

22.5.15

## **Briefing Paper: CEC Proposals to Rationalise Bus Lane hours to Peak Only**

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### **1. Introduction**

Edinburgh City Council proposes to rationalise all bus lanes to peak-hour only, Monday-Friday only, and also to allow motorcycles into bus lanes – both of these as 18-month experiments with a view to becoming permanent. A decision on the TROs<sup>i,ii</sup> which would allow the experiment is expected at the Transport Committee on 2 June 2015.

*We urge Councillors to decide as follows at the Committee ...*

- ◆ **Postpone a decision for further consideration of the options, and ...**
- ◆ **If it is still felt that rationalising bus-lane times is important, then first consult the public properly on all the options, as Glasgow has recently done, rather than moving straight to implementing (as a lengthy experiment) just one option.**

**Spokes**, together with **Living Streets** (who seek streets welcoming to pedestrians as well as cycling), **Greener Leith** and **FOE (Scotland)**, have submitted a detailed objection<sup>iii</sup> to the draft orders. We understand that many individuals have also objected.

Since our objection was drawn up there have been various developments, most notably Glasgow City Council's '**7-7-7' decision**<sup>iv</sup>, which followed much wider consultation than was undertaken by Edinburgh. Glasgow has decided to rationalise its bus lane hours to all operate 7am-7pm, 7 days a week.

Whilst our above formal objection concentrates on the practical impacts on pedestrians and cyclists of the Council's currently preferred option, this briefing paper concentrates on policy and political aspects and recent developments. Please refer to the formal objection for comments on the practical impacts.

## 2. Contradicting the Council's own Local Transport Strategy<sup>v</sup>

LTS policies and statements 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.

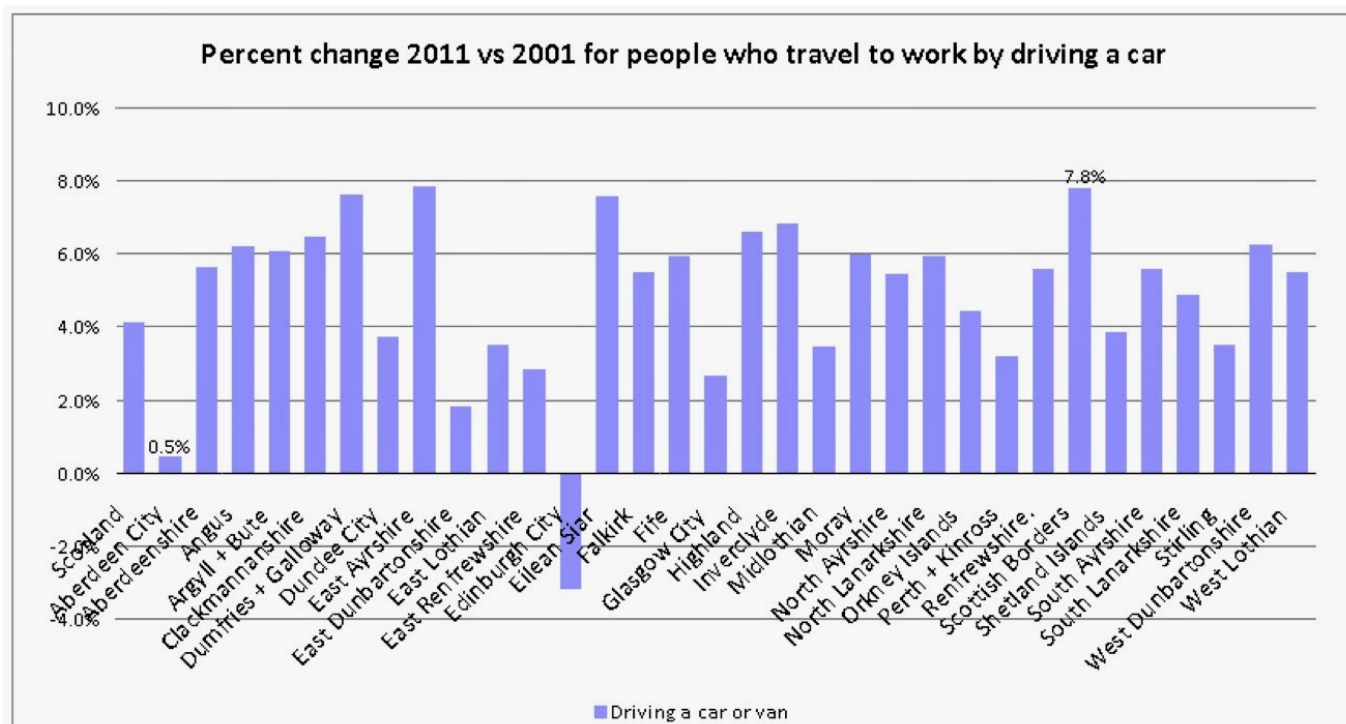
The proposal to cut bus lane hours, and scrap bus lanes on Saturdays, is hardly giving buses priority over other traffic [**PubTrans1**].

The Committee report of 26 August 2014<sup>vi</sup> which gives the go-ahead to draw up the draft TROs rightly quotes LTS policy **PubTrans7**, to *enhance* the City's bus lane network - but it makes no attempt to reconcile that policy with the report's proposals which clearly *de-enhance* the bus network and do the opposite of *extending* it, by scrapping Saturday bus lanes altogether.

Clearly *pedestrian* facilities are not being improved [**Walk1**] by allowing lorries and cars next to the footway throughout the day, including when parents are collecting young children from playgroup and school. Nor will *cycling* be made more attractive [**LTS 9.2**] by increasing the area of roadway available to motor traffic.

## 3. Giving the wrong message

The Council has LTS targets not just to increase bus, walking and cycle use but, in parallel, to reduce car trips. These targets are very ambitious – for example to cut car use from 43% of all trips in 2010 to just 31% in 2020. Against national trends, **Edinburgh is succeeding**, as was shown by the census figures<sup>vii</sup>, some of which are highlighted in the following dramatic graph.



Already by 2009, 57% of all Edinburgh trips were by sustainable modes. Our own Spokes bi-annual traffic counts show this trend continuing – indeed, our latest count<sup>viii</sup> in May 2015 found car use down at all 4 of our count points (and cycle use up at 3 of the 4).

Why put this success at risk by expanding car use opportunities and making travel less pleasant for walking and cycling?

**Edinburgh's citizens** understand the thrust of the Council's overall Transport Strategy and are helping make these changes happen, in response to the changing opportunities and conditions provided by the Council. Major Council consultations such as on the LTS and 20mph also suggest that the majority of the population support this direction of travel. If the Council now expands road capacity for private motor traffic, this will be giving a wrong and contradictory message to its citizens.

Furthermore, **other local authorities** look to Edinburgh as an exemplar in public transport and in the shift to sustainable and active transport. Cutting back on bus lane hours, in contradiction to the Council's own LTS, puts this reputation at risk. Glasgow proudly states that its 7-7-7 decision was taken “*in the context of Council policies*” such as its objective to “*increase public transport priority relative to cars.*” **Edinburgh too needs consistency between policy and practice if it is to maintain its reputation.**

## 4. Failure of consultation

Edinburgh knows how to consult the public on transport proposals. The Council has an excellent record – no one could reasonably fault the consultations on the likes of school streets, 20mph or George Street.

It therefore greatly puzzles us that this proposal to drastically cut back weekday bus lane hours and to scrap Saturday bus lanes altogether, a significant policy change affecting pedestrians and cyclists in particular, was not considered for a public consultation of options. Instead the Council decided, with a very low level of consultation, to go ahead with one particular option of its own choosing.

### 4.1 The Edinburgh consultation

- (a) Organisations like Spokes were sent an 'annual bus lane survey' in April 2014. The **covering letter**<sup>ix</sup> explained that the Council was considering allowing other types of vehicle to use bus lanes, but *did not mention any proposal to alter bus lane hours*.
- (b) The '**annual survey**' itself<sup>x</sup> covered a wide range of matters such as satisfaction with bus lane road surfaces, overhanging vegetation, etc, with two of the 16 questions being whether bus lane times give 'adequate priority.' If anything this wording suggests the Council might be contemplating extending the hours to increase priority, but in any case the covering letter did not mention proposed changes – however, we did respond briefly, saying bus lane hours should be extended.
- (c) The proposal was discussed in a workshop at the Council Transport Forum (24.4.14) but **was not taken to the Cycle Forum**. The minute does not suggest any consensus other than a desire to make hours easier to understand, and the need for 'evidence.' The minute also suggests introducing bus lanes 7-days a week, which would imply extending weekend hours rather than scrapping them. At the next Transport Forum (28.8.14) a proposal for peak-only was put forward. Whilst that minute records support, it says that the “busiest 10%” of bus lanes would remain all-day, and it asks for additional bus lanes to be investigated and, again, for more weekend times. However, the draft TRO does not incorporate any of these requested enhancements – it enables the cuts in weekday bus lane hours and, rather than enhancing weekend bus lanes, it scraps them.

- (d) The above **report to the 26.8.14 Transport Committee** states that a 'consultative review' of the bus lane network had been undertaken - presumably the survey in (b) above. The report comments at some length on the responses received in the survey from Spokes and others about allowing other vehicles into bus lanes. However **the report does not mention the survey question on whether bus lane times are adequate, and the responses to that question. Indeed, the section of the report dealing with bus lane hours does not even refer to pedestrians or cyclists. It is as if the Council believed that pedestrians and cyclists were irrelevant to this decision.**
- (e) It was only at around this point in time that Spokes began to fully appreciate what was happening. Even then we did not realise that bus lanes were to be scrapped on Saturdays until we met a council officer to discuss the proposals in more detail - nowhere in the report is this explicitly stated; it has to be deduced from the definition of 'peak period'. Contact with Living Streets, Transform Scotland and others made it clear that we were not alone, and the subsequent growing concern resulted in many individuals lodging detailed objections to the draft TRO.
- (f) The bus lane proposals were not on the advance agenda for the next Cycle Forum, 10.2.15, so Spokes asked for this to be added. **Aa a result, an officer attended to give the Council's case, but no questions or debate were allowed.** It was stated that this was a legal necessity due to the current stage of the TRO process. Be that as it may, we recall no other occasion when debate on a controversial topic has been refused. Thus the Cycle Forum has never discussed this proposal which clearly impacts on cycling; and nor has the new Walking Forum had the opportunity.

#### 4.2 The Glasgow City Council contrast

In contrast Glasgow, which also wished to rationalise bus lane hours, identified three options: peak-only, 7-7-7, or 24/7, and consulted on them, before deciding which to adopt [footnote iv below].

**We note that Glasgow's consultation results pointed strongly to either 24/7 or 7-7-7, not peak-only, and the Council decided to adopt 7-7-7 (subject to TRO processes). This must surely cast grave doubt on Edinburgh's decision to go ahead with peak-only without presenting and consulting on the options. The weight of serious objections to Edinburgh's draft TRO adds to this doubt.**

### 5. Practical impacts on pedestrians and cyclists

This is covered in our formal combined objection to the draft TROs [footnote iii below] and so will not be repeated here.

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- i ETRO/14/38B Bus Lanes - Operational Hours Experimental Order  
<http://www.edinburgh.gov.uk/downloads/download/1060/etro1438b>
  - ii ETRO/14/38A Bus Lanes - Permitted Vehicles Experimental Order  
<http://www.edinburgh.gov.uk/downloads/download/1059/etro1438a>
  - iii Combined objection to the TROs by Spokes, Living Streets Scotland, Greener Leith, Friends of the Earth Scotland  
<http://www.spokes.org.uk/wp-content/uploads/2015/02/1501-Bus-lane-TROs-objection-v5-final.pdf>
  - iv Glasgow City Council 7-7-7 bus lane decision  
<https://www.glasgow.gov.uk/councillorsandcommittees/submissiondocuments.asp?submissionid=73931>
  - v Local Transport Strategy - [http://www.edinburgh.gov.uk/download/downloads/id/3525/local\\_transport\\_strategy](http://www.edinburgh.gov.uk/download/downloads/id/3525/local_transport_strategy)
  - vi CEC Transport Committee report 26.8.14, giving go-ahead to prepare the TROs  
[http://www.edinburgh.gov.uk/download/meetings/id/44353/item\\_72\\_-\\_bus\\_lane\\_network\\_review](http://www.edinburgh.gov.uk/download/meetings/id/44353/item_72_-_bus_lane_network_review)
  - vii 2011 census – Edinburgh transport data - <http://www.spokes.org.uk/documents/technical-and-research/census-data/>
  - viii Spokes May 2015 traffic count - <http://www.spokes.org.uk/2015/05/traffic-count-bikes-highest-ever/>
  - ix Bus lane 'annual survey' covering letter, March 2014  
<http://www.spokes.org.uk/wordpress/wp-content/uploads/2009/03/Letter-97913OUTn-21Mar14.pdf>
  - x Bus lane 'annual survey' questionnaire, March 2014  
<http://www.spokes.org.uk/wordpress/wp-content/uploads/2009/03/Bus-lane-User-Annual-Survey-21-March-14.xlsx>