

Edinburgh Bus Users Group Comments on draft City Mobility Plan

Edinburgh Bus Users Group welcomes the current consultation on the next stage of the City Mobility Plan and is pleased to submit these comments.

Our comments are not intended to repeat previous contributions we made at earlier stages in the development of the Plan. Instead this document focusses on what is unique to this reiteration of the Plan. We have previously noted that the general direction of the Plan is welcome. In our view, it is consistent with the general principles of earlier Local Transport Strategies in Edinburgh. What is different, perhaps, is the scale of ambition.

General points

Having already set out general principles, at this stage of the development of the Plan we would expect it to set out more detailed proposals. Therefore, publication of the Delivery Plan, currently scheduled for autumn 2020, is a critical next step.

We note also the importance of the Plan's interface with the Edinburgh City Centre Transformation proposals. We therefore refer to our previous comments on the Transformation project alongside the following comments.

As with our previous contributions, these focus on the components of the Plan of most interest to, and impact on, bus users. These are primarily expressed in pages 19 to 31 of the draft Plan.

An important first point is that the current draft pays more attention to buses than previous documents in this and related series. This is a welcome recognition of the central importance that they play in Edinburgh's transport network.

However, the draft plan does not effectively consider:

- The question of the impact on bus operators', especially Lothian Buses, profitability and consequent ability to provide a level of service which the Plan implies (and to return a dividend to the Council in the case of Lothian Buses).
- Whether the Council has the capability and capacity to intervene more directly in bus operations, as the draft plan implies¹; and why residents and others would believe that the council is equipped to do so (bearing in mind issues with the delivery of services and other initiatives that the council currently controls).
- Whether the achievement of the timescales set out, especially from 2025 onwards, is likely.

An overall reduction in general traffic might be expected to be followed by an increase in bus use. But it is not inevitable, and there needs to be a robust analysis of the relationship between reduced general traffic and increased bus use.

The long-term national decline in bus use, which now includes Edinburgh for the first time since the 1990s (see graph, Appendix), resulted from a complex interplay of factors. It is illustrated by research by KPMG for the CPT (Scotland)², and suggests the CMP will have to consider, in particular:

- Car ownership
- Online services
- Bus journey time
- Bus fares
- Car use
- Demography

¹ 'Connecting people, transforming places. A mobility plan for Edinburgh 2030' (2020) page 23

² KPMG 'Trends in Scottish Bus Patronage (2017)

- Employment patterns and economic change³

Specific points

We have previously observed that bus services should, in principle, be constantly considered, and cannot disagree with 'A comprehensive review of bus routes in the city' taking place by 2022⁴.

'By 2025, a comprehensive mass rapid transit plan...will be completed. This will include new bus and tram systems, as well as park and ride...A detailed plan will be in place to reallocate road space on all arterial routes to deliver improved public transport and dedicated active travel infrastructure.'⁵ We have no issues with this; EBUG has continually urged expansion of bus priority provision throughout Edinburgh.

However, the draft Plan then states that by 2025 'A comprehensive new bus strategy will be agreed, including stops, routes, and public transport interchanges. Bus congestion will be reduced and bus penetration of key streets like Princes Street will be addressed. The 'to not through' philosophy for the city centre will be being delivered.'⁶ We would have thought that the review of bus routes (to be completed by 2022) would precede the Council challenging bus penetration of key streets like Princes Street, and would examine whether the 'to not through' philosophy is appropriate.

In our submission on City Centre Transformation we challenged the assumptions on which 'to not through' is based, and we have seen nothing since to indicate that the Council has addressed this. The Council therefore appears to be repeating the mistake that it made in Transformation, based on a set of unevicenced presumptions.

It will suffice for now to note that EBUG will oppose to a dogmatic adherence to the principle of buses being removed from the city centre, at least without a thorough and adequate exposition of 'why, what, when, where, how and who'. We have not seen this to date.

In our submission on Transformation, we noted '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...it is desirable that LB remains profitable, or it will begin a spiral of decline...recent trends in bus patronage set alarm bells ringing...LB patronage has in fact levelled off in recent years.'

Furthermore, we noted that 'by and large, Edinburgh's bus network is highly prized and valued...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?"'. Again, this question has not been answered, if it has even been considered.

The draft Plan states that by 2030, a number of substantial infrastructure investments will have been developed⁷. This is an ambitious statement of intent which requires a much greater rate of implementation than has been achieved by previous Local Transport Strategies. It would be prudent for the Council to incorporate into the Plan a fall-back position based on 'if it proves impossible to achieve this by 2030, what then?'

As the draft Plan refers a number of times to public transport interchanges and 'hubs'⁸, we repeat our comments on Transformation that '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

³ Ibid, page 9

⁴ Connecting people, transforming places. A mobility plan for Edinburgh 2030' (2020) page 19

⁵ Ibid, page 20

⁶ Ibid, page 20

⁷ Ibid, page 21

⁸ Ibid, pages 21, 23, 24

alternative to current access; which we cannot support... We are also not convinced that the Council has the capacity and capability to deliver this.

The Delivery Plan is critical to Points 1 to 8 on page 23. We believe that the Council needs to consider its role as a licensing authority of taxis and private hire cars vis-à-vis its transport policies; at present there appears to be no integration at all between them.

With regard to point 14 (page 24), it is clear from feedback we receive that bus stops and shelters are currently far from adequate. Stops and shelters are literally the gateway to the bus network, and we were surprised to find that, some 15 months after publication of the Edinburgh Design Guidance the sections dealing with stops and shelters were added with little or no publicity, or, apparently, scrutiny.

Finally, again we can find no reference to long-term maintenance. This is a critical omission. 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.

Appendix

The graph below uses patronage data from Lothian Buses Group annual reports, as a proxy for all bus services within, to and from Edinburgh. Over the past decade, services were to South Queensferry and parts of the Lothians. Since 2015, overall patronage figures have been stable, with patronage from the new longer-distance services apparently counterbalancing a decline in the urban area.

