



Postal address [we have no staff]: St. Martins Community Resource Centre, 232 Dalry Road, Edinburgh EH11 2JG  
Website: [www.spokes.org.uk](http://www.spokes.org.uk) Email: [spokes@spokes.org.uk](mailto:spokes@spokes.org.uk) Twitter: @SpokesLothian Answerphone: 0131.313.2114

---

To: Councillors on CEC Transport Cttee

29 October 2016

Dear Councillor

## **Transport & Environment Committee 1.11.16 - Bus Lane Network Review**

Spokes and Living Streets write to express our great disappointment at [the above report](#) and to suggest alternative recommendations rather than making the current experiment permanent.

The report fails to address some crucial issues, and misses some important evidence from the trial. Nor does it recognise and address the disconnect between this proposal and Council transport policies.

### **1. RECOMMENDATIONS**

We ask the Committee to defer a decision on the report's recommendations, pending further analysis and discussion of the issues raised in our letter.

If, however, the Committee feels it must make an immediate decision, we suggest the '7-7-7' solution adopted by Glasgow, after wider consultation than has been the case in Edinburgh, whereby the default timing for bus lanes is 7am-7pm, 7 days a week. The Committee could set this up as a further experiment before taking a final decision.

Nonetheless, we recognise that the Committee is unlikely to agree to 7-7-7, and therefore we suggest a compromise whereby bus lanes would remain peak-only on weekdays but would also operate on Saturdays and Sundays. We note that 63% of respondents in the Council's attitude survey supported this proposal with only 37% against, yet the issue is not discussed in the report or its recommendations - only the bare statistic is reported.

## 2. RATIONALE AND COMMENTS ON THE REPORT

### 2.1 Danger to cyclists

The report states clearly that the proposal “*will affect cyclists, by reducing the amenity provided by bus lanes.*” Making cycling conditions worse is contrary to council policy and should only be pursued if there are very clear benefits which outweigh this loss. The report shows no such benefits. Below we give a clear example of the actual dangers, let alone “loss of amenity,” which the proposal brings.

We urge Committee members to watch [this short video](#), sent to us by a cyclist, taken with his headcam – it shows, first, the back view as a car approaches, then the front view as the car overtakes.



*In watching the video, note the following...*

- ◆ There is no value in the motorist being allowed to use the bus lane – there is plenty space in the main traffic lane, with traffic travelling at a similar speed.
- ◆ The motorist appears more concerned with keeping within the thick white line of the bus lane than with passing the cyclist at a safe distance, in keeping with the Highway Code.

In summary, the video illustrates an entirely unnecessary danger to the cyclist, and the sort of incident which deters people from taking up cycling – the opposite of what Edinburgh wishes to encourage.

### 2.2 Disbenefits to pedestrians

Whilst the report acknowledges that the proposal reduces cyclist amenity, it does not make the same point for pedestrians, although this is clearly the case and should be corrected in the report. Keeping moving traffic one lane away from the footway greatly improves the pedestrian experience in terms of noise, splashing, pollution and general ambience – as the attitude survey suggests (2.3 below).

Despite an explicit request by Living Streets, no breakdown of the attitude survey is given by age, by mobility handicap, by child accompaniment, by buggy use, etc – although this data was collected. The generalized results, which include many relatively able-bodied adults, may mask traffic barrier and safety problems faced by the more vulnerable. According to Q17, 14% of interviewees reported a disability, and the interviewer noted use of stick, wheelchair, buggy etc - the attitudes of this group would have been of particular interest, even though the sample is not large.

## 2.3 Cyclist & pedestrian attitudes

Whilst the report presents the findings of the attitude survey in a relatively positive light, a different interpretation is possible. For example, the survey results show a clear view that conditions have deteriorated compared to a year ago, before the experiment began. In nearly all the following questions, 20%-40% of respondents felt that conditions were now worse, compared to just 3%-10% who felt they were better (the remainder not noticing any difference)...

- ◆ Speeding in the bus lane
- ◆ Parking in the bus lane
- ◆ Crossing the street
- ◆ Journeys take longer
- ◆ Feels less safe for cycling
- ◆ Street is worse for walking or cycling

## 2.4 Bus issues

The Lothian Buses statement includes, *“Bus lanes are an effective mitigation measure for congestion and as such their provision is important in encouraging modal shift to public transport”* and *“The analysis did not show a conclusive effect on transit times but did show a consistent marginal increase.”*

Thus Edinburgh's award-winning bus company clearly states the importance of the bus lane network and reports a *“consistent marginal increase”* in journey times – albeit not a large increase.

Unless the Council can show a major overall benefit to the city from this proposal – which the report patently fails to do – there should be no question of imposing even marginal disbenefit on Lothian Buses.

We also note that Prof David Begg (who introduced Edinburgh's Greenways bus network when he was Transport Convener, and is an expert on public transport) [has recently stated](#), *“When they 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 ten per cent every decade.”* He then warned against making the current experiment permanent *“or congestion will worsen, journey times will increase further and the council will lose out financially because its dividend from Lothian Buses will drop.”*

As a separate but related issue, parking in bus lanes needs effective enforcement. This is a major cause of delay for buses, whilst for cyclists it means moving out of the relative safety of the bus lane and into the main traffic stream – a manoeuvre with which regular cyclists are familiar but which is particularly daunting to the new cyclists that the council wishes to encourage. Possibly a proportion of the Council's dividend from Lothian Buses should be ring-fenced for additional enforcement.

## 2.5 Car issues

No evidence is presented in the report that the experiment has speeded up car trips or reduced congestion. Indeed, most cars have always stayed out of the bus lanes because of the potential delays resulting from occasional (or frequent) parked cars. 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 off-peak, the obvious solution for simplicity and consistency would be the 7-7-7 policy in section 1 above.

## 2.6 Sustainability impact

The report (para 8.3) states that the reduced bus lanes will cut carbon emissions, congestion and air pollution. No evidence is presented in the report that the experiment has achieved any of these ambitions.

Para 8.3 further states that Edinburgh aims for a transport system “*based on sustainable alternatives to the car.*” Yet this proposal worsens conditions for bus, walking and cycling, all in the name of (though without proof) improving conditions for the car.

## 2.7 Policy contradictions

Policies and statements in the Council's [Local Transport Strategy](#) include...

- ◆ **PubTrans1:** The Council will presume in favour of giving buses and Trams *priority over other motorised traffic*
- ◆ **PubTrans7:** The Council will continue to maintain the bus lane network, review it regularly and *extend* it or *enhance* it where opportunities arise
- ◆ **Walk1:** The Council will seek opportunities to improve pedestrian facilities
- ◆ **[9.2]:** The attractiveness of cycling is dependent on the degree to which the road network is dominated by motor vehicles.

Cutting weekday bus lane hours, and scrapping Saturday bus lanes, contradicts these policies.

## 2.8 Public objections

When the TRO to introduce the experiment was approved by the Committee in 2015, Spokes and Living Streets, for legal reasons, were not permitted to have a deputation. We were further disappointed that there was little discussion or consideration by that Committee of the [over 150 written objections](#), including from several community councils, Sustrans Scotland, Transform Scotland and the Scottish Association for Public Transport. In contrast there were no written submissions in support of the TRO.

## 2.9 Positive aspects

We support the proposal (3.29) in the report to consider cycle facilities within bus lanes – but there is nothing specific and no timescale, and in any case such measures would be less necessary if bus lane hours were not being cut. Furthermore, we would not want staff resources reduced on the Council's planned segregated cycleroutes if that were to be a consequence of this measure.

We do strongly support the proposal (3.30) to make the Calder Road bus lane 24-hour, specifically to encourage more cycle use. This proposal, of course, further reinforces the fact that making other bus lanes peak-hour-only is detrimental to encouraging more people to cycle.

In conclusion, we trust the Committee will consider our points carefully - specifically the recommendations in section 1 at the start of this letter

Yours sincerely

Dave du Feu, Spokes  
David Spaven, Living Streets Edinburgh  
Stuart Hay, Living Streets Scotland