

**CITY OF EDINBURGH COUNCIL**  
**TRANSPORT AND ENVIRONMENT COMMITTEE**

**Item No 3**

**2 February 2023**

**DEPUTATION REQUESTS**

<b>Subject</b>	<b>Deputation</b>
<b>3.1 In relation to Item 7.3 on the agenda – Active Travel Action Plan 2023 – Delivering the City Mobility Plan – Report by the Executive Director of Place</b>	Spokes (written submission only)
<b>3.2 In relation to Item 7.5 on the agenda – Edinburgh Cycle Hire Scheme – Options Appraisal – report by the Executive Director of Place</b>	The University of Edinburgh Cargo Bike Movement Thistle Foundation
<b>3.3 In relation to Item 7.6 on the agenda – Response to Motion by Councillor Booth – Rainbow Bridge / Lindsay Road Bridge – Infilling – report by the Executive Director of Place</b>	Save the Pride Bridge (written and verbal presentation)
<b>3.4 In relation to Item 7.7 on the agenda - Queensferry Town Centre Project – Traffic Regulation Orders and Project Update – Report by the Executive Director of Place</b>	Spokes (written submission only)
<b>3.5 In relation to Item 9.1 on the agenda - Motion by Councillor Lang - Flooding in Kirkliston</b>	The Orchard Nursery Ltd

**Our deputation is relevant to all the *draft CMP delivery plans*, but most specifically  
*Item 7.3, Active Travel Action Plan 2023***

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3. Demand Management
4. Public Transport Action Plan, PTAP, and other CMP delivery documents
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## **1. Introduction**

Spokes strongly welcomes the new set of City Mobility Plan (CMP) draft delivery policy and action documents (listed & linked in the appendix below).

The ambition “*to create a city where you don’t need to own a car to get around*” mentioned in several of the documents (e.g. Parking Action Plan, p8) is to be applauded for reasons of climate, public health, congestion and equalities. Such an ambition is also essential if the Council is to achieve its ultra-ambitious target to reduce car-km 30% by 2030.

We also support the forthcoming ‘en bloc’ consultation, rather than a drawn out series of consultations on individual documents. We hope this will give officers more time to ensure much speedier implementation than has been the case in recent years, and will also assist interest groups such as ourselves in avoiding the need for ongoing repetitive responses.

**This early Spokes submission follows a brief initial look at the documents and is to highlight points that we are particularly pleased to see, alongside some concerns.** Detailed comments will follow during the forthcoming consultation.

NOTE: *Italics* denote quotes from the documents.

## **2. Active Travel Action Plan 2023, ATAP**

The Plan states...

*“The (off road) traffic-free routes will continue to play a vital role, and we will seek to improve their comfort, safety and security. However, we now plan to develop a joined-up network of routes that **feel safe to everyone at all times of day**. This network will need to use **segregated cycle tracks on main roads**, as well as unsegregated on-street routes that have low volumes of motor traffic.”* [ATAP, chap 5]

The three highlighted phrases above [our emphases] neatly summarise important major developments, which we strongly welcome, in the Council’s approach to cycling policy, and we urge determined implementation.

Specific commitments we particularly welcome for their importance and/or innovation include the following. And this is far from an exhaustive list! However, given the Council’s past history of project delay, implementation, together with the requisite adequate staffing levels, is a critical issue.

- **A8 Roseburn to Gogar** - segregated cycling [presumably extending CCWEL westwards]
- **A70 Juniper Green to Dundee Street** - segregated cycling
- **Gilmerton to Cameron Toll and City Centre** - segregated cycling [existing plan now extended outwards to Gilmerton and inwards to city centre]
- **Portobello to Musselburgh** - segregated cycling
- **Lothian Road Boulevard** (including West End & Tollcross junctions) *“we’ve started work”* – what does this mean? Appendix 3 states implementation “after 2026.” Note that the West End junction is a priority action in the City Centre Transformation document, following the fatality.
- **Travelling Safely main road ‘covid’ routes** – *“making permanent and improving junction infrastructure, subject to current ETRO experimental process”* NB non-junction needs improved also!
- **Dalry & Portobello town centre schemes** *“by 2026”* – these will be a true test of how far the Council decides to prioritise active travel and ‘place’ over motorised traffic. Ditto the current **Leith Connections** project.
- *“Sub 20mph limits would require amendments to national regulations and signage. With this in mind, we propose to explore the potential for pilots with the Scottish Government”*
- *“Action J6: Implement the Major Junction Programme”* - a rapid and transformative approach would be a real tribute to the three cyclists killed at major Edinburgh junctions in recent years, and whose deaths helped instigate this project
- *“Continue to engage with the Scottish Government to ... remove (legal) barriers to efficiently delivering Active Travel infrastructure”* including Automatic Number Plate Recognition (ANPR) for enforcement, low cost zebra crossings, and tackling arcane Traffic Order processes.
- **Traffic light innovation** including... *“radar (to) detect the person cycling approaching and call the crossing or lights to go green”* and *“software at major junctions on (bike bus routes) that allow the lights to be held on green, giving the bike bus enough time to pass through in one go.”* (we understanding this is already used in Glasgow)
- **Active-Travel bridges** (action J11) funding opportunities to be sought, e.g. for major problematic locations such as Slateford aqueduct and the main line rail at Roseburn and at Waverley.

We also have some significant concerns, including...

- In our [Circulation Plan comments](#) we have already expressed the concern that main road segregated routes may be replaced by less satisfactory facilities in some locations where space is at a premium. The draft ATAP does attempt to ameliorate such negativities, but any breaks which deter less confident cyclists from using a particular section of route are likely to mean they will choose not cycle the entire journey, and use a different transport mode instead.
- We greatly welcome the intention that **main road segregated routes** should become the core of the Edinburgh Cycle Network. However, this important change in *policy* must be reflected early on in the *implementation programme*, even though this may entail modifying the existing [Active Travel Investment Program \(ATINP\)](#). Given the increasing availability of government AT cash it should be possible to add to or modify ATINP. We recognise that work on the A7, Cameron Toll to Bioquarter, is due soon, and CCWEL is underway, but to demonstrate the new intent we urge *early work* on at least one other main road route such as the A70 (Lanark Road to Dundee Street), the A199 (Portobello to Musselburgh) or extending the A8 CCWEL westwards to Corstorphine.
- ATAP implies a major step up in Council activity on active travel. **Will staffing be adequate to ensure rapid and quality delivery?** - particularly given the many other CMP delivery elements. Secondly, will staff across the Council, in all areas of activity (such as Planning, Housing, Education) be sufficiently cognisant of active travel and other sustainable transport policies to ensure that all relevant Council actions are compatible with and support the transport programs?

- **Joining up journeys with public transport** This section covers rail only but should also include cycle parking at bus & tram stops, as well as safe and attractive routes to them. This, and bike carriage on buses, also need attention in PTAP (discussed in 4 below) as well as ATAP.
- For the forthcoming consultation, much higher resolution, ideally digital, maps will be important.

### 3. Demand Management

Research is clear that ‘carrots’ (such as improved bus, bike and walk facilities) alone will not bring about anything like the transition needed to achieve hugely ambitious targets such as the Council’s 30% traffic reduction by 2030, or the Scottish Government’s 20%. A combined carrots/sticks approach, with demand management including forms of charging, is vital. Charging, of course, also assists the investment required for active and sustainable transport.

**We are very concerned that the draft CMP delivery plans, such as PTAP, ATAP and the Parking Action Plan are inadequate in not integrating this issue sufficiently.**

Responding to questions on the government’s Climate Change Plan at a [Scottish Parliament Committee](#), Chris Stark, CEO of the [UKCCC](#), stated [20.1.21] ..

*“The Scottish Government has notably moved towards the carrot approach as its major way of encouraging people out of cars. However, all the evidence suggests that some sticks are needed too.”*

Prof Iain Docherty of Stirling University, and renowned expert on Scottish transport policy, stated..

*“The first stage is for the culture of carrot-ism in the transport debate to end, and for some very straight talking to be done.”* [article “Tell It How It Is” in [Transport Times, Oct 2020](#)]

**Edinburgh City Council’s draft policy documents fall into a similar danger.** Yet it is vital that demand management, including charging, is built into the transport strategy from the outset, so that everyone from the council, to developers and the general public is aware that it is an integral part of the overall picture. Measures such as charging are less unpalatable if they are part of an **overall package** including much improved public and active travel, with public understanding and expectation of the entire package built in from the outset. A policy of ‘introduce carrots then wait and see if charging is needed’ is a recipe for conflict and failure at that later date.

The Mobility Plan, CMP [pages 42-44] does have a section on demand management, but this concentrates very heavily on **parking controls** – which are indeed vital but are only one part of the story.

**Roadspace reallocation** is not mentioned in the CMP demand-management section, although that is probably inadvertent since it is clearly intended, given what is said elsewhere, and the contents of PTAP and ATAP.

The **Workplace Parking Levy** is covered (policy M38) although no firm decisions have yet been taken. The administration and the parties who support WPL need to find a solution which tackles any realistic concerns (noting Nottingham’s success) and move forward rapidly on this.

Despite the CMP content, there is little mention of WPL in the draft CMP delivery documents – it is mentioned briefly in the **Parking Action Plan** (p20 & p27) but CMP policy M38 is only referenced in the introduction (not in the relevant table on p21) and a starting date of ~2027 is suggested – making it a likely controversial issue at the next Council election, rather than an issue for this Council. If this date is correct, it is also a **significant backslide** from the Council’s **Business Plan** (Action 9e) which proposes WPL implementation in year 2 of that plan, i.e. 2024.

**Road User Charging** appears not to be mentioned in any of the new draft CMP delivery documents – although it is particularly crucial in relation to **PTAP** at commuting times. Speaking at a [Spokes public meeting](#) shortly after taking office, Transport Convener Cllr Scott Arthur outlined an intention for a combined commuter package of greatly improved bus corridors into the city, together with road user charging, to deter car commuting into the city. This he had already raised at SEStran with, apparently, initial support from surrounding Council representatives.

Again, road user charging is covered as a serious option in the Mobility Plan (policy M39 and page 44), and there is a passing reference in the Business Plan [end of action 9e] to assessing charging opportunities. However, as far as we can see policy M39 is not referenced even once in any of the new draft CMP delivery documents such as PTAP. This appears to be a second **significant backslide**.

## 4. Public Transport and other CMP delivery documents

Apart from the above concerns, Spokes generally strongly welcomes all the delivery documents

**Parking** - controls and enforcement are vital for safe and convenient travel by bike. The existing levels of blatant and illegal or antisocial parking on footways and cycleways, in particular, is a source of endless comment, complaint and danger. The Council must also increase pressure on the Scottish Government to improve enforcement options, including use of ANPR and allowing higher penalties for illegal parking.

**Public transport** - alongside tough demand management (3 above) quality public transport is vital to help drastically reduce unnecessary motor use, with its consequent impact on congestion, emissions and the enjoyment of local streets. A few initial specific comments...

- **PG3** – Consultation on **7-7-7 bus lane hours** should be only as part of the Traffic Order process, given that there has already been [wide consultation](#), to avoid another year of delay
- **PR5** – The **design of tramline layouts** must cater *far better* for cycling safety – a major council failure in the past, [contributing](#) to many unnecessary injuries and, arguably, a death. This is so essential that it should be *in the policy statement*, not just in general text
- **PT1 – Cycling to public transport** should be recognised, adding the word ‘cycling’ in this policy
- **Bikes on buses**, especially for longer-distance and rural routes, needs included to cater for and encourage joined-up bus/bike travel. In particular, we urge a review by Lothian family company bus services, noting the successful bike-carriage schemes by Borders Buses and Ember.

**Road Safety** – also vital. As regards cycling, whilst deaths and injuries in total and per km have declined over the years, despite rising bike use, every injury remains a family and workplace tragedy – not to mention deaths still occurring once or twice most years.

**Circulation Plan** – we have already submitted [initial comments](#). Whilst welcoming the concept, our top concerns are potential breaks in segregated main road routes, which would render sections of the Edinburgh Cycle Network not ‘suitable for all’; and the need for more detail on the creation of traffic-reduced areas through features such as bus gates and modal filters. Encouragingly, for the city centre, the Feb 2023 Circulation Plan update says that such restrictions “*could now be considered*” for the Bridges, Lothian Road, Lauriston Place and Cowgate.

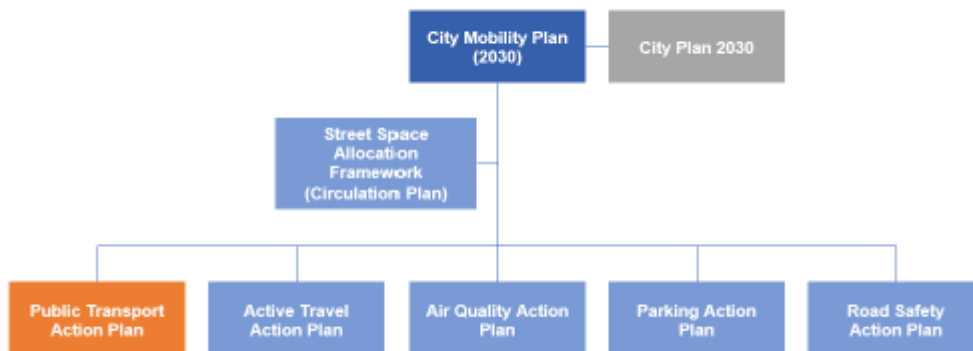
## 5. Appendix – Council draft CMP delivery documents

- [Active Travel Action Plan](#) ATAP
- [Public Transport Action Plan](#) PTAP
- [Parking Action Plan](#)
- [Road Safety Action Plan](#)
- [Air Quality Action Plan](#) AQAP
- [Circulation Plan](#) [under development] [Feb 2023 update](#)

all based on ...

- [City Mobility Plan](#) 2021-2030 CMP
- [Council Business Plan](#) 2023-2027 [Note Appendix 1, sections 7 & 9e]

Figure 1.1: City Mobility Plan and Associated Action Plans



## **Deputation statement on behalf of Save the Pride Bridge**

Transport and Environment Committee Meeting, 2 February 2023

The Save the Pride Bridge community organisation requests that the TEC commit to infilling the Lindsay Road Bridge, also known as the Pride Bridge. We appreciate the work done by council officers in exploring the options for the bridge's future and, in particular, we are grateful for the seriousness with which council officers have treated community feeling towards the bridge. However, we continue to feel that infilling represents the best option for the bridge's future, as it is the only way to preserve the multiple aspects of the bridge that are so valued by community members.

As described in our deputation to the 6 October 2022 TEC meeting, the bridge was well used by the local community before it was blocked, and it provided the most direct and accessible walking and rolling route between North Fort Street and Annfield. The alternatives remain unsatisfactory. Crossing down to the Hawthornvale path presents significant accessibility challenges and the Lindsay Road route forces people next to a busy road with fast-moving traffic. Maintaining the route over the Hawthornvale path is the best way to improve the active travel links between Annfield and Fort areas.

Of equal, if not greater, importance is the social and symbolic value of the bridge to the local community. Since the October TEC meeting, Save the Pride Bridge has received lots of feedback from community members who value the bridge not only as a means of access between local areas, but as a space in and of itself. Questionnaire responses, gathered at a community meeting in November (attended by over 70 people), repeatedly showed that people see the bridge as a welcoming environment and as a safe space for social gatherings. The bridge has previously been used as a gathering space for local running groups, as a place for birthday parties, and as a beer garden by the local pub. Crucially, community members said that their perception of the bridge as a welcoming space for social activities was inextricably linked to the LGBTQ-affirmational symbolism of the rainbow colours. The bridge was initially painted in part as a defiant response to homophobic graffiti in the local area and, in a virtuous circle, its symbolic value has encouraged and is reinforced by community use of the bridge. For example, a local running group has led fun runs starting from the bridge, raising money for LGBTQ charities.

The bridge is a unique and special community asset. It is a physical reminder of industrial heritage of north Leith which has in recent years been invested with new and important significance by the local community. It would be a significant cultural loss to the local community if the bridge were to be demolished or replaced by an option that would not permit social use. Infilling remains the most financially viable option for maintaining everything that community values about the bridge, as a convenient and pleasant active travel route, an important social space, and a symbol of positivity.

# SPOKES

## *The Lothian Cycle Campaign*

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## **Written deputation from Spokes to the CEC T&E Committee Meeting to be held on Thursday 2 February 2023**

### **Item 7 Queensferry Town Centre TRO**

#### **1. Key Points Summary**

Spokes welcomes the general principle of improving the High Street and Waterfront areas of Queensferry. However, we have serious concerns that:

1. a highly localised non-standard consultation process has been used, bypassing the CEC Consultation Hub, which we regard as highly unsatisfactory. See section 2.
2. the previously unseen design of the contraflow cycleway at the west end of Newhalls Road, will be particularly dangerous, because it is sandwiched between parking bays and oncoming traffic. See 4.2.
3. cycling west along the High Street on the contraflow system will continue to be very problematic, especially at the Seals Craig blind corner and other pinch points (see 4.3).
4. without adequate enforcement proposals we consider it highly likely that vehicles will be driven and parked as suits them, irrespective of signage, weight limits or restricted hours. This is already acknowledged as being a problem at the newly remodelled layout at the foot of The Loan. (see 5.3)
5. despite the attractive placemaking improvements, this is a vehicle access and heavily parking dominated design, which fails to align with the Councils travel hierarchy policies, active travel plan and parking plan.



## **2. Consultation process**

We have concerns about the consultation process. Although Queensferry is part of Edinburgh, these proposals have developed outwith the normal CEC consultation channels.

We have previously requested that this consultation be widened and regularised by it being listed on the CEC Consultation Hub, so that Edinburgh-wide views can be heard and have greater stakeholder involvement, but this has not happened.

This is particularly puzzling as other Queensferry proposals do appear on the Hub. (There is currently one about improvements to the streets and between the Builyeon Road, Scotstoun Avenue, Queensferry High School and Dalmeny Station. )

Spokes was not party to the Steering Group, despite it having been agreed that a local members of Spokes would be invited to participate.

Accordingly, we consider that this consultation risks being flawed because:

- the findings of the Steering Group cannot be said to be fully representative of the local population.
- Queensferry is a very popular destination, and yet the consultation process used here has not sought the views of the wider Edinburgh population and stakeholder groups.

## **3. Local Parking Strategy.**

3.1 Section 4.14 mentions a local parking study. This study fails to provide any context of local schools and how parking may impact on children walking, wheeling or cycling to schools. It also fails to make any reference to the two national cycle routes in South Queensferry and how the increased presence of parked vehicles and subsequent increases in traffic would have on the impact of people using these routes.

3.2 Section 4.15 We are concerned about a local parking plan and the statement "The Executive Director of Place has recently made contact with colleagues in Transport Scotland to explore parking opportunities, on Scottish Government Land close to the town centre." Although the following section mentions a "temporary arrangement" it does not make clear how temporary or when a CPZ may be introduced. We are concerned about the potential for the increased parking capacity and subsequent impacts on walking, wheeling and cycling that the inevitable increase in traffic that more parking brings. We believe resources should be invested reflecting the transport hierarchy and not on further parking provision.

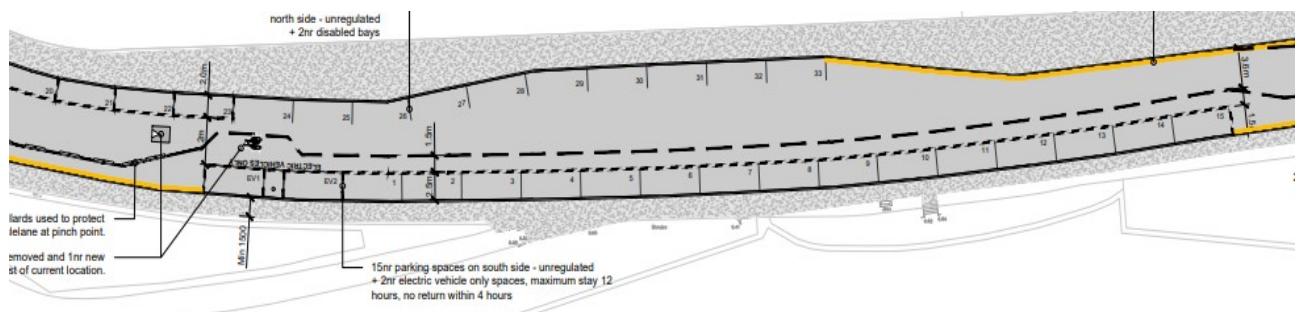
## 4. Newhalls Road

4.1. It is disappointing that there are currently insufficient funds for phase 2, such that the fully segregated cycle path along the waterfront has been postponed, as that would be both a very significant place-making improvement and also a step change in the quality of the provision for safe cycling.

4.2. We **strongly object** to the proposed parallel parking bays on the south side of Newhalls Road between the turning circle and Seals Craig (Reference EV1-2 and 1-15) as:

- It is dangerous and unreasonable to expect westbound cyclists who are cycling contraflow against the traffic flow, to have to contend with cars cutting across in front of them to park **and** to also be at risk from "dooring" by parked vehicles.
- Eastbound vehicles speed along this section, having escaped the confines of the High Street and because of the downhill gradient.
- The road is too narrow to accommodate parallel parking on **both** sides, plus one way traffic and a contraflow cycle lane.
- This is all wrong in terms of the CEC accepted transport hierarchy.

Accordingly, we **strongly recommend** that the contraflow cycle lane be located alongside the pavement, with full segregation, throughout for its entire length between the turning circle and the Seal's Craig.



*NB Contraflow cycle-lane hard alongside parking bays*

4.3. We **strongly recommend** that signage be located at the Seals Craigs pinch-point giving westbound traffic priority over eastbound, in order to lessen the danger to cyclists at this difficult pinch pint and blind corner.

4.4. Although there is very little new for the rest of Newhalls Road in this phase, we **recommend** that the current absence of bike parking be addressed now and that it should be located close to the shops and cafes.

## 5. High Street

5.1. We continue to find the existing one-way with cycling contraflow system **very problematic**, because of driver behaviour both intended and unintended - particularly contraflow close passes. Unfortunately, we do not see how that experience will be improved by these proposals, which designs-in close passes and pinch point face-offs. Most cycle users will be for leisure and will include family groups and we continue to **recommend** as much segregation as possible. There are many examples of where the contraflow is problematic with the example below providing one example, We do not believe it is acceptable to put people in these dangerous situations and that physical protection for the contraflow is a necessity.



*Although the surface treatments will have been improved, situations like this will continue.*

5.2. Only closure to general traffic (with the usual exemptions for timed deliveries, disabled permit holders etc) will remove this conflict danger. Previously proposed complete pedestrianisation did not survive local consultation, but we **recommend** that consideration be given to temporary and/or rolling closures, such as at weekends.



5.3. We have **serious enforcement concerns and can find no reference to an enforcement plan in the report.** We are strongly of the view that **vehicles will be driven and parked as suits them, irrespective of signage, weight limits or restricted hours.** This is already acknowledged as being a problem at the newly remodelled layout at the foot of The Loan. Unless there is physical protection it is an inevitability that this gross abuse will present itself along the High Street, in the same manner as has been the case even with fully pedestrianised streets across Edinburgh. The photo below presents an example of the recently altered pedestrian space at the bottom of the Loan. This happens on multiple occasions daily. We do not see why this would change elsewhere on the High Street without enforcement.



*Rogue parking on the newly remodelled pavements at the foot of the Loan*

5.4. We continue to have **unresolved concerns** about:

- how eastbound traffic entering from the signalled junction will be fully expecting to meet people on bicycles travelling west.
- whether the paved area immediately to the east of the traffic signals at The Loan is intended for waiting cycles; and why does the contraflow cycle way surface treatment does not connect to into it.
- the safety implications of eastbound delivery vehicles having to cross westbound cyclists to access the daytime loading bays.
- the multiple types of surface treatments have the potential to significantly improve the cycling quality, but can we be assured that these are all cycle friendly and will be laid as such.

## 6. Wider Area View

6.1 This is one of at least 3 current project schemes for Queensferry and we are keen to see how these are being coordinated. We have particular concerns about traffic diverting to Station Road.

6.2 Port Edgar is the other Queensferry waterfront leisure destination, but cycling and walking access is very poor. We have previously suggested that it would be beneficial for access and for the local economy if safe pedestrian and cycling linking infrastructure were created (a) connecting it with the High Street and (b) through to Society Road (which has existed previously). Although mentioned in this report, it is mainly about its potential for overflow parking.

6.3 We have also previously suggested the provision of a peak-times shuttle service between Dalmeny Station and Port Edgar via Hawes Brae, Newhalls Road and the High Street. It would encourage visits by public transport access by rail and bus, as well as linking all of the car parking locations.

Ewan Jeffrey and Simon Christie for Spokes Planning Group  
30 January 2023