**Edinburgh Bus Users Group comments on The City of Edinburgh Council’s draft Public Transport Action Plan**

In commenting on the six Action Plans which underpin the CMP, Edinburgh Bus Users Group is:

* Submitting the commentary below regarding the Public Transport Action Plan
* Submitting a general statement regarding the Active Travel, Road Safety, Air Quality and Parking Action Plans
* Submitting the commentary below, and the general statement, with regard to the Circulation Plan, taking account of the iterative relationship between PTAP and Circulation Plan.

**Public Transport Action Plan**

Before commenting on specific details in the PTAP, we must reflect on some key contextual issues.

**General transport policy**

UK transport policy since the mid-20th century can perhaps be divided into three periods:

* The post-war period when the car and the lorry was ‘the future’, with society built around them
* The late 1980s onwards, when the drawbacks of ‘the great car society’ began to be understood
* A ‘backwash’ when the challenges of reversing post-war policy became clear

We are now, perhaps, into a ‘second wave’, characterised by a greater sense of environmental urgency. We sense a mood of impatience with the speed of change, or lack of it.

**Transport policy in Edinburgh**

In Edinburgh, transport policy has been remarkably consistent since the 1990s. Nevertheless, we detect some exasperation with apparently endless consultation, often over issues which have already been discussed ad nauseum. There is some justification in the criticism that Edinburgh is good at drawing up policies and plans, but not so good at delivering them.

We recognise that there are constraints to how the Council must work. Medium to long term projects take inordinately long, and are over-expensive, in the UK. This has been recognised by the UK government, which launched ‘Project Speed’ in response, which is still working through the system.

Our view, expressed in a deputation to a Full Council meeting in September 2022, is that in recent years the Council rather took Edinburgh’s bus network for granted, and lost sight of its earlier successful partnership with operators <https://edinburghbususers.group/ebugs-deputation-to-cec-22-september-2022#more-8316>

We highlight the transformation of the ‘Greenways years’ in the 1990s, when not only was transport policy substantially reshaped, but delivery literally on the ground was achieved. We suggest three major factors were at play:

* Substantial political commitment, which generated cultural change throughout departments
* Sufficient funding
* Simpler, more streamlined processes compared to today (also limiting cost)

**Dealing with the constraints**

Few would dispute that Councils such as Edinburgh are now considerably more constrained in their ability to shape local transport, particularly because of finance. Therefore they need to pay ever closer attention to using their resources effectively.

Transport is plagued with fanciful ‘silver bullets’, canards, and distractions. The constraints noted above mean the Council needs to avoid ruthlessly any wild goose chases. Therefore, the Council should be ambitious but absolutely hard-headed about its priorities. We hope our following comments help provide some focus on these.

For convenience, we have copied the full list of Actions as amended by Transport and Environment Committee in February 2023, but comment only where we believe it is required.

Addressing Climate Emergency

PC1 Deliver a programme of behaviour change interventions, focusing on key priority groups

PC2 Work with operators to deliver options for a net zero carbon fleet

*COMMENT 1: generally, actions beginning ‘we will work with’ are vague. Operators determine vehicle procurement, albeit sometimes influenced by Scottish Government funding. It would be prudent to ensure that PC2 does not require significant Council staff time.*

PC3 Review on street infrastructure required (e.g. opportunity charging) to support multi operator electric/hydrogen fleets

PC4 Review of depot infrastructure and charging requirements to support a fully electric/hydrogen fleet

*COMMENT 2: we cannot see a Council role, except perhaps as Planning Authority if/when appropriate.*

Providing Safe, Affordable and Accessible Public Transport

PT1 Improve perceived safety for all users through improved lighting at and walking routes to bus and tram stops and rail stations

PT2 Improve travel experience for disabled users including more information on space availability

*COMMENT 3: preventing parking at bus stops needs particular attention. We also agree with Living Streets Edinburgh Group that Floating bus stops undermine the confidence of some bus users, especially blind people, to the extent that some people will avoid using them altogether.*

PT3 Deliver Edinburgh Tram/Lothian Buses integrated ticketing

*COMMENT 4: PTAP aims for tap tap cap to be integrated by “end 2025”. While it doesn’t impact on concessionary fare users, it runs counter to PC1 (Changing minds, changing behaviour) for the vast majority of car users, thereby undermining the overall CMP. This element needs to be accelerated.*

PT4 Continue engagement on concessionary travel/free under 22 travel on tram

PT5 Work with public transport operators and Transport Scotland to deliver comprehensive integrated ticketing across tram, bus and rail

*COMMENT 5: as above, vague; perhaps understandably, as the subject has been discussed for many years with little progress. It would be easy to waste a considerable amount of unproductive staff time on this. It is likely that Transport Scotland will lead any progress on this.*

PT6 Complete Trams to Newhaven operations and handover

PT7 Continue ongoing programme of shelter replacement

*COMMENT 6: as EBUG’s bus stop audits show, the quality of the infrastructure and environment at the beginning of each bus journey, which is a key factor for impacting travel behaviour, is inconsistent. Along with PT8 this needs prioritised attention.*

PT8 Replace existing on-street bustracker signs with multi operator information signs

PT9 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

PT10 Ensure existing taxi-rank requirements are protected –general locations and capacity; continue to review provision to deliver additional capacity in consultation with the taxi trade

PT11 Develop DRT solutions that are useable for everyone and provide travel choices to support journeys that are sustainable, efficient and affordable

*COMMENT 7: DRT is a ‘no-brainer’ concept that has been discussed for years but rarely progresses except in specialist situations. We understand that Edinburgh’s Dial-a-Bus is highly valued by its users, but is a specialist service. We recall two attempts by larger operators to introduce generally available DRT, but these were discontinued. EBUG is as perplexed as many others as to why DRT is not more widespread. We can only offer our impression that a key factor is a very close connection to its potential ridership; it may well be best delivered by small operators who can provide a highly personal service.*

PT12 Support development of Mobility as a Service (MaaS) in Edinburgh

*COMMENT 8: given our earlier comments, we feel it is time to challenge MaaS. It appears to be a concept that has been aired for some time, but does not address the question ‘what is it for?’ It has the hallmarks of other tech products touted by their developers as futuristic or innovative, but actually less useful and more expensive than traditional products; often designed to lock users into a buy-replace cycle.*

PT13 Deliver enhanced public transport solution through use of Data Driven Innovation (DDI) experts

Delivering a Reliable and Efficient Network to Support Growth

PG1 Deliver outcomes from the Circulation Plan to ensure that the bus network continues to support strategic priorities including improved accessibility, integration and traffic reduction,

PG2 Work with the Council’s Planning Authority, developers and public transport operators to ensure public transport provision serves new developments

PG3 Extension of bus lane operating hours

*COMMENT 9: very welcome, but needs to be accompanied by consistent enforcement.*

PG4 Deliver bus priority through the UTC/UTMC and AVL at traffic signals and investigate further technology options to help deliver reductions in peak bus journey times

PG5 Delivery of bus stop realignment supporting faster journey times with an opportunity to provide higher quality infrastructure

*COMMENT 10: We strongly welcome the motion at TEC (February 2023) to note previous concerns regarding ‘Bus Stop Rationalisation’, and that any plans to move/combine bus stops should consider accessibility, be mindful of service reliability, aim to increase patronage, and be informed by public engagement etc.*

*Nevertheless, given recent history, we are wary of the wording in the draft PTAP. Note Comment 3 above: preventing parking at bus stops, and improving the bus-footway interface, would generally improve boarding times; as would the elimination of bus bays (especially if linked to installing bus boarders). That is the kind of ‘realignment* *supporting faster journey times’ that we support.*

PG6 Deliver additional bus priority interventions through the Bus Partnership Fund (BPF) and

other funding sources, helping to support the aim of a 25% reduction in peak bus journey times on key corridors and hotspot locations

*COMMENT 11: very welcome.*

PG7 Plan, design and deliver pilot projects with site specific sustainable transport and urban realm facilities to suit the needs of the area

*COMMENT 12: as with Comment 8, we are far from convinced by the Mobility Hub concept. 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.*

Enhancing Regional Connectivity

PR1 Identify additional city centre terminating capacity (East and West Ends) to support growth

in regional bus services

PR2 Consider future options for the bus station

*COMMENT 13: Edinburgh Bus Station is, in many respects, an exemplar of an unpretentious, functional and practical facility. There is, of course, always room for improvement, but we would urge the Council not to throw the baby out with the bathwater.*

PR3 Enhance interchange:

▪ between rail, tram, bus and active travel

▪ between radial and orbital bus services

▪ across the city centre

*COMMENT 14: see also Comment 12. As set out in this draft, this is an important and pragmatic approach. We are much more convinced of its benefits than ‘Mobility Hubs’, whatever they are.*

PR4 Deliver regional Park & Ride/Choose strategy so as to expand existing and deliver new park and ride capacity.

*COMMENT 15: We recognise the role of Park & Ride in the transport mix. However, sometimes it is seen as a panacea. It is often forgotten that there are already many thousands of P&R spaces, both rail and bus-based, around Edinburgh. We refer you to the ‘Round up’ section of this item on EBUG’s website https://edinburghbususers.group/council-election-manifestos-2022-whats-in-them-for-buses#more-8252 . Existing P&R need to be better sign-posted, attractively priced (parking+travel combined, with city centre shopping discounts) and along reliably enforced bus lanes.*

PR5 Develop mass rapid transit plan (including tram and Bus Rapid Transit (BRT)) for the city and region

PR6 Deliver North/ South tram line linking Granton to the Bio Quarter and beyond

PR7 Implement express and regional bus services (limited stops). This must be done in a way that avoids reducing public transport options for Edinburgh residents.

PR8 Engage with Transport Scotland, Network Rail and rail operators in the delivery of new strategic rail projects

*COMMENT 14: as with Comments 1 and 2, the Council needs to be careful of overreach. In reality, Councils have few or no levers to pull with regard to Scotland’s railways. One exception applies to PR9, given the Council’s role as Planning Authority.*

PR9 Deliver Waverley Station Masterplan subject to Network Rail programme

PR10 Consider future use of South Suburban Rail Line

PR11 Working with partners, explore the opportunity for a Cross-Forth ferry

Place; Reducing Vehicular Dominance

PV1 Support Edinburgh City Centre Transformation (ECCT) initiates to reduce city centre traffic volumes on key streets

PV2 Review opportunities to reduce bus stop dwell times lessening the need for stacking and the impact of vehicle dominance

Improve Governance and Coordination

PS1 Deliver new governance arrangements for council owned public transport operators

PS2 Align strategic business planning and operational management of the council owned public transport companies with the city’s transport policies and programmes

*COMMENT 15: Transport progress in the UK is bedevilled by debates about organisation and structure. It is difficult to avoid the conclusion that such debates often illustrate that discussion is often a substitute for action. Therefore, the Council should avoid unduly expending time, energy and resources in this area. A key outcome of any organisational structure for Edinburgh Tram and Lothian Buses must be collaboration resulting in an integrated travel experience for all PT users.*

PS3 Deliver Edinburgh Bus Alliance/Bus Service Improvement Plan