

CITY OF EDINBURGH COUNCIL

Item No 3

Transport and Environment Committee

01 February 2024

DEPUTATION REQUESTS

Subject	Deputation
3.1 In relation to item 6.1 – Business Bulletin (Bus Partnership Fund – Funding Update)	Edinburgh Bus Users Group (verbal and written submission)
3.2 In relation to Item 7.1 - City Mobility Plan – 1st Review	Edinburgh Bus Users Group (verbal and written submission) GMB Union Scotland (verbal and written submission) Capital Cars (verbal and submission) Scottish Private Hire Association (written submission)
3.3 In relation to item 7.2 – Our Future Streets	Edinburgh Bus Users Group (verbal and written submission) Capital Cars (verbal and written submission) Car Free Holyrood (written submission)

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Subject	Deputation
3.4 In relation to item 7.3 – Tram from Granton to Bioquarter and beyond	Edinburgh Bus Users Group (verbal and written submission) Spokes Planning Group (verbal and written submission) Transform Scotland (verbal deputation) Friends of Dalry Cemetery (verbal and written submission)
3.5 In relation to item 7.4 – West Edinburgh Transport Improvements Programme – outline business case	Edinburgh Bus Users Group (verbal and written submission)
3.6 In relation to Item 9.1 – Motion by Councillor McKenzie – T7 Longstone Link	Longstone Community Council (verbal and written submission)

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**EDINBURGH BUS USERS GROUP; WRITTEN DEPUTATION TO TRANSPORT & ENVIRONMENT
COMMITTEE 1 FEBRUARY 2024**

Agenda Item 6.1 Business Bulletin Bus Partnership Fund – Funding Update

The Bus Partnership Fund was already paused once during the Covid pandemic. Now the Scottish Government plans to make no funds available in 2024-25. It is understood that it faces a challenging budget in 2024-25, but it still has choices within that budget. Spending in some areas of transport will INCREASE in 2024-25. With two 'pauses' in less than four years, it seems that bus funding is a default option to cut when things get difficult.

How does it fit with the Scottish Government's climate objectives? Or the objective of reducing car kilometres by 20% by 2030? This kind of stop-start process is bad project management, incurring additional delays and costs.

Nevertheless, we understand that any proposed budget is just that, a proposal, until approved by Parliament. Until then it is open to the Council to lobby any or all political parties to seek to amend the budget to reinstate the BPF.

Agenda Item 7.1 City Mobility Plan First Review

We consider this review/update is a marked improvement on the initial document, reflecting a better perspective on the role and needs of buses in Edinburgh's transport.

One general point is that we suspect that rather too many KPIs are proposed.

1) It appears that the draft Public Transport Action Plan now forms, in Appendix 4 (Updated Implementation Plan) 'Delivering Actions for Public Transport; Supporting Information'.

We note paragraph 6.6 in the main report: 'Given the financial constraints faced by the Council, certain areas will need to be prioritised'. A general philosophy of doing less, but better, may be prudent.

There are some proposals where CEC has no role. For example, determining bus fleets and depots ('We will assess the viability of existing bus depots to be upgraded to provide charging facilities for buses and if required identify locations for new depots'). Why devote scarce resources to work where the Council has no role or leverage?

2) We are sceptical about 'Develop and implement a plan for delivery of Mobility Hub pilot projects and monitor usage'. We understand the nature and benefits of Interchanges, but the Mobility Hub concept seems to be an overdeveloped, overcomplicated, and expensive case of Interchange suffering from Scope Creep. What is needed are clearly sign-posted and easily navigated interchanges throughout the on-street PT network.

Rather like MaaS, it sometimes seems that Mobility Hubs are a concept which is promoted to transport authorities and others, based on particular expertise, 'toolkits' etc. In brief, an emerging industry which is a solution looking for a problem, existing primarily to generate an income stream for its exponents.

3) A specific point; Appendix 3 paragraph 3.27 reads 'Proposals to realign a small number of bus stops across the city will reflect these preferences, to optimise spacing of stops and improve bus journey times and reliability.' What is a 'small number'? This seems to conflict with Appendix 4, where the Updated Implementation Plan proposes to 'Identify initial corridors for bus stop realignment trial'.

Either the plan is to address a 'small number' of stops, or a 'corridor', as almost by definition there is a medium to large number of stops in a corridor.

4) The report (paragraph 4.5.5) notes the reduction in use of buses and trams over the Covid pandemic. The Committee will be aware that buses are by far the most commonly used form of public transport. To put this into perspective, before Covid Lothian Buses alone carried more passengers than the entire ScotRail network.

5) Reference is made to the importance of improving real-time passenger information. This is a real issue right now, and we urge the Committee to call for definitive and well-publicised clarity across the Council's public channels on the state of play, and when it will improve. This should not be left to individual Councillors to circulate, no matter how diligently they do so.

6) We would welcome greater clarity on what working with bus operators to identify services which can terminate east or west of the City Centre means.

Agenda Item 7.2 Our Future Streets

Generally welcome. We have some concerns regarding the potential impacts on buses on Lothian Road, and look forward to seeing how these will be mitigated.

Issues arising from the Bridges corridor proposals reinforce the importance of the points made below regarding Item 7.3. Strictly from a user's point of view, if buses are prioritised on the corridor, it will be welcome. If trams are subsequently added to the mix, a number of other issues may arise.

Agenda Item 7.3 Tram from Granton to Bioquarter and beyond

We must note that Appendix 1 might be read as implying that Edinburgh Bus Users Group has been consulted on the scheme. Whilst EBUG received notification that this report had been published on 26 January, no consultation has taken place.

Any further routes must be based on a systematic network approach, notably including buses, incorporating and embedding high quality public transport infrastructure within high quality public realm. In particular, buses must be planned in from the outset, not squeezed in as an afterthought.

No passenger volumes are forecast for trams and buses if trams are extended. We would expect some quantification of the impact on different travel modes of construction.

Agenda Item 7.4 WETIP outline business case

Given our earlier comments, the Committee will appreciate how much we welcome this report, as it appears likely to be the only major bus priority work to make substantial progress over the next year.

We urge the Committee to ensure that any staff time which is otherwise freed up by the Scottish Government's BPF 'pause' be poured into accelerating WETIP.



Deputation For City Mobility Plan to comply with Taxi and Private Hire Cars Disabled Persons Act 2022

Edinburgh Transport Current Policy of not allowing Private Hire Car to Access Bus Lanes and Bus Gates Conflicts with Taxis and Private Hire Cars Disabled Persons Act 2022

GMB Union ask for Private Hire Taxis to be allowed access to Bus Lanes and Bus Gates ASAP.

The Legislation and Law

4.10 In addition to the 1982 Act, the two key pieces of primary legislation which set out the accessibility related requirements of licensing authorities and drivers are:

4.11 **Equality Act 2010:** The Equality Act 2010 ("the 2010 Act") contains a number of important provisions for the protection of disabled people from discrimination when using taxis and private hire cars. In June 2022, the Act was amended by the Taxis and Private Hire Cars (Disabled Persons) Act 2022 ("the 2022 Act") to make a number of important improvements.

4.12 **Taxis and Private Hire Cars (Disabled Persons) Act 2022 ("the 2022 Act"):** The 2022 Act aims to further reduce discrimination against disabled people by extending some of the existing 2010 Act duties to apply to more disabled people and more taxi operators. The amendments include:

- Extending the protections currently afforded to place duties on the driver of a taxi or private hire that has been hired to transport a disabled person who is able and wants to travel in a non-wheelchair accessible vehicle. This will benefit wheelchair users whose wheelchairs can be folded and stowed while travelling in a non-designated taxi or private hire car.
- Wheelchair users whose wheelchairs cannot be folded and stowed while travelling will further benefit from the new requirement on licensing authorities to publish a list of wheelchair accessible vehicles in their area – making it easier for them to identify services they can use.
- Extending the protections currently afforded to wheelchair users using a designated the wheelchair-accessible xi or private hire car and/or assistance dog users to **all** disabled passengers regardless of the vehicle they travel in.



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Disability Disabled Persons Transport Advisory Committee (DPTAC): Position on Taxis and Private Hire

Published on 8 August 2020

Anyone who has to travel in their wheelchair needs what is defined as a wheelchair wheelchair-accessible). The London-style taxi and a small number of mass-market people carriers have been adapted so that they can provide a service to wheelchair users who cannot transfer. WAVs can also be used by non-disabled people and many disabled people.

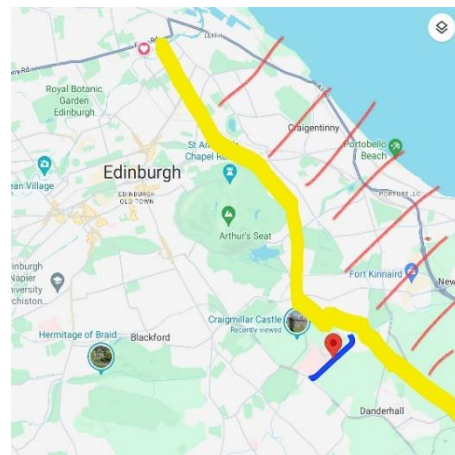
Unfortunately, for a significant number of disabled people, they are difficult to use, particularly those using artificial limbs and others with restricted mobility. Creating the space for the wheelchair frequently means that there is a gap between the door and seat, which some people find difficult to negotiate. Design features, such as swivel seats, have been introduced to mitigate these problems. But DPTAC accepts that, at present, there is no WAV available which is a truly universally-accessible vehicle.

A clear example of Edinburgh City Transport policy of discrimination is the Little France Drive Bus Gates at the Edinburgh Royal Hospital. Any patient from the East of Edinburgh who can't use or choose not to use a London Hackney-type Taxi is forced to pay higher fares due to extended distance and time taken.

Little France Drive Bus Gate.



Little France Dr



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<https://www.gov.scot/publications/taxi-private-hire-car-licensing-best-practice-licensing-authorities-taxi-private-hire-car-operators-3rd-edition/pages/6/>

I hope the evidence above convinces the current transport committee to allow Private Hire Cars Access to Bus lanes and Bus gates ASAP.

Colin Dodds

GMB Union Scotland Lead Representative Private Hire Drivers.

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29 January 2024

Dear Transport and Environment Committee Members,

We, as representatives of the Scottish Private Hire Association, who represent private hire drivers in Edinburgh, are writing to express our concern regarding the current restrictions and proposed plans to further restrict private hire vehicles by expanding on bus lanes and bus gates within the city centre. The limitations that is and further will be imposing on these streets hinder the ability of private hire vehicles that are governed and licensed by City of Edinburgh Council as part of the city's public transport network, to efficiently access significant parts of the city, impacting not only our industry but also the citizens who rely on our services, particularly those with disabilities.

It is crucial to highlight that not all individuals with disabilities require the use of wheelchairs. By restricting our access to these areas, the council is inadvertently limiting the mobility of a significant portion of the disabled community. As we all strive to adhere to the principles of the Taxis and Private Hire Vehicles (Disabled Persons) Act 2022, it is essential to recognise that these restrictions may inadvertently hinder the ability of disabled individuals to access key areas within the city.

Furthermore, these limitations also constrain the choice of transportation available to disabled individuals, effectively compelling them to opt for black cabs (hackney carriages), which are often a more expensive alternative. This lack of choice not only affects the financial aspect but also diminishes the overall accessibility and inclusivity of transportation options for individuals with disabilities.

We are committed to working with the council to find a solution that ensures the smooth functioning of public transport while also accommodating the needs of our industry and the individuals we serve.

We stand steadfast and ready to challenge the council over these actions including protest and legal action if a workable solution cannot be found.

TEC Deputation 01-02-2024

I have included a list of Points from the Report, and appropriate questions to those Points. I was sure I would not have time in this Deputation to raise them all verbally, but I would be happy to answer any questions elected members may have to my questions. And I would hope that some or all could be clarified by officials during your discussions later.

All the Questions have been raised in the context of Public Safety and fairness when it comes to servicing the needs of the population of Edinburgh.

Licensed Private Hire Vehicles carry out an extremely important element of the Public Transport needs in our city, without our vehicles on the road carrying out our licensable activity I would suggest the city would come to a standstill. We have a fleet of Licensed Private Hire vehicles that contribute over 50% of the income received by the City Of Edinburgh Council Taxi and PHC Licensing Department, as we have the majority of vehicles on the road compared to Licensed Taxis. (Currently approx. 2500 PHC to 1200 Taxi.)

Licensed Private Hire Vehicles currently operate 32% of the fleet as either Hybrid, LPG or Electric. Licensed Hackney Taxis currently operate 17% of the Fleet as either Hybrid, LPG or Electric. The numbers are as follows:

Hybrid, LPG or Electric Taxi- 212 vehicles.

Hybrid, LPG or Electric PHC- 694 vehicles.

This data was provided by the Licensing Department in response to an FOI Request.

Our Licensable activity in Edinburgh is governed by the same Civic Government Scotland Act, and enforced by the same Licensing Department that covers both sectors of our trade. We have a duty to service the needs of the public of Edinburgh, and Public Safety is at the forefront of our service remit.

Our licensable activity has undergone huge changes in the last 10 years and indeed our position within the marketplace has been enhanced with those changes. More and more people use our services through Phone booking, App booking, and major Transport Hubs like Edinburgh Airport and the Waverley Station recognise this fact. Our drivers are more professionally trained than ever before with the advent of the Councils own training regime for both new and existing drivers which will have a huge impact in the years to come.

Licensed Private Hire Vehicles are a major part of the Public Transport needs of the citizens of Edinburgh in exactly the same way as Licensed taxis are, and indeed are tested and regulated by the same Licensing Department within the Council. We ask that when it comes to the discussions around the access to Edinburgh City centre as included within this Report, that Edinburgh City Council, and this Committee, **give equal and fair access** to all City Centre areas for both Licensed hackney Taxis and Licensed Private Hire Vehicles, anything less would have a severe impact on the licensable activity of our trade, and also importantly would result in a severe impact to the citizens of Edinburgh who require our services on a daily basis.

I would leave you with one last thought, Licensed Hackney Taxis and Licensed Private Hire Vehicles undertake **over 10 million journeys per year** collectively, and when you recognise that the average number of people in the vehicles at 2.2 per journey that is **approx. 22 million passengers annually**, a huge number of which take place during the night and are either dropping off or picking up in the

city centre area under discussion today. If both sectors of trade are not given equal and fair access to the City Centre, then who or what will service those citizens of our city.

We are not the enemy, we have a very strict age and emissions policy in place equally across both sectors, we understand that there are targets that must be met when it comes to reducing emissions and congestion in our City, however we can play a huge part in the solution to that problem in reducing private vehicle use in the City Centre, **a strong and easily accessible Taxi and PHC Sector will help to reduce those vehicle miles, we are part of the solution, not the problem!**

Questions on Report Points.

Shared Mobility

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Council officers are working in partnership with SEStran and transport providers, [including taxi and private hire vehicle companies](#), to refine the GoSEStran MAAS App so that it is fully useable in Edinburgh as a MAAS journey-planner to support sustainable trips in the city and region. The app is a pilot at this stage, having been established in August 2022, and is undergoing annual monitoring and funding in partnership with Transport Scotland.

Question: [Can we clarify at what point we have had any direct conversation or dialogue of any description including email, with Council Officers on this subject?](#)

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3.55 A City Centre Operations Plan is currently being developed which will respond to feedback on the need for a clear strategy to support consolidation of freight and servicing movements including last mile delivery opportunities using low/zero emission modes such as cargo bikes. [The Operations Plan](#) will also consider other key city centre operational elements including coaches, [taxis and private hire cars](#). It will also need to consider parking strategy to manage demand and improve accessibility for those with mobility requirements and residents living within the city centre.

Question: [At what point will there be engagement with the Taxi and Private Hire Operators as to what this Operational Plan entails.](#)

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Climate Emergency - Transport, the way we move people, goods and services around places, is the second biggest generator of carbon emissions in Edinburgh. In 2021, 29% of carbon emissions are accounted for by transport. Data shows that there has been a 12% 'rebound' in carbon emissions in Edinburgh from 2020 to 2021, following a 15% drop in 2020 due to the COVID-19 pandemic. 2021 data shows that emissions increased predominantly from the transport sector as COVID-19 pandemic restrictions were lifted from between 2020-2021. [According to the Department for Transport, around 80% of vehicle mileage in Edinburgh comes from cars and taxis, and the latest figures show that mileage for cars \(including taxis\) is at 93% of pre-pandemic levels, and for all motor vehicles, at 96%.](#)

Question: [Can we see that Data please, or at least a specific reference to the DfT Report that this data comes from. And the reference to Taxis in this section, can you clarify that the data includes Licensed Private Hire Vehicles please.](#)

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[Shared Mobility](#) Replace 3rd paragraph to reflect that a bike hire scheme is not currently running, however the Implementation Plan includes an action to support its reintroduction subject to agreement/funding: Edinburgh has a variety of shared transport options and is committed to supporting the reintroduction of a public cycle hire scheme subject to agreement and funding. [Shared transport options include taxis \('black cabs'\), which are considered part of the wider public transport system, private hire cars and Car Club.](#)

Question: Can you clarify this statement. Exactly what is considered part of the wider public transport system, Taxis, or Taxis and Private Hire Vehicles. The statement is ambiguous at best and requires a more specific statement to be considered. If it is, as suggested, that only Taxis can be considered as part of the wider public transport system, can you explain and provide the data which covers this statement please.

Page 245 & 246

3.5 Shared Mobility: We will develop an access strategy for taxis and Private Hire Cars (PHCs) in the city centre and on key arterial routes and seek opportunities to expand city car club throughout the city. Strengthen partnerships with the taxi and private hire car trade and car club partners as key providers of the city's shared mobility offering to support the shift to zero emission vehicles and the introduction of new technology to improve safety, standards and accessibility.

Question: Once again can you clarify this statement, particularly with reference to timescales for this access strategy? We are already embroiled in the George Street Plan discussions which to date have not been clarified, and the current Policy approved by this Committee excludes Private Hire Vehicles from entering George Street at any time, hardly an acceptable "access strategy".

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Action 4: Support and Implement Public Transport Improvements

The timescale for an age limitation and vehicle engine (emission) policy for taxis and private hire vehicles has been extended in light of the COVID-19 pandemic, to alleviate pressure on the sector. As of 1 April 2023, any new licensed taxi (or private hire) vehicle, or a replacement vehicle under an existing licence, is to be Euro 6 engine standard. Significant progress has been made by taxi operators with approximately 75% of the fleet already at least Euro 6. The extension of these dates allows licence holders to retain existing vehicles for a longer period (18 months) than would previously have been allowed, however these timescales complement the LEZ, with grants available from Transport Scotland.

Question: The initial sentence refers to a Policy for Taxi's and Private Hire Vehicles, however the significant progress data of 75% refers to Taxi Operators only. Can you clarify the data and whether or not that Data includes, or specifically excludes Private Hire Vehicles. If it excludes, can you explain why, and can we have the relevant statistics on Private Hire Vehicles added to this paragraph please. If it includes, can this statement be amended to reflect the inclusion of Private Hire Vehicles please.

The Data above refers to the Euro 6 category only, however It is also worth pointing out that data was produced in 2023 from Edinburgh Council Licensing Department that shows only 17% of the Licensed Taxi Trade currently operate either a Hybrid, LPG, or Electric vehicle, which means that 83% are Diesel and don't, however currently 32% of the Licensed Private Hire Trade operate either a Hybrid, LPG or Electric Vehicle, with 2% Petrol and 66% are Diesel. I would suggest that this data is perhaps more relevant.

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Work towards 'EV only' for business travel by taxi.

Question: Can this statement be clarified further please. Firstly, does Taxi's include Private Hire Vehicles as far as this sentence is concerned, or only Hackney Taxi's. Secondly regardless of the answer to the first part of my question, can you clarify exactly what is meant by "business travel". Surely if we are to have a fleet of Taxi's and/or Private Hire Vehicles that are EV only, it would be reasonable to assume those vehicles would, and indeed should, be used for more than just business travel as is being suggested in the city centre, and how would you enforce a business only strategy for EV Licensed vehicles entering the city centre. What timescales are being considered within this "working towards" strategy, and furthermore what infrastructure plans are being considered to accommodate city centre charging facilities for these vehicles. I would suggest that a separate set of infrastructure would be required to separate licensed vehicles from that of the wider general public usage if this policy were to be enacted.

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City interchanges – public transport interchanges at key locations in the city, supported by taxi ranks.

Question: Once again, we are seeking clarification on this point. Taxi Ranks is perfectly understandably taken to mean Hackney Taxi only Ranks, however given that the majority of Licensed Vehicles in Edinburgh are Licensed Private Hire Vehicles, does it make any sense whatsoever to exclude the majority of Licensed Vehicles from these crucial public transport interchanges. It would be our assertion that it does not, and we would ask the officials to consider including Private Hire Pick-up and drop off points also at these interchanges. We can already see horrendous queues at certain Taxi ranks in the city centre at peak times (East Market Street), and with an **ever-decreasing** Taxi fleet in Edinburgh (100+ licences are currently sitting un-used at the Council Licensing Dept), I would suggest that the current fleet of Taxi's in Edinburgh could not support these vital Interchanges alone. Some form of pick-up area for customers who would like to book a vehicle on arrival should be included within these plans. If the officials are unsure of the Legislation and how this would work in practice, we are happy to give them a presentation to allow consideration of our point going forward.

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Motorised traffic is one of the UK and Edinburgh's biggest contributors to harmful emissions, including CO₂, with cars generating 63% of all carbon emissions in Edinburgh in 2020. The Council and Scottish Government have ambitious targets to reduce car kilometres. Provision for private vehicles in terms of street space and car parking is also seen as a key factor reducing the amount and quality of space available for public realm and sustainable modes. Therefore, it could be assumed that all increases in general traffic travel times modelled as part of this assessment should be considered positive. However, quick and direct access to key amenities is vital for stimulating economies and revenue is also generated from parking charges. Furthermore, significant delays and more difficulty servicing (deliveries, taxis, emergency services, etc.) could be a major negative for a vibrant city centre in addition to reducing the accessibility of the city centre for those that need to drive (mobility impaired, etc.). The result of this is there needs to be a balance between discouraging private vehicle use while also maintaining an acceptable level of service for general traffic.

Question: Again, clarification on this point as to the use of the word Taxis. Does that mean Taxis and Private Hire Vehicle, or Hackney Taxis alone. Licensed Private Hire Vehicles perform a very important function in our city. We currently estimate around 200,000 journey per week that are undertaken in our city with Licensed PH Vehicles in the majority of Licensed Vehicles within both fleets. The city centre usage is huge in those numbers, particularly those who operate within the nighttime economy and again Licensed PH Vehicles play a major part in servicing that economy. Any exclusion of access

to Licensed PH Vehicles within the city centre would result in a major negative for the public of Edinburgh and would restrict those Licensed vehicles from carrying out their licensable activity under the Civic Government Scotland Act. It is also worth noting that Licensed Ph Vehicles also perform a very necessary function in servicing the needs of those within our community that have mobility and other health issues, something which is frequently overlooked when it comes to these discussions, not all people with mobility issues are wheelchair bound and indeed Licensed PH Vehicles are very often the vehicle of choice for those that have mobility issues as it is easier to get in and out of a saloon car as the step up and down is easier.

**Car Free Holyrood
Written Deputation
Transport and Environment Committee 1 February 2024**

Item 7.2 Our Future Streets – a circulation plan for Edinburgh

Car Free Holyrood is a group of local residents campaigning for a safer, greener Holyrood Park free from motorised through traffic.

Summary

While we welcome actions to meet the Council's 30% car km reduction targets and changes made to the report to reflect HES's management of the Holyrood Park road network, we are concerned that traffic modeling continues to show increased traffic in Holyrood Park, degrading the experience for park users when we should be enhancing our green spaces. Instead:

1. Objective 5 from the Outline Strategic Plan for Holyrood Park should be explicitly referenced in the plan.
2. CEC should state unequivocally in the plan that Our Future Streets will not be used by CEC to ask HES to delay implementation – including of the Holyrood Gait to Pollock Halls connection – of Objective 5 from the Outline Strategic Plan for Holyrood Park. Further, in the plan, CEC should welcome HES to implement of Objective 5 ahead of or alongside Our Future Streets in the interest of protecting Holyrood Park as an invaluable green space.
3. Quiet Route 5, which has been delayed to 2026, should be brought forward to align with Our Future Streets implementation to reduce severance.
4. Niddrie Mains Rd should be reassessed in the corridor appraisal in light of Objective 5.
5. Further collaboration is required between CEC and HES to ensure public transport and active travel routes to the park are enhanced as described in Objective 5.

Welcomed Changes to Report

We welcome that Holyrood Park's road network is no longer included on the key routes for general traffic (Appendix 1, Figure 5.1) and are noted as 'Managed by Historic Environment Scotland' to indicate that these are not owned or managed by CEC¹. Furthermore, we welcome that "additional sensitivity testing has been undertaken to assess the implications of potential Holyrood Park restrictions" in regard to traffic modeling.

However, we are concerned that Holyrood Park's road network remains in the traffic modeling and shows that traffic will increase in the Holyrood Gait to Pollock Halls section of the Park due to Option C.

¹Horse Wynd and Holyrood Gait (except 47 metres NW of roundabout with Queen's Drive) are already adopted and do not have restrictions on goods vehicles (as implied in 4.37). Furthermore, signage restricting goods vehicles is only in place on Queen's Drive past the roundabouts, implying that there are at least in practice no goods vehicles restrictions between the roundabouts. Maps should be updated and 4.37 should be clarified.

Objective 5

Between the publication of the draft Circulation Plan in December 2022 and this update released in February 2024, Historic Environment Scotland has published the draft Outline Strategic Plan for Holyrood Park for consultation, which closed in December 2023.

The draft included Objective 5 to make active travel the dominant travel mode through and to the park and that “steps will be implemented to very substantially reduce, or remove all, vehicular through traffic from the Park”.

Instead of references to the “future management of Holyrood Park” by HES, Our Future Streets should cite Objective 5 explicitly and reiterate the Council’s position that:

- “provision of through routes to motorised vehicles via the private roads within Holyrood Park does not align with Edinburgh’s transport strategies, and seeks to continue working collaboratively with the park authorities to end motorised vehicle journeys through the park” (October 2021)
- “officers will continue the discussion with HES on the management of the roads in Holyrood Park with a view to further reducing traffic” (February 2023)
- “if HES does decide to stop traffic cutting through the park the Council will support them and work with them to minimise any negative impacts on the surrounding communities” (October 2023).

Despite the position that the goal is the end of motorised vehicle journeys in Holyrood Park and while we welcome the changes as cited above made to the report from draft, Our Future Streets continues to cause greater levels of traffic in Holyrood Park from displacement as well as allowing induced demand for motor vehicle journeys through it, with no recognition of the impact this will have on the quality of the user experience in, and equitable access through, Holyrood Park.

While Holyrood Park may be managed by Historic Environment Scotland (HES), it cannot be understated that CEC have a responsibility to Edinburgh residents to protect and maintain access to green space. Holyrood Park is in Edinburgh, and albeit indirectly, CEC has a responsibility to maximise its social and environmental benefit. The current proposals within Option C lay that responsibility entirely on HES and, without the swift implementation of Objective 5, will lock in emissions, degrade the park experience for residents and visitors, and undermine the Council’s traffic reduction targets. The people of Edinburgh will pay a dear price if HES do not take action in response to the Council’s plans.

CEC should state unequivocally in the plan that Our Future Streets will not be used by CEC to ask HES to delay implementation – including of the Holyrood Gait to Pollock Halls connection – of Objective 5 from the Outline Strategic Plan for Holyrood Park. Further, in the plan, CEC should welcome HES to implement Objective 5 ahead of, or alongside, Our Future Streets in the interest of protecting Holyrood Park as an invaluable green space.

Quiet Route 5

Motor vehicle traffic on Holyrood Gait - Queen’s Drive - Horse Wynd already puts pedestrians and cyclists at risk and will only worsen with the implementation of Our Future Streets.

We are extremely disappointed to see further delays in delivery of Quiet Route 5, as referenced in Item 7.1, which provided funding for crossings in this area among other improvements.

The October 2021 Active Travel Investment Programme Update had Quiet Route 5 construction starting in 2022-2023, and this most recent update shows anticipated delivery as 2026. This should be aligned with the implementation of Our Future Streets to protect walking, wheeling and cycling to the park.

Public Transport around Holyrood Park

We are very supportive of investment in public transport around the Park that will support greater modal shift and equitable connectivity. However, as discussed, this cannot come at the expense of Holyrood Park by using its road network to take the city centre general traffic.

Niddrie Mains Road to the A7 and London Road (A1) are key public transport routes around the park. We were pleased to see predicted reduced bus times under Option C for routes coming from A7 to Leith Street. We support a future tram line serving the southeast and would encourage faster implementation of the southern section to facilitate further public transport provision around the park and modal shift. However we note with concern that under Option C, there are predicted increased bus times for A1 to A8; the report does not specify if this will affect the bus times along the A1 from eastern Edinburgh to the city centre.

In addition to public transport routes around the Park, we also encourage consideration by CEC of public transport and active travel routes to the Park and further collaboration between CEC and HES to fully realise Objective 5 as outlined in the Outline Strategic Plan.

We also note that Niddrie Mains Rd did not score as highly as other streets in the corridor appraisal. We encourage officers to consider the impact of Objective 5 in Holyrood Park here. If the appraisals were done without considering that of Holyrood Park's road network would be closed to motorised through traffic, we ask that Niddrie Mains Rd is reappraised to see if this change will mean there is greater impact in investment along this route for public transport.

Ultimately we encourage CEC to work with HES to ensure Our Future Streets does not negatively impact the park experience for Edinburgh residents and, within the context of HES's Objective 5, rather greatly reduces motor vehicle through traffic in both the city centre and Holyrood Park.

Sarah Gowanlock, on behalf of Car Free Holyrood

Edinburgh City Council, TEC 1 Feb 2024 - Spokes deputation

7.3 Tram from Granton to BioQuarter and Beyond Consultation for Strategic Business Case Development

Spokes is extremely concerned over the proposal to remove cycling from the Roseburn corridor.

We appreciate that the report is about the contents and processes of the consultation, and we ask you to amend the consultation proposals such that retaining cycling on the Roseburn path (whether through a cycle/wheel/walk route beside the tram, or an onroad tram route) is a given in the consultation.

1. Spokes has [always supported](#) the tram in principle, assuming holistic design in which cycling, walking and indeed bus are fully catered for (albeit that has not always been the case so far!) We see cycling as part of an overall sustainable transport and access strategy, not as single-issue.

For the avoidance of doubt, whilst Spokes would be very happy with a holistically-designed onroad tram route, and that would be much preferable for wildlife and nature, we have never opposed the option of tram on the Roseburn route if that is very clearly shown to be the best public transport route, provided good cycling and walking conditions remain.

2. A cycle/wheel/walk route beside the tram has always been considered feasible, and desirable, from the original tram proposals in the early 2000s, right up to the present. For example, the [2006 Tram Design Manual](#) (p90), “Cycle/pedestrian routes are to be provided alongside the tram track on those sections where the tram route follows a corridor currently occupied by a cycle/pedestrian path.” The existing path is 3m wide, and so is the proposed new path, albeit presumably with some significant pinch points.

3. The [2021 ESSTS Phase 2 report](#) (table 5.5) proposed two walk/wheel/cycle path options beside the tram – they rightly rejected a ‘do minimum’ (B1a) on the grounds that it contradicted council active travel policy. Remarkably, the new council proposal is *even less cycling-inclusive* than that rejected ‘do-minimum’ option!

ESSTS also proposed a ‘do maximum’ (B1b), which admittedly looked costly. A ‘do medium’ solution should be feasible, dealing with pinch points by means such as possibly replacing just a few of the more problematic structures, possibly some single-track, and accepting a number of remaining pinch points. This should be manageable in a £2bn project, particularly if the mitigations are fairly limited. *We have given an example of ‘do-medium’ in an appendix below.*

4. The onroad cycling ‘alternative’ proposed in the report does of course have some value in itself, but is **not** a valid alternative, with different connections and destinations, e.g. missing Craighleith Retail Park. Furthermore, it is certainly not of equivalent safety or attractiveness (e.g. Dean Bridge, [Orchard Brae steep climb](#), junctions). Indeed, table 4.2 in Appendix 2 says of this onroad alternative, “*provision would be worse towards Haymarket.*” And whilst the Circulation Plan mentions a cyclist route ‘connection’ across Dean Bridge, the Plan also shows Dean Bridge remaining part of the general traffic network. In summary, it is far from clear what standard this ‘alternative’ would provide, and parts of it clearly would not be the sort of route to attract a wide section of the population..

5. The North Edinburgh Network is well used for [utility purposes](#), not just recreation. It is a complete misnomer to describe it solely or even largely as a ‘recreational route.’

6. Utility use will increase further once the Roseburn-Canal project is complete (a major aim of that [£12.5m project](#)) and in the future once a regular tram improves security on the route during hours of darkness.

7. A concern of the present route is 'stranger danger' for walkers and cyclists (largely during hours of darkness). Whilst a tram will somewhat allay these fears, removal of those cyclists who are content to use the path in the evenings will have the opposite effect, significantly reducing public surveillance for walkers and wheelers, particularly given the ability of cyclists to arrive quickly if they hear calls for help.

8. The TEC report says the impact of removing cycling would be 'slight negative' (table 4.2 in Appendix 2). This is ridiculous, as we can see from the immediate reaction on social media – it would be a major negative.

9. The TEC report is itself ambiguous. Table 4.2 in appendix 2 says "Cycle provision cannot be provided" beside the tram whereas 3.2.1 says "Cycling will be discouraged"

10. Cycling on footpaths is legal in Scotland, under Section 1 of the Land Reform (Scotland) Act 2003, with only a few exceptions which do not appear to apply here. So how would the Council either ban or 'discourage' cycling? – and would either be legal? Of course, under the Act, this right of cycle access must be "exercised responsibly."

11. Finally, the Future Streets Circulation Plan ([TEC report 7.2](#)) rightly includes this route as part of the 'Secondary Cycle Network' (see map below) i.e. it is important for both utility and recreational purposes, and linking from the Primary Onroad Network. **Councillors passing both reports unamended would be contradicting themselves and giving absurd instructions to officers – to discourage or even ban cycling on a route they have defined as part of the city's cycle network!**



Map from fig 3.3 of the Circulation Plan report, TEC paper 7.2

Construction period

On a separate but vital issue, if the tram uses the Roseburn route, there will be a closure period of years for construction. Alternative cycling provision, as good as possible, must be provided during this period. Again, this should cover all destinations connected by the Roseburn path (e.g. Craighleith Retail Park), not just an end to end connection. A great value of cycling is that it is about *local access*, not just long distance trips.

Appendix: Providing for cycle/wheel/walk beside the tram

In bullet point 3 above, we suggested a 'do medium' approach. Whilst we are not engineers, here is the sort of approach that might be considered...

- *Coltbridge Viaduct, Ravelston Dykes overbridge, Queensferry Rd overbridge*: major structures, where the cost of a replacement structure would be unreasonable. Options might be single-track operation, modifications to the structure (e.g. path attached beside the viaduct) or accepting a pinch point
- *A8, Craigleith Drive, Groathill Road South*: possible extra active travel bridge
- *St George's school bridge*: not sure here – the bridge may be listed
- *Path width*: there may well be scope to widen the path to 4/4.5m for most of the way, possibly enabling a path segregated between walking and cycling, thus actually enhancing current provision! This could be helped by raising the bottom of some cuttings, and lowering the top of some embankments, to widen the floor area.

Longstone Community Council Response for TEC Committee in relation to

Motion 9.1 – T7 Longstone Link

Our community faces some significant physical barriers with our neighbouring communities, such as the Murray burn to our North, the Water of Leith to the East and South, and has the busy Lanark Road and Calder Road enclosing us.

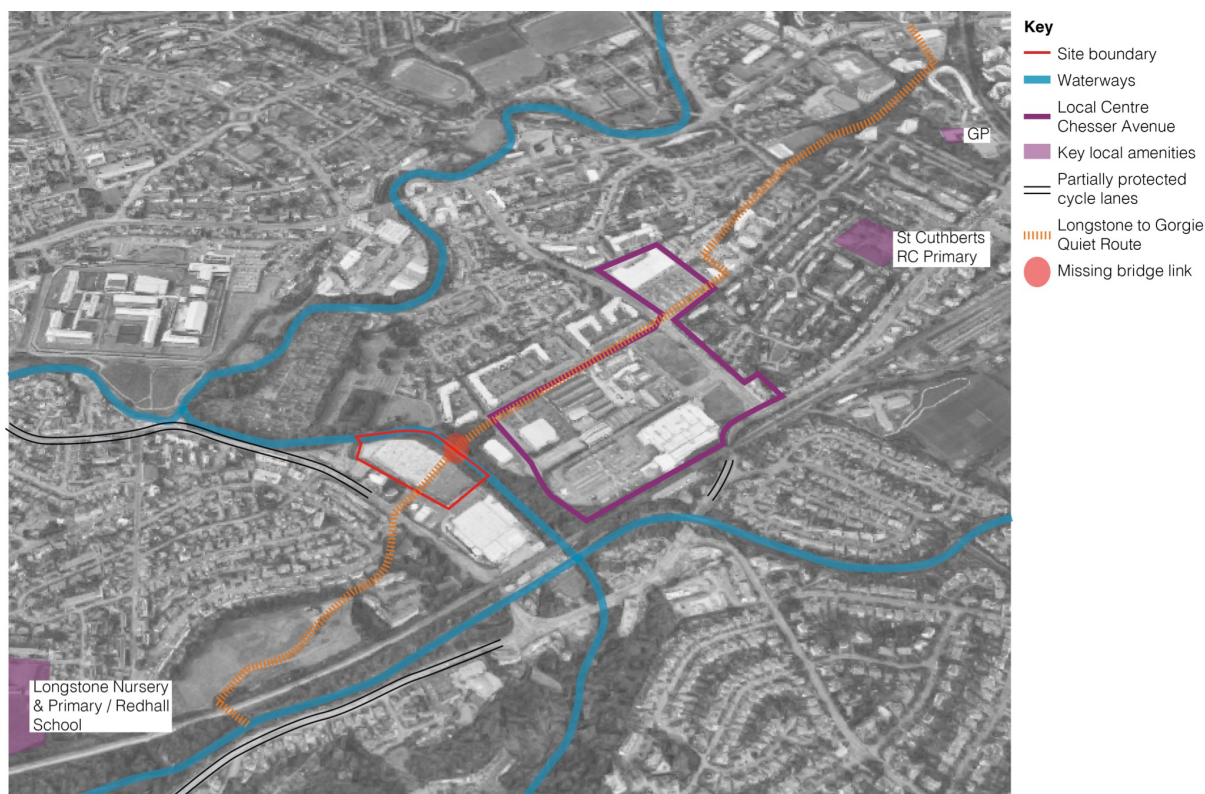


Image 1 - map showing the development site in context

This is important, because it means that we rely on good connectivity and permeability with our neighbouring communities to access Local Centres, schools, GPs and services. Longstone has not been identified as a candidate 20 minute neighbourhood by the Council so it's vital we look to 'connect' to areas that have the shops and services our community needs.

Indeed, over the last 20 years Longstone has lost many of its local amenities. Only one of our two remaining local pubs is not currently under threat of demolition and the café opened within Sainsbury as part of a promised 'active frontage' when planning was granted, has already closed. We are somewhat asset poor as a community. Our local Councillors have nowhere suitable to even hold their regular surgeries.

It's with this context in mind that we look at the important opportunity presented here to improve matters for our community, our neighbouring communities, and importantly, the new residents we can expect this major development to attract to our community. It should be noted this is one of six other developments currently being progressed locally, each of which will attract more car owners to the area and add pressure to existing services.

Additionally, there is a major 'no car' development proposed on the other side of the Water of Leith to replace the 'World of Football' (1200 cycle parking provision).



Image 2 - map showing all proposed local housing developments

LCC Ask

LCC welcome the 30% contribution from the Smarts towards a new bridge crossing and making the new active travel route central to their design.

We remain disappointed the bridge will not be installed early in the development of the site when heavy machinery is already on site and under the developers control.

We ask the committee;

- What more might be done to expedite provision of the new bridge crossing?
- To explore different specifications and cost options for a new bridge to ensure something is delivered, that is sensible, within the existing local context?
- Ensure any solution is well lit through to New Mart Road to allow 24/7 use by all.
- Consider connection/junction/pavement improvements at Inglis Green Rd per the proposed Circulation Plan, where the new safeguarded route joins the existing network.
- To pass Motion 9.1 and deliver on it's suggested way forward.

Consultation Feedback

Many **benefits** were identified by our community during previous consultations, for new and existing residents, which would feed into helping the Council towards its target of reducing kms driven by 30% by 2030;

- Empowers new and existing residents to replace short car journeys with healthy active travel choices immediately.
- Opens a quiet, safe, non-polluted school route for pupils of St Cuthberts living in Longstone.
- Reduction of the many short local car journeys to services in Hutchison/Chesser.
- Direct access to the Local Centre in Hutchison/Chesser and Slateford Medical Centre.
- Direct access to Water of Leith walkway improving circular walking routes locally.
- Safe, well-lit walking route back to Longstone from employment centres for staff living locally.
- Direct access to Hutchison/Chesser quiet route network allowing journeys from the Union Canal, via Redhall Park in Longstone, all the way to Gorgie.
- For less confident cyclists and families; a safer, alternative active travel route that Lanark Road cycle lanes and Longstone Road cycle lanes could connect onto, avoiding the intimidating Inglis Green Road junction and Slateford Railway Bridge pinch point, allowing onward progress through Hutchison, avoiding much of Slateford Road and re-joining the protected cycle lanes later.
- Direct route for Hutchison/Chesser residents to Redhall Park & Hailes Quarry Park.
- Delivers on the CityPlan 2030, City Mobility Plan, and Core Path Strategy.
- Potential reduction in cycle pressure on the Union Canal path and aqueduct.
- Completes a 'missing link' in the local network.