

# SPOKES

*The Lothian Cycle Campaign*

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## **City of Edinburgh Local Transport Strategy 2007-2012 Spokes response to consultation on 'Issues for Review'**

We welcome the opportunity to respond to this consultation

### **General comment**

We understand from the consultation website [www.edinburgh.gov.uk/localtransportstrategy](http://www.edinburgh.gov.uk/localtransportstrategy) that the targets and policies supporting active travel modes will be retained in the new LTS, as these are considered still valid and non-contentious, though may be updated through the ATAP progress review.

### **Specific issues raised for consultation**

We comment only on those issues which concern us, and we use your numbering below.

#### **1) Integrated Transport**

We support ticketing and information issues, which should include rail.

Secure cycle parking needs to be provided at rail, bus and tram stops to facilitate interchange.

Accessibility and interchange should include cycling and walking. Cycle and pedestrian access needs to be improved at Haymarket and Edinburgh Gateway stations, both of which have been omitted in recent proposals. It is disgraceful that access from the city to Edinburgh Gateway, and beyond to the International Business Park, requires cyclists to dismount en route. Similarly, what is effectively a major new station at Haymarket should have included a bike hub, with bike hire, secure storage and maintenance facilities, instead of which inadequate consideration was given even to the most basic requirement of cycle parking. A city with Edinburgh's bold and taxing targets for cycle use should ensure through the planning process that cycling is fully integrated into all relevant policies, proposals and permissions. The above are examples of very serious failure of integration.

Most recently, there appear to be tram/cycle path integration problems around Edinburgh Park Station.

Finally integration needs to take place within the council's own project design and implementation, including in plans prepared by outside agencies or consultants. At present a project designed to improve one mode often actively disadvantages another mode, whereas a holistic design would benefit all modes. Sometimes small changes are all that is needed. A prime and serious example of non-integration is the onstreet tramline layout which, despite our own best efforts, to the extent of bringing over a specialist consultation from the Netherlands, was designed 'tram-only,' leaving other modes to be slotted around it later. This has been very serious indeed for cycling, resulting in many more danger situations than should have been the case.

### **3) Speed limits 20mph**

We support option 1, 20mph in busy and shopping streets, not just residential.

The extension of 20mph zones has been shown to reduce the impact of accidents on pedestrians and cyclists as well as motorists. Reduced speed limits, even without road humps, have resulted in reductions in actual traffic speeds if not quite as far as the new speed limits. The limited enforcement to reduce speeds to the new limit is much cheaper than physical road humps. Other features such as cycle lanes and other painted features can also give the impression of road width reduction and cause a fall in speeds.

Edinburgh is almost unique in the UK in having main roads and shopping streets which are also residential. Keeping the vitality of suburban shopping streets is vital to local areas and small businesses - lower speed limits make it easier for pedestrians to cross such streets, for cyclists to use such streets, and for the reduction of vehicle noise and improvement of the shopping environment.

Bus companies say that lower speed limits delay their buses and thus increase their costs and make their services uneconomic. However research already passed to your department [from [mccraw.co.uk/lothian-buses-20mph-limit](http://mccraw.co.uk/lothian-buses-20mph-limit)] shows otherwise; the two examples given show that for instance the introduction of a 20 mph limit on the whole of Leith Walk would delay buses by well under one minute.

Similar arguments about fewer and less severe accidents, improved environment and better facilities for pedestrians apply also to limits in the city centre.

Finally the more streets have 20 limits the more certain people are of the limit and the fewer signs (and thus clutter) are needed for their notification and enforcement

### **4) Speed Limits 30 and above**

We support option 1, reducing 40mph limits to 30mph on roads such as those specified, largely for the same reasons as in issue 3 above. The suggested exemptions on dual carriageways should be re-assessed, with cyclist safety in mind.

Cyclists have little realistic choice but to use several roads at present with 40 mph limits, Comiston Road being a prime example. A speed reduction would improve safety greatly. The cyclist risk of death per km on a typical urban 'A' road is a frightening 5 times higher than for on minor roads [see table on page 7 of Spokes Bulletin 115 at [www.spokes.org.uk/wordpress/bulletin](http://www.spokes.org.uk/wordpress/bulletin)]. Reducing the limit from 40mph to 30mph makes a big start in reducing this differential – although high quality cycle facilities on such major direct urban roads are also vital.

A further point is rural speed limit reduction on minor roads. It seems dangerous and indeed ridiculous to have a 60 mph limit on Long Dalmahoy Road which is basically a country lane and part of the national cycle network.

### **5) School Streets**

We strongly support option 1, trials of 'school streets,' which should help tackle the problems below.

Much car traffic is caused by children being taken to school by car - you only have to see the reduction in traffic congestion in school holidays.

It is also council policy to encourage children to walk or cycle to school; for environmental and health reasons.

Parking around schools is also a significant problem and danger.

## **6) City Centre Parking**

The council should encourage a shift from on to off street parking, with better information on off-street parking spaces to reduce the number of cars cruising around looking for on street spaces. However, some off street parks are rarely full, so any increase in off street provision should be selective.

Parking on cycle lanes, and the precedence given to onstreet car parking rather than segregated or mandatory cycle lanes, are huge causes of complaint from cyclists *and* from those people who are too scared to cycle. A major reduction in onstreet parking would allow safer and more attractive cycle facilities and pedestrian space.

As an example just outside the city centre, the Quality Bike Corridor has come in for significant criticism because it did not take a tough enough stance on car parking, meaning that the cycle lanes are often parked on. We appreciate that tackling onstreet parking is politically difficult, but unless this nettle is grasped we are unlikely ever to reach the levels of cycling seen in European cities, because the available roadspace will not permit facilities which look and feel sufficiently safe and welcoming.

Finally, park and ride should be provided as far out as possible to reduce car usage within the city.

## **7) Sunday parking**

We support options 3 or 4, extending parking and loading restrictions and charges and resident permits.

Sunday free car parking locks bus and cycle lanes, and in our opinion often leads to all day parking (although research needs to be done on this). Sunday parking zones would improve this situation, to the benefit of conditions for cycling and walking.

Parking restrictions would also transfer people to buses which might well improve frequencies and lead to a "virtuous circle " of bus provision. This could be helped by hypothecation of meter revenue, at least in the short term.

## **9) Air quality**

We support option 3, Low Emission Zone.

This is an issue on which CEC is required to act. Fortunately, bus companies already seem to be mostly complying voluntarily, but this needs formalised and extended to all goods vehicles.

## **10) Travel Planning**

We support option 1, a travel plan officer.

We believe that the council should provide the most information possible to enable people to make rational travel choices themselves, for their own and the public benefit.

Individual travel planning is more costly than provision of non-personalised information, but is cheap compared to physical measures. A proper hearts and minds travel choice campaign has never been carried out in Edinburgh. Yet pilot studies have shown that measures such as travel diaries and the combination of journeys for more than one purpose can cut car mileage by 20%, even before counting other trips which can transfer to public transport walking and cycling.