

CITY OF EDINBURGH COUNCIL
TRANSPORT AND ENVIRONMENT COMMITTEE

Item No 3

8 December 2022

DEPUTATION REQUESTS

Subject	Deputation
3.1 In relation to Item 6.1 on the agenda – Business Bulletin – Bus Lane Operating Hours	Joint request on behalf of BEST (Better Edinburgh for Sustainable Travel), Edinburgh Bus Users Group, Living Streets Edinburgh Group, Capital Rail Action Group, Spokes, SW20 (written)
3.2 In relation to Item 7.1 on the agenda - Circulation Plan: Delivering the City Mobility Plan – Report by the Executive Director of Place	a) Spokes (written) b) Car Free Holyrood (written)
3.3 In relation to Item 7.2 on the agenda A71 Dalmahey Junction Improvements – Report by the Executive Director of Place	Spokes (written)
3.4 In relation to Item 7.3 on the agenda – Review of Parking Policy – Report by the Executive Director of Place	Spokes (written)
3.5 In relation to Item 7.4 on the agenda – Strategic Review of Parking - Results of Informal Consultation for Phases 3 and 4 – Report by the Executive Director of Place	Portobello Amenity Society (written)
3.6 In relation to Item 7.6 on the agenda – Brunstane Road Closure (Progression to a Permanent Traffic Regulation Order) – Report by the Service Director for Operational Services	a) Calming Brunstane Group (written) b) Brightons and Rosefield Residents' Association (written) c) Spokes (written)

Joint statement

A Working Group formed in summer 2022, partly following the removal of a bus lane on the A8 which provoked wider concern over the future of Edinburgh bus lanes. Members include Edinburgh Bus Users Group, Spokes, Living Streets Edinburgh Group, BEST, SW20 and CRAG. The members continue to be independent organisations, but all recognise that bus lanes are important because they reduce bus journey times. They also reduce bus operator costs, and provide a degree of priority and protection for cyclists and emergency vehicles among others.

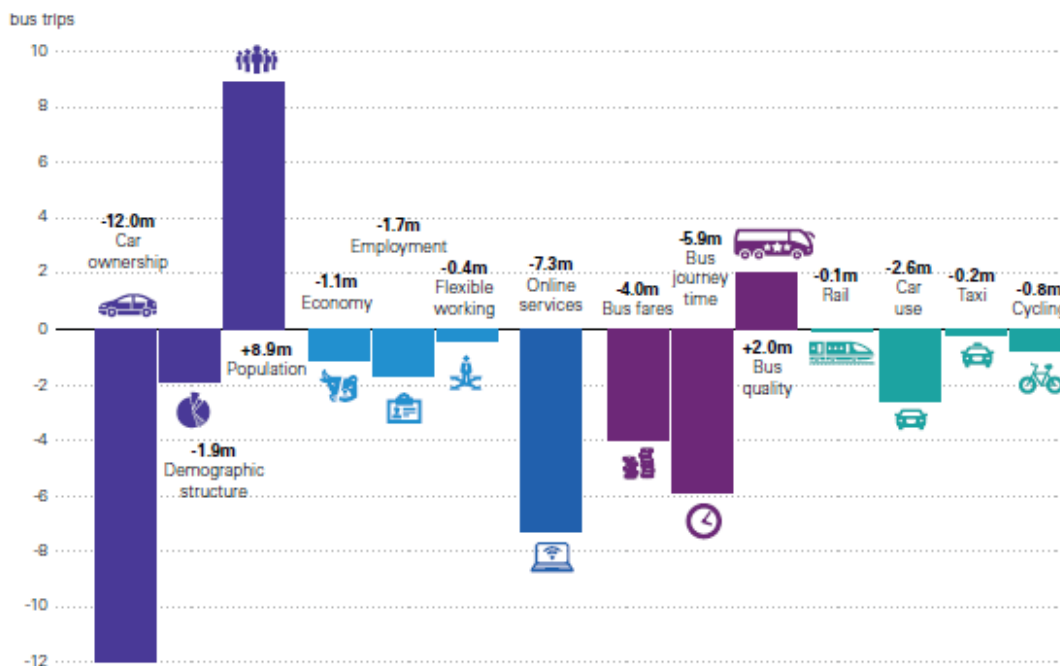
We welcome the Council's unanimous decision to review bus lane operating hours with a view to establishing a consistent all-day pattern, and restore them at weekends. Specifically, we urge the Council to adopt the 7-7-7 approach, i.e. 7am-7pm, all 7 days of the week.

Global evidence

In 2017, research by KPMG for the Confederation of Passenger Transport (Scotland) identified the following drivers of change in bus patronage:

(Summary impact of different demand drivers on bus use 2011-16. Net; 27 million fewer journeys).

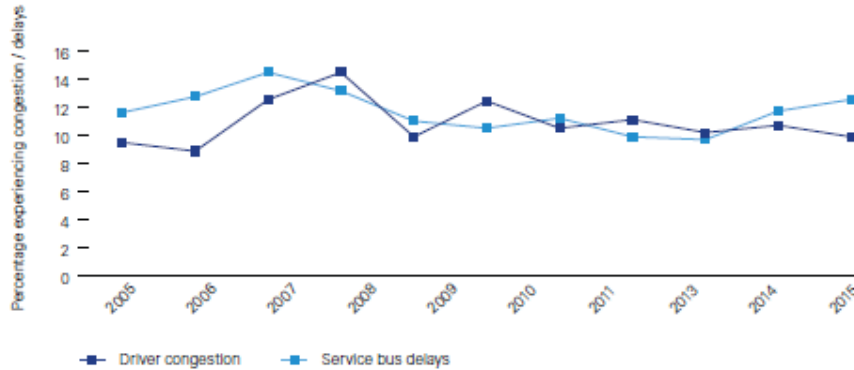
Drivers of change



This shows two factors increased bus patronage (population growth and bus quality), whilst every other factor decreased it. Of these, journey times were the third most important, coming after only car ownership and online services.

KPMG also showed that, throughout Scotland, the percentage of car drivers and bus users experiencing delay matched each other closely between 2008 and 2014.

Figure 7: Percentage of car drivers and bus users experiencing delay



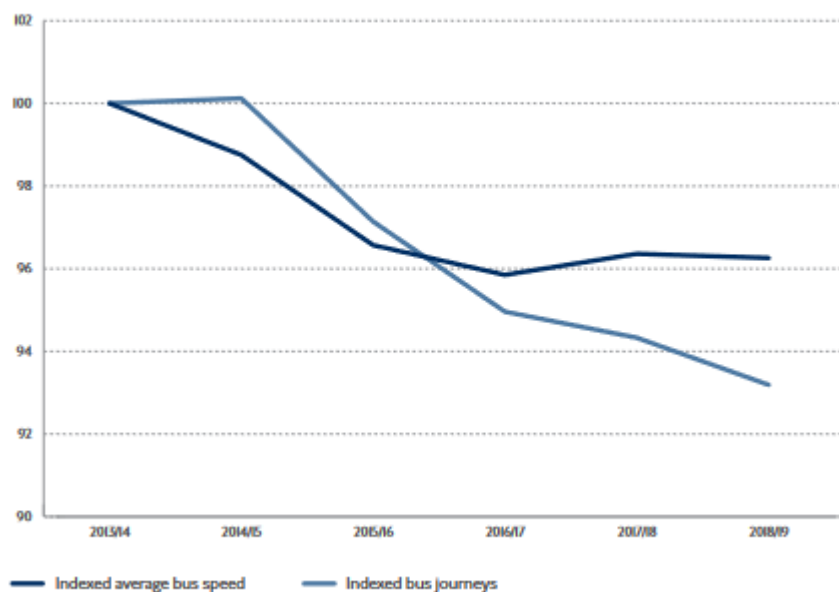
26. KPMG (2017) The true value of local bus services. A report to Greener Journeys. [http://www.greenerjourneys.com/wp-content/uploads/2017/07/Greener-Journeys-Value-](http://www.greenerjourneys.com/wp-content/uploads/2017/07/Greener-Journeys-Value-Source: Scottish Transport Statistics 2016)
Source: Scottish Transport Statistics 2016

In 'The Impact of Congestion on Bus Passengers (2016)', Greener Journeys observed 'a clear correlation between declining bus demand and deteriorating average bus speeds. Research shows that a 10% increase in journey times can, on its own, lead to a 6% fall in bus demand. Slower journeys are more than an operational cost; they are also an opportunity cost. Every vehicle added to the schedule to maintain reliability in congested areas is a vehicle that could otherwise have been used elsewhere.'

In 2015 the Scottish Household Survey found the main reason for not using public transport to work, where it was possible (e.g. a bus service is available) was that it takes too long (48%, sample 5,200), followed by no direct route (30%). When asked what discourages them from using buses more often, 16.3% (of 7,750) said 'nothing' followed by 15.6% who said it 'takes too long'.

The graph below, from London's Bus Action Plan, illustrates the correlation between bus speeds and patronage.

Figure 14: Indexed average bus speeds and bus journeys (2013-2019)

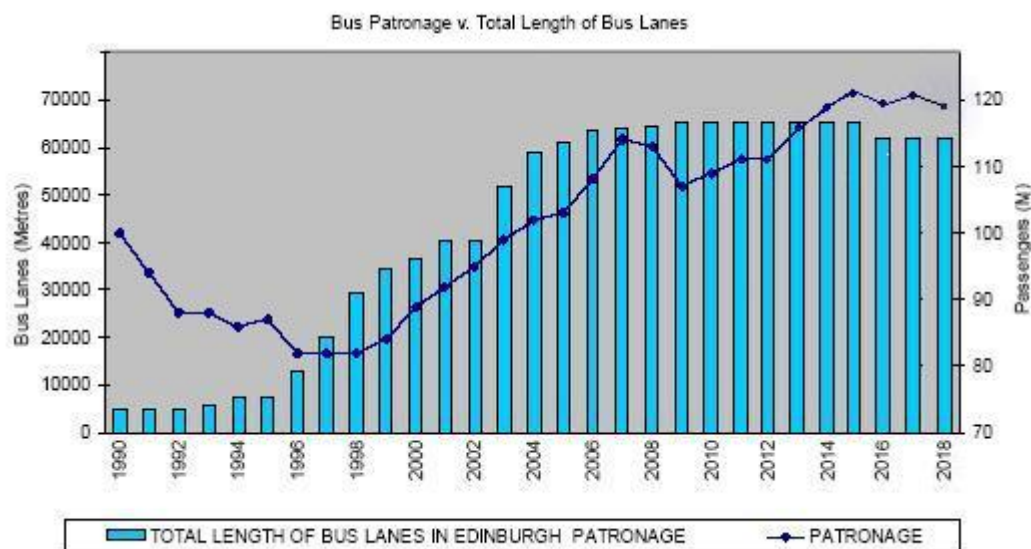


The London Bus Action Plan cites case studies including a multi-modal scheme in Waltham Forest, where the removal of a gyratory and installation of new bus lane produced a four-minute time saving on routes 357 and 97.

West Midlands Combined Authority reported bus services became more reliable and average journey times up to 22% quicker on two Birmingham routes after the introduction of 'Sprint' bus priority measures in 2022. <https://www.wmca.org.uk/news/bus-journeys-up-to-22-quicker-following-introduction-of-sprint-priority-measures-on-key-birmingham-routes/>

And in Putney, (A3 West Hill bus lane) where a 24/7 new bus lane of 200m northbound reduced journey times on routes 170 and 670, which were often delayed in the morning peak, by more than 2 minutes (morning) and 30 seconds (evening).

Local evidence



There were 61.8km of bus lane in Edinburgh in 2019, according to an FOI response by the City of Edinburgh Council (FOI ref 25602). This doesn't reflect any changes made since, notably by Spaces for People schemes. It compares with 65.25km in 2013.

This is supported by evidence from KPMG's research (see above) which found that the percentage of Edinburgh's population using a bus every day grew from 25.6% in 2008 to 27.4% in 2015, the most recent data before publication.

Enforcement

It is clear from feedback we have received that bus lane enforcement is equally important. This needs to be reviewed by the Council, including bus lanes, bus stops and adjacent parking/loading bay stay times.

As population and travel around the city grows, one would expect that enforcement resources and vigour would increase. However, despite the welcome introduction of some bus lane cameras, we consider that enforcement has not improved commensurately.

Extract from EBUG's submission to the Council's 2019 on extending bus lanes

It is important to establish some first principles. Firstly, what is the purpose of bus lanes? This may seem obvious, but is sometimes lost sight of in discussion. A report to the Transport and Environment Committee on 2 June 2015 stated 'The primary purpose of bus lanes is to provide journey time reliability and time savings for buses by allowing them to bypass congestion during busy traffic periods. This increases the attractiveness of travelling by bus...'

Secondly, do bus lanes currently fulfil this purpose in Edinburgh? EBUG's answer to this is 'they do, but could do much better'. Unfortunately, it appears there is little if any data to quantify their impact. Therefore we must rely on secondary data, for example:

- Personal experience of our members; journey times are reduced and more reliable when and where bus lanes operate.
- Observations by bus operators; it is clear that most if not all operators consider that they do.
- Is there a correlation between bus use and bus lanes?...(see above).

The graph (as above, bus patronage v. bus lane length, Edinburgh) was produced by Transform Scotland from data originally supplied by the Council, which appears to have stopped updating it around 2015...The patronage data is from the Lothian Buses group only; it does not isolate additional patronage from the expansion of LB group routes beyond the Edinburgh urban area.

What it does show is declining patronage until bus lanes began to be expanded in the late 1990s; growing patronage as bus lanes are expanded, both reaching a peak in 2007; a drop in patronage associated with disruption during tram construction, followed by a return to growth until 2015. Since 2015, however, patronage has levelled off. BUT patronage then began to include the 'Country' routes. Clearly within the city it has declined, although it is not possible to deduce how much...

On 26 August 2014 it was reported to TEC that a review had been completed, and an Experimental Traffic Order (ETRO) should be promoted cutting peak hour bus lanes. It claimed 'all-day bus lanes offer little additional operational benefit to buses compared to peak periods lanes, under normal traffic conditions.'.. It should be noted that the 'review' survey covered a wide range of bus lane issues, did not involve public consultation other than a few stakeholders, and gave no indication of an intention or need to drastically cut bus lane hours.

(A) 2 June 2015 report recommended that objections to the ETRO be set aside. It stated that bus lane camera experience showed widespread confusion over operating hours. This appears to be the reasoning for adopting uniform operating hours (although the 'widespread confusion' was not quantified). It missed the point that it is the responsibility of road users to familiarise themselves with regulations applying to the roads they use (as with parking restrictions).

Consultation had produced 151 objections to cutting off-peak hours, primarily because it affected cycles, air quality, modal shift, and was contrary to the Council's Local Transport Strategy. No bus/tram operator objected, but there were apparently few or no expressions of support. Objections were received inter alia from Spokes, Living Streets, Transform Scotland, Scottish Association of Public Transport, Friends of the Earth, Greener Leith, Gorgie/Dalry and Leith Central Community Councils, Napier University and Sustrans. EBUG did not exist at that time.

As a number of objectors noted, if the Council wished to adopt uniform hours, it would be just as logical to adopt universal all day operation. Indeed, all day operation is arguably less confusing than two peak periods.

In paragraph 3.16, the report noted 'interpeak surveys...of all day bus lanes, showed that general traffic in the adjacent lane was generally flowing freely...and therefore there is little advantage to be gained by general traffic from using the bus lane...It is therefore reasonable to expect a considerable proportion of general traffic to continue to use the general traffic lane' as commonly seen outwith operating hours. This begs the question of what would be achieved by allowing general traffic to use bus lanes.

It highlights the flawed logic of a frequent argument i.e. 'there's no need for off-peak bus lanes, because buses are not delayed by congestion off-peak'; in which case, why does general traffic need to use them?

Uniform peak-hours only, Monday to Friday bus lanes were then implemented. A subsequent report to TEC, on 1 November 2016, noted Lothian Buses 'did not show a conclusive effect on transit times but did show a consistent marginal increase...The bus lane network needs to be regularly reviewed to identify new locations as well as identifying redundant lanes. For bus lanes to be effective they need to be kept clear during their hours of operation; this requires enforcement of parking and loading restrictions which are frequently ignored'.

Significantly, we see no evidence of the bus lane network being regularly reviewed, rigorous enforcement of operating hours or of parking and loading restrictions.

On 21 March 2017, a report to TEC recommended that objections to making the ETRO permanent be set aside. It noted that Spokes and Living Streets had argued that 63% of survey respondents supported bus lanes operating on Saturdays and Sundays. Compared to before the experiment '20%-40% of respondents felt that conditions were now worse, compared to just 3%-10% who felt they were better'. Spokes and Living Streets cited Prof David Begg: 'When (Greenways) were first introduced, Edinburgh was the only city in the UK to show a consistent improvement in bus journey times. However, since then bus journey times in Edinburgh have reverted to the UK norm and have been increasing by 10% every decade'. They noted the Council had no evidence that the experiment speeded up car trips or reduced congestion, and most cars had stayed out of the bus lanes 'Therefore the benefit of allowing cars into bus lanes off-peak, when the main traffic lane usually has more than adequate capacity, is hard to fathom. Given therefore that bus lanes are vital for buses in the peak, and have no great value for cars in the offpeak, the obvious solution for simplicity and consistency would be the 7-7-7 policy'.

(All this indicates) that the decisions to reduce their operating hours were:

- The product of flawed logic
- The subject of faulty (if not partial) analysis
- Supposed to be subject to mitigating actions which were not implemented

EBUG fully supports the proposal to introduce uniform bus lane operating hours from 7am to 7pm, 7 days per week, for the following reasons:

1. Encouraging modal shift towards more sustainable modes, including buses, is at the heart of the Council's general transport strategies and specific programmes...
2. Given the Council's reliance on income from Lothian Buses' dividend there are major budgetary implications if the Council does not provide an environment in which bus services prosper.
3. It is the 'right thing to do' for a host of social, economic and environmental reasons which should not need restating here.
4. There are a range of ancillary benefits for other bus lane users (e.g. cyclists, taxis, emergency vehicles) which contribute to the council's wider goals...

The Council's consultation webpage (referring to consultation on extending bus lane hours in 2019) notes that it is taking 12% longer to travel by bus than in 2006 at peak times and 14% off-peak, while buses are travelling nearly 8% slower. This bears out Prof Begg's comment, as quoted by Spokes and Living Streets (above). Clearly the reduction in operating hours from 2015 was a misstep, and there is now an excellent opportunity to rectify it, and align the hours with today's needs....the proposed hours...fulfil the Council's clear preference for the hours to be clear, simple, and easily understood (and) Saturdays and Sundays for the same reason, but primarily because modern travel patterns are such that congestion is a similar problem at weekends as on weekdays.

Some opponents argue that bus lanes are mostly empty off-peak (few, if any, oppose peak-hour lanes). We refer to paragraph 3.16 of the 2 June 2015 report (above). Our experience is that few/no buses are empty (and operators would quickly withdraw any unused services). It is the number of people, not vehicles, that is important. The distinction is even more marked if we include the time that cars are completely unoccupied (i.e. parked on the road).

Related issues

The following points are outwith the immediate scope, but related and important...

- The commitment to regularly review bus lanes implies that, as the city grows, mileage would too, but it has not. The consultation webpage notes Edinburgh's population has grown by 12.5% in the last decade. By 2023, it will be 23,000 higher.
- There are issues with particular road layouts and traffic conditions. A full review of the location and length of bus lanes relative to traffic junctions should be conducted before introducing stricter enforcement.

Comments from Spokes Planning Group

In general, Spokes welcomes the circulation plan proposals and we recognise that compromises have to be made. Nonetheless we have concerns with the current draft. We trust that councillors will consider our comments carefully.

Getting around by bike has an important role in public health and in climate but also has a unique capacity to accomplish short everyday trips of say 1 to 5 miles in a very short time – a capacity increased with the widespread popularity of e-bikes, which remove the former barriers created by hilly parts of the city. Cycling is thus ideally suited both to the 20-minute neighbourhood concept and also to travelling to the city centre or between neighbourhoods.

We are encouraged by the very strong statement in appendix 5 that the City's target to reduce car-km 30% by 2030 "*will be the benchmark for traffic modelling, in order not to bake in current levels of traffic*" and that the principles and trade-offs in the Circulation Plan will be considered in that context. We suggest that context allows more space and scope for cycling provision than is perhaps implied by the report.

Aspects which concern us are described below. However, the general issue underlying all our concerns is the need to ensure a connected and useful cycling *network*, rather than a series of disconnected and out-of-the-way routes, even if they are high quality.

1. Private motor traffic

Although, as we recognised above, the draft Plan is intended to support the 30% car-km reduction, it is difficult to see how this will be achieved without significant measures on the ground to ensure this. The current draft plan is only at outline stage, and perhaps for that reason does not yet show any restrictions, such as bus gates. Such measures will be essential and must be shown in the next iteration of the Plan. In particular, the Council should be aiming to remove private through-traffic (with some specific exemptions for, for example, blue badge holders) from the City Centre. This should be accomplished by the addition of modal filters such as bus gates to streets such as The Bridges.

2 . City Centre and local High Streets

We have a particular concern re High Streets/ shopping streets such as Dalry Road, Morningside Road, Portobello, etc, and the slightly different case of Princes Street.

Shopping streets are sometimes of restricted width, but are also important destinations and are likely to be significant links in any city cycle network. We hope there would normally be width for segregated cycling provision, e.g. as in the very popular tweet by Cllr Ross McKenzie a few weeks ago suggesting a bus gate, wider footways and segregated cycling in Gorgie/Dalry.

However, the draft maps seem to suggest cycle facilities being largely restricted to main roads, and ending before you enter destination areas – this is particularly notable in the city centre mapping. However, if families and the less confident feel unable to use a bike at their destination, they are unlikely to cycle at all for that journey, even if the other 80% or 90% of the journey is on high quality facilities.

Within the city centre we are particularly thinking of streets such as Broughton Street and Leith Street. In streets such as these, and in local town centres, wherever possible, carriageway space should be reallocated to allow for footways and cycleways of acceptable widths, even if in some cases the ideal widths of cycleway and of footway widening is not fully achievable.

Specifically on Princes Street, Spokes remains strongly of the view that protected cycling provision is vital for this major destination, but in part also to reduce the continuing non-blackspot crashes which occur when cyclists are travelling parallel to the tramlines but do encounter them. Some argue that George St is an alternative - but for many trips it is not, and would require several extra junction manoeuvres or tramline crossings to use it. Furthermore, we are extremely concerned that the current proposed concept of a 'cycle street' in the centre of George St (which Spokes originally reluctantly agreed in place of protected lanes) is being watered down more and more, with additional categories of motor traffic access now being actively considered.

3. Moving cycling into indirect side routes

Secondly, we are concerned that in some cases cycle routes appear to be being sidelined into indirect, twisty and/or hilly alternatives, which are also away from destination shopping areas.

One particularly obvious case is that cyclists appear to be relegated from the Bridges/Newington shopping street to the parallel Pleasance route – which has very few shops and at the north end is extremely steep and then leads up to the High Street via the cobbled and steep St Mary's Street.

It may be that the intention is to use the Bridges for the tram, but, given the infrequency of tram stops, and the nearness of the Pleasance, that this would be a better route for the tram, leaving the Bridges for buses, bikes, walking and wheeling.

There are perhaps parallels with the decision some 10 years ago to divert the 'flagship' CCWEL route away from the direct and most useful Shandwick Place/Princes Street route, going instead via back streets with complex turns and cut-throughs. For all its benefits, CCWEL would have been better as a direct, main road, segregated route, and leading to the City's main shopping street.

4. Use of reallocated roadsapce

On one specific point of wording, we suggest that, to remove any ambiguity, the second bullet point in the Place, Walking, Wheeling section adds the word 'existing' so that it reads...

Generally avoiding any loss of existing pedestrian space to provide segregated cycling.

We can agree with the above sentence, but where *roadspace* is reallocated then it should be clear that the aim is to provide both wider footways and protected cycleroutes. Indeed, if reallocated roadsapce can generally only be used for pedestrian purposes, then major projects such as the ongoing Meadows to George Street scheme will be ruled out.

5. Other deputations

On another specific we support the deputations on 7-7-7 by Edinburgh Bus Users Group and on Holyrood Park by Car-Free Holyrood.

In conclusion, the Council has made a valuable first step in developing the Circulation Plan, but modifications such as we suggest need careful thought.

We thank you for considering our deputation, and trust our points can be taken into account by the Committee.

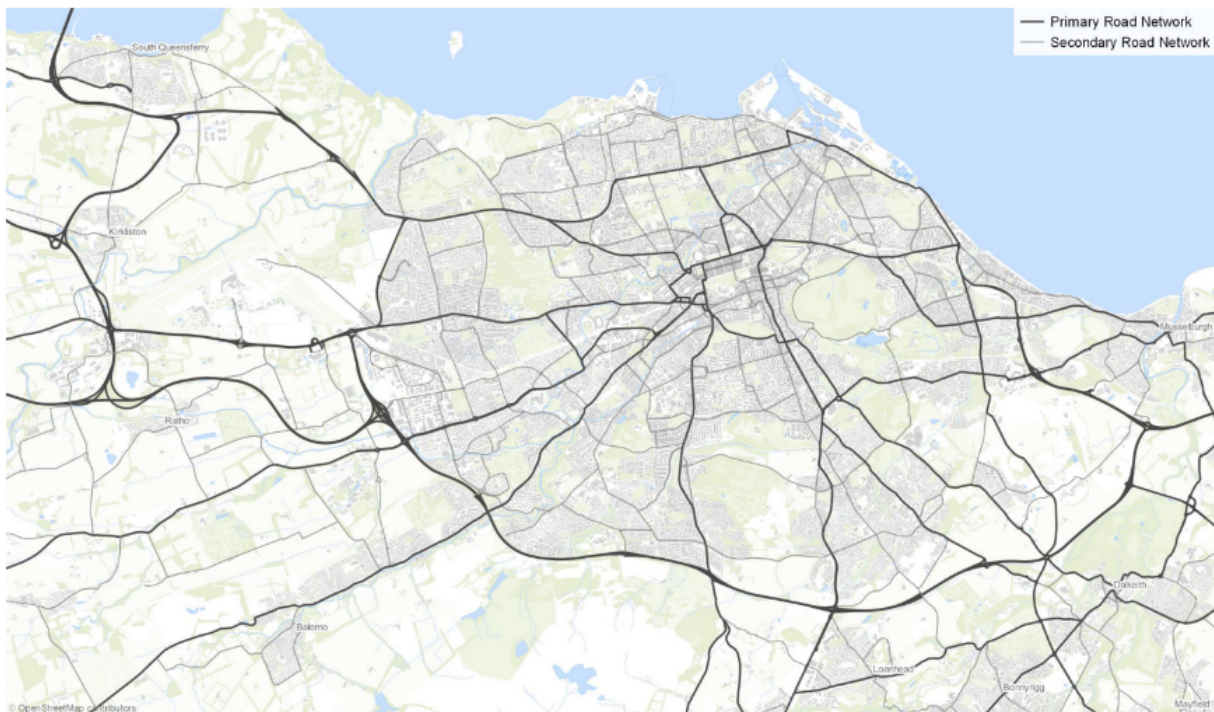
Car Free Holyrood
Written Deputation
Transport and Environment Committee 8 Dec 2022
Item 7.1 Circulation Plan Delivering the City Mobility Plan

Car Free Holyrood is a group of local residents campaigning for a safer, greener Holyrood Park. Our main campaign ask is for the end of motorised through-traffic on the private park road network. We have written extensively on our website about the benefits of closing the park roads to motorised through-traffic for safety, how such an approach supports local and national transport and environmental goals, and the opportunities to increase accessibility in a car free park where the most accessible, paved space is opened up for an inclusive access hub. We are now working with Historic Environment Scotland to bring a Cycling Without Age Scotland chapter pilot to Holyrood Park, showing the immense possibility for community engagement and expanding accessibility in the park.

The campaign also has significant popular support. In [survey results recently released by HES](#), 62% of the ~4,000 survey respondents said they 'would like to see further road closures for vehicles in Holyrood Park' beyond the Saturday and Sunday closures currently in place.

Within this context, we were alarmed to see the draft network mapping for the Circulation Plan designates Holyrood Park's private roads as part of the secondary road network for general motorised traffic:

General motorised traffic network



Circulation Plan, Appendix 1: Network mapping – draft individual modal network maps

This designation is unsuitable for three key reasons:

1. It is contradictory to Council policy from a previously passed addendum from the Transport and Environment Committee.
2. It is not compatible with CEC's draft decision-making framework in Appendix 3.
3. The park roads are private with additional restrictions for motor vehicles.

Previously Passed Addendum

Holyrood Park's private road network should not be designated as a secondary route for general motorised traffic because to do so would conflict with an addendum passed by the Transport and Environment Committee in October 2021. [This addendum](#) noted "that provision of through routes to motorised vehicles via the private roads within Holyrood Park does not align with Edinburgh's transport strategies, and seeks to continue working collaboratively with the park authorities to end motorised vehicle journeys through the park."

The designation of the private park roads as a secondary route for general motorised traffic contradicts this previously passed addendum, potentially committing the park roads to be used for general motorised traffic rather than seeking to work collaboratively with HES to end such journeys through the park.

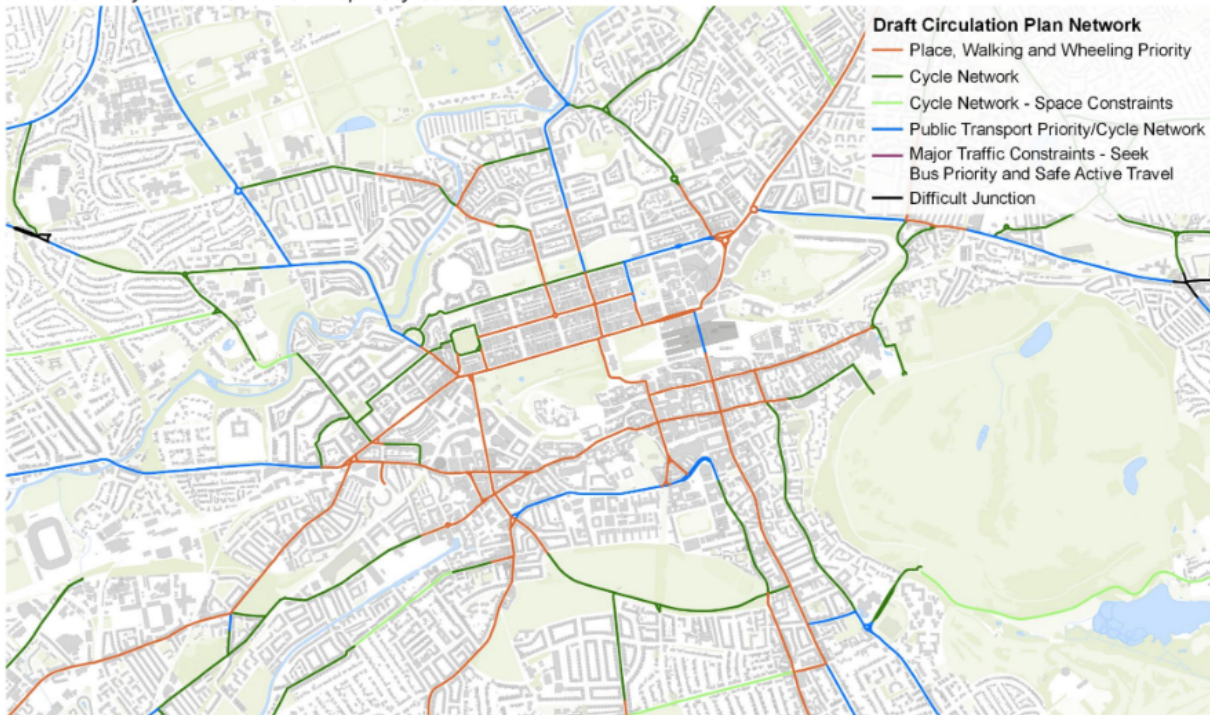
The question then becomes, what has changed to reverse the position of the Council on this issue. In the year since the addendum passed, COP26 and COP27 have made apparent the scale of the challenge before us and the increasing unlikelihood of restricting warming to 1.5°. If anything, the need to reduce motor vehicle traffic, address public health concerns, and improve physical and mental wellbeing, access to greenspace, reduce pollution and emissions, etc has become more urgent and compelling, not less.

Therefore, as the provision of through routes to motorised vehicles via the private roads within Holyrood Park does not align with Edinburgh's transport strategies, and there is no reason to change this position, the designation of the park roads in the Circulation Plan as a secondary route for general motorised traffic should be removed.

Prioritising Place

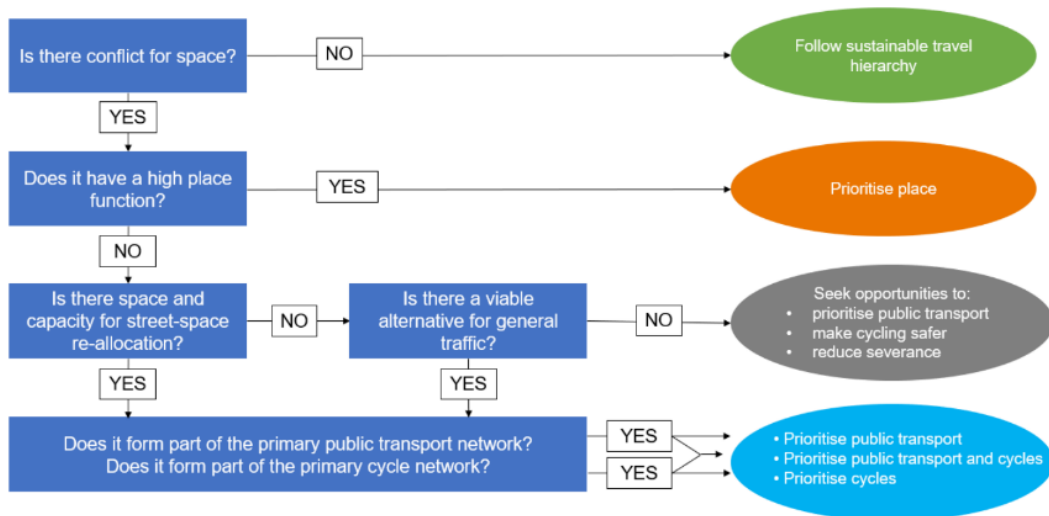
The multi-modal map (Appendix 4) makes the assumption that motorised through-traffic will continue to be in Holyrood Park. We assume the lack of designation in the multimodal network map for Queen's Drive in Holyrood Park, in conjunction with the private park roads as a secondary route for general motorised traffic, implies that motorised through-traffic will be the priority.

Draft summary multimodal network map - City Centre



However, this is it is not compatible with CEC's own decision-making framework (Appendix 3):

Appendix 3: Network mapping – draft decision-making framework



If the framework were to be used in Holyrood Park, is there a conflict for space? The answer in Holyrood Park is Yes. Designating this space as both a secondary route on the general motorised traffic network and a secondary cycle route when there are sub-standard cycling facilities in the park, will continue to exacerbate the conflict for space in Holyrood Park.

Duddingston Low Road has been marked as ‘Cycle Network - Space Constraints’. It should be noted the space constraints are only caused by allowing motorised through-traffic in Holyrood Park, and there would be ample space for walking, wheeling and cycling otherwise. Furthermore, as referenced earlier, there is a need to use these roads for walking, wheeling and cycling as the most accessible - paved, wide - areas in the park.


Does it have a ‘high place function’? The answer in Holyrood Park is Yes, perhaps more so than any other area on the Circulation Plan. Holyrood Park is a park, an SSSI and historic site, vitally important to the wellbeing of residents and a significant contribution to the City of Edinburgh’s ‘brand value’.

If the draft decision-making framework were applied to Holyrood Park, ‘place’ should be prioritised. Designating this as a secondary route for general motorised traffic is in conflict with prioritising ‘place’ in this context. However, with Holyrood Park’s unique ‘place function’ as a park road, rather than a shopping street such as Princes Street, it must go beyond the designation of ‘Place, walking/wheeling priority’ in the draft street type definitions to fully prioritise walking, wheeling and cycling in a traffic-free environment.

Holyrood Park’s Private Road Network

Holyrood Park, including its road network, is owned by the Scottish Ministers and managed on their behalf by Historic Environment Scotland (HES) as a Property in Care. HES are responsible for the day to day operation of Holyrood Park.

The road network in Holyrood Park (Queen’s Drive, High Road, Duke’s Walk and Duddingston Low Road) is private, as confirmed by CEC’s List of Public Roads:

		My Account	Q SEARCH	≡ MENU
Home / Roads, travel and parking / Roads and pavements / List of public roads in Edinburgh / Queen's Drive				
Queen's Drive				
Street Name	Queen's Drive			
Locality	Holyrood			
Street Adoption Status	Private			
Property Notice Description	QUEEN'S DRIVEPRIVATE DRIVE: HOLYROOD PUBLIC PARK.Not adopted for maintenance under the List of Public Roads.			

Private roads have previously been omitted from transport legislation and policy, such as the [Transport \(Scotland\) Act 2019](#) on the Low Emission Zone:

14. (3) For the purpose of subsection (1)(a)(ii), a low emission zone scheme may not specify—
 (a) a private road

The private park road network is operated significantly differently from CEC's road network and already places some restrictions on certain motorised through-traffic. [Holyrood Park Regulations 1971](#) effectively prohibits commercial vehicles and buses (vehicles with more than 7 passengers) from park roads. This has resulted in an inverted transport hierarchy in the park where public transport is excluded while private motor vehicles are permitted to use the park roads.

HES can also open and close the park road network to motorised vehicles at any time. According to HES's ['Guidance notes for holding an event in Holyrood Park'](#):

"HES has the authority to implement closures to most roads when required or requested. The exception to this is the 'Loop' road between Holyrood Gait and Horse Wynd, where prior agreement for closure is required, in discussion with the City of Edinburgh Council. HES may open or close roads at any time in the interests of safety, maintenance or to facilitate organised events."

This power is exercised on weekends when the park is closed to motorised through-traffic, as well as some public holidays, events, and for maintenance such as tree and verge cutting.

There is also further scope for changes to HES's operation of the road network, as referenced above their recent survey showed there was significant public support for further closures. Additionally HES's [Climate Action Plan](#) promises to "develop integrated transport hub solutions and remove visitor vehicles from many of our top sites by 2028".

Having established that Holyrood Park's roads are private, subject to restriction for motor vehicles, and outwith CEC's road network and management, they should not be included as a secondary route for general motorised traffic in the Council's Circulation Plan.

Next Steps

We are asking the Transport and Environment Committee:

- (1) For the removal of Holyrood Park's private road network designation as a secondary route for general motorised traffic, prior to the Circulation Plan going to public consultation.
- (2) For the planned workshop with HES referenced in the Circulation Plan papers to be used to reiterate the Council's position established in the passed addendum and to clarify the timeline for closure to motorised through-traffic, including the roles and responsibilities of CEC and HES in relation to the road network.

It is not the case that the Council must choose between a traffic-free Holyrood Park or a low-traffic city centre. Working to close the park roads to through-traffic, as already agreed in the previously passed addendum, will contribute to not only the Circulation Plan but also the Council's 30% reduction in private motor vehicle journey km. If the Circulation Plan were to go

ahead without due consideration for the park, Holyrood Park would experience greater levels of traffic from displacement as well as continue to induce demand for motor vehicle journeys through it. This will lock in emissions, degrade the park experience for residents and visitors, and undermine the Council's traffic reduction targets.

Council officers will of course be best placed to assess alternatives, but an initial consideration would be to remove the designation from Holyrood Park in favour of aligning the secondary road network for general motorised traffic with the east boundary of the LEZ. This is where the commercial traffic is already directed due to their non-permittance in the park according to the Holyrood Park Regulations 1971. It would also be a suitable route at all times of day, not subject to the closure regime currently in place in the park.

We welcome the inclusion of a workshop with HES to discuss the Circulation Plan prior to the public consultation. Such a workshop would be a golden opportunity to clarify the Council's position on Holyrood Park ("that provision of through routes to motorised vehicles via the private roads within Holyrood Park does not align with Edinburgh's transport strategies, and seeks to continue working collaboratively with the park authorities to end motorised vehicle journeys through the park") and outline a timeline for the end of motor vehicle through-traffic on Holyrood Park's private road network, which can then be shared publicly. Greater clarity, transparency, and commitments from the Council and HES about the intended future of Holyrood Park's private road network would be advantageous for both parties as well as the public.

Sarah Gowanlock, on behalf of Car Free Holyrood

Spokes – Item 7.2 - A71 Dalmahoy Junction Improvements

7.2 - Dalmahoy junction:

Spokes notes the proposal to use £750,000 of funding from the annual Cycling Walking Safer Routes (CWSR), which we understand is approximately 20% of the annual CWSR budget. We do not consider this project to be an appropriate use of the active travel budget when so many projects with clearer active travel benefits are currently experiencing significant delays and backlogs.

7.3 - Review of Parking Policy

Spokes support the proposals to remove the observation period if a vehicle is parked on a cycleway and to reduce the thresholds for “persistent offenders”, as we believe that these measures will make Edinburgh safer and more pleasant for those walking, wheeling and cycling in Edinburgh.

Portobello Amenity Society

Deputation to Transport and Environment Committee

Item 7.4 Strategic Review of Parking – Phase 4

Portobello Amenity Society does not support the current proposals for a controlled parking zone in Portobello. There is some support from members for controlled parking as a wider strategy to reduce the over dependence on car travel within the city and the Society acknowledges that this is part of the Council's approved Mobility Plan.

Portobello was built with narrow streets, particularly around Marlborough Street, Regent Street and Bath Street where there are tenements resulting in a density of residents that makes it difficult to allocate resident parking close to their homes. This pattern of development continues along the north side of the high street to the end of the promenade, therefore, the Society welcomes the extension of the proposed area eastwards to include part of Joppa in order to reduce the risk of parking migration.

With regard to visitor parking, it has long been accepted that Portobello, as Edinburgh's seaside, will attract visitors to use the beach especially when the weather is good creating a parking problem but this is only for short periods of the year and is mirrored by the problem of over-crowded buses.

The proposals will introduce parking controls on streets where currently there is no parking pressure and a concern has been raised about visitor parking for guest houses making them less attractive to tourists. There is also a concern about how the restrictions will tie-in with the proposed bin hubs and the total lack of a proposal for the Baileyfield development where 540 houses and flats have been built with only 68% parking provision.

The report states that Portobello is not just a peripheral residential area but also a town centre and a destination for the rest of the city. This is used to justify parking controls seven days a week but it would mean parking controls starting at 8:30 on a Sunday which seems to be at odds with the rest of the city. However, it is not clear that the proposed parking controls will address the major problem that residents have highlighted. Problems such as there are not being enough parking provision or spaces near to people's houses, dangerously parked cars and abandoned vehicles.

Edinburgh City council has a policy of supporting established town centres of which Portobello is one. The new supermarket in Portobello was allowed twice the amount of parking permitted in the council's policy and the council should not be adding to the inequality created for independent traders. There is no recognition in this report that there are controlled 30 minute parking bays where parking is free for people who need to use their car for top up shopping in the local shops. The time limit is enforced by an attendant on a scooter. The free, 30 minute parking should be retained and expanded. How can you make the argument that controlled parking zones benefit town centres when you worsen the current situation by charging for

parking and, by lengthening the period for parking, reduce the turnover and therefore availability of a parking bay.

It is essential that the existing provision of 30 minute free parking for shoppers is retained and expanded which, outside normal shopping hours, would become available for residents. In particular, the resident parking outside Portobello Court and the north end of Adelphi Place near the town centre should be designated as half-hour duration free parking.

What is often ignored is that whilst most people are fully ambulant, there is a substantial number of people who have difficulty walking or cycling but who do not qualify for a blue badge disabled permit. By providing short term free parking the council's plan would meet the needs of a greater number of residents and impact less on equality issues.

There appears to be a lack of consistency and fairness between groups of residents in allocating Adelphi Place and the lane off Bellfield Lane as mews developments. There is no difference between these cul-de-sacs and many other streets in Portobello. Dwellings constructed in Bellfield Lane within the recent past were approved with garage spaces so these residents would not be disadvantaged.

The Society believes that the Council could facilitate visitor parking in Portobello which would benefit residents by making more use of and better signage to existing car parking areas such as the Bridge Street car park and the parking at Tumbles off Westbank Street. We also support parking provision at King's Place but with a ban on overnight parking.

With controlled parking comes double and single yellow lines and parking bays painted in white which detract from the streetscape, for instance in Brighton Place where the Council recently replaced the setts leaving a very attractive, uncluttered carriageway. Should the scheme proceed with painted lining, it is essential that road markings within the Portobello Conservation Area are only 50 mm wide rather than the 100 mm normally used.

From a road safety point of view, there is a concern that the removal of parking from some streets will encourage motorists to drive at a greater speed where parked cars currently restrict speeding. There is also great concern that the proposal to limit or not provide cash payment points will adversely impact on older people who may not be comfortable using mobile phone apps.

In the conclusion on page 568 no evidence is given from the consultation results to support what is proposed. It is simply an opinion. It should be noted that there are more consultation respondents that do not have a problem even though it is more likely that those who experience problems at present were more motivated to complete the survey.

Finally, the Council should only introduce a CPZ with the support of those affected. This means officers actively working with the community, including traders, and hearing what is said by all to achieve a workable solution before the TRO legal process starts.

Calming Brunstane Group

**Community led case for
a TRO in
Brunstane Road**

Aims of Calming Brunstane Group

- **Improve safety by reducing volume of traffic**
- **Promote healthier, pleasant community with a traffic calming plan which puts people before cars**
- **Work collaboratively and use evidence to avoid displacing traffic to surrounding area**
- **Action CEC's policies and actions ie:**
 - **Local Development Plan and City Mobility Plan 2021-30**
 - **Future Edinburgh, *living well locally***
 - **City Plan 2030 which states - '*walking, cycling and wheeling at the top and private car use at the bottom.*' 2.17 National Transport Strategy 2**

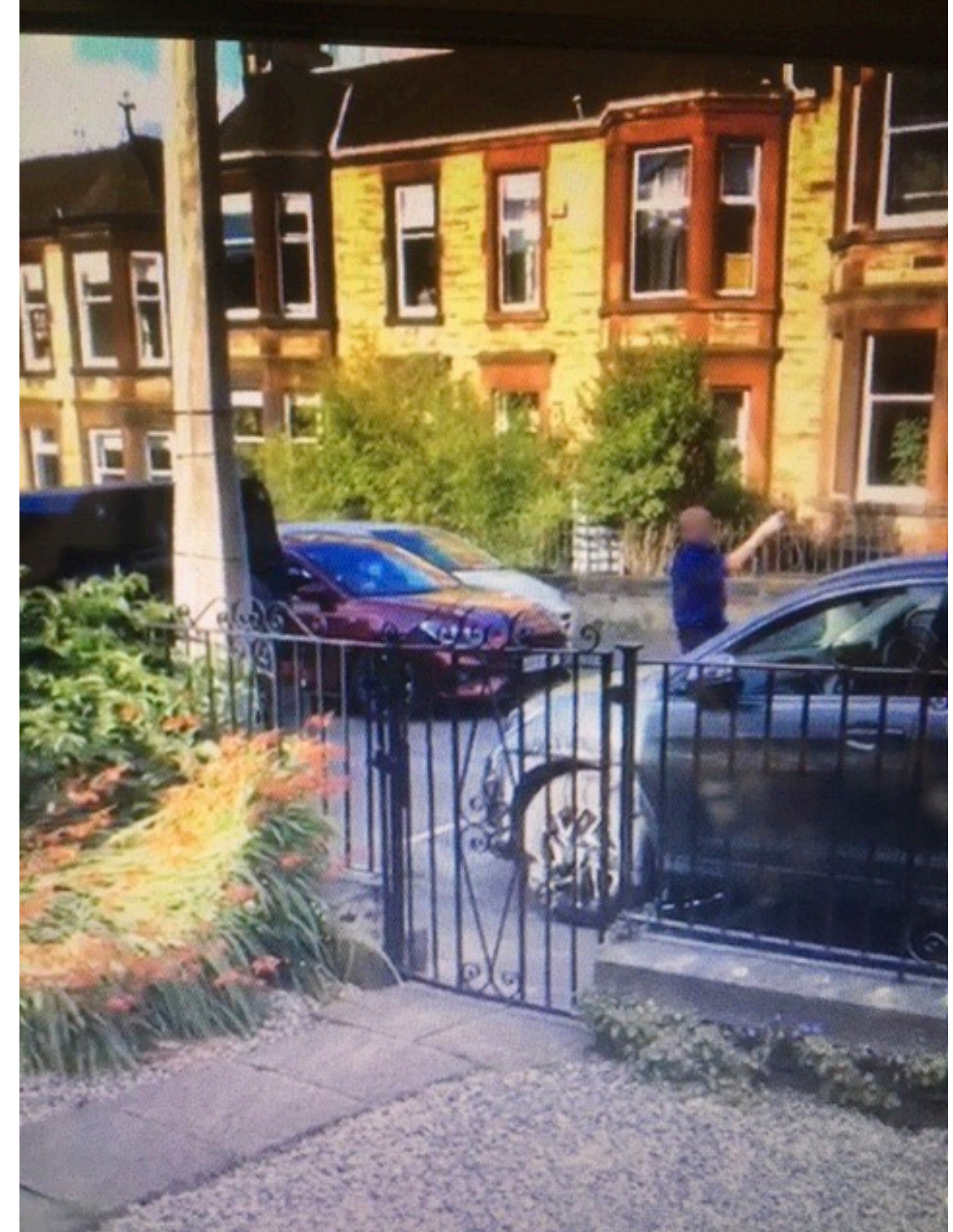
Typical blockage in the road millimetres between lorry and parked cars



Before ETRO

- **CEC report - 7 day average of 2,200 vehicles a day in Brunstane Road CEC Traffic Survey Oct 2021**
- **Persistent abuse, damage to cars, gridlocks, stress**
- **Volume of traffic has increased in a very narrow road due to Sat-Nav (eg HGVs, coaches)**
- **Problem for 30 + years with campaigns to close Brunstane Road**

Case for ETR0 made after careful consideration by CEC



The ETR0 has had a positive impact

- Marked reduction in traffic, noise, confrontations, now a pleasant place to walk and live**
- Improved safety for all road users - particularly significant for children, disabled, older people**

**Significant increase in walkers, wheeling and cyclists, no of two wheelers rose 3.6%-24.5%
(links National Cycle Network Route 1 'Innocent Path' with CEC's local route No 9)**

Brunstane Road link expands city's cycling infrastructure



Case for TRO

- **TRO addresses aims of national and CEC transport and placemaking, public health and environmental policies**
- **Promote use of arterial roads over residential streets**
- **Traffic lights, double yellow lines, one-way - considered and discounted by CEC traffic experts**
CEC T & E Report p3, Jan 2021
- **Improve mitigations in surrounding area**



Gridlock Jan 1st 2020 at 6:30pm



DEPUTATION ON BEHALF OF BRIGHTONS AND ROSEFIELD RESIDENTS' ASSOCIATION ON ITEM 7.6 BRUNSTANE ROAD CLOSURE TRANSPORT AND ENVIRONMENT COMMITTEE MEETING 8 DECEMBER 2022

I am making this deputation on behalf of Brightons and Rosefield Residents' Association, which covers Brighton Place and the surrounding streets. The Association carried out a survey of residents on this scheme, to which 92% objected and 8% supported. Unsurprisingly, the latest Council survey shows that almost 70% oppose this scheme following the "trial" closure of Brunstane Road.

It is clear from the council's report that the closure of Brunstane Road to through traffic has caused a load of problems elsewhere, just as predicted by many but ignored by officers.

Many more people have been disadvantaged than have benefitted from this scheme. Traffic has been displaced to this area and Coillesdene, with increases in traffic volumes in the Coillesdene area and damage to vehicles reported. The solution that the Council offers such as chicanes and speed bumps could easily have been implemented in Brunstane Road, avoiding complete closure but for some reason it has had to be total closure or nothing for Brunstane Road.

The report says other options were looked at but does not provide any solid evidence as to why they would not work and the Council have refused to run any trials. A compromise would be fairer for all but it seems that the residents of Brunstane Road are to be given preferential treatment.

Since the closure, in the area around Brighton Place we have experienced:
(SEE TABLE)

- An overall increase in traffic of 30% on this already busy route.
- In some instances more than 70% of vehicles were exceeding the speed limit
- There has been an increase in rat-running around East Brighton Crescent and Lee Crescent with cars trying to avoid the queues in Brighton Place, putting residents and children attending the nursery in this street at increased risk of accidents.
- An increase in road rage incidents at the rail bridge between Brighton and Southfield Place, probably born out of frustration at having to do a big detour to get into Portobello.

The traffic was monitored in Southfield Place close to the bridge where vehicles are likely to be slowing down so the real speeds are likely to be considerably higher

Existing traffic problems in and around Brighton Place

To set the problem into context, Brighton Place is a residential street and busy bus route with three services operating on it. Traffic tails back from the lights at the north end of the street as far as the railway bridge at the south end of Brighton Place. The rail bridge is a single-lane pinch-point that causes a bottle neck. (SEE MAP)

Traffic flow is curtailed by traffic lights at the south end of Southfield Place (a continuation of Brighton Place) and the north end of Brighton Place where traffic on Portobello High Street is often at a standstill.

Southfield Place is a narrow street south of the rail bridge and currently has parking down both sides, which causes traffic chaos with two lanes of traffic plus buses trying to pass and queueing to get under the bridge.

As you will know, HGVs are banned from turning left onto Harry Lauder Road from Portobello High Street, meaning an increase in the number of HGVs travelling up the Brighton Place route to access Milton Road, posing an increased risk of accidents in Brighton Place and Southfield Place.

The Council flat-out denied at first that there would be any problem in this area as a result of the road closure and we had to fight tooth and nail to get any traffic monitoring done in Brighton Place/Southfield Place.

When pushed, the council said if there was an increase in traffic they would introduce mitigation measures but refused to say what these might entail. However, this report makes it clear that the council does not plan to introduce any mitigation measures in this area so in other words we just have to suck it up.

Brighton Place is referred to as a “corridor” into Portobello and it appears that the Council reckons they can force more traffic down it. We disagree. We have to live with the traffic congestion, day in and day out and are not prepared to tolerate any more.

As we knew it would, the traffic has increased by an alarming 30% as shown by the Council’s own monitoring data.

The latter two survey dates (SEE TABLE) were impacted by road closures in the Northfield and Mountcastle area which diverted vehicles away from this

route and also the survey period in October took place during the school holidays. **The data collected during these times is therefore invalid.**

Brighton Place is a residential street and **supposedly safe route to school** but according to the council it is ok to dump more traffic on this route. The report claims in paragraph 4.22 that “there is no indication that road safety has been compromised”. This goes against all prevailing wisdom and the Council’s own rationale for imposing 20 mph speed limits all over the city. If there is an increase in traffic volume and speed there will be an increased risk to road users, particularly pedestrians and cyclists.

What the council has failed to mention in the report is the frightening statistic that in some instances more than 70% of traffic is speeding on this route. It is not good enough to say it’s a 20 mph zone, as the council does in this report. The situation here, with increased traffic, worse air quality and speeding vehicles is worse and more dangerous than Brunstane Road ever was.

Many children and their parents and carers use this route to go to and from school and nursery five days a week and the BrightonPlace/Southfield Place route is now a more dangerous and less pleasant route for pedestrians, cyclists and motorists. (SEE PHOTOS)

Would you be happy with your child having to negotiate that traffic on the way to and from school and nursery?

The message from the council is that our quality of life is worth less than that of Brunstane Road residents, who are the only people who benefit from this closure.

The priorities of the council are clear: alleged damage to vehicles is of more concern than children's health and safety in going to and from school and nursery.

What is it going to take for the council to listen and rectify the problems they have dumped on this area by closing Brunstane Road: a death or serious accident on this route?

What we would like to happen:







- Brunstane Road to be re-opened to through traffic for the sake of the many, not the few.

- Failing that, run trials of other solutions for Brunstane Road, such as traffic lights at the bridge or a one-way system, removal of some parking and chicanes.
- Continue monitoring before making a final decision as the survey period has not been long enough and the latter two sets of data are invalid.
- Introduce speed limiting measures in Southfield Place and Brighton Place immediately to prevent any more accidents - a child was knocked off his bike in Southfield Place last year - and make it a safer space for all. We don't have the luxury of time to wait for 20 minute neighbourhoods to be introduced. We would like a speed camera on Brighton Place and the speed activated signs reminding motorists of the speed limit.
- We ask the council to engage with residents in our area in a collaborative and open-minded approach to problem-solving.

Brighton Place Traffic Counts				
Total combined traffic				
		Start	7 Day	% Increase
Total	Saturday	9th October 2021	32816	
	Wednesday	9th March 2022	42519	29.57
	Thursday	9th June 2022	40161	22.38
	Thursday	13th October 2022	37602	14.58
Mountcastle road works				
Mountcastle/Duddingston Road junction closed plus half term				
Taking into consideration the roadworks it's fair to say that there has been a 30% increase in traffic				
Percentage of traffic exceeding speed limit (20 mph)				
		Start	Combined 7 day Ave.	Maximum percentage
	Saturday	9th October 2021	43.2	49.7
	Wednesday	9th March 2022	58.6	72.5
	Thursday	9th June 2022	63.8	76.0
	Thursday	13th October 2022	58.4	66.0
Measurements were taken Southfield Place just south of the constricted (one lane) railway bridge. Much traffic has to slow to allow for oncoming traffic and therefore average speeds will be affected by this slow traffic.				
The average speed calculated does not reflect the speed of freely moving traffic.				

Brightons and Rosefield area traffic problems



-  Traffic lights
-  Queuing traffic
-  Rat running along East Brighton/Lee Crescents
-  Safe route to school
-  Parking both sides of Southfield Place
-  Narrow, single lane underpass to Sir Harry Lauder Road and railway

Brightons' and Rosefield Residents Association – Traffic Problems

















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Spokes – Item 7.6 - Brunstane Road Closure (Progression to a Permanent Traffic Regulation Order)

7.6 - Brunstane Road

Spokes supports the proposal to make the Brunstane Road scheme permanent. However we ask that the existing planter arrangement is modified, possibly using collapsible bollards, to improve accessibility for cyclists (including those using non-standard cycles).