

CITY OF EDINBURGH COUNCIL
TRANSPORT AND ENVIRONMENT COMMITTEE

Item No 3

19 February 2021

DEPUTATION REQUESTS

| Subject | Deputation |
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| 3.1 In relation to Item 7.1 on the agenda – City Mobility Plan – Report by the Executive Director of Place | Edinburgh City Private Hire Ltd and Seven Sevens Cars Ltd New Town and Broughton Community Council Newington Hotels Group |

This Deputation to The Transport and Environment Committee on the 19th of February 2021 and refers to Item 7.1 The City Mobility Plan 2030.

This Deputation is on behalf of Edinburgh City Private Hire Ltd and Seven Sevens Cars Ltd.

Some background to our Deputation today, and relevant information for your perusal. The City Mobility Plan 2030 is 172 pages long, is extremely detailed in its content, discussing the future transport and mobility plans for our city. Private Hire Taxis in Edinburgh Pre-Covid numbered approximately 2500 vehicles and 3000 drivers, all licensed by Edinburgh Council, there are almost double the number of Licensed Private Hire Taxi's in Edinburgh compared to Hackney Taxi Operators. As a group Private Hire Taxi's in Edinburgh cover approx 5.5 million journeys per annum with an average of 2 passengers per journey, equating to 11 million passengers per annum. In 2018 Edinburgh Trams according to the CMP transported 7.8 million passengers, that gives you a comparison of just how popular and important Private Hire Taxi's are to the transportation of passengers in our great city. Again, for context, the CMP mentions Private Hire Taxi's once in 172 pages.

Our Deputation requests that the Committee amends the detail of the City Mobility Plan by

- (a) replacing the word "taxi" or "taxis" with the phrase "Taxi and Private Hire Taxi" or "Taxis and Private Hire Taxis as appropriate, at pages 24, 26, 34, 39, 46 and 52 of the Plan; and
- (b) including reference to "Private Hire Taxi drop off and pick up areas" in Policy Measure MOVEMENT 3 and as one of the key measures in Mobility Hubs on page 35;

These changes are required to clarify that a Private Hire Taxi provides the same function as a Taxi in Transport sustainability terms. It ensures the Private Hire Taxi industry will have access to the same level of partnership working with the Council as other Taxis and ensures that both classes of vehicle description can contribute to the fulfilment of the Council's ongoing strategy of the City Mobility Plan 2030.

We thank you for your time today.

Deputation to Transport and Environment Committee meeting to be held on 19 February 2021 regarding item 7.1 City Mobility Plan

The New Town and Broughton Community Council (NTBCC) welcomes the City Mobility Plan (Plan). The Plan is well structured and makes a positive contribution to addressing the significant transport issues affecting Edinburgh. As always there are some areas where greater detail and clearer targets would be beneficial if only as a means of allowing the Council and others to monitor progress against the Plan. The lack of confirmed funding for much of the Plan raises significant concerns. Without the necessary investment it will not be possible to deliver the modal changes anticipated in the Plan.

We provided comments to the earlier draft of the City Mobility Plan last year. Many of the comments we made at the time still apply and therefore have been attached for ease of reference. In addition, we would make the following comments:

- We would have liked to see greater efforts to retain the positive changes resulting from the pandemic including increased active travel, reduced congestion and lower levels of atmospheric pollution. We are encouraged though by [‘an increased focus on local trip-making as part of the 20 minute neighbourhood’](#) which is consistent with our approach to Broughton Street and aligned with the ‘Totally Local’ concept.
- We are disappointed that the Plan does not seek to reverse the decision to increase the number of pay and display parking spaces let alone seek any reduction in such spaces. We are concerned that the new parking at the St James Quarter when it opens this year will result in increased traffic resulting in more congestion and atmospheric pollution. The delay in introducing the workplace-parking levy is a lost opportunity to encourage businesses to allow continued home working for many of their staff.
- We would have expected to see a commitment to accelerate the switch to EVs, especially buses, taxis and delivery vehicles but instead the roll-out of EV chargers has been delayed and there is no specific target for the number of charging points to be installed over the life of the Plan.
- We note that there is no specific goal in Policy Measure MOVEMENT 6 – Fleet Enhancement to improve the environmental performance of the City’s own fleet of buses. Nor is there any plan to reduce the number of tourist buses that add significantly to the congestion in the City Centre. We understand that the Council does not have the powers to limit the number of such buses and consider that the Plan should have set out the steps to establish such powers.
- It is noted in the Plan that the number of light goods vehicles has risen by 20% over the 10 years to 2018; a trend that has probably accelerated during the pandemic given the increased number of home deliveries. Although the Plan includes Policy Measure MOVEMENT 26 – Managing Deliveries and Servicing, it lacks any definite goals. We suggest that reducing the number of delivery journeys and the resultant atmospheric pollution would have very positive benefits for the City’s residents.
- We are disappointed that implementation of the LEZ have been delayed and that there is no commitment in the Plan to accelerate the introduction of the LEZ or to expand the area covered by the initial City Centre LEZ as we had suggested. We note that the Strategic Environmental Assessment also highlights the negative impact of displaced traffic on atmospheric pollution

levels in areas adjacent to the LEZ (as shown in the following extract from the SEA below). The lack of any action to address this issue is concerning.

“Depending on potential displacement of traffic, there may be locations outside of the LEZ boundaries where air quality is made poorer by a change in the quantity and types of vehicles passing through. Initial transport modelling shows that roads outside the LEZ boundary are likely to see an increase in traffic volumes.” It is critical to the success of the LEZ, the ECCT, the CMP and the City Plan that poor air quality is not moved from one area to another. It is essential that analysis identifies the scale and location of impacts of displacement and effective measures are identified and implemented to avoid these impacts.” - SEPA

- The focus of the section relating to atmospheric pollution is on Carbon Dioxide emissions that contribute to global warming but are not regarded as having health-related impacts. There are already 6 Air Quality Management Areas (AQMA) in Edinburgh where pollution currently exceeds the present statutory levels for Nitrogen Dioxide and particulates. We suggest that meeting existing targets for atmospheric pollution is too conservative and that there should be a goal to seek further reductions in the levels of NO₂ and particulate emissions supported by more effective monitoring and mitigating actions.
- We welcome the decision to more clearly identify separate goals for Walking and Cycling, and to recognise ‘Wheelers’ as a special category but disagree that this term should only apply to people using wheelchairs. This is contrary to other national active travel guidance that states *‘wheeling is any mode of wheeled transport such as wheelchairs, mobility scooters, adapted bikes, hand-cycles, scooters, prams etc.’* Anyone pushing a child’s buggy knows how difficult it can be to negotiate cluttered pavements or access public transport.
- We are disappointed that there is no commitment made to eliminate shared use space (pedestrians and cyclists). This issue received a number of negative comments in the earlier consultation and is widely recognised as being undesirable. Instead there is a Policy Measure to mitigate conflict through infrastructure design, signage and awareness campaigns. It would be better to set a target to reduce such space rather than just mitigate the consequences.
- There is nothing in the Plan to ensure the effective enforcement of the 20mph speed limits beyond continuing to work with Police Scotland on this issue. Speed of traffic was one of the key concerns raised in the Commonplace mapping exercise and is recognised as being one of the most important factors affecting the safety of cyclists and pedestrians. There should be a clear target to reduce traffic speed through more effective enforcement of speed limits and through the introduction of traffic calming measures.
- As noted in our comments last year, the ‘mass rapid transport system’, as conceived, is not comprehensive or rapid enough to deliver a ‘car-free’ future. In particular, options for light rail should be urgently explored with potential partners. There are no plans to make use of the southern suburban railway line, as many people have suggested nor are there any plans to reactivate suburban stations on existing railway lines. The Plan merely commits the Council to maintain engagement with Network Rail on these options. The Plan is not sufficiently ambitious in its goals for mass rapid transport and will result in Edinburgh falling further behind other comparable European cities.

- We strongly support the need to undertake Bus Network Review but believe that this should take place sooner. As noted in the Plan, there are too many buses crossing the City Centre resulting in an over supply in this part of the City at the expense of others which are under serviced. In order for people to be able to transfer from one bus to another or to other modes of transport, there need to be well-designed transport interchanges as well as an integrated fare structure and timetable. Currently these changes will happen too late to produce the desired transport and behavioural changes.
- We note that Appendix 3 'Edinburgh Strategic Sustainable Transport Study Phase 2 Summary Report' states that '[stakeholder engagement to date has been limited to handful of external bodies...](#)' and goes on to say that '[it will be necessary to engage with a select number of external stakeholders. These may include Spokes, Living Streets, Edinburgh Access Panel...](#)'. There is though no mention of Community Councils or any of the heritage groups such as Edinburgh World Heritage or the Cockburn Association. We suggest that this is a serious oversight and trust that Community Councils and Heritage groups will be involved in the next phase of the Strategic Sustainable Transport Study but also the development of specific plans and targets outlined across the Plan. We suggest that the Transport Forum referenced in the Committee report could be expanded to provide an appropriate forum for such a wider engagement.



**RESPONSE TO CONSULTATION ON EDINBURGH CITY MOBILITY PLAN
APRIL 2020**

KEY POINTS

- **Revise the plan to take account of changes following the COVID-19 pandemic. Implementation will need to be reassessed, and there are likely to be opportunities to make faster progress towards some of the long-term objectives**
- **Ensure a safe infrastructure for cycling, but prioritise pedestrians and public transport at all stages**
- **Revise transport and economic priorities so the health benefits of lower emissions in the lockdown are retained in the long-term; introduce restrictive measures to maintain lower volumes of traffic in city streets**
- **Any increase in private car use, because of lower risk of infection, should be carefully managed: ensure the focus remains on delivering the CMP's long-term environmental and health benefits**
- **Accelerate the switch to EVs, especially buses, taxis and delivery vehicles**
- **Revise the parking proposals: reverse planned increases, and cut spaces in the centre and surrounding areas to encourage a lower level of private car use and take account of more people working from home**
- **The 'mass rapid transport system', as conceived, is not comprehensive – or rapid – enough to deliver a "car-free" future: it should be more ambitious**
- **In particular, options for light rail should be urgently explored with potential partners**
- **The LEZ proposal should be expanded to extend the greatest protection from harmful emissions to residents beyond the central business and tourism district, and should include Queen Street and York Place**
- **A robust and radical approach is needed to enforce the 20mph speed limits**
- **We support pedestrianisation of streets – but only if an effective framework is put in place to protect them from over-use by events or activities of a commercial or tourist nature**
- **There should be no return to the unsustainable levels of tourism and commercial exploitation of public space of recent years: diversify the economy away from over-dependence on these, and limit use of public space to the existing small number of established large-scale events.**
- **Focus instead on local businesses and economic sectors which bring sustainable, long-term added value to the city economy**
- **We ask all parties on the Council to work together to deliver consistent planning decisions which ensure that private sector activity aligns fully with the city's long-term environmental and economic aims**

1 - Put pedestrians and public transport first

Transport policy should prioritise pedestrians and public transport over cycling. Partnership with Sustrans should be balanced by a stronger relationship with Living Streets. The proposals carefully refer to “walking and cycling” in that order and we ask that this priority should be observed in the planning and implementation of all three stages of the vision.

2 - Fewer vehicles, lower levels of harmful emissions

There is a possibility that as lockdown restrictions ease, private vehicle usage – as a mode of transport with a lower risk of infection – returns to or exceeds pre-pandemic levels. It is likely this mode of transport will be advised at least for vulnerable groups. If there is an increase, we believe the Council should seek to manage it very carefully so that the environmental and health benefits promised in the CNP are still delivered in the longer-term.

In the short-term, travel restrictions, working from home and the growth of local delivery networks have radically reduced the number of private vehicle journeys in the city. The Council should introduce restrictive measures to maintain these lower levels of traffic, and also reduce parking capacity in the centre and surrounding areas.

The Parking Action Plan (voted through the month before lockdown) would expand private car-parking capacity in central Edinburgh to what must be the highest levels since restrictions were introduced; together with the 1600 spaces in the new St James’ Centre, this could only lead to an increase in vehicle journeys to the city centre. We believe the Council now has an opportunity to reduce parking and support the development of delivery networks on a faster timescale than envisaged in the CMP.

The parking plan runs counter to the aims of the National Transport Strategy (“*we will design our transport system so that walking and cycling and public and shared transport take precedence ahead of private car use*” ... “*alternatives to car use must be encouraged*”). It also conflicts with the Council’s own ‘Transformation Strategy’. We suggest that the Council confers with the city’s MSPs to ensure that this contradiction is resolved. The NTBCC submitted an objection to TRO/19/29 on these grounds (26 November 2019) and we ask for a response to this objection from the Council.

There is clear evidence that the lockdown has resulted in lower levels of harmful vehicle emissions. The Council should reconsider its transport priorities to ensure that these healthier levels become an accepted norm in future.

There should be greater emphasis on the use of electric vehicles in the city centre area, particularly electric buses, taxis and delivery vehicles. In light of a possible increase in private car use as people seek to minimise the risk of infection, we suggest that the EV charging infrastructure be increased and introduced more quickly to make it easier for residents to switch to EVs.

3 - Use the time to develop a fully thought-through ‘mass rapid transport system’

We support the ambition to develop a “comprehensive mass rapid transport system” (MRTS) “by 2025” however we should be clear that a bus + tram system is not a rapid transport system and this option needs a great deal more work.

The suspension of much of council activity during the pandemic offers CEC an opportunity to give this crucial element of the CMP a detailed re-think.

Most European cities of Edinburgh's size have a wider mix of transport options (subways, trains, trams and buses) which between them make it possible to plan for a car-free future. Only Manchester and Bordeaux rely on buses and light rail (trams) but these both have much larger and more extensive light rail systems than Edinburgh. We believe Edinburgh should explore suburban rail/light rail much more vigorously, as the only practical option for offering truly rapid transport to the city centre from population centres across the wider Lothian/Fife catchment area. Neither trams nor buses can offer sufficiently rapid movement within this wider area.

We therefore strongly support the extension of tram or light rail links to the RIE and Musselburgh. But options for developing light rail combined with reopened former suburban lines should also be urgently developed in collaboration with Network Rail.

The Council should work with relevant partners to create integrated fare structures across the various public transport systems serving the city and city region.

3.1 The LEZ proposal

As the wider city area will be unable to reduce dependency on cars until an effective MRTS is in place, the main priority for now should be to remove pollution and reduce CO2 emissions. This is why we believe it is necessary for the LEZ proposal should be more ambitious and extend the highest levels of protection beyond the central business and tourism district to a much higher proportion of the city's residents. Increased working from home would make this both a higher health priority, and easier to achieve.

NTBCC objected to the Council's LEZ proposal (July 2019) asking that the proposed "central" zone be widened to include the Northern New Town, and objecting to the designation of Queen Street and York Place as "alternate routes" for non-compliant traffic, a proposal which can only increase pollution on these streets. We ask again that these streets, and also Regent Road, be included in the central LEZ zone.

The Council should also use its leverage with Lothian Buses, and other operators, to ensure that all fleets operating in the Edinburgh city region meet Euro 6 standards as soon as possible. In redesigning bus routes, careful consideration should be given to the air and noise pollution, and potential structural damage, caused by routing a disproportionate number of bus journeys through any one residential street, as has been happening in East London Street. We ask that the Council work with Lothian Buses to ensure that city residents are not exposed to an excessive level of hazard in this way.

3.2 Other traffic reduction measures

- We support plans for a workplace parking levy on employers (not staff, and excepting provision of disabled spaces) to raise income for investment in public transport.
- Transport interchanges should be convenient for users and comfortable and pleasant to use like the successful rail/tram/bus interchange at Haymarket.
- We support the ambition to expand bus priority corridors and to extend operating hours especially to suburban areas some of which have very infrequent services in evenings and weekends.

- The Council should work with neighbouring local authorities to enlarge park and ride facilities and parking capacity at railway stations within commuting distance of the capital.
- Legislation to prevent parking on pavements, already passed by the Scottish Parliament, should be fully utilised by the Council as soon as it comes into force.

3.3 Congestion charging

Congestion charging based on the current CPZ should be introduced but should – unlike the failed 2005 scheme – include sensible consideration for car owners who live in the residential centre.

4 - A safe infrastructure for cyclists

Much more could be done to make roads safe for cyclists. Traffic congestion, speeding, oversized vehicles and poor surface maintenance are strong disincentives for cyclists and it is little surprise that many people consider Edinburgh's roads too dangerous for cycling.

Reducing congestion, enforcing speed limits, regulating the size of commercial vehicles and repairing roads would greatly reduce the demand for separate cycle lanes.

5 - Put pedestrians first

We welcome pro-active measures to improve conditions for pedestrians such as traffic-calming, allowing longer crossing-times for pedestrians at lights, enforcing the 20mph speed limit, pedestrianising streets (with the proviso below, section 6), and reducing the number of street activities which take up pedestrian space.

5.1 Non-observance of speed limits

Radical and robust action should be taken to enforce speed limits as levels of non-observance remain significant, and the police can only allocate limited time to enforcement. We suggest that the Council investigates possibility of using traffic wardens to monitor speeds and enforce limits.

6 - Reclaim public space from commercialisation

The city should redirect commercial activity away from streets and public places and focus it back into commercial premises, locally-based businesses and emerging economic sectors more likely to bring sustainable, long-term added value to the city and regional economy.

Existing public recreation spaces such as Princes Street Gardens and Calton Hill should be protected from development and should not be used for more than a small number of established large-scale events.

We support the pedestrianisation of streets only on condition that the Council puts in place a clear and effective framework to ensure that the space regained is not then monopolised by events and/or activities of a commercial or tourist nature.

Where significant changes are proposed, the Council should model the likely effects on surrounding streets.

6.1 Over-dependence on tourism

Edinburgh is and should remain the global destination acknowledged by its World Heritage Site status. However it has failed to manage this optimally in recent years.

The aftermath of the pandemic will be an opportunity for Edinburgh to reset its policies on tourism. We ask that these be recalibrated to a level consistent with sustainable economic development, avoiding over-dependence on tourism and protecting permanent residents from its ill-effects.

The travel/tourist sector will revive but likely in a different form, offering the city an opportunity to reset its framework for the visitor economy. This should focus on bringing as much of the existing built environment as possible into sustainable economic use where economic activity can be properly regulated and return real added value to the city economy. Some of CEC's attempts to regulate commercial partners (e.g. Underbelly) have manifestly failed. Streets and recreation areas should be better protected than they have been from damage, pollution, clutter and litter. The activities of bodies such as Underbelly and the 'Quaich project' should be closely monitored by officials and councillors to ensure that public space is not degraded or effectively monopolised for commercial purposes.

We agree that streets should be safe, attractive and healthy, but it is not clear what the Council intends when it says that streets need to be "interesting". We agree that they should be unobstructed and well-lit, with convenient seating where appropriate; free from clutter and commercialisation; and free from the disruption involved in what has been a near constant cycle of setting-up and dismantling for events. With the international economy operating at a lower, perhaps more sustainable level following the pandemic there will be opportunity to set a more equitable balance between the needs of Edinburgh citizens and those of events organisers and visitors.

6.2 Sustainable tourism

Commercial tourist buses are major causes of pollution and congestion and we suggest that CEC consider restricting their use to those with specific mobility requirements. Tourist routes using a mix of public transport facilities and walking and/or cycling could be designed, and tourists then directed towards the use of these.

7- Mobility needs

The needs of neurodiverse people and others with particular mobility needs should be built into planning and implementation at all stages. Housing, transport, planning and economy officials should work closely with health and social care specialists to ensure this is achieved.

Accessibility must be a priority throughout planning and implementation. Where relevant and appropriate, every aspect of design should conform with the needs of those with protected characteristics.

8 - Longer-term aims of the Plan

We support the longer-term aims described in the 2030 vision with the exception of the Waverley Station Masterplan.

This plan appears to offer no public transport improvements, and appears to be essentially a further expansion of retail space. The thinking behind this plan seemed ambitious before the pandemic, and we believe it should be completely reassessed in the context of the likely recession. We recommend that the Council should work with Network Rail to divert available investment into improving rail links for the long term. As noted above, we strongly support the extension of tram or light rail links to the RIE and Musselburgh.

9 - Planning and development

The Council has overseen some valuable planning work in recent years but there have also been some significant failures, a continuation of which could threaten delivery of the aims of the CMP.

All new private developments should be carefully scrutinised and if necessary changed to align with and actively support the ambitions in the CMP vision. The Council cannot deliver the plan it on its own and will need to ensure that private sector activity supports the vision and does not detract or divert from it.

Developers should not be permitted to exploit weaknesses in the planning framework to defeat the vision for their own ends. The planning framework gives councillors adequate scope for discretion to achieve this, but we believe that higher levels of scrutiny, and greater cohesion of intent from councillors in different parties, are also required. We suggest that the controlling coalition should create a project to ensure a unified approach to planning and development to ensure that all private sector activity supports and enhances the CMP vision.

This will require courageous leadership from the Council. Many of their planning professionals possess the skills and experience to deliver this – but can only do so if they have the respect and support of politicians of all parties. It is for the politicians to put in place a culture in which public outcomes are more important than bureaucratic procedures, management targets, or pressure from developers.

On behalf of New Town & Broughton Community Council, April 2020



17-02-2021

For the Attention of the Transport and Environment Committee
Meeting 19th February 2021
Item 7.1 City Mobility Plan

Dear Councillors and Officials,

Newington Hotels Group (NHG) are concerned with the potential impacts of 'eyesore' infrastructure on Tourism.

NHG have lost confidence in City of Edinburgh Council through existing transport schemes such as 'Spaces for People', to implement considerate infrastructure which maintains or enhances the visual character of our World Heritage City centre and outlying conservation areas.

The Old and New Towns of Edinburgh World Heritage site were added to the United Nations Educational, Scientific and Cultural Organisation's - UNESCO's list of World Heritage sites in 1995.

UNESCO states:

That the site "represents a remarkable blend of two urban phenomena: organic medieval growth and 18th and 19th century town planning".

World Heritage Sites belong to all the peoples of the world, irrespective of the territory on which they are located.

UNESCO requires those responsible for a World Heritage Site to have a way to manage it. In the UK, this takes the form of a management plan. This should:

- Include the vision and goals for preserving and enhancing Edinburgh's Outstanding Universal Value
- Explain the special qualities and values of the Site
- Lay out policies to protect the Site
- Provide support for monitoring future developments planned for the Site



See below George IV Bridge Old Town, one of Edinburgh's top tourists attractions located within the UNESCO World Heritage Site negatively impacted with 'eyesore' infrastructure which does not preserve or enhance Edinburgh's Outstanding Universal Value:



Research conducted by Visit Britain shows Edinburgh as the UK's second most visited city to London. It is vital for any infrastructure changes across Edinburgh to have a pleasing and respectful aesthetic particularly when implemented within The Old Town, New Town and surrounding Conservation Areas.

Edinburgh Tourism Action Group states:

"Tourism is one of Edinburgh's success stories. The city sells £1.3 billion of services to staying visitors, which supports around 30,000 jobs, and pays wages and salaries of around £400 million, per year in 2015. Over the last five years, visitor spending has increased by 30% from £1.0 billion in 2010 to £1.3 billion. Tourism partners aim to increase visitor spend to £1.5 billion by 2020."



NHG asks the council to consider infrastructure changes which allow the city to meet its zero carbon goals while not compromising on the unique character of Edinburgh.

A good example of such a scheme which fits into both criteria would be the re-opening of the South Suburban Line for passenger rail travel.

NHG are fully supportive and enthusiastic about the re-opening of the South Suburban Line for passenger rail travel. The majority of Edinburgh's Transport network is focused on routes in and out of the city centre with few options for direct travel between the surrounding suburbs. We believe re-opening the South Suburban Line would be an efficient use of funds as the core infrastructure is already in place and in working order.

The South Suburban Line would vastly improve mobility around the city, would not have a negative impact to the unique aesthetic character of Edinburgh and would benefit both the local and transient populations.

We urge the council to take the appearance of all proposed changes seriously and to consider Edinburgh's Tourism industry when planning.

Thank you for taking your valuable time to read our deputation.

Our best wishes,

Newington Hotels Group.