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CEC DRAFT LOCAL TRANSPORT STRATEGY 2014-19

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Comments from Spokes

In general we only comment below where we suggest improvements or changes. Overall, Spokes is very supportive of the changes included in the new strategy as compared to the previous strategy. We particularly congratulate the Council on its intention to adopt 20mph limits, not just in residential and shopping streets, but in particular also on main roads with high numbers of pedestrians and/or cyclists – we urge that this policy is implemented boldly and timeously.

A small number of our comments below we consider absolutely critical, and these are in **red type**.

2.3 Indicators and targets

We particularly welcome the modal split targets in section 2.3 for all journeys and for travel to work. It would be useful to know how progress to the targets will be measured, particularly the 'all journey' targets.

3 Putting the customer first

Whilst we very often experience good service and effective consultation, this is not consistently the case. Recent unfortunate examples include...

- ◆ **Road resurfacing prioritisation.** In the final year of the previous council a new approach was agreed by Council Committee, after very full consultation with the Cycle Forum, and which included a weighting for roads important to cyclists but not used by buses. However in 2013 the actual proposed funding allocations did not incorporate this weighting, and indeed a new weighting system was developed. The Cycle Forum was not told that the previously adopted decision had not been implemented, and was not informed that a new system was being developed – let alone consulted on it. Only when this by chance came to our attention were we able, belatedly, to comment.

- ◆ **Red surfacing.** It had been our understanding that the use of chipping in QBIC and Dalry Road was a trial, after which there would be further discussion about future colouring methods. That has not happened, despite Spokes submitting a paper on this and raising it at the Cycle Forum.

4 Sustaining a thriving city

One of the four basic objectives of this section, relating also to the LTS targets in 2.3, is to minimise the need for car use. We do not feel that the LTS prioritises this objective sufficiently, particularly at the rate which is needed to improve the city and to reduce carbon emissions. Major changes are needed – for example see 4.5 below.

As one very specific example, we suggest the Council sets a lead to other organisations in the city by removing what we believe to be a free parking concession for some Council HQ senior staff.

4.5 Reducing the need to travel and managing the impact of developments - add new para at end of 4.5 [alternatively and/or additionally this could be covered in section 12, below]

The availability of large numbers of parking spaces at retail, leisure and workplace destinations is a serious drag on policies to promote modal shift. The Council will lobby government to provide powers to charge operators for the numbers of parking spaces over a certain minimum at retail, leisure and workplace destinations and any other appropriate destinations with large numbers of parking spaces.

5 Protecting Our Environment

This section seems to cover only various forms of pollution and emissions. It should also cover the **Built Environment** – or that should be covered in some other chapter, and this chapter then renamed *Pollution* to reflect its restricted use of the word 'Environment.'

Regarding the Built Environment, *a balance must be struck between the Council's Planning and Transport policies/actions.* Too often they are in separate silos and there are *numerous* examples where planning policies or decisions have impacted very negatively on transport objectives, particularly in relation to cycling development. We fully appreciate that a balance has to be struck, but that is what we are seeking – a balance, not a total neglect. **As this is such an important issue we list a range of examples showing how widespread and serious is this lack of a holistic approach.**

- ◆ Planning policies have caused severe problems for **householders who have no storage option for bikes other than in their front garden**, despite the fact that transport objectives seek to increase cycle use substantially. There have been appeals, several successful, great distress to individuals who felt they were doing their best for both their family and their city, and a huge waste of time and resources for council officers and elected members. Fortunately, after much time and effort we appear now to be at a resolution. However, this was a perfect example of the silo approach mentioned above.
- ◆ There are examples where an **area MasterPlan includes cyclerroutes to and through the area, but the final built outcome is extremely disappointing** with pedestrian/cycle conflict effectively built in, and an unsatisfactory cyclerroute with little consistency along its length. The prime example is the route from the canal to the West End – on the original

masterplan (many years ago) this looked a fantastic opportunity for a safe and convenient alternative to Lothian Raod. Sadly the planning permissions subsequently approved for individual sites within the area have been totally uncoordinated in this respect, and have allowed some individual designs which can only be described as laughable in terms of effective cycle provision. The final route does now exist but is a real hotch potch and in places seems almost designed to engender pedestrian/cycle conflict.

- ◆ In the recent High Street consultation little regard appears to have been paid to the comments re. **the impact of rounded cobbles on cycling**, despite the council's wish to encourage cycle use and despite the safety implications that rounded cobbles, especially when wet, compel the cyclist to pay undue attention to the road surface at the expense of concentrating on surrounding traffic and walkers. Clearly planning considerations are also important, but we note that the Council is prepared to modify such surfaces in response to other needs, and the same should be the case in relation to cycling. For example, at the North Bridge junction, flat-topped setts have been used, for the benefit of general traffic. Similarly in the High Street near City Chambers flat-topped drainage channels have been installed which – unintentionally – provide a useful cycling surface (except when parked on, which is frequently the case as this paving was installed for drainage rather than cycling reasons). There is even an example in Linlithgow where former Lothian Regional Council installed flat-topped slabs through a cobbled area at The Cross to provide safer and more pleasant cycling conditions.
- ◆ Cyclists heading from the city to the new Edinburgh Gateway rail/tram interchange station, and beyond it to the International Business Park are to be **forced to dismount and walk** for a significant distance through a tunnel under the A8 because planning permission was granted for a walk-only tunnel. Once these developments are complete, this will impact on many cyclists and will undoubtedly cause unnecessary pedestrian/cyclist friction.

In conclusion, a new paragraph, policy, and effective actions are required. The policy statement could be on the following lines...

Policies, objectives and practices between the planning and transport functions will be closely coordinated at high level and at operational level, to ensure a holistic, balanced approach from the outset in all relevant decision-making.

6.5.1 20 mph speed limits – add at end of 2nd para [and reference this in 6.5.4]

Locations where traffic management schemes are in any case planned will be considered for early implementation – for example, Leith Walk.

6.5.3 & 6.5.4 Speed limit policies & Speed reduction actions

We are very seriously concerned about **policy Safe5** and the **second bullet of 6.5.4** – they should be completely rewritten, taking into account the following...

Government statistics [RAS 30018] show that 'A' roads are the location of disproportionate numbers of killed and seriously injured cyclists. Whilst traffic speed reduction is a very worthwhile objective, and will assist safety, the provision of safe and welcoming cycling conditions on such roads should be a top priority – not purely a consequence (if possible) of lower traffic speeds.

First, there is no mention of segregated cycle infrastructure, whereas this should always be investigated as a favourable option.

Second, 6.5.3 & 6.5.4 suggest that the primary purpose of cycle lanes is to slow motor traffic. **This is very disturbing – they should be primarily to promote cycle use, cycling safety and the perception of safety, with car speed reduction being a side-benefit.** If designed primarily to slow traffic they may end up unsatisfactory for cycling – for example too narrow in places, ending prematurely, not providing safe travel through junctions, badly cambered, and so on.

Furthermore it should be explicitly mentioned that central islands, depending on road width and design, can be a serious danger and deterrent to cycling. Again it appears that the sole intention is to slow traffic, with no holistic consideration to overall cycling safety and to cycling promotion.

We also disagree with policy safe6. Some roads with no urban frontage, principally in rural West Edinburgh, still carry significant numbers of cyclists, may even be designated part of the National Cycle Network, and are often narrow. Speed limits of 40mph and above are totally inappropriate in such areas

7 Managing and Maintaining our infrastructure.

This section is still very motor vehicle based, in apparent contradiction to the tables in 2.3 which have targets for considerable reduction in car traffic and increases in walking and cycling.

The council's LTS targets in 2.3 should be reflected in section 7, with a section on the use of available street space, and a rebalancing of scarce street space in favour of pedestrians and cyclists. At present reallocation of space is only talked about in policy park10.

9.2 Cycling

9.2 Para 2 (para beginning 'Provision of...'). Add new sentence at end...

This includes experimentation with on-road provision physically segregated from motor traffic.

9.2 Pcycle2, final bullet point Rewrite this completely, as below. Firstly, to use a phrase clearer than 'cycle paths' and, secondly, because there will be some situations where cycle facilities are required or desirable even in a 20mph area [this will, for example, very likely be the case in Leith Walk and Princes Street]

cycle lanes or, where appropriate, physically segregated onroad cycle facilities, in all schemes involving main roads, except that this may not be necessary where there are speed limits of 20mph.

9.2 Pcycle7 amend first line to read...

railway routes including those used by the tram.

9.2 Pcycle8 add new paragraph and policy as follows..

Many householders, for example in flats, tenements and terraced housing, find domestic bike storage difficult, and there is research evidence suggesting that this reduces cycle use [the Edinburgh study by Tim Ryley for example].

Pcycle8 : *The Council will seek to assist householders with domestic bike storage where this is feasible. This will include growing provision of onstreet secure bike storage, conditions placed on all relevant planning applications, suitable enforcement action, and lobbying of government so that garden bike sheds meeting certain criteria are counted as 'permitted development.'*

10.7 Rail After the para beginning "Carriage of cycles..." add a new para...

The Council will actively seek and support the provision of Dutch-style Bike Hubs, including staffed bike storage, minor repairs and bike hire, at both Waverley and Haymarket.

12 Car Parking After section 12.4 add new section 12.5, and renumber subsequently [this is also mentioned in 4.5 above]

12.5 Car parking at retail, leisure and workplace destinations

The availability of large numbers of parking spaces at retail, leisure and workplace destinations is a serious drag on policies to promote modal shift. The Council will lobby government to provide powers to charge operators for the numbers of parking spaces over a certain minimum at retail, leisure and workplace destinations and any other appropriate destinations with large numbers of parking spaces.

14.1.4 Rail and coach services

para 3 - Spokes is concerned about the massive costs of a high-speed rail corridor between Edinburgh and Glasgow, particularly when existing rail service improvements such as EGIP are being cut back and rail services between Edinburgh and the north are increasingly inadequate. The LTS should refer to these opportunity-cost considerations and not give unequivocal support to the High Speed proposal.

para 4 [beginning "Rail services to Aberdeen..."] – Add at end..

Rolling stock on these services is also inadequate in many respects, including capacity for luggage and bicycles. The Council actively supports measures to improve these services.

Appendix 1 – indicators Add new indicator as below, as we believe had previously been intended. **We consider this a very important indicator, showing overall public reaction to the council's cycling policies.**

At present only two indicators cover cycling – school journeys and casualties. **This is a totally inadequate coverage of the overall effect of council cycling policies.** The absence of an indicator reflecting wider cycling policies could distort council actions on cycling, with higher priority given to actions which will support other indicators.

Thus the following new indicator should be added...

6.5 Feeling safe when cycling.

END OF SUBMISSION