

Appendix 3

Travelling Safely – Stakeholder Engagement Comments:

Edinburgh Access Panel

"The concerns and objections stated by Edinburgh Access Panel from May 2020 onwards in the context of the TTROs and the associated notifications and consultations remain largely unchanged. Here's a reminder of our position.

- We object to the transfer of risk from cyclists to pedestrians. It's unacceptable to protect cyclists from vehicles with measures that put pedestrians at risk from cyclists.
- We therefore object to kerbside mandatory cycle lanes which, for pedestrians, entail crossing a cycle lane to get to and from their parked car or taxi. Our strong preference is for kerbside parking with any cycle lane running outside the parking area - as implemented on Chesser Avenue.
- Besides the risk of collision with a cyclist, wheelchair users struggle to get up on to the pavement from the cycle lane.
- In addition, there is the risk of tripping over the separators that delineate the cycle lane. Note that one of our panel's council contacts ended up at A&E when he tripped over a cycle lane separator - and he had no vision impairment.
- Kerbside cycle lanes also cause unacceptable access issues for blue badge holders. Some councillors have declared that they are ""proud"" to have created 39km of cycle lanes in Edinburgh. But for many of Edinburgh's 7,000-odd blue badge holders, for whom their only practical option for getting about is to use their car and blue badge, these cycle lanes represent 39km of barriers because they are prohibited from parking on cycle lanes and are therefore no longer able to access their destinations.

Under the council's own scoring system, more than 60 percent of the measures which were carried forward from TTROs to ETROs were marked as having a negative impact on disabled people because they fell foul of the issues above. As the Travelling Safely programme progresses to its next stage, we wish to see these issues addressed.

We also object to the attempted justification of controversial measures on the basis that all road users will ""behave appropriately"". Experience demonstrates that a significant minority of road users, including pedestrians, cyclists and drivers, in fact do not behave appropriately. A shocking report appeared in the papers a few months ago about a survey that was carried out recently at a signalised road junction in London. During a 2-hour period 83 cyclists arrived at the junction while a red light was showing. Of these 83 cyclists only 18 stopped at the red light. The remaining 65 cyclists (ie 78%) went through the red light, including some who mounted the pavement.

When designing street infrastructure it's therefore essential to assume that some road users will not behave appropriately. In the context of the ETROs this concern is exacerbated by the council's promotion of cycling. Their strategy is to persuade as many people as possible to adopt cycling as their preferred means of transport. For this reason we can expect vast numbers of rookie cyclists to appear on our roads with little or no skill and experience and probably very poor road-sense. They will clearly need protecting from vehicles but, as we said at the start, not at the expense of pedestrians please."

Spokes Edinburgh:

'Travelling Safely' ETROs — TRO/21/26 to TRO/21/30

Spokes response to the public engagement consultation, June 2022

Spokes welcomes the Travelling Safety project. Representative surveys such as the Council's recent survey, and the Edinburgh Bike Life surveys, confirm the public desire for schemes which make cycling, wheeling and walking safer, even where this involves reallocating some roadspace. We are therefore pleased to see the temporary main-road Spaces for People schemes moving to this experimental stage, as a step towards improvement and permanence.

Most importantly, we urge the Committee to approve the process of moving from Temporary Orders to ETROs for all the Travelling Safely schemes.

Introduction and nature of response

Although welcoming the ETROs, we see significant scope for improvement over the initial Spaces for People provision, both in relation to the traffic restrictions in the ETROs and in relation to the designs and layouts of schemes.

However, the ETROs currently being consulted on concern only the legally required issues – traffic restrictions, waiting, loading, traffic bans, bus lanes etc. The fact that segregation infrastructure is not shown on the drawings makes a detailed response to each scheme difficult at this stage. However, we appreciate this will be easier once the ETROs are underway, when the infrastructure details are then consulted on. Many of these concerns are not described here, not being relevant to the ETRO content, but are laid out in the appendix to our April Spaces for People consultation response. It is vital however that they are considered by the designers at as early a stage as possible in the ETRO process.

Nonetheless, even at the present stage, we have various concerns on the proposed traffic restrictions, and these are set out below under 'general' and 'specific'.

General - issues needing addressed in all ETROs

- We understand that once an ETRO is approved by Committee, the traffic restrictions in the Order cannot be tightened during the operational period of the Order, but can be relaxed.

Therefore it is vital that the draft Order at the outset includes the maximum restrictions that may conceivably be required.

- It is our understanding that, once the ETROs are in force, the Council, during the experimental period, has the power to change layouts and designs. This can happen several times if necessary, as long as the designs remain compatible with the ETRO traffic restrictions. For example, defenders can be added, moved, or replaced by kerbing; signs can be changed, and so on, provided compatibility is retained with the traffic restrictions in the Orders. Please advise if this is incorrect.
- For protected cycle lanes to be effective and reliable, and to cater for users who fear traffic, it is essential that kerbside parking in such lanes is avoided. For many potential cyclists, the need to pull in and out of the traffic stream, let alone the added danger of 'dooring,' makes the entire route unusable. This is particularly important for corridors specifically designed to encourage cycling, such as the Travelling Safely corridors.

Therefore:

- Where loading is allowed this should be outside the cycle lane, not kerbside. Furthermore, to ensure that vehicles do not stop kerbside, the cycle lane should be protected by defenders at such locations.
- We recognise the need to cater for disabled parking, unloading of wheelchairs, etc. Each potential location should be carefully assessed and treated on its merits, avoiding kerbside parking wherever possible for the reasons above, notably that such parking may result in some categories of cycle lane user, such as children and disabled cyclists, being prevented from using the cycle lane at all. However, if there are locations where such kerbside parking is nonetheless unavoidable, measures should be undertaken to maximise the safety and confidence of cyclists pulling out into traffic to pass vehicles parked in these areas. Furthermore, physical and enforcement measures should be built in to guarantee that the parking spaces are used solely for the allowed purposes.
- All bus lanes should be 24/7. This is the most effective way to avoid, or substantially reduce, kerbside parking in bus lanes. 24/7 should apply even where there is a protected cycle lane to the left, as in London Road(see below).
- Wherever speed limits have been lowered in the Spaces for People TTROs, these should be retained in the ETROs.
- Where one-way traffic is proposed (whether or not it is pre-existing) there should always be a cyclist exemption, in line with Council policy.
- Many of the protected cycle lanes have very bad surfaces. Whilst this was "acceptable" for what was thought to be a short period, they really should be addressed as part of this next phase. Rodney Street, Minto Street and Crewe Road South are some particularly bad examples, but the surface in every project should be checked and fixed where necessary.
- There are several places where vehicles wait/load/etc very close to the start of the temporary segregated lanes making it difficult to see/access the start of the lanes. Stronger waiting restrictions are needed at these points. Two examples are Broughton Street and southbound on The Mound.
- We would like to know what monitoring and evaluation is planned for each project. Will regular traffic counts be undertaken, and journey times be measured, for example?
- Similarly, are there any plans for proactive enforcement of the proposed restrictions?

Specific - City Centre (ETRO 21-26)

- CC2 Cockburn Street: There should be a cyclist exemption to the one-way, in line with Council policy.
- CC3 Victoria Street: We presume that, although traffic will be 2-way, there will be a closure at the Grassmarket end (with turning circle) so that Victoria Street is not a through-route. Physical barriers (e.g., bollards or planters) should be used at the foot of the street to prevent through traffic.
- The Mound (in the list here but no plan here): Whilst it has been good to see the replacement of the original wand units with the more robust defenders on most of the Mound, it is extremely concerning that there are no lane defenders at the pinch points where cyclists are most in need of protection. We are aware this is because of the lengthy North Bridge closure to northbound buses. However, buses previously operated successfully here with lane defenders in place, and should do so again. There are already multiple photos on

social media of motor traffic encroaching into the cycle lane on these corners. To thus endanger cyclists, particularly during a period when north / south routes are limited, is extremely concerning. This needs urgent attention, whether or not that requires an amendment to the ETRO.

Specific - North (ETRO 21-27)

- N2 Bellevue to Canonmills & Broughton Street: Significant changes are likely to be needed to the ETRO. We are concerned that cycle facilities have been removed between Canonmills and Broughton Road, and that there is a lack of clarity about the status of the measures at Broughton Street and at the roundabout, as these are not shown on the consultation map (we understand this may be a mistake). The ETRO must include traffic restrictions which allow for safe and convenient cycle routes throughout. We are particularly concerned that no restrictions on waiting or loading are shown on Broughton Street, as the uphill cycle lane here is extremely valuable for cyclist safety and confidence. Furthermore, this cycle lane should be extended to the top of the street - it is clearly possible given that the inside lane here is currently closed as part of the tramwork Traffic Management Plan. The layout of the southbound cycle lane through the Canonmills/Rodney Street junction should be reviewed, as the current layout encourages left hooks of cyclists – the cycle lane should be moved more centrally. Finally, any waiting/loading restrictions that support the roundabout safety measures must be retained and extended to provide for direct pedestrian crossing facilities at the footway build-outs.
- N3 Crewe Road South: The surface in the cycle lanes is very poor, and should be improved.
- N4 Ferry Road: Waiting by coaches should not be permitted, and nearby parking should be sought. Even if drop-off only is permitted, this brings the alternatives either of a large group of people exiting from the bus into the cycle lane, or, if the parking is kerbside, forcing cyclists out into the main traffic lane outside of the bus.
- N6 Comely Bank Roundabout: The geometry of the roundabout should be changed so that drivers cannot use the desire line and go straight across the hatching from Craighleith Road to Comely Bank Road.

Specific - East (ETRO 21-28)

- E2 Kings Place: Formal, enforceable disabled parking bays for blue badge holders should be added to the bottom of King's Road. In our experience, the blue badge parking at West Shore Road is much better observed; the style and layout of those bays should be copied at King's Road.
- E3 Duddingston Road: There are two primary schools fronting onto this road and two secondary schools in the vicinity. It is essential that the full length of the protected cycle lanes is protected at all times, but particularly during school drop off and pick-up times so that parents can rely on the safety of the cycle lanes for their children. Cyclists heading from Duddingston Road to Duddingston Road West are regularly close-passed at the junction as the road narrows. Please consider options to reduce the risks of collision here, such as extending the protected cycle lane and implementing early-release signals for cyclists.
- E5 Duddingston Road West: Speeding and close-passing continues to be a problem on this road on sections without protected lanes. The speed limit should be retained at 20mph.
- E6 A1 Corridor: The bus lane should be 24/7, for the reasons in the General section above. Secondly, we are concerned over the interruptions to the continuity of the cycleway: to allow this to be rectified during the experiment loading and waiting restrictions may need

to be added to the ETRO. The London Road protected cycle lane is in part “kerbside,” to the left of the bus lane. However, there are build-outs at the bus stops where cyclists have to use the bus lane - this would be less serious if the lane were 24/7, but the position even then is much worse when a bus is at the stop, as cyclists then have to move out yet further, into the main traffic lane. Redesign is vital, and the ETRO should include any further restrictions that might be required for this, as part of the experiment.

Specific - South (ETRO 21-29)

- S1 Buccleuch Street and Teviot Place: As detailed in S2, we would suggest filtered permeability would be a more effective solution here, as parking/loading on cycle lanes remains a significant issue, especially (but not exclusively) Southbound. In addition, the major junction at Hope Park Terrace has a three-lane approach northbound, with a feeder lane provided for bikes to an ASL. Using bus gates to significantly reduce traffic on that approach would make it safer until a permanent solution such as a CYCLOPS-style junction can be implemented.
- S2 Causewayside: A big problem is with vehicles parking outside and opposite Tesco, reducing the street to less than the width of a car and a lorry. There should be a protected cycle lane on the east side and loading only (off-peak) on the west side. The measures under the TTRO have not been effective, as cycle lanes are consistently parked on (legally at certain places and times, illegally at others). We remain of the view that closing this route to through traffic (while maintaining access) through strategically placed bus gates would allow parking/loading to coexist with safe cycling as overall traffic levels would fall sharply. An ETRO seems an ideal way to trial a different approach, moving through traffic to wider parallel streets.
- S4 Old Dalkeith Road: If at all possible, lane defenders should be added to the southbound cycle lane on the bend just before Kingston Avenue. Many drivers cut the corner here, leading to frighteningly close passes of cyclists.
- S5 Gilmerton Road: The scheme should be extended southwards, to fill in the short gap between The Spinney and Moredun Dykes Road. This would make it reach Gilmerton Primary School. The bus lanes on Liberton Road should be made 24/7, in order to make it easier and safer to cycle between Gilmerton Road and Craigmillar Park.
- S6 Quiet Corridor - Meadows to Greenbank: The scheme will have to be adapted to the forthcoming changes to Braid Road which will return two way traffic to Braid Road. The right turn connection from the Quiet Route section of Braid Road into Braidburn Terrace must provide a way to achieve this safely in the presence of two-way traffic. We have seen drawings that propose a two stage crossing which would be appropriate. We would like to see a trial of ways to connect South Morningside areas West of Comiston Road to the quiet route to increase its potential reach.
- S7 Craigmillar Park: The current scheme is let down by the bus stop treatments. Given the high number of buses on this corridor, the level of service for people cycling remains insufficient. Can ways of helping people on bikes safely pass stopped buses be considered? The cycle lanes also end before the junction with Lady Road in both directions - can the protected lanes be extended further? A link on Salisbury Place to connect this to S2 would also prove helpful, otherwise it ends suddenly in the Northbound direction. The surface in the southbound cycle lane is also incredibly poor, and should be addressed.
- S8 Comiston Road : We are concerned about safety in relation to the planned relaxations on loading - see the general note above about loading issues. Finally, as officers know, we are very concerned about safety at the junction with Braid Hills Road, and have suggested

as one option that motor traffic use an alternative (nearby) location - this would presumably need to be included in the ETRO.

- S9 Braid Road: The return of two way traffic (and the consequent reduction in protected cycling) must be monitored around the Hermitage of Braid entrance area where there is a clear desire for pedestrians and cyclists to connect to Braidburn Terrace but will have no safe crossing. We would like to see either the toucan crossing or a trial of a shared pavement to a side by side crossing nearer to the junction with Hermitage Drive/Braidburn Terrace. While there will be no access for Southbound motor vehicles to Braidburn Terrace, a suitably sized modal filter (e.g., planters) should be in place to enforce this.
- Addition - Morningside Road: We believe that removal of the uphill protected cycle lane was a major mistake in terms of cyclist safety. It has been widely condemned by users. The reason given for removal was road width, and yet the space is now often occupied by parking vehicles, narrowing it even more than did the cycle lane. We therefore urge that the South ETRO is amended to allow for the option of a protected uphill cycle lane.

Specific - West (ETRO 21-30)

- W1 Queensferry Road: The protected cycle lanes are welcome and should be retained in their entirety. There are numerous pinch points along Queensferry Road at junctions where drivers encroach on the cycle lane from side streets while at the same time drivers on Queensferry Road follow the painted lanes and cyclists are close passed on both sides. These need to be addressed with better signage, not permitting passing at junctions and traffic islands and by reducing the width of side streets to only allow one vehicle at a time at the junction. They should not be side by side as this restricts sight lines of both drivers. The loading area outside Stewart's Melville College should eventually be replaced by protected cycle lanes to ensure protected cycle lanes are continuous. The loading bay should be moved to Ravelston Terrace. The loading bay outside Orchard Brae House is a good example of accommodating continuous protecting cycle lanes and loading bays and we suggest this be adopted elsewhere in the city.
- W2 Pennywell Road: We understand that there are proposals currently being considered to change the dual carriageway to one carriageway for bikes and the other one for motor vehicles. The ETRO would be an excellent opportunity to test this proposal. If this is done then the western carriageway should be for cyclists to use, as that is nearer the shops, Arts Centre etc.
- W3 Silverknowes Road North: It's disappointing that people cycling between the cycle path to Haymarket and the promenade continue to have to choose between the relative safety of the signed quiet route via Silverknowes Court/Place/Parkway and the more direct route along Silverknowes Road. Can the cycle lane be extended northwards along Silverknowes Road to avoid this trade-off? This would also reduce the road width and improve compliance with the 20mph limit.
- W4 Cammo Walk: This should be retained with better connections to/from Queensferry Road and Maybury Road. It should be quicker, safer and easier to cross both the busy roads by bike.
- W6 Meadowplace Road: At its southern end the cycle facilities stop just before a very nasty roundabout with slip roads. That's where cycle facilities are really needed.
- W7 Fountainbridge: The opportunity to make the Dundee Street/West Approach Road junction safe for cyclists should be taken - an ETRO is an ideal opportunity to trial a closure of the junction, and any restrictions which would be necessary for this should be included in the ETRO. We are also concerned over the proposed suspensions of "No loading at any

time". If these are included in the ETRO, is it possible to reinstate them during the experimental period if that were desired? If this is not possible, then we don't think these should be included.

- W8-10 Slateford Road, Lanark Road and Longstone Road: We endorse the response of SW20 related to these projects.

Spokes Party

General comments

Spokes Party welcomes the Travelling Safely project. Representative surveys such as the Council's recent survey, and the Edinburgh Bike Life surveys, confirm the public desire for schemes which make cycling, wheeling and walking safer, even where this involves reallocating roadspace. We are pleased to see the temporary main-road Spaces for People schemes moving to this experimental stage, as a step towards improvement and permanence.

Most importantly, we will be urging the Transport and Environment Committee to approve the process of moving from Temporary Orders to ETROs for all the Travelling Safely schemes.

Although we welcome the ETROs, we see significant scope for improvement over the initial Spaces for People provision, both in relation to the traffic restrictions in the ETROs and in relation to the designs and layouts of schemes.

The ETROs currently being consulted on concern only the legally required issues - traffic restrictions, waiting, loading, traffic bans, bus lanes etc. The fact that segregation infrastructure is not shown on the drawings makes a detailed response to each scheme difficult at this stage.

However, we appreciate this will be easier once the ETROs are underway, when the infrastructure details are then consulted on. Many of these concerns are not described here, not being relevant to the ETROs content, but are laid out in the appendix to the Spokes April Spaces for People consultation response. It is vital that they are considered by the designers at as early a stage as possible in the ETRO process.

General - issues needing addressed in all ETROs

We understand that once an ETRO is approved by Committee, the traffic restrictions in the Order cannot be tightened during the operational period of the Order, but can be relaxed. Therefore it is vital that the draft Order at the outset includes the maximum restrictions that may conceivably

be required. In Edinburgh East, this is particularly important for the Duddingston Road scheme.

It is our understanding that, once the ETROs are in force, the Council can, during the experimental period, has the power to change layouts and designs. For example, defenders can be added, moved, or replaced by kerbing; signs can be changed, and so on, provided compatibility is retained with the traffic restrictions in the Orders. Please advise if this is incorrect.

For protected cycle lanes to be effective and reliable, and to cater for users who fear traffic, it is essential that kerbside parking in such lanes is avoided. For many potential cyclists, the need to pull in and out of the traffic stream, let alone the added danger of 'dooring,' makes

the entire route unusable. This is particularly important for corridors specifically designed to encourage cycling, such as the Travelling Safely corridors. Therefore:

Where loading is allowed this should be outside the cycle lane, not kerbside. Furthermore, to ensure that vehicles do not stop kerbside, the cycle lane should be protected by defenders at such locations. We recognise the need to cater for disabled parking, unloading of wheelchairs, etc. Each potential location should be assessed and treated on its merits, avoiding kerbside parking wherever possible for the reasons above, notably that such parking may result in some categories of cycle lane user, such as children and disabled cyclists, being prevented from using the cycle lane at all. However, if there are locations where such kerbside parking is nonetheless unavoidable, measures should be undertaken to maximise the safety and confidence of cyclists pulling out into traffic to pass vehicles parked in these areas. Furthermore, physical and enforcement measures should be built in to guarantee that the parking spaces are used solely for the allowed purposes.

All bus lanes should be 24/7. This is the most effective way to avoid, or substantially reduce, kerbside parking in bus lanes. 24/7 should apply even where there is a protected cycle lane to the left, as in London Road - (see below)

Wherever speed limits have been lowered in the Spaces for People TTROs, these should be retained in the ETROs, for example on Duddingston Road West. We would like to know what monitoring and evaluation is planned for each project. Will regular traffic counts be undertaken, and journey times be measured, for example?

Similarly, are there any plans for proactive enforcement of the proposed restrictions?

Specific - East (ETRO 21-28)

E1 Seafield St:

We support the retention of this protected cycle lane which is important for preventing conflict with cyclists and drivers (particularly bus drivers) heading for the Seafield Road crossing.

E2 Kings Place:

Formal enforceable disabled parking bays for blue badge holders should be provided near the bottom of King's Place. In our experience, the blue badge parking at West Shore Road is much better observed; the style and layout of those bays should be copied at

King's Road.

E3 Duddingston Road:

There are two primary schools fronting onto this road and two secondary schools in the vicinity. It is essential that the full length of the protected cycle lanes is protected at all times, but particularly during school drop off and pick-up times so that

parents can rely on the safety of the cycle lanes for their children. Cyclists heading from Duddingston Road into Duddingston Road West are regularly close-passed at the junction as the road narrows. Please consider options to reduce the risks of collision

here, such as extending the protected cycle lane and implementing early-release signals for cyclists on Duddingston Road.

E4 Stanley St/Hope Lane:

We support the retention of this scheme which improves the active travel route between Portobello and the National Cycle Network/Innocent Path via the Magdalenes as well as providing an important quiet leisure area for walking, wheeling and cycling around the secondary school and golf course.

E5 Duddingston Road West:

Speeding and close-passing continues to

be a problem on this road on sections without protected lanes. The speed limit should be retained at 20mph.

E6 A1 Corridor:

The bus lane should be 24/7, for the reasons in the General section above. Secondly, we are concerned over the interruptions to the continuity of the cycleway: to allow this to be rectified during the experiment loading and waiting restrictions may need to

be added to the ETRO. The London Road protected cycle lane is in part "kerbside," to the left of the bus lane. However, there are build-outs at the bus stops where cyclists have to use the bus lane - this would be less serious if the lane were 24/7, but the

position even then is much worse when a bus is at the stop, as cyclists then have to move out yet further, into the main traffic lane. Redesign is vital, and the ETRO should include any further restrictions that might be required for this, as part of the experiment

Thank you for accepting our submission.

Lothians Conservation Volunteers

Good evening,

I am responding to the consultation on behalf of Lothians Conservation Volunteers, a registered charity (SC020384). Our registered office is: *Redacted*

Our charity operates a minibus to take volunteers from Edinburgh to the sites where we undertake our work (habitat and wildlife conservation).

Although we support the goals of the proposed Order, the proposed arrangements for St Andrews Square and South St David Street will impact our operations.

It is our practice to pick up volunteers on Saturday and Sunday mornings from the north side of St Andrew Square, in the area proposed to be designated as "No Waiting At Any Time".

However, a larger problem is the proposed changes for South St David Street. While our minibus is allowed to use bus lanes, the proposed order only exempts "local buses".

Therefore even if we can pick up, we could not exit via Princes Street as is our usual practice.

As our bus reduces individual car journeys beyond the city centre (by avoiding the need for volunteers to travel using their own vehicles) and promotes inclusion (by allowing volunteers without vehicles of their own to participate in our tasks) we feel this could be better supported by the proposed order. For example, making South St David St a plain old bus lane would appear to resolve the majority of our problems while continuing to suppress general motor vehicle traffic.

Many thanks & regards,

David Nutter, LCV Treasurer

Lothians Conservation Volunteers is a Scottish Charitable Incorporated Organisation registered in Scotland, No: SC020384 see us on the web at