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15.2.15

Dear Sir/Madam

ETRO/14/38B¹ Bus Lanes - Operational Hours Experimental Order **ETRO/14/38A² Bus Lanes - Permitted Vehicles Experimental Order**

We are writing on behalf of the undersigned organisations, which represent many walkers, cyclists and bus users, to object to the above Orders.

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1 <http://www.edinburgh.gov.uk/downloads/download/1060/etro1438b>

2 <http://www.edinburgh.gov.uk/downloads/download/1059/etro1438a>

BACKGROUND

The Council is succeeding in the excellent policies of its Local Transport Strategy, to increase walking, cycling and public transport use, whilst reducing car use. The recent census^{3,4} provided clear evidence of this success. Indeed Edinburgh is on the verge of overtaking Glasgow for the proportion of work trips made by public transport and, unique in Scotland, it has achieved a declining proportion of people who drive to work. Thanks in part to the Car Club, fostered by the city, Edinburgh is also the only Scottish Council to see a rising proportion of households not owning a car.

In this context it is surprising and disappointing that the Council now proposes to retreat on one of the policies which has led to these major and hard-won achievements, its bus lane network. We believe that this decision is a result of a narrow consultation that did not adequately engage key stakeholders or the affected public. Bus lanes are important not only for bus users but for cyclists (in the absence of segregated lanes) and for pedestrians on the footway. Furthermore this is at a time when Glasgow is consulting⁵ on strengthening its own bus network by converting peak hour bus lanes to all-day or even to 24/7, to provide consistent and reliable bus services. A current major Glasgow bus project⁶ has the specific objective to “*increase public transport priority relative to private cars.*”

THE PROPOSALS

Edinburgh proposes to rationalise all bus lanes into peak-hour only (with a few small exceptions such as contra-flow lanes where 24-hour operation is essential for safety reasons) effectively also scrapping Saturday bus lanes entirely; and also to allow motorbikes into the residual peak-hour bus lane network. A total of 22km of all-day bus lanes is affected by the peak-hour-only proposal.

The Committee report⁷ authorising the TROs justifies the proposed reduction of bus lane hours on the grounds [3.7] that all-day bus lanes offer “little” benefit to buses “under normal traffic conditions”, and that [4.2] motorists would find life easier if they knew that every bus lane (with a few exceptions) would be peak-hour only. **Shockingly, the report completely fails to discuss or even to mention the impact of the cutback in bus lane hours on pedestrians or cyclists.** The impact on cyclists of allowing motorbikes into bus lanes is briefly discussed [3.21 on].

The report states that the proposals are the result of “a consultative review” [1.1.1]. In our view there has not been an adequate “consultative review” and certainly nothing on the lines of the very transparent current Glasgow consultative review [referenced above]. Unlike Glasgow’s consultation on changing hours of operation, a letter⁸ and survey⁹ in March 2014, to which we responded¹⁰, gave no indication that a major cutback in bus lane hours was an option being considered.

It may be argued that the present proposal is an “experiment” which can be discontinued if not successful. If an experiment is to be undertaken, it should be on the basis of advancing the Council’s Local Transport Strategy objectives on public transport, walking and cycling, not retreating from them. For example, an experiment rationalising bus lanes such that they all become all-day.

3 http://www.spokes.org.uk/wordpress/wp-content/uploads/2014/01/1401-Census-Edinburgh-travel-analysis-PIB_No_1_Jan_14.pdf

4 http://www.spokes.org.uk/wordpress/wp-content/uploads/2014/01/1401-Census_2011-Edinburgh-fullrpt-Transport_and_travel.pdf

5 <http://www.heraldscotland.com/news/transport/glasgow-drivers-face-24-hour-ban-from-all-bus-lanes.116309351>

6 <https://www.glasgow.gov.uk/councillorsandcommittees/submissiondocuments.asp?submissionid=73217>

7 http://www.edinburgh.gov.uk/download/meetings/id/44353/item_72_-_bus_lane_network_review

8 <http://www.spokes.org.uk/wordpress/wp-content/uploads/2009/03/Letter-97913OUTn-21Mar14.pdf>

9 <http://www.spokes.org.uk/wordpress/wp-content/uploads/2009/03/Bus-lane-User-Annual-Survey-21-March-14.xlsx>

10 <http://www.spokes.org.uk/wordpress/wp-content/uploads/2009/03/1404-CEC-Bus-lane-survey-response.pdf>

WHY THE ORDERS SHOULD BE REJECTED

- The proposal to downgrade bus lane hours sits very uneasily with policies in the Council's *Local Transport Strategy*¹¹, and arguably directly contradicts it. The Committee report quotes the LTS but does not attempt to reconcile its peak-hour-only proposals with the clear LTS policies to *prioritise* buses and where possible *enhance* bus lanes.
 - ◆ **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.

- The Local Transport Strategy begins its **Cycling** section [9.2] with a very perceptive sentence, “*The attractiveness of cycling is dependent on the degree to which the road network is dominated by moving or parked motor vehicles.*” Until we have segregated cycle facilities on arterial roads, bus lanes provide a wide area of roadspace in which this “domination by moving or parked vehicles” is significantly reduced. Peak hour bus lanes are very valuable for cycle commuters. However, off-peak lanes are just as valuable when using a bike for **shopping, school travel**, and the **multitude of other off-peak journey types**. Many of these trips are by the **less confident type of cyclist**, who is understandably deterred by the constant presence of cars and lorries rather than just the occasional (and well-trained) Lothian Buses driver. A council with a target of 10% of **all trips** by bike in 2020 (not just commuting trips) should not be removing this facility – or, at least, not until segregated cycling provision is made.

- The Local Transport Strategy begins its **walking** section with policy Walk1, “*The Council will seek opportunities to improve pedestrian facilities...*” Nowhere is there any policy to downgrade pedestrian facilities, yet that is exactly what this proposal will do for *22 kilometres of footway* along Edinburgh arterial roads, by bringing lorries and cars adjacent to the pavement throughout the off-peak day and all day Saturdays, when currently they are separated from the footway by the bus lane. Motor vehicles immediately adjacent to the footway mean increased pollution [see next para], noise, splashing, scariness and, on occasions, danger. We recall that the first response received by the Council after the installation of its first ever cycle lane was not from a cyclist but from a pedestrian who said how much nicer it was pushing her pram along with no more splashing from lorries on wet days (and of course a bus lane gives even more protection). We also highlight the fact that the Council's plan to abolish off-peak bus lanes will particularly hit **school children on their way home** as well as families out walking to the shops or the park on Saturdays.

- Edinburgh City Council faces continued problems over toxic air pollution, with several roads continuing to exceed Scottish air quality standards which should have been achieved by the end of 2005, and with estimates by *Health Protection Scotland* of 200 premature deaths a year as a result¹². Given that pollution (as also noise pollution) declines rapidly with distance, bus lanes are likely to reduce the pollutants breathed in by walkers and, to a lesser extent, cyclists using the bus lanes. Whilst we have not found any studies which assess the effect of a gap of 3m-4m (a typical bus lane width) a paper by Brugge et al¹³ states “*recent studies have shown that sharp pollutant gradients exist near highways*” and reports that particle concentrations decreased 5-fold within just 30m of a roadway. Figure 1 in that paper¹⁴ shows an extremely rapid decline in certain particle concentrations with distance. Is it really worth taking this risk for so little benefit? Allowing lorries and cars into the bus lanes just at the times when children are most likely to be using the footways seems a highly retrograde decision.

11 http://www.edinburgh.gov.uk/download/downloads/id/3525/local_transport_strategy

12 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/332854/PHE_CRCE_010.pdf

13 <http://www.ehjournal.net/content/6/1/23>

14 <http://www.ehjournal.net/content/6/1/23/figure/F1>

- The Council also proposes to allow **motorcycles** in bus lanes (at all times). This is likely to reduce the attractiveness of bus lanes for cycling, thus cutting use, contrary to the Council's policies and targets. Reports of a London trial¹⁵ show no clear impact on pedestrian or cyclist casualties, but show a significant rise in motorcyclist injuries, in motorcyclist speeds, and in motorcycles exceeding the speed limit. After a period of enforcement, a further survey¹⁶ showed some improvements, but 40%-60% still exceeded speed limits. These concerns over speeding are heightened by the responses to Edinburgh's own 20mph consultation¹⁷, in which every identified grouping, including car users, supported the plan, apart from motorcyclists, who opposed it by three to one. A further London study showed motorcycle emission reductions¹⁸ when bus lane use is permitted, but at under 1% for small machines, and no more than 10% for large.
- **Consultation** in advance of the Traffic Orders has been seriously inadequate. It would appear from the above-mentioned August Council report that the "review" which led to this proposal consisted of little more than monitoring lanes for off-peak bus delays (and even then only "under normal traffic conditions"). There is no mention whatsoever of consulting affected bus users, walkers or cyclists. Yet, for example, schools near the affected roads may have major concerns if more lorries and cars are to be allowed right next to footways, instead of being separated by a bus lane, at the very time when kids are walking home. Parents taking the pushchair out to the shops or the park in the afternoon may too have concerns about greater pollution, splashing and noise.

Wide public consultation was not undertaken for the proposals. Yet rationalising bus lane hours to peak-time only is a major policy change and a clear departure from the Council's Local Transport Strategy. In contrast relevant sections of the public *were* consulted on other major transport innovations, such as the 20mph plans, school streets, Leith Walk, the city centre, and so on.

- **Monitoring of the experiment**, however well designed, can not be conclusive, and certainly not over just a 9-month period (the length of time before a decision will be taken on permanent Orders) or even an 18-month period. Of course, monitoring can come up with the obvious counts showing whether buses have been delayed, or whether speed limits are broken more often. But decisions made on such data will miss the more subtle but perhaps more significant effects of the bus lane hours cutback. For example, how will the monitoring identify any long-term trend if some motorists gradually adapt to the change and use car instead of bus when travelling off-peak? Will it identify any long-term trend as people who might have tried using a bike do not do so in future because the bus lanes are trafficked throughout the day? Does the monitoring assess whether toxic pollutants are higher on the footway when more traffic is immediately adjacent?
- The proposals impact seriously on **Leith Walk**. They are contrary to the design principles applied as part of the Leith Programme, and also contrary to the priorities identified in local consultation¹⁹. Furthermore, the Council has received considerable external funding from the Scottish Government in order to create "exemplar" active travel infrastructure on this street. These proposals will partially undermine this investment, and thereby lessen the Council's chances of obtaining similar funding in future schemes.
- Finally, the proposals give exactly the wrong message as to **the direction in which the Council wishes the city to develop**. The LTS has truly dramatic targets to *reduce* car use – from 43% of all trips (i.e. including off-peak) in 2010 to 31% in 2020. The current proposal, to reduce bus priority in favour of car convenience, gives the opposite message to the public and, indeed, may bring negative modal shift by making off-peak car trips more convenient. Yet off-peak is the very time when Lothian Buses need maximum patronage to enhance financial efficiency.

15 <https://www.tfl.gov.uk/cdn/static/cms/documents/motorcycles-in-bus-lanes-full-report.pdf>

16 <https://www.tfl.gov.uk/assets/downloads/motorcycles-in-bus-lanes-report.pdf>

17 http://www.edinburgh.gov.uk/download/meetings/id/45788/item_72_-_delivering_the_its_2014-2019_-_20mph_speed_limit_roll_out_-_proposed_network

18 <https://www.tfl.gov.uk/cdn/static/cms/documents/pt-emissions-study.pdf>

19 <https://docs.google.com/document/d/12puRvMx6ogHvXVTOE1UbrzFtF8vznSZZTGIDA8HSn80/edit>

OUR REQUEST

We have to wonder what is the motivation for the proposals. The contradiction with Council policies, the many potential negatives, and the decision not to consult widely in advance - all for a relatively small benefit for a transport mode which, in any case, the Council wishes to reduce in favour of sustainable modes!

The current experimental draft Orders should not be taken forward and instead the Council should experiment with rationalising all bus lanes to all-day operation, to support not only consistent and reliable bus services but also cycling and walking. This supports, rather than contradicts, Local Transport Strategy objectives and is consistent with its policies to prioritise buses over other motorised traffic and to enhance the bus lane network.

If the Council is still minded to pursue this course, then a full and transparent public consultation should first be undertaken - and with a full set of options, namely 24/7 lanes, all-day lanes, and peak-hour only, as in Glasgow's consultation. Clearly the consultation should not just be limited to buses, cars and lorries, but should also include full consideration of the role of bus lanes in relation to walking and cycling.

We trust the Committee will look carefully at our arguments and not go ahead with the proposed Order.

Yours Sincerely

Dave du Feu, Lead Organiser, **Spokes**

Stuart Hay, Head, **Living Streets Scotland**

David Spaven, Convenor, **Living Streets Edinburgh**

Jeremy Darot, Charlotte Encombe, Matt Roy, Charles Dundas, Trustees, **Greener Leith**

Emilia Hanna, Air Pollution Campaign, **Friends of the Earth Scotland**

