TEC 12 November 2026

7.7 City Mobility Plan - 2026 Review[1] [and appendices 1-6)

Written deputation from Spokes

Introduction

These documents contain a huge mass of material which, as volunteers, we cannot fully absorb in the time available. Below we pick out a number of relevant points, but this should not be taken to mean that we are necessarily in agreement with others.

[Section numbers below refer to those in the report]

4.32-4.33 Updating the CMP itself - the proposed changes are in Appendix 5[2]

Congestion - We note that one proposed change (for CMP p11) is to add "*Congestion - Edinburgh was the second most congested city in 2025, seeing a worsening since 2023.*" This is a very concerning statement, but obviously must be included assuming it is correct. We could not locate the source for this elsewhere in the documents, but presumably it is there.

Updating of Delivery documents (4.33) Officers are asked to update the 'supporting documents,' based on decisions taken today. These include *CMP – Implementation Plan - Delivering Actions for Active Travel)*[3]. We note that this document is what the Council used to call its '*A**ctive Travel Action Plan (ATAP)***'. We are concerned that, now buried away as one of 4 plans of a bigger plan to implement another plan (the CMP), few outside this Committee may appreciate that it is in fact what most councils do call their Active Travel Action Plan (or similar), and publish as a document in its own right. **We are particularly concerned that the consultation with ourselves and other relevant groups which used to accompany ATAP revisions appears to be missing in this proposed update**. Consultation is vital - we have important concerns, such as in the following two paragraphs, plus others not listed here to avoid lengthening this submission further.

In relation to this forthcoming revision of *Delivering Actions for AT*, whilst we have strongly welcomed the 'Primary Cycle Network' policy introduced in the Plan, we consider it crucial that the revision includes a clear description of *the standards which the Primary Network should meet*. For example, buildouts or other features whose design blocks the primary network, forcing cyclists into the main traffic flow, and *which are currently being installed*, should be explicitly ruled out. The Cycle Network is intended to cater for and encourage cyclists of all ages and confidence levels, and forcing cyclists away from the kerb, into the main traffic lane, should be a complete no-no. We also note in appendix 4[4] that action 45 was to develop a prioritised "*core citywide network of routes to 'Active Travel Freeway' standard*" but that this action is now considered 'superseded.' **Such a commitment remains essential for the Primary Network, and so must be included in the *Delivering Actions for AT* document.**

A second revision to the *Delivering Actions for AT* document should be a commitment that **cyclist interests will be consulted over *any road project which impacts on the cycle network***, even if designed by non-AT teams such as Signals or Road Safety. This would enable comment on installations such as the above, potentially blocking the cycle network, and which currently are implemented without cyclist consultation. Such consultation did often occur prior to 2024, but ended as an unanticipated side-effect of the otherwise welcome TEC decision of 12.12.24[5] to restrict the use of Redetermination Orders.

---

1 https://democracy.edinburgh.gov.uk/documents/s105964/Item%207.7%20-%20City%20Mobility%20Plan%20-%202026%20Review.pdf

2 https://democracy.edinburgh.gov.uk/documents/s105969/Item%207.7%20-%20City%20Mobility%20Plan%20-%202026%20Review%20-%20Appendix%205.pdf

3 https://www.edinburgh.gov.uk/downloads/file/35655/delivery-actions-for-active-travel-supporting-information

4 https://democracy.edinburgh.gov.uk/documents/s105968/Item%207.7%20-%20City%20Mobility%20Plan%20-%202026%20Review%20-%20Appendix%204.pdf

5 file:///C:/Users/Dave/Documents/spk/Improved%20Process%20for%20Implementation%20of%20Traffic%20Calming%20Measures-5.pdf

4.30-4.31 Changes to Policies in the CMP

Two existing policies are proposed to be 'paused'...

> "*4.31.1 Following consultation, a workplace parking levy will be designed and presented for consideration.*
> *4.31.2 Explore the introduction of a "pay as you drive" road charging system to encourage use of sustainable modes of travel and reduce congestion.*"

Whilst we understand that this is based on decisions already taken by the Council, and the second is partly due to Scottish Government actions, we register our continuing extreme concern.

Given the statement about Edinburgh congestion in 4.33 above – *the second worst in Britain, and increasing* - it is vital that these policy levers continue to be developed. As is well known, research commissioned by the Scottish Government[6] showed that only by some form of road user charging could car use be reduced sufficiently widely in reasonable timescales.

4.21-4.31 Updating the Implementation Plan

The proposed changes are in Appendix 4[7]

There are 112 actions at the time of the 2024 review, and it is proposed to drastically reduce these to 50, by consolidating some, and several other reclassifications. However, appendix 4 does not appear to show this reclassification of the 112 into 50, so it is hard to comment specifically.

We in principle appreciate the value of consolidation/ reclassification, if for no other reason than to make the material less complex, but are naturally concerned that important active travel actions may be lost. This is a further reason why it is vital we are consulted on the *Delivering Actions for AT* document.

4.11-4.19 Data on Traffic Volumes

Council data and DfT data differ substantially, with the Council data showing a much better picture regarding traffic reduction, although the actual DfT figures do not appear here, just reference to them.

We do appreciate the reasons given in the report for differences, including the DfT statement that their figures may not be robust or up to date at local level, but nonetheless we are concerned at the level of difference. In particular, the CMP update, both this time and in future iterations, should include *and compare* the DfT data with the locally produced.

Note that, Spokes traffic counts[8] do confirm a trend, since the pandemic, of declining car use and rising bike use at our count points, which are in the central areas. It is also notable that the Council's own automatic counters are more densely located in central areas than outer areas [map 2.2.1 in appendix 2[9]]. Therefore it is quite feasible that the DfT and the Council data are both correct, but are measuring different things. i.e. across the city as a whole (including the bypass) car numbers have not reduced, whereas nearer the central areas they have reduced. This greatly strengthens the case to continue to report both sets of data – and possibly to consider installing further counters in the outer areas.

---

6 https://www.spokes.org.uk/2025/01/20-traffic-reduction-scotgov-research-shows-how/
7 https://democracy.edinburgh.gov.uk/documents/s105968/Item%207.7%20-%20City%20Mobility%20Plan%20-%202026%20Review%20-%20Appendix%204.pdf
8 https://www.spokes.org.uk/2026/05/spokes-traffic-count-may-2026-bikes-up-everywhere/
9 https://democracy.edinburgh.gov.uk/documents/s106130/Item%207.7%20-%20City%20Mobility%20Plan%20-%202026%20Review%20-%20Appendix%202.pdf

4-3-4.10 Revising the Key Performance Indicators - proposed new indicators are in appendix 1[10]

The report proposes to reduce the number of KPIs from 36 to 26, for reasons such as "*duplication or outdated methodologies*." We strongly oppose the removal of certain of these KPIs from the City Mobility Plan's monitoring framework.

Removing indicators does not remove the underlying transport challenges they measure, nor does it demonstrate progress towards the Plan's objectives. A robust monitoring framework must provide transparency, accountability and a clear evidence base for assessing whether the Council is delivering safer, healthier and more sustainable streets. In particular, the following KPIs should be retained or replaced with meaningful alternatives:

- KPI 3 – **Cycling**: It is unclear why KPI 3, relating to cycling, should be removed while the equivalent relating to pedestrians, KPI 2, is retained. Cycling is a fundamental component of the City Mobility Plan's sustainable transport ambitions and should continue to be monitored. If the existing methodology is no longer considered fit for purpose, the appropriate response is to replace it with a more relevant and reliable indicator, not remove the measure altogether. Any replacement should reflect contemporary commuting and travel patterns, rather than relying solely on periodic spot counts undertaken by the Council (CEC). The Council should develop a meaningful KPI that provides an accurate picture of cycling levels and trends across the city.
- KPIs 20, 21, 23 and 26 – **Road safety**: The removal of these indicators is particularly concerning. It is bizarre that those which are currently failing are being dropped, whilst those on target are retained.. On the contrary, indicators that highlight areas of underperformance are arguably the most important to retain, as they enable the Council and the public to understand where further action is required. Road safety is a fundamental objective of the City Mobility Plan, and maintaining transparent measures of road safety performance is essential to ensuring accountability and driving improvement. Furthermore, as with KPI 3 above, pedestrian safety monitoring KPI 22 is proposed to be retained whilst cyclist safety KPI 23 is to be dropped
- KPI 29 – **Children's safety**: This KPI should unequivocally be retained. Children's safety must be a central consideration in the planning and delivery of the city's transport network. Monitoring an indicator specifically relating to children's safety provides an important means of assessing whether the Council is creating an environment in which children can travel, walk, cycle and play safely and independently. Removing this measure risks diminishing the visibility of children's safety within the Plan's objectives and monitoring framework.
- KPI 34 – **Rat-running**: This KPI should also be retained, given the direct relationship between rat-running and the safety and liveability of residential streets. Rat-running increases the volume of through-traffic on unsuitable residential roads and can increase collision risks for pedestrians and cyclists, encourage higher vehicle speeds, generate additional noise pollution and accelerate wear and tear on narrow residential roads. These impacts are particularly concerning for children, pedestrians and other vulnerable road users. Reducing rat-running is an important part of creating safer neighbourhoods and more liveable streets, and the Council should continue to monitor its progress through a clear and measurable KPI.

Ultimately, the purpose of monitoring is to provide an honest assessment of progress, including where objectives are not being met. Removing inconvenient or challenging indicators risks weakening the Plan's accountability and undermining public confidence in its delivery. Where existing measures are no longer appropriate, they should be updated or replaced with more effective indicators, rather than simply discontinued.

10 https://democracy.edinburgh.gov.uk/documents/s106129/Item%207.7%20-%20City%20Mobility%20Plan%20-%202026%20Review%20-%20Appendix%201.pdf