

Spokes comments on the [draft CMP delivery plans](#) most specifically the **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. Of course, there will be exceptions, but such an overall ambition is also essential if the Council is to achieve its ultra-ambitious target to reduce car-km 30% by 2030.

NOTE: *Italics* denote quotes from the documents.

2. Demand Management

A top level issue, relevant to all the action plans, is the inadequate coverage of demand management, in terms both of policy and, most important, implementation.

Research is clear that ‘carrots’ (such as improved bus, bike and walk facilities), whilst essential, will not alone 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% commitment. 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 City Mobility Plan, CMP [pages 42-44] does have a section on demand management, but this concentrates 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) and we are pleased that the Council is working on this, although no firm decisions have yet been taken. The administration and the parties who support WPL need to find a solution which tackles any genuine concerns (noting Nottingham's successful approach) and move forward rapidly on this. Furthermore, the Council should continue to lobby the Scottish Government to extend WPL powers to a wider premises levy, which allows charging of car-based leisure and retail operators (such as out-of-town) for the number of customer car spaces over a certain minimum.

However, despite the CMP content, and support for WPL at the Council's Transport Committee, 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**.

3. Active Travel Action Plan 2023, ATAP

3.1 Top takeaway

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 (the "primary" 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, p29-32].

The four 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. The 'joined up' must apply with particular force on the main road routes, where even a short lower-quality section may deter potential or nervous cyclists from cycling the entire route, reverting to a less sustainable mode instead.

Perhaps our greatest concerns are over delivery, given the Council's poor record on this, and on ensuring adequate staffing resources.

3.2 Specific welcome commitments (when implemented!)

Specific commitments we particularly welcome for their importance and/or innovation include the following. And this is far from an exhaustive list! However, to repeat our above concern, **implementation**, together with the requisite **adequate staffing**, is a critical issue if these commitments are to be realised.

- [p40] **A8 Roseburn to Gogar** - segregated cycling [presumably extending CCWEL westwards]
- [p41] **A70 Juniper Green to Dundee Street** - segregated cycling
- [p41] **Gilmerton to Cameron Toll and City Centre** - segregated cycling [the existing project, Lady Road to RIE, will be extended outwards to Gilmerton and inwards to the city centre]
- [p41] **Portobello to Musselburgh** - segregated cycling
- [p48] **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. Spokes has proposed an interim 'quick win' [[Spokes Bulletin #123](#), p3] if full redesign and implementation has to await the complete Boulevard project
- [p40/41] **Travelling Safely main road 'covid' routes** – "*making permanent and improving junction infrastructure, subject to current ETRO experimental process*" See detailed our detailed comments and suggestions in 3.3 below. NB: Obviously, non-junction infrastructure needs improved also.
- [p49/50] **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. The [Leith Connections](#) project, now partially installed, is a hopeful sign.
- [p33 p50] "*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*"
- [p33 p51] "*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
- [p74] "*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* [See 3.3 below for detailed comment on TRO processes].
- [p78] **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 already happens in Glasgow)
- [p55] **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.

3.3 Significant concerns

- [p36 p40 p86] We greatly welcome the intention that **main road segregated routes** should become the core of the Edinburgh Cycle Network. **However, if this important major policy change is to be believed by the public, then it must be reflected early on in the implementation programme**, not leaving it until 2026 when the existing [Active Travel Investment Program \(ATINP\)](#) is due to be complete. Given the availability of much-increased 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. Moreover, the recent low-cost cycle segregation work on [Holyrood Road](#), if found to be successful, is a model which could be used to upgrade multiple Travelling Safely schemes [p101 on] much sooner than had been anticipated.

- [p32] In our [Circulation Plan comments](#) we have already expressed 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 therefore choose a different transport mode instead.
- [p46] Almost every city which has substantially increased bike use has a wide **bike hire** scheme, and Edinburgh badly needs this. It is puzzling that so many other cities have found acceptable financial and other arrangements, and yet Edinburgh apparently has been unable to do so.
- [p75/76] 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. For example, the plan envisages an increased emphasis on walking – this is very welcome, but needs to be achieved through the additional resources now available to the Council from the Scottish Government rather than by any slowing down in work on cycling infrastructure.
- [p74] One very significant cause of delay, which is not in Council hands, is the inconsistencies and anomalies in **Scottish Government Traffic Order rules**, whereby the government retains powers for very local decisions which should be for councillors to decide. Some (for example, that which delayed [CCWEL](#) for literally 2 years) have been revised, but others remain and are a significant drag on Council resources and timescales. *The Council must keep pushing the government hard for action here.* Specifically, RSOs should be abolished (as in England) or, at the least, the final say on objections should lie with councillors, not with Ministers. Secondly, Councils have the power to prohibit loading at specified locations during peak hours, and many other powers to take final decisions on local Traffic Orders, yet objections to loading bans outside peak hours have to be referred to Ministers for a hearing. Not only is this inconsistent but, again, such highly-local decisions should be for councillors, as in England, and not for Ministers.
- [p75] 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?
- [p28] **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 (4.2 below), not just in ATAP.
- [p75] We'd welcome more **information about ATAP progress** being published regularly, at least 3-monthly, on the Council website. Just to take one small example, the ongoing 'minor improvements' program [p57] is quite opaque and few people even know it exists. A regularly published list of completed actions would grow public confidence in the Council 'acting' and would also encourage more people to propose minor improvements to benefit their own local area.
- [p59] We welcome the Council's **Street Design factsheets**. These are intended to complement the Scottish Government's *Cycling by Design* standards, and to go further in facing up to difficult realities, such as where space is highly constrained, with competing demands, and a 'streetspace' approach is necessary. However, the Leith Walk experience, where Trams to Newhaven claims that (most of) the footway and cycleway works are compatible with the guidance, suggests that the existing factsheets may need revision. Finally, we are disappointed by the slowness in preparing the promised factsheet on best practice in catering for *active travel at roadworks and temporary road closures* – an issue which arises very frequently, with seemingly random approaches each time, ranging from the deprecated 'Cyclists Dismount' to the desirable 'Do Not Overtake Cyclists' (at appropriate roadworks) and 'Cyclists Go Slow' at appropriate works on shared paths.
- [p99] The future of **Morrison Street** is of great concern, given its important role as a cycle connection, recognised in the [Transformation Policy](#) and City Mobility Plan, and connecting to the [recognised dangerous junctions](#) of Haymarket and Tollcross. Yet it is being modified to cater for additional (and particularly polluting) motor traffic as part of the LEZ plans [Spokes commentary [1](#) [2](#)]. Spokes urges that the long-promised improvements for cycling here include segregation and are designed and implemented rapidly, and certainly by the July 2025 date in this draft ATAP.
- [p108] The listed **Queensferry** ambitions do not correspond sufficiently to the [actual current proposals](#). Indeed, Sustrans is refusing to fund the project on the grounds that excessive parking is included, to the detriment of cycling and walking conditions.

3.4 Other specifics

- The **cover picture** should reflect walking, wheeling and cycling, not one mode alone
- [p16, p122] The draft ATAP classes **wheeling** with walking, and certainly if it is to be classed with either walking or cycling then this is the most appropriate. However, the strong overlap with cycling needs recognised. For example mobility scooters are classed in ATAP as ‘wheeling’ but often use cycle-only infrastructure, and indeed offroad facilities designed primarily for cycling tend to be more amenable to all forms of wheeling than the narrower, unbound surfaces often provided for recreational walking. Conversely, users of some disability-adapted cycles (categorised as cyclists) would avoid roads entirely and restrict themselves to off-road paths only. Indeed, some vehicles, such as the trishaws extensively used by [Cycling Without Age](#), could perhaps be classed both as cycling and as wheeling.
- [p4, p14] A common perception, particularly on social media, is that it is inappropriate to aim for cycling to be a “**realistic choice for all.**” Obviously there would be some exceptions, but to counter the misperceptions we suggest an additional sentence at an appropriate place, on the lines that “Through deliberate policy, cities such as Copenhagen have largely achieved this.”
- [p32] **Bus Lanes** are better for confident cyclists than are all-traffic lanes, but many novice and potential cyclists, and many parents with children, still find them too daunting to use. They should therefore not be counted as part of a primary cycle network intended to attract large numbers of people to change mode to cycling.
- [p45] Obviously the Council needs to, and has the powers to, ensure safe access routes and high quality bike parking at new developments – this needs to happen more consistently both in granting permissions and in ensuring compliance. However, we are equally concerned about bike parking *and safe bike access* at **existing** retail parks, standalone supermarkets, and other locations which attract large numbers of the public. Craigleith Retail Park is an example where both cycle and pedestrian access are very poor, offputting and potentially dangerous – even though it is adjacent to the North Edinburgh path network. Whilst the Council has no powers in existing centres, proprietors could be encouraged to do better and offered advice.
- [p51] **School streets** are very important, but enforcement is often poor. Designs which minimise the need for enforcement should be used wherever possible – e.g. full closures to motor traffic, and in some cases using former roadspace for playground expansion as currently being pursued at [Sciennes Primary](#).
- [p66] **‘Recreational’ paths** should be accessible to everyone, including wheelchairs, adult trikes, etc. Surfaces, widths and other design features should enable this.
- [p17, p82] **Tactiles** on or adjacent to cyclist routes, and running parallel to them (‘tramline’ layout) can cause bikes to skid, and there have been serious injuries and concussion. Whilst national rules have to be followed, use of tactiles in such layouts should be minimised. For example, cyclist routes should be edged with kerbing (with height difference as required for blind people) rather than tactiles; tactiles on cyclist routes should only be in single rows; and tactiles should have non-skid surfacing.
- [p109-110, p11] In comparing **ATAP expenditure** on walking/wheeling with that on cycling it is important to bear in mind that the existing walking network, in terms of footways, whilst needing many upgrades, is already omni-present; whereas the cycling network is still in a highly rudimentary condition. Furthermore, 30% of the carriageways renewal budget (the total budget is normally around £13m, though with an additional £11m for 23/24) is invested in footway renewals, a welcome sum and the highest of any Scottish local authority.
- [Appendix 1] It is difficult to categorise some actions as between walking, cycling or joint; but the appendix should be scrutinised in this regard. Several ‘joint’ actions [e.g. J20] appear to be cycling-only; some ‘cycling’ actions [e.g. C3] are joint; and some of the ‘walking’ actions should also cover cycling aspects [e.g. W15, and toucan crossings in W9]

- [Appendix 6] As in [previous discussions](#) over the CMP, we support non-numeric **targets** for sustainable modes, as in the monitoring appendix. The overall policy to reduce car-km by 30% by 2030 needs to be supported by increases in use of bus, walking and cycling; but competitive targets between the sustainable modes will not assist this process – see the above link for a summary of the issues. In terms of **monitoring**, although [automatic counter data is available](#), we would like to see summarised Council figures published more regularly. Our bi-annual counts suggest [significant peak-period cycle flows](#) (as a % of all vehicles) even on bike-unfriendly Lothian Road, and this may well be the case for other city centre roads such as South Bridge and Leith Walk. Anecdotally, there are also suggestions of cycle use rising further as a result of the new Leith Walk cycle lanes, despite their many flaws. The [Sustrans Bike Index](#) reports are useful, particularly for public attitude research, but are not a substitute for regular monitoring and publication of actual usage.

4. Public Transport and other CMP delivery documents

In general, Spokes supports all the delivery documents, with the major caveat in (2) above about demand management, and concerns about staffing and resourcing similar to those for ATAP above.

Note that we have not had the resources to study these plans in detail, and thus our comments below are somewhat random and certainly not intended to be comprehensive.

4.1 [Parking Action Plan](#)

- **Parking controls** are one of the major tools available to the Council in working towards its traffic-reduction target. Many European cities have achieved significant urban traffic reduction, and increased walk, cycle and bus, in part by a phased programme of removal of urban parking spaces. We suggest a similar programme here.
- Furthermore to achieve successful 24/7 bus lanes and cycle lanes on main roads, parking and loading has to be undertaken by other modes, such as cargobikes where appropriate, or moved to nearby locations. It is similar on shopping streets, where footways may need widened and, where appropriate, cycle lanes installed. The changes to Scottish Government **Traffic Order rules** mentioned above (3.3) are vital here, to avoid inordinate delays and the tying-up of staff resources, and the Council must continue to press this case.
- **Enforcement** is vital for safe and convenient travel by bike. The existing level of blatant and illegal or antisocial parking on footways and cycleways, in particular, is a source of endless 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.
- **Illegal Blue Badge parking** is a growing concern, particularly given the increasing major exemptions allowed such as the [George Street](#) proposals and the LEZ. Not only are genuine blue badger's inconvenienced when spaces are occupied illegally, but the Council's objectives to create people-friendly streets and places are challenged.
- See also our comments on **Workplace Parking Levy** (and its extension to a wider **premises levy**) and **road-user charging** [2 above].

4.2 [Public Transport Action Plan \[PTAP\]](#) - alongside tough demand management (2 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.

- [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. For example, Princes Street could have been laid out with a wide footway and tramlines on the south side, and segregated cycling on the north side – without doubt this would have reduced the number of unnecessary injuries, some life-changing, that have occurred and continue to do so.
- [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.
- See also our comments on Workplace Parking Levy (and its extension to a wider premises levy) and road-user charging [2 above]. In relation to PTAP, a combined package of **congestion charging** and **high quality bus corridors** is likely to be more effective than either measure alone.

4.3 [Road Safety Action Plan](#)

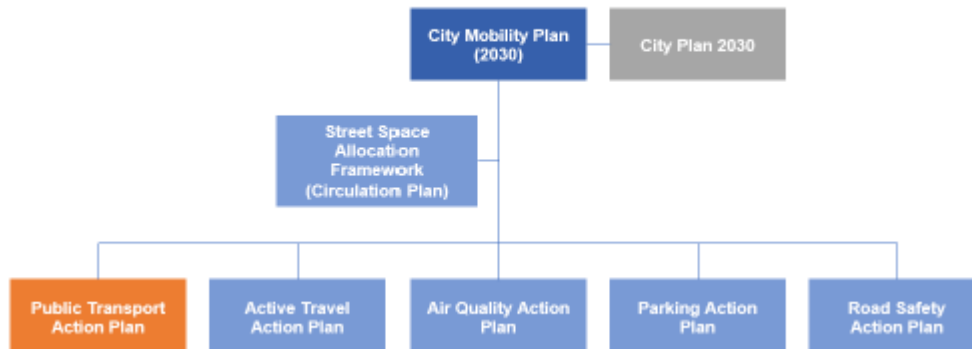
- Every injury remains a family and workplace tragedy. It is disturbing that pedestrian and cycling deaths and serious injuries have remained largely unchanged over the last 10 or so years. The report should discuss why this has happened when slight injury has apparently fallen substantially – indeed it raises the question of whether the latter is merely a reflection of reporting or recording patterns rather than an actual decline?
- In terms of cycling, deaths still occur once or twice most years, which is unacceptable in a city with a ‘Vision Zero’ ambition. Given that deaths are frequently at junctions, we urge priority for action on the **Major Junctions Review** [3.2 above].
- **Speed reduction**, and particularly the **enforcement** of limits are critical to the reduction of injuries, as well as making streets into places where people are happier to walk and cycle. Engineering should aim to discourage speeding; 20mph cameras should be installed at speeding or danger locations, and the Scottish Government should be pressed for greater powers to allow the Council to enforce limits.
- Many ‘quick wins’ should be possible **when roads are resurfaced** – for example removing wide splays at side-road junctions.

4.4 Circulation Plan

- We have already submitted [comments on the early draft](#), and we await a fuller version
- 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 – though this welcome statement was brought into question recently when North Bridge was reopened to 2-way traffic following a closure of over a year for bridge repairs.

5. Appendix – Council draft CMP delivery documents

Figure 1.1: City Mobility Plan and Associated Action Plans



- [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 [Appendix 1, sections 7 & 9e]