTAP
- [Parking Action Plan](#)
- [Road Safety Action Plan](#)
- [Air Quality Action Plan](#) AQAP
- [Circulation Plan](#) [under development] [Feb 2023 update](#)

all based on ...

- [City Mobility Plan](#) 2021-2030 CMP
- [Council Business Plan](#) 2023-2027 [Note Appendix 1, sections 7 & 9e]

Figure 1.1: City Mobility Plan and Associated Action Plans

