

# Response ID ANON-GSB3-ZC4J-A

Submitted to **Edinburgh City Centre Transformation - Proposed Strategy for Consultation**  
Submitted on **2019-06-21 11:39:20**

## Introduction

### 1 What is your name?

**Name:**  
Chris Day

### 2 If you would like to be contacted with the results of this survey and about the next stages of this project please enter your email address below.

**Email:**  
edinburghbususersgroup@btinternet.com

### 3 If you are responding on behalf of an organisation, what is your organisation?

**Organisation:**  
Edinburgh Bus Users' Group

## A walkable city centre

### 4 Do you agree with this proposal?

Agree strongly

Do you have any further comments::

## A walkable city centre

### 5 Do you agree with this proposal?

Agree strongly

Do you have any further comments::

## Public Realm Improvements

### 6 Do you agree with this proposal?

Agree strongly

Do you have any further comments::

## High-quality and fully connected cycling network

### 7 Do you agree with this proposal?

Don't know

Do you have any further comments::

## Bus priority

### 8 Do you agree with this proposal?

Agree slightly

Do you have any further comments::

We believe that the proposals in the Strategy relating to public transport are vague and not thought through.

In principle, we would strongly support bus priority and other measures to improve bus services, but do not believe those in the Strategy are robust enough.

## A free city centre hopper bus

### 9 Do you agree with this proposal?

Disagree slightly

**Do you have any further comments::**

The concept is vague. What need is it designed to meet?  
We cannot therefore supported in the form described in the strategy.

**Access for private cars and city centre businesses**

**10 Do you agree with this proposal?**

Agree strongly

**Do you have any further comments::**

**A potential tram loop around the city centre**

**11 Do you agree with this proposal?**

Disagree slightly

**Do you have any further comments::**

We are not convinced that the need and purpose of this has been thought through. We believe that, if the tram network is to be extended, there are other routes which probably warrant much higher priority than this one.

**New public transport interchanges**

**12 Do you agree with these proposals?**

Disagree strongly

**Do you have any further comments::**

We believe this is a particularly weak and vague concept. Whilst we would support improved interchange as a means to facilitate orbital travel across the city, the Strategy proposes it as an alternative to current access; which we cannot support.  
We are also not convinced that the Council has the capacity and capability to deliver this.

**New vertical connections**

**13 Do you agree with this proposal?**

Don't know

**Do you have any further comments::**

In principle, the point is understood. However, there must be major questions about practicability.

**A new walking and cycling bridge**

**14 Do you agree with this proposal?**

Agree slightly

**Do you have any further comments::**

**Waverley Bridge plaza**

**15 Do you agree with this proposal?**

Agree slightly

**Do you have any other comments::**

In principle, we would strongly support this. However, it cannot be considered in isolation from the Waverley masterplan, so here we are rating 'slightly support'

**Catalyst Areas**

**16 How much do you support the range of proposals for each of the catalyst areas?**

**Catalyst areas - Haymarket:**

Somewhat support

**Catalyst areas - Lothian Road:**

Somewhat support

**Catalyst areas - New Town:**

Somewhat support

**Catalyst areas - Old Town:**

Somewhat support

**Catalyst areas - Waverley/ Calton:**

Somewhat support

**Catalyst areas - Innovation Mile:**

Somewhat support

**Do you have any comments about the catalyst area proposals: :**

**Your thoughts****17 This strategy is designed to be transformational. Do you believe it is?**

Agree strongly

**Comments - do you wish to explain your view::**

There can be no doubt that if fully implemented, the Strategy would radically change Edinburgh City Centre. However, until funding for the full strategy is identified, it is not clear whether it can be fully implemented.

**18 What impacts on fairness and equality, positive or negative, might result from introducing any of the proposals discussed previously?****Comments::**

In principle, the impacts will be positive in both respects.

**19 If you wish to make any other comments on the Edinburgh City Centre Transformation Strategy, please do so here:****Any other comments::**

We submitted comments during previous consultation phases on Transformation (November 2018), and welcome the opportunity to submit further comments as the project progresses from broad principles to more detailed proposals.

In principle we are pleased that the overall direction of Transformation remains as before. In our earlier submissions we were concerned by a number of specific concepts in the project. As Transformation has developed with more detailed proposals into the current consultation, some of our concerns remain; some new concerns have emerged; and some have been resolved.

This is expected as a project like this develops. We acknowledge and trust that it is a dialogue.

EBUC's comments focus on buses and bus use, as we consider the broad principles of Transformation are now settled. Bus users rarely, if ever, use only buses as a means of travel. There are critical interfaces in particular with walking, and with tram and rail use. So we have a particular interest in these components of Transformation, but our comments address these, and other transport modes, as they interface with bus use.

**General issues**

Transformation is described as a 10 year programme. This is ambitious; in particular, it spans several political cycles, therefore requiring continuing cross-party support at local and national level. The history of transport policy in the UK is not encouraging in this respect.

Secondly, an allied issue is the availability of funding to implement the various schemes in Transformation. This is addressed only in Section 5.3 on page 98, which indicates work is ongoing. Edinburgh has been successful in securing funding for cycling and tram projects. However, funding for bus or walking schemes appears to have been static or declined. For example, the City Region Deal is remarkably bereft of such schemes.

Transformation suggests increased capital spending, but perhaps even more critically increased revenue spending and/or declining income; for example on the free 'Hopper bus', and reduced parking revenue.

Furthermore, realigning bus routes will affect the profitability of Lothian Buses in particular. This might be positive, or it might be negative. However, there is little if any analysis in the current documents. For the sake of clarity, our view is that it is desirable that LB remains profitable, or it will begin a spiral of decline, making Transformation's aspirations unachievable. Even current plans to extend the tram to Newhaven depend on a dividend from Lothian Buses. That is not to say that LB should focus only its most profitable routes; it should be possible to be profitable as well as meeting wider transport and social needs. Indeed, recent trends in bus patronage set alarm bells ringing. The graph by Transform Scotland below shows how LB patronage has in fact levelled off in recent years.

This is not the place to analyse why, although there is a clear correlation with extending bus lanes. Other recent Council decisions alongside Transformation entail expanding bus lanes and operating hours. This should improve patronage, allied to reducing parking in the city centre.

The question is whether this will offset the revenue challenges noted above.

We detect a shift in the current document towards a more positive attitude to buses compared to previous documents. It appears less definitive about proposals

which would disrupt the bus network. This is welcome. However, it is still rather weak and vague about buses. References to public transport often pay much more attention to trams. Trams are now an important addition to public transport in Edinburgh, but buses will continue to be, by far, the predominant mode in the city. This would be true even if all the aspirational new tram routes in the document are completed.

The Council must recognise that, by and large, Edinburgh's bus network is highly prized and valued. It is not perfect, but other cities benchmark their aspirations by it. Much of that is down to the operators delivering a good service, day in day out. The Council must consider whether it is wise to disrupt that. The message should be: \*We have something good here. Do we really want to throw it up in the air and start again? Or build on what is successful?\*

Lastly, we can find no reference to long-term maintenance; even though section 5 (page 96 et seq) seems an obvious place for it. We do not need to point out what a mistake it would be to implement any of the proposed schemes (bus-related or otherwise) without addressing this.

#### Specific issues

'Improv(ing) public transport' leads with interchange, the proposed Hopper bus and tram loop.

#### Interchange

Unfortunately the document is vague on interchange: what it is, what it does, and how it works. But it appears to form a concept which underpins much of everything else. The document implies a model based on increasing orbital routes, and reducing cross-city centre bus routes ('Reduced volume of buses in city centre without loss of service provision' and routes which 'kiss' the city centre). We would not disagree with improved orbital routes; indeed feedback we receive suggests significant gaps in bus services between non-city centre locations.

However, we have significant concerns regarding reducing cross-city routes. No data at all is provided on the consequences of doing so. This is a serious omission if it is a centrepiece of the strategy.

Neither is there any analysis of which buses might no longer cross the city centre. We would expect a view on whether, as an initial step, long-distance buses, private coaches and tour buses should be re routed away from Princes Street, for example.

Thus, a drawing on page 28 implies there would be NO bus services on the north end of Lothian Rd, which would significantly affect anyone travelling from the south/south west side of Edinburgh to the core city centre. But on page 56 a drawing refers to this being a 'boulevard including bus route'.

How can public transport improvements be delivered if passengers cannot cross the city centre? For example, currently they can travel from Bruntsfield to different parts of north east Edinburgh on the 10, 11, or 16. Are they to be expected to change twice, via the Hopper bus?

It is particularly concerning that the document talks so much of interchange, despite Edinburgh having a very poor record in this respect. There was a desultory attempt to improve it in the early 2000s. A few remnants possibly survive of that project; perhaps these should be retained as a warning. More seriously, the completed tram route from the Airport to York Place made no effort to provide for interchange between buses and trams. To illustrate:

- At the Gyle, although west Edinburgh residents have repeatedly pointed out the inadequacy of interchange at present, and despite an obvious 'quick win' of installing bus stops on South Gyle Broadway next to the tram stop, it has never been implemented.
- At Haymarket, a sensible arrangement on the westbound roadside would be a large, joint tram and bus shelter. But the approach adopted was a standard tram shelter, with the bus stops, apparently, to be moved as far away as possible.

Furthermore, some references to interchange centre on Picardy Place/St Andrew Square (e.g. page 31). Why was this selected rather than Waverley station, for example?

In summary, for there to be any confidence in the Council's ability to deliver interchange, it will need to produce clear, detailed principles for what it means in practice; how it will be implemented; and how it will be managed on a continuing basis.

#### Hopper bus

It is difficult to understand where this proposal has come from. We are aware of communities in the Old Town setting out proposals for local route(s) to provide particular connections and overcome topographical challenges. These are worth considering. However, this appears to have transmogrified into some kind of circular route or routes performing a multitude of roles; a clear case of a 'solution' being identified before the problem is defined.

The document implies that passengers for the city centre who use bus routes which no longer go there (see above) will change to the 'Hopper' which then distributes them around the centre (Distances between stops/services to be 'mitigated' by the Hopper, page 30). Apart from the question of how to physically accommodate those changing passengers (see above):

- What if the Hopper doesn't go where they want?
- Public transport does not generally work well on circular routes, because of the cumulative effects of inevitable delays. Hence previous circular routes (e.g. 32/52, 42/46) were redrawn as conventional 'out and back' services covering parts of their former circles.
- Our previous submission included an appendix on reducing city centre buses. We noted:

Shuttle buses may reduce wait and walk times but have limited capacity if they are smaller than incoming buses. A free shuttle bus with a 3 minute frequency, 4km route, taking 30 minutes to complete, 12 hours/day annualised at 350 days, would cost £672,000/yr. In comparison, the cost of supported routes 13, 63 and 68 projected to 10 buses, 12 hrs/day, 350 days/yr are: £1,128,090; £301,925; and £1,710,800 (2015 prices). These costs are suppressed compared to a free shuttle because fares are paid.

#### Tram loop

Like the Hopper bus, it is difficult to know where this proposal has come from. We understand why a case for 'tram line 3' to the south east might be examined. However, the case for a cross-city loop, as described here, is not clear. As noted above, circular public transport routes do not perform well. In reality, we would anticipate a series of tram services each using part of the infrastructure.

However, Manchester has only recently completed a 'second city crossing', some 25 years after the first line was completed. The intervening years saw development of a large network before a second city crossing was needed or justified. It is difficult to understand why it is proposed in Edinburgh at such a relatively early stage.

#### Outstanding issues

In summary, we are not convinced by the three high-profile public transport schemes described in the document. While there may, or may not, be a case for a Hopper bus and/or tram loop at some point, we doubt whether this is in the next ten years. The interchange proposals are more concerning, and, it must be said, do not appear to be thought through.

We are also concerned by the regular references to 'rationalising' (i.e. cutting) bus stops. This has already been considered by the Council (Transport and Environment Committee, August 2018) outwith the context of Transformation. However, that decision included a number of caveats, and a step by step assessment.

The proposal to reduce the impact of coach movements on Regent Road, Johnstone Terrace, and Waverley Bridge is welcome, but should go further (for example, Princes Street)

We would argue for much more emphasis on building on Edinburgh's bus network's existing strengths. There needs to be more focus on bus priority and enforcement, to reduce journey times.

We detect a more balanced view to buses crossing the city centre than in previous documents, although as indicated above, significant questions remain. These are summed up in the phrase 'Reduced volume of buses in city centre without loss of service provision' which begs the questions 'what, and how?'

There is a paradox in aspiring to reduce the volume of buses in the city centre whilst introducing a 'Hopper bus' which must be high frequency to achieve the objectives indicated. Using the example of the 10, 11 and 16 cited above; removing them from the city centre would reduce the volume of buses by 18 per hour (each way) off-peak. They would be replaced by 15 Hopper buses/hr at a 4 minute frequency, or 12 at a 5 minute frequency. This scarcely achieves the objective of reducing bus volumes. Meanwhile, passengers who previously enjoyed a through journey would face all the downsides of changing buses en-route, before boarding a possibly overcrowded bus, unless especially large vehicles were used.

#### Concluding remarks

Whilst there is much in the current consultation which is positive, unfortunately little of it relates to bus services. If the Council wants bus services to make the contribution to Transformation which they can (indeed must make, if the project is to succeed) it must consider how far it wishes to take risks with what is fundamentally a good network.

Obviously there are many ways in which Edinburgh's bus network can be improved. However, we do not believe that the current proposals get to grips with them.

We would be happy to work with the Council and other relevant parties to see how they can be improved.

## About You

### 20 What is your age?

Not Answered

### 21 What is your gender?

Not Answered

### 22 Do you have any long-term illness, health problem or disability that limits your ability to carry out day-to-day activities?

Not Answered

### 23 What is your home post code?

Please enter postcode with a space in the middle e.g. EH8 8BG:

### 24 What mode of travel do you use most often?

mode of transport:

Public transport

### 25 What is your ethnic group? (Choose ONE section from A to E, then tick ONE box which best describes your ethnic group or background)

Not Answered

Other white ethnic group, please write in:

Not Answered

Any mixed or multiple ethnic groups, please write in:

Not Answered

**Other, please write in:**

Not Answered

**Other, please write in:**

Not Answered

**Other, please write in:**

**Data Analysis**