

Transport and Environment Committee

10.00am, Tuesday, 2 June 2015

Bus Lane Network Review - Objections to the Experimental Traffic Regulation Orders

Item number	7.3
Report number	
Executive/routine	Executive
Wards	Citywide

Executive summary

The primary purpose of bus lanes is to provide journey time reliability and time savings for buses by allowing them to bypass congestion during busy traffic periods. This increases the attractiveness of travelling by bus, compared to taking the car.

The main users of the bus lane network are bus passengers and in 2014 Lothian Buses carried 118.4 million bus passengers, an increase of 3 million over the previous year's figure.

From the late 1990s, a corridor approach was taken towards the development of the bus lane network. The first corridors were the five Greenways routes, all of which were all day bus lanes (7.30am to 6.30pm, Monday to Friday and 8.30am to 6.30pm, Saturday), except for the section of the A8 corridor west of Shandwick Place. Virtually all bus lanes introduced since then, except for the Fastlink (Gyle to West Approach Road) corridor, are peak period bus lanes; (7.30am to 9.30am and 4.00pm to 6.30pm, Monday to Friday). Peak period bus lanes currently make up approximately 60% of the total bus lane network.

Links

Coalition pledges	P19
Council outcomes	CO22
Single Outcome Agreement	SO4

The Council states in its Local Transport Strategy that it will regularly review the bus lane network. In June 2013, the Transport and Environment Committee noted that a bus lane network review was in progress and that part of its remit was to review the existing bus lane operational hours and the permitted vehicles classes that are allowed to use bus lanes.

In April 2014, a presentation on the Bus Lane Network Review was given to the Council's Transport Forum. After the presentation, a workshop was held to discuss all day bus lanes and whether other vehicle classes should be allowed to use bus lanes.

On 26 August 2014, Committee approved the promotion of two 18 month Experimental Traffic Regulation Orders (ETROs) to undertake a trial of standardising bus lane operating hours, by changing all day bus lanes into peak periods bus lanes. It was also agreed, on a trial basis, that motorcycles be permitted to use with-flow bus lanes.

This report details the objections received to the advertisement of the two ETROs and the proposed Council's comments in response. It recommends that the objections be set aside and that the Orders are made.

If the Committee sets aside the objections, the trials will commence in June 2015. Before and after surveys will be undertaken as part of the trials to monitor the impact of the changes on different bus lane user groups.

An assessment of the trials will be undertaken after nine months. If one or both of the trials are deemed to be successful, this will allow time for more consultation to take place with organisations representing bus lane users before any future decision is taken with regard to making any of the changes permanent.

Bus Lane Network Review - Objections to the Experimental Traffic Regulation Orders

Recommendations

- 1.1 It is recommended that Committee:
 - 1.1.1 notes the objections received to the two advertised Experimental Traffic Regulation Orders and the Council's comments in response;
 - 1.1.2 sets aside the objections and gives approval to make Experimental Traffic Regulation Order ETRO/14/38B to change all day bus lanes into peak periods bus lanes, on a trial basis;
 - 1.1.3 notes that there was an error with the advertisement of ETRO/14/38B and that an amendment to correct this was subsequently advertised as ETRO/14/38B(i). This amendment will be incorporated into ETRO/14/38B;
 - 1.1.4 sets aside the objections and gives approval to make Experimental Traffic Regulation Order ETRO/14/38A to permit motorcycles to use with-flow bus lanes during their operational hours, on a trial basis;
 - 1.1.5 notes that the trials will not make any changes to existing waiting or loading restrictions within bus lanes;
 - 1.1.6 notes that before and after surveys will be undertaken and used to inform the evaluation of the two trials;
 - 1.1.7 notes that consultation with stakeholders will continue throughout the trials;
 - 1.1.8 notes that the findings of the before and after surveys will be discussed with organisations representing bus lane users before they are reported to Committee; and
 - 1.1.9 notes that the results of the trials will be reported to the Committee in Autumn 2016.

Background

- 2.1 The introduction of bus lane camera enforcement in 2012 generated widespread feedback. A number of issues that required further consideration were raised by this process, one of which was that there was widespread confusion over the operating hours of different bus lanes throughout the city.

- 2.2 It was therefore decided to undertake a review of the city's bus lane network and consider possible measures to address the various issues that had been identified. A report to the Transport and Environmental Committee on 4 June 2013 noted that a bus lane network review was being undertaken and that this would include a review of bus lane operational hours and the vehicle classes that are allowed to use bus lanes.
- 2.3 As part of the bus lane review, a variety of organisations representing bus lane users were asked to provide their views regarding bus lane hours and allowing motorcycles and Private Hire Cars into bus lanes. Bus operators, taxi operators, cycling organisations, including SPOKES, and the police were asked to contribute to this survey.
- 2.4 On 26 August 2014, Committee approved the promotion of two 18 month Experimental Traffic Regulation Orders (ETROs) to trial:
- standardising bus lane operating hours, by changing all day bus lanes into peak periods bus lanes; and
 - permitting motorcycles to use with-flow bus lanes during their operational hours.
- 2.5 Around one third of the city's total bus lane network (22km of a total network of 65km) will be affected by the trial to change bus lane operating hours. All bus lanes, except 24 hour bus lanes and bus gates, will be affected by the motorcycle trial. The bus lanes affected by both trials are listed in Appendix 1.

Main report

Advertising of the ETROs and Objections Received

- 3.1 Two ETROs, relating to the above trials, were advertised between 26 January and 18 February 2015:
- ETRO/14/38B - changing all day bus lanes (7.30am–6.30pm, Monday to Friday and 8.30am–6.30pm Saturday) into peak periods bus lanes (7.30am-9.30am and 4.00pm-6.30pm, Monday to Friday); and
 - ETRO/14/38A - permitting motorcycles to use with-flow bus lanes.
- 3.2 Due to an administrative error in ETRO/14/38B, relating to the title and operating times for Great Junction Street and North Junction Street, this part of the ETRO was re-advertised as ERT0/14/38B(i) between 20 February and 13 March 2015. The amendment to correct the error will be incorporated into TRO/14/38B, should Committee give its approval to make the Order.

- 3.3 151 objections were received; 129 joint objections to both ETROs 16 objections to ETRO/14/38B and six objections to ETRO/14/38A. Details of a joint objection received from stakeholder organisations is given in Appendix 2 and the comments in response to it are given in Appendix 3. Details of the remaining objections and the comments in response to these objections are given in Appendices 4 to 6.
- 3.4 Some elected members forwarded correspondence that had been sent to them by their constituents objecting to the ETROs/proposals. These have also been included as objections.

Main Issues Raised in Objections

- 3.5 There are five main issues raised in the objections to the ETROs and details are given below:

Impact on cyclists

- 3.6 Objectors raise a number of concerns relating to the trials' potential impact on cycling and cyclists; including safety concerns and reduced amenity, which will discourage people from cycling.
- 3.7 Concerns relating to safety arise from the potential for cyclists to have to interact with general traffic during the interpeak period and on Saturdays in bus lanes that currently operate all day (around one third of the bus lane network) and with motorcyclists in all bus lanes.
- 3.8 The trial to change all day bus lanes into peak periods bus lanes will replicate the road conditions that are currently experienced by cyclists in the existing peak periods bus lane corridors (approximately 60% of the bus lane network). The Council will monitor road traffic collisions throughout the trials to ensure that any serious concerns over the safety of cyclists, or any other user groups, are identified and addressed quickly.
- 3.9 An initial analysis of the last five years of complete data (2009 to 2013) showed that in the interpeak period and on Saturdays there was no significant difference in the number or severity of accidents involving cyclists between all day bus lanes and peak periods bus lanes.
- 3.10 The recommendation to allow motorcycles into bus lanes on a trial basis is based on a review of the conclusions from Transport for London's (TfL) two extensive trials. Following these trials, TfL decided to give motorcycles permanent access to the majority of the Capital's red routes. TfL states on its website that 'the safety of motorcyclists and other vulnerable road users is unaffected' and 'benefits include reduced journey times for motorcyclists and less carbon dioxide emissions'.

- 3.11 In addition to London, the following cities also allow or partially allow motorcycles to use bus lanes: Bath, Bedford, Belfast, Birmingham, Colchester, Derby, Hull, Leicester, Newcastle, Plymouth, Reading, Sheffield, Sunderland and Swindon.
- 3.12 The Council accepts that during the trials there will be some loss of amenity for cyclists, as there will be an increased level of interaction with general traffic within bus lanes.
- 3.13 The Council will undertake before and after cycle surveys to ascertain if there is any significant change in cycling levels during the trials. Opinion surveys will also be undertaken to record cyclists' views on the impact of the changes.

Impact on air quality

- 3.14 Objectors raise two concerns relating to the trials' potential impact on air quality:-
- That they will lead to an overall decrease in air quality, as objectors believe that traffic levels will increase along the affected corridors; and
 - That they will lead to an increase in the levels of exhaust pollution experienced by pedestrians, as more traffic will use bus lanes and therefore be closer to pedestrians.
- 3.15 The Council believes there will not be a significant increase in either overall air pollution levels along the affected corridors or exhaust pollution experienced by pedestrians.
- 3.16 This belief is based on the following rationale:-
- Initial interpeak surveys, undertaken in 2014 of all day bus lanes, showed that general traffic in the adjacent lane was generally flowing freely at most locations and therefore there is little advantage to be gained by general traffic from using the bus lane in preference to the adjacent traffic lane.
 - It is therefore reasonable to expect a considerable proportion of general traffic to continue to use the general traffic lane, rather than the bus lane. This behaviour can currently be commonly seen at existing peak periods bus lanes outwith their hours of operation.
 - Interpeak loading and parking bays at a number of locations along the affected corridors, especially in the city centre and local shopping areas will also discourage general traffic from using the bus lanes.
 - There are large stretches (approximately 7 km) of the affected bus lanes where the footway is not directly next to the roadside, eg A71 Calder Road and the West Approach Road.
- 3.17 Before and after traffic volume and speed surveys will be undertaken at a number of locations on affected corridors and also on two corridors not involved in the trial, to provide control results for comparison. These will provide data from which vehicle emissions can be calculated and will determine whether the trials have resulted in a significant impact on air quality.

Impact on modal shift

- 3.18 Objectors raise concerns that the proposals will discourage the use of public transport, increase car usage and discourage cycling. The Council believes that the trials will not significantly impact on modal shift. While bus lanes do offer significant benefits to bus operators and users, these mainly relate to journeys undertaken during the peak periods. As previously explained, allowing general traffic to use bus lanes in interpeak periods is unlikely to introduce any significant disbenefit to buses as traffic is generally free flowing anyway. It will not therefore increase the attractiveness of using the private car instead of public transport or active travel.
- 3.19 Before and after traffic volume surveys will be used to determine whether the trials have an impact on travel modes on affected corridors.

Contrary to Council's Local Transport Strategy

- 3.20 Some objectors contend that the trial to change all day bus lanes to peak periods bus lanes would be contrary to the Council's Local Transport Strategy, in particular the following two stated Policies:
- PubTrans1: The Council will presume in favour of giving buses and trams priority over other motorised traffic; and
 - PubTrans7: The Council will continue to maintain the bus lane network, review it regularly and extend it or enhance it where opportunities arise.
- 3.21 The Council undertook a review of the bus lane network in 2014, which included a review of bus lane operational hours. Surveys undertaken as part of the review indicated that all day bus lanes offered little additional operational benefit to buses, compared to peak periods lanes.
- 3.22 However, observations could only be carried out on a small percentage of the city's 65km bus lane network and on a limited number of occasions. It was therefore decided to recommend a trial, which would allow a more comprehensive and robust analysis of the impacts of this proposed change on all user groups to be undertaken prior to making any decision to introduce permanent changes.
- 3.23 The trials will be monitored throughout their operation and, if at any stage serious concerns regarding safety or impact on bus or tram operations emerge, they can be abandoned at short notice.
- 3.24 It should be noted that neither the city's tram operator nor any of the bus operators objected to the ETROs.

Lack of public consultation

- 3.25 Objectors contend that there was a lack of public consultation in advance of Committee approving the promotion of the ETROs.

- 3.26 A report to Committee, in June 2013, noted that a bus lane network review would be undertaken, which would include reviewing existing bus lane operational hours and the vehicle classes that are allowed to use bus lanes.
- 3.27 As part of this review, a variety of organisations representing bus lane users were asked to provide their views regarding bus lane hours and allowing motorcycles and Private Hire Cars into bus lanes. Bus operators, taxi operators, cycling organisations, including SPOKES, and the police were asked to contribute to this survey.
- 3.28 In April 2014, a presentation on the Bus Lane Network Review was given to the Council's Transport Forum. After the presentation, a workshop was held to discuss all day bus lanes and whether other vehicle classes should be allowed to use bus lanes.
- 3.29 At its meeting on 26 August 2014, Committee approved the promotion of the two ETROs necessary to trial the proposals. The ETRO process involves consultation with statutory bodies and public advertisement of the draft proposals. This allows for objections to the proposals to be submitted by stakeholders and the public and for these to be considered by Committee, prior to it making a decision on whether to proceed with the trials.
- 3.30 The trials will allow data to be collected so that the impact of the proposals can be determined. Further consultation will then take place with major stakeholder groups on the results of the trials before they are reported to Committee in Autumn 2016.
- 3.31 If the trials are deemed to be successful, permanent Traffic Regulation Orders would be required. This would provide a further opportunity for stakeholders and the public to comment or object.

Other issues raised in the Objections

- 3.32 Details of other issues raised by Objectors and the comments in response can be found in Appendices 2 to 6.

Monitoring of the trials

- 3.33 The effects of the trials on all bus lane user groups will be monitored. One of the main tools for this will be a series of before and after surveys, which are being designed in consultation with organisations representing bus lane users, including SPOKES, to ensure that they are appropriate to measure potential impacts.
- 3.34 Before and after surveys will be undertaken to measure bus journey times, traffic volumes (including changes in lane activity), traffic speeds, collision data, cycling surveys, pedestrian surveys, air quality analysis, and legal/illegal parking in bus lanes.

- 3.35 Off-peak parking and loading is currently permitted in all day bus lanes at a number of locations along the A702 (Lothian Road to Bruntsfield Place), Dalry Road, Gorgie Road and Lanark Road and the trials will make no change to this arrangement.
- 3.36 The surveys will also collect qualitative data on the effects of the changes (eg various user group opinion surveys). The Council is liaising with user groups, including SPOKES, with regard to the scope and design of the surveys.
- 3.37 The trials will allow a review of the appropriateness of the current peak periods bands ie 7.30am to 9.30am and 4.00pm to 6.30pm, Monday to Friday to be undertaken. They will also provide information regarding the interpeak and Saturday operation of buses on existing peak periods bus lanes.

Anticipated timeline

- 3.38 An assessment of the trials will be undertaken after they have run for nine months. If one or both of the trials are deemed to be successful, this will allow time for more consultation with organisations representing bus lane users before any decision is taken on making any of the changes permanent.
- 3.39 If Committee approves the making of the ETROs, the trials are scheduled to commence in September 2015. Nine months of trial data will be collected and these results, along with the 'before' data, will be reported to Committee in Autumn 2016. There is a time lag of several months before the Council receives road collision data from Police Scotland.
- 3.40 Further consultation with major user groups will be undertaken before the trial results are reported to Committee in Autumn 2016.
- 3.41 Should Committee decide in Autumn 2016 that it wishes to make any of the changes permanent, further Traffic Regulation Order processes would be required.

Measures of success

- 4.1 The trials will produce evidence that will allow decisions to be taken on the future operation of the city's bus lane network, taking account of the actual impact of these changes on all bus lane user groups.

Financial impact

- 5.1 The estimated costs associated with these proposals are, £250 to make the ETROs, £45,000 for signage, £20,000 for surveys and £11,000 for the media campaign. These costs will be funded from current bus lane Penalty Charge Notices' revenue.

- 5.2 Currently there are two bus lane cameras, operating in all-day bus lanes, on the A71 Calder Road. It is estimated that the change to peak periods operation would result in an annual reduction of up to 4,300 bus lane Penalty Charge Notices issued, with a potential reduction in income of up to £65,000 in the remaining six months of this financial year.
- 5.3 If either or both of the trials are unsuccessful, there will be additional costs to change the bus lane signs back to their current configuration.
- 5.4 It should be noted that the Council is currently assessing the need for bus lane camera enforcement at a number of additional sites throughout the city. Details of this assessment will be reported to a future Committee.

Risk, policy, compliance and governance impact

- 6.1 Some objectors have suggested that one of the trials conflicts with the Local Transport Strategy's Policies PubTrans1 and PubTrans7. It is suggested that the recommendations of this report do not conflict with these policies (refer to paragraph 3.20 to 3.24 of this report).
- 6.2 There are not expected to be any health and safety, governance or compliance implications arising from the proposals set out in the report.

Equalities impact

- 7.1 The bus lane trial will affect cyclists, by reducing the amenity provided by bus lanes. SPOKES have been consulted with regard to the design of some of the before and after surveys. SPOKES will be consulted, regarding any proposals to permanently make all-day bus lanes into peak periods bus lanes.
- 7.2 An objective of the Active Travel Plan is to increase the number of people with disabilities, age infirmities and young children to cycle and walk, more often and more safely and comfortably and therefore it has been identified that a robust ERIA will require to be undertaken during the implementation and throughout the trial period. This will involve working in partnership with key stakeholders eg Police Scotland, Road Safety Officers, SPOKES and EaRN (the city's Equality and Rights Network).
- 7.3 An update regarding the outcomes and recommendations of the ERIA will be presented in all future reports.

Sustainability impact

- 8.1 The impacts of this report, in relation to the three elements of the Climate Change (Scotland) Act 2009 Public Bodies Duties, have been considered and the outcomes are summarised below.

- 8.2 Relevant Council sustainable development policies have been taken into account.
- 8.3 The proposals in this report will:
- not increase carbon emissions as it is expected that there will be no increase in traffic levels or changes in modal share as a result of the bus lane trials;
 - not significantly impact on the city's resilience in relation to the current and predicted impacts of climate change; and
 - help achieve a sustainable Edinburgh because an improved transport system will enable everyone to have the best possible access to jobs and essential services.

Consultation and engagement

- 9.1 Statutory consultation was undertaken as part of the ETROs' statutory process. Consultation with the major stakeholder groups will be undertaken before the trial results are reported to Committee in Autumn 2016. Further details of consultation and engagement are given in paragraphs 3.27 to 3.31 of this report.

Background reading/external references

- 1 Transport and Environment Committee (26 August 2014) - Bus Lane Network Review (Item 7.2)
http://www.edinburgh.gov.uk/meetings/meeting/3481/transport_and_environment_committee
- 2 Transport and Environment Committee (4 June 2013) - Bus Lane Camera Enforcement Expansion and Bus Lane Network Review (Item 7.8)
http://www.edinburgh.gov.uk/meetings/meeting/3004/transport_and_environment_committee
- 3 Objections to the Experimental Traffic Regulation Orders ETRO/14/38A and ETRO/14/38B.

John Bury

Acting Director of Services for Communities

Contact: Len Vallance, Senior Professional Officer, Projects Development

E-mail: len.vallance@edinburgh.gov.uk | Tel: 0131 469 3629

Links

Coalition pledges	P19 – Keep Lothian Buses in public hands and encourage the improvement of routes and times.
Council outcomes	CO22 – Moving Efficiently – Edinburgh has a transport system that improves connectivity and is green, healthy and accessible.
Single Outcome Agreement	SO4 – Edinburgh’s communities are safer and have improved physical and social fabric.
Appendices	Appendix 1 – List of roads affected by ETRO/14/38A and ETRO/14/38B. Appendix 2 – Joint Objection from stakeholder organisations. Appendix 3 – The Council’s comments in response to joint Objection from stakeholder organisations. Appendix 4 – Joint Objections to ETRO/14/38A and ETRO/14/38B. Appendix 5 – Objections to ETRO/14/38A. Appendix 6 – Objections to ETRO/14/38B.

Appendix 1 – List of roads affected by ETRO/14/38A and ETRO/14/38B

ETRO/14/38A (To permit motor cycles to use bus lanes)

Roads affected:-

A1, southbound slip road (at Fort Kinnaird),	Haymarket Terrace,	Portobello High Street,
Balgreen Road,	Hillhouse Road,	Portobello Road,
Bankhead Drive,	Howdenhall Road,	Potterrow,
Barnton Junction,	Inverleith Row,	Princes Street,
Broomhouse Drive,	Lanark Road,	Queen Street,
Bruntsfield Place,	Leith Street,	Queensferry Road,
Burdiehouse Road,	Leith Walk,	Roseburn Terrace,
Calder Road,	Leven Street,	Slateford Road,
Clerk Street,	Liberton Brae,	South Bridge,
Comiston Road,	Liberton Gardens,	St Andrew Square,
Commercial Street,	Liberton Road,	St John's Road,
Corstorphine Road,	Lindsay Road,	St Patrick Square,
Craigmillar Park,	London Road,	St Patrick Street,
Dalkeith Road,	Lothian Road,	Stenhouse Drive,
Dalry Road,	Lothian Street,	Stenhouse Road,
Drum Brae South,	Mayfield Gardens,	Stevenson Drive,
Duddingston Park,	Melville Drive,	Stevenson Road,
Duddingston Park South,	Milton Road,	South Clerk Street,
East Preston Street,	Milton Road East,	South Gyle Access,
Earl Grey Street,	Milton Road West,	South Gyle Broadway,
Ferniehill Drive,	Minto Street,	Straiton Road,
George IV Bridge,	Morningside Road,	Telford Road,
Gilmerton Road,	Newington Road,	West Approach Road,
Glasgow Road,	Nicolson Street,	West Coates,
Gorgie Road,	North Bridge,	Willowbrae Road,
Great Junction Street,	North Junction Street,	York Place.
	Old Dalkeith Road,	
	Peffermill Road,	


ETRO/14/38B (To change the times of operation of all day bus lanes to peak periods bus lanes)

Roads affected:-

A1, southbound slip road (at Fort Kinnaird),	Gorgie Road,	Queen Street
Balgreen Road,	Great Junction Street	Slateford Road,
Bankhead Drive,	Lanark Road,	St Andrew Square,
Broomhouse Drive,	Leith Street,	Stenhouse Drive,
Bruntsfield Place,	Leith Walk,	Stenhouse Road,
Calder Road,	Leven Street,	Stevenson Drive,
Commercial Street,	Lindsay Road,	Stevenson Road,
Dalry Road,	Lothian Road,	South Gyle Access,
Earl Grey Street,	North Junction Street	South Gyle Broadway,
	Princes Street,	West Approach Road,
		York Place.

SP KES *The Lothian Cycle Campaign*

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

If replying by email, please use... 

Traffic Orders
 Services for Communities
 City of Edinburgh Council
 High St
 Edinburgh EH1 1YJ

trafficorders@edinburgh.gov.uk

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.

CONTENTS

- ◆ **Background**
- ◆ **The Proposals**
- ◆ **Why the Orders should be rejected**
 - Contrary to policies in the Council's own Local Transport Strategy
 - The impact on cycling and cyclists
 - The impact on walking and walkers, including children walking home from school
 - Toxic traffic pollution may worsen on the footway
 - Permitting motorcycles in bus lanes likely to result in more breaking of speed limits
 - Consultation with the public was non-existent, and did not consider walking or cycling
 - Monitoring over 9 or even 18 months cannot uncover long-term impacts on modal shift
 - Leith Walk's government-supported "exemplary" project is compromised – and this could also impact on the Council's ability to attract government funding for similar future schemes
 - The proposals give the wrong message to Edinburgh's citizens as to how the Council wishes the City to develop, and may result over the long term in negative modal shift.
- ◆ **Our Request**

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>

- 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 <http://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_lts_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>

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>

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

[REDACTED], Lead Organiser, Spokes
[REDACTED], Head, Living Streets Scotland
[REDACTED], Convenor, Living Streets Edinburgh
[REDACTED], Trustees, Greener Leith
[REDACTED], Air Pollution Campaign, Friends of the Earth Scotland



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Appendix 3 - The Council's comments in response to Objections from stakeholder organisations

Objectors' concerns	Response
1. Impact on Cyclists	
<p>That the proposed change to bus lane operating hours will result in a loss of amenity during the weekday interpeak (9.30am to 4.00pm) and all day Saturday (8.30am to 6.30pm) and will also discourage people from cycling; and</p>	<p>The Council accepts reducing the all day bus lane hours to peak period bus lanes will mean that during the trials there will be some loss of amenity for cyclists, as there will be an increased level of interaction with general traffic within bus lanes.</p> <p>The 26 August 2014 Transport and Environment Committee report, paragraph 7.1 stated that 'the bus lane trial will affect cyclists, by reducing the amenity provided by bus lanes'.</p>
<p>That the proposals to change bus lane operating hours and to allow motorcycles to use bus lanes will cause safety concerns due to cyclists having to interact with general traffic during the interpeak period and on Saturdays in bus lanes that currently operate all day (around one third of the bus lane network) and with motorcyclists during the operating hours of all bus lanes.</p> <p>It is also suggested that motorcycles in bus lanes are more likely to exceed speed limits.</p>	<p>The trial to change all day bus lanes into peak periods bus lanes will replicate the road conditions that are currently experienced by cyclists in the existing peak periods bus lane corridors (approximately 60% of the bus lane network).</p> <p>An initial analysis of the last five years of complete data (2009 to 2013) that showed that in the interpeak period and on Saturdays there was no significant difference in the number or severity of accidents involving cyclists between all day bus lanes and peak periods bus lanes.</p> <p>Transport for London (TfL) has undertaken two extensive trials of allowing motorcycles access to bus lanes; the first from January 2009 to July 2010 and the second from July 2010 to January 2012.</p> <p>After the trials, TfL decided to give motorcycles permanent access to the majority of the Capital's red routes. TfL states on its website that 'the safety of motorcyclists and other vulnerable road users is unaffected...'</p> <p>In addition to London the following cities allow or partially allow motorcycles to use bus lanes: Bath, Bedford, Belfast, Birmingham, Colchester, Derby, Hull, Leicester, Newcastle, Plymouth, Reading,</p>

	<p>Sheffield, Sunderland and Swindon.</p> <p>Collision data will be monitored throughout the trials and, if at any stage serious concerns regarding safety emerge, they can be abandoned at short notice.</p> <p>With regards to motorcycle speeding, traffic volume and speed surveys within bus lanes will be undertaken as part of the trial.</p> <p>The Council will also undertake before and after cycle surveys to ascertain if there is any significant change in cycling levels during the trials. Opinion surveys will also be undertaken to record cyclists' views on the impact of the changes.</p> <p>The trials' results will be reported to Committee prior to any decision to implement the changes on a permanent basis.</p>
<p>2. Impact on Air Quality</p>	
<p>That the proposed change to bus lane operating hours will lead to an overall decrease in air quality, due to a perception that traffic levels will increase along the affected corridors; and</p>	<p>The Council believes there will not be a significant increase in either overall air pollution levels along the affected corridors or exhaust pollution experienced by pedestrians. The belief is based on the following rationale:-</p>
<p>That the proposed change will lead to an increase in the levels of exhaust pollution experienced by pedestrians, as more traffic will use bus lanes and therefore be closer to pedestrians. 'Bus lanes are likely to reduce pollutants breathed in by walkers and to a lesser extent cyclists using the bus lanes'.</p>	<p>Initial interpeak surveys, undertaken in 2014 in all day bus lanes, showed that buses were not being delayed and traffic was generally flowing freely at most locations.</p> <ul style="list-style-type: none"> • Under free flowing traffic conditions there is little advantage to be gained by general traffic from using the bus lane in preference to the adjacent traffic lane. • It is therefore reasonable to expect a considerable proportion of general traffic to continue to use the general traffic lane, rather than the bus lane. This behaviour can currently be commonly seen at existing peak periods bus lanes outwith their hours of operation.

	<ul style="list-style-type: none"> • Interpeak loading and parking bays at a number of locations along the affected corridors, especially in the city centre and local shopping areas will also discourage general traffic from using the bus lanes. • There are large stretches of the affected bus lanes where the footway is not directly next to roadside, eg A71 Calder Road and the West Approach Road. <p>Before and after traffic volume and speed surveys will be undertaken at a number of locations on affected corridors and also on two corridors not involved in the trial, to provide control results for comparison. These will provide data from which vehicle emissions can be calculated and will determine whether the trials have resulted in a significant impact on air quality.</p> <p>The air quality results will be reported to Committee prior to any decision to implement the changes on a permanent basis.</p>
3. Impact on Pedestrians	
That the proposed change to bus lane operating hours will downgrade pedestrian facilities in affected areas by increasing pollution, 'noise, splashing, scariness and, on occasion danger'. (also see '2 Impact on Air Quality').	The Council believes that the proposed changes will not downgrade pedestrian facilities in affected areas based on the rationale give in the previous section.
4. Impact on Modal Shift	
That the proposed change to bus lane operating hours will cause modal shift back to the use of the car by making off-peak car trips more convenient.	<p>The Council believes that the trials will not significantly impact on modal shift.</p> <p>While bus lanes do offer significant benefits to bus operators and users, these benefits mainly relate to journeys undertaken during the peak periods. As previously explained, allowing general traffic to use bus lanes in interpeak periods is unlikely to introduce any significant disbenefit to buses or advantage to general traffic, as traffic is generally free flowing anyway. It will not therefore increase the attractiveness of using the</p>

	<p>private car instead of public transport or active travel.</p> <p>Before and after traffic volume surveys will be used to determine whether the trials have an impact on travel modes on affected corridors. Before and after bus journey times data will be used to measure changes to bus journey times.</p> <p>The trials' results will be reported to Committee prior to any decision to implement the changes on a permanent basis.</p>
<p>5. Contrary to Council's Local Transport Strategy (LTS)</p>	
<p>The proposed changes sit very uneasily with policies in the Council's LTS, and arguably directly contradicts these.</p> <p>PubTrans1 – The Council will presume in favour of giving buses and Trams priority over other motorised traffic; and</p> <p>Pubtrans7 – The Council will continue to maintain the bus lane network, review it regularly and it extend it or enhance it where opportunities arise.</p>	<p>It must be stressed that these proposals are trials to allow data to be collected to assess the impact of the proposals and are not at this stage permanent proposals.</p> <p>The Council undertook a review of the bus lane network in 2014, which included a review of bus lane operational hours. Surveys undertaken as part of the review indicated that all day bus lanes offered little additional operational benefit to buses, compared to peak periods lanes.</p> <p>However, observations could only be carried out on a small percentage of the city's 65km bus lane network and on a limited number of occasions. It was therefore decided to recommend a trial, which would allow a more comprehensive and robust analysis of the impacts of this proposed change on all user groups to be undertaken prior to making any decision to introduce permanent changes.</p> <p>The trials will be monitored throughout their operation and, if at any stage serious concerns regarding safety or impact on bus or tram operations emerge, they can be abandoned at short notice.</p> <p>It should be noted that the city's tram operator nor any of the bus operators objected to the ETROs.</p>

<p>6. Consultation</p>	
<p>Consultation in advance of the Traffic Orders has been seriously inadequate; and</p> <p>Wider public consultation was not undertaken for the proposals.</p>	<p>As part of review of the Bus Lane Network Review, a variety of organisations representing bus lane users were asked to provide their views regarding bus lane hours and allowing motorcycles and Private Hire Cars into bus lanes. Bus operators, taxi operators, cycling organisations, including SPOKES, and the police were asked to contribute to this survey.</p> <p>In April 2014, a presentation on the Bus Lane Network Review was given to the Council's Transport Forum. After the presentation, a workshop was held to discuss all day bus lanes and whether other vehicle classes should be allowed to use bus lanes.</p> <p>At its meeting on 26 August 2014, Committee approved the promotion of the two ETROs necessary to trial the proposals. The ETRO process involves consultation with statutory bodies and public advertisement of the draft proposals. This allows for objections to the proposals to be submitted by stakeholders and the public and for these to be considered by Committee, prior to it making a decision on whether to proceed with the trials.</p> <p>The trials will allow data to be collected so that the impact of the proposals can be determined. Further consultation will then take place with major stakeholder groups on the results of the trials before they are reported to Committee in June 2016.</p> <p>If the trials are deemed to be successful, permanent Traffic Regulation Orders would be required. This would provide a further opportunity for stakeholders and the public to comment or object.</p>

7. Leith Programme	
<p>The proposed changes will compromise the Leith Programme, which have been part funded by the Scottish Government.</p>	<p>Most of the cycle facilities being provided under the Leith Programme are outwith bus lanes and will therefore be unaffected by the changes. The Council also believes that the changes will not impact adversely on pedestrians (see also 3. Impact on Pedestrians).</p> <p>The trials' results will be reported to Committee prior to any decision to implement the changes on a permanent basis.</p> <p>The Council is developing the designs for the Leith Programme in partnership with Sustrans and will ensure that these continue to reflect the aspirations that led to the funding award from the Scottish Government.</p>

Appendix 4 – Joint Objections to ETRO/14/38A and ETRO/14/38B

No	ID	Objection's Summary	Response
1	Gorgie Dalry Community Council	<p>The proposal to trial making all bus lanes into peak periods bus lanes contradicts the Council's Local Transport Strategy policies, PubTrans1 and PubTrans7, 'which promises to prioritise buses and enhance bus lanes'. The LTS begins its walking section with policy Walk1, "The Council will seek opportunities to improve pedestrian facilities..." 'Bus lanes provide a wide area of road space in which this "domination by moving or parked vehicles" is significantly reduced. Off-peak lanes are really important when using a bike for shopping, school travel, and a multitude of other off peak journey types. Many of these trips are by the less confident cyclist, who is understandably deterred by the constant presence of cars and lorries...'. That the proposed change to bus lane operating hours will, in affected areas, downgrade pedestrian facilities, by allowing general traffic and motorcycles into bus lanes, during the interpeak and Saturdays, bring them closer to pedestrians and this will increase pollution, 'noise, splashing, scariness and, on occasion danger'. The proposal to trial making all bus lanes into peak periods bus lanes 'will particularly hit school children walking home as well as families out walking to the shops or the park on Saturdays'. The proposal to trial allowing motorcycles into bus lanes is likely to reduce the attractiveness of bus lanes for cycling, thus discouraging cycling. The proposals are being implemented without prior public consultation.</p>	<p>See Appendix 3 for the Council's response to the points raised in the objection. It must be stressed that the ETROs' proposals are not permanent but relate to trials that will allow data to be collected and studied to assess the impact of the proposals. Before and after surveys will be undertaken to measure bus journey times, traffic volumes (including changes in lane activity and modal shift), traffic speeds, collision data, cycling surveys, pedestrian surveys, air quality analysis, and legal/illegal parking in bus lanes.</p>

- 2 Leith Central Community Council The proposal 'appears to be in contradiction' of the Council's Active Travel Action Plan target to achieve 10% of all trips to be by bike. The proposals 'would encourage more motorised traffic rather than more active travel'. By reducing of the operating hours of bus lanes on Leith Walks, 'people will be deterred from walking and cycling on Leith Walk'. 'They will either be fearful of the increased traffic or join it because of convenience. We also believe it will have a negative impact on the local businesses as people will not want to walk and or sit right next to fast moving cars and motorcycles, especially during weekends'. 'Pollution has been a long-standing problem in Leith. Encouraging more motorised traffic will aggravate the situation'. 'Peak hour bus lanes are very valuable for cycle commuters. However, off-peak lanes are just as valuable when using a bike for shopping and a multitude of other off-peak journey types. Many of these trips are by the less confident type of cyclist, who may well be deterred by the constant presence of cars and lorries...'. Allowing motor cyclists in bus lanes will equally deter the less confident cyclist.
- See response to Objection 1.

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| 3 Sustrans
Scotland | <p>The needs of cyclists have not been fully considered before issuing the proposals' Experimental Traffic Regulation Orders. The proposal to trial making all day bus lanes into peak periods bus lanes 'will not help to encourage cycling in the city'. Under the proposals, cyclists would have to share the bus lanes with general traffic, buses and taxis during the interpeak and Saturdays. Sustrans 'do not think that this is conducive to encouraging more people to cycle'. The Local Transport Strategy sets targets to reduce car use from 43% of all trips in 2010 to 31% in 2020 and cycling, 15% of journeys to work by 2020 and 10% of all trips by 2020. To achieve these cycling targets, 'it is imperative that facilities for cyclists are both maintained and improved'. The proposal 'will essentially encourage more car usage' and will not help increase the levels of cycling. The proposal is contrary to the Council's Local Transport Strategy policies, particularly PubTrans1 and PubTrans7. Are also opposed to allowing motorcycles in bus lanes at all times of the day. The proposals should not be implemented 'as they will not help to encourage more cycling in the city and they also have the potential to have a detrimental impact on the city's excellent bus services'. The public has not been properly consulted on the proposals. If the Council 'wishes to rationalise bus lanes, Sustrans 'strongly recommend that they consider making them either all-day or 24/7' and that a 'thorough public consultation' is undertaken before making any such changes.</p> | See Appendix 3 (Section 1 to 6). |
| 4 Transform
Scotland | <p>The proposals are contrary to the Council's Local Transport Strategy policy's PubTrans7. The proposals to trial making all day bus lanes into peak periods bus lanes 'gives the signal that greater private transport access within the City is being promoted at the expense of public transport provision'. Transform Scotland 'are happy to be associated with the detailed objections submitted by Living Streets Scotland, Spokes the Lothian Cycle Campaign, and the Scottish Association for Public Transport.</p> | See Appendix 3 (Section 4 and 6). |

5	AB10 7LJ	Proposals will impact on modal shift 'with car friendly bribes that limit the effectiveness of networks for more sustainable modes'. Abandon proposals 'and look instead to further increase the reliability of the public transport network'.	See Appendix 3 (Section 1 and 4).
6	EH10 4AL	The proposals are contrary to the Council's Local Transport Strategy 'which promises to prioritise buses and enhance bus lanes'. The proposals will discourage and endanger cyclists and 'expose pedestrians to increased traffic pollution'. There was no public consultation and the proposals did not consider cyclists.	See Appendix 3 (Section 1,2,3,5 and 6).
7	EH10 4HR	Is concerned that that the proposals will make 'it more difficult for cyclists in the city'. 'Bus Lanes are a lifeline. My own experiences of cycling up and down Leith Walk to commute to work last year makes me deeply concerned by these proposals as I relied heavily on the bus lanes and without them would not have had the confidence to cycle'.	See Appendix 3 (Section 1 and 7).
8	EH10 4HT	Impact on cyclists - removal of amenity and protection will make it more dangerous, thus discouraging cycling. Negative impact on air quality as it will encourage modal shift to car use thus increasing air pollution. Contrary to Council's Local Transport Strategy of encouraging Public Transport use, proposals will impede public transport's performance and reduce its attractiveness.	See Appendix 3 (Section 1,2,4,5 and 6).

- 9** EH10 4JW Concerned that the proposal to trial changing all day bus lanes into peak period bus lanes will make it more dangerous for cyclists at the inbound downhill section of bus lane on Lothian Road/Earl Grey Street. 'Even right now this road can be terrifying to cycle down, particularly in light, free-flowing off-peak traffic where car drivers enjoy to go no slower than the speed limit which leads to large speed differences between them and bus lane users...' 'These two groups of road users are currently still separated thanks to the existence of the bus lane, but the proposed changes to this lane would eliminate this important buffer zone which can accommodate road users going at less than the speed limit, particularly cyclists'. 'Given the obvious dangers of mixing road users of very variable speeds in the same lane I would urge you to reconsider both of the proposed orders'. See Appendix 3 (Section 1).
- 10** EH10 4SL The proposals are contrary to Council's policy as they 'prioritise private transit over public transit' which 'contribute to pollution'. 'Edinburgh Council has wisely set a goal of increasing cycling' and 'bus lanes are a haven for cyclists'. The proposals, by reducing bus lane hours and allowing motorcycles into bus lanes, will discourage cycling. There was no prior public consultation and the proposals 'should not go ahead without a full public consultation'. See Appendix 3 (Section 15 and 6).

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| 11 | EH10 5HY | <p>These proposals are very much against the spirit of most of CEC's recent (good) initiatives on Active Travel and discouraging car use. The proposals are contrary and 'against the spirit of the Council's Local Transport Strategy and its Active Travel Action Plan. 'It is a good idea to review locations and operating hours of bus lanes, however (in line with above) it is reasonable to assume that some current p/t lanes should be made full time - not all the other way round'. 'Increasing the amount of available road space during the day will discourage cycling (in particular further discouraging those currently reluctant to try cycling) and (probably) increase the amount of traffic - and possibly speed'. If the proposal to trial changing all day bus lanes into peak periods bus lanes goes ahead the bus lanes 'on Leith Walk (in the process of being made more pedestrian/cycle 'friendly' - and due to be 20mph should definitely not be included'.</p> | See Appendix 3 (Section 1,3,4,5 and 7). |
| 12 | EH10 5HZ | <p>Proposals contradict the Council's Local Transport Strategy, specifically policies PubTrans1 and PubTrans7. 'There has not been proper public consultation about these proposals'. The proposals will act to discourage cycling by increasing the conflict between cyclists and other vehicles. They will act to discourage walking by making the road close to the pavement busier and more polluted than at present and they will increase pollution and carbon emissions. The proposals will encourage more low-occupancy vehicles onto the road and will discourage people from taking the bus, cycling or walking.</p> | See Appendix 3 (Section 1 to 5). |
| 13 | EH10 5PR | <p>Impact on cyclists - Bus lanes 'provide a safer cycling environment 'and the proposals remove amenity and protection, making it more dangerous, thus discouraging cycling. These proposals 'seriously undermine' the Council's policies which are generally supportive of encouraging and increasing cycle journeys. Allowing motorcycles into bus lanes 'would also discourage and be a threat to the safety of cyclists'.</p> | See Appendix 3 (Section 1 and 5). |

- 14** EH10 5PR Proposals are contrary to the Council's Local Transport Strategy 'to encourage cycling in the city'. 'Allowing motor cycles to use bus lanes would be dangerous for cyclists and would discourage people new to cycling from beginning to cycle. Permitting cars to use all bus lanes outwith peak hours and on Saturdays will be likewise both more dangerous and more intimidating for cyclists. In addition, these measures discourage walking by bringing motor vehicles closer to pedestrians and appear to promote private car and motor cycle use rather than active travel and public transport'.
- See Appendix 3 (Section 1 to 5).
- 15** EH10 5QL It is important to keep our bus and cycle lanes open as often as possible, and free from other traffic. Not only is this necessary to ensure that public transport remains a faster and thus more appealing option than car travel, it is important in order to maintain any appeal for cyclists, and indeed walkers on adjacent pavements to these lanes. Bus users, pedestrians and cyclists are very valuable to our efforts to reduce air pollution and fossil fuel use. The proposals will discourage people from walking (especially schoolchildren, who would be affected by the proposed time changes) and cycling' .
- See Appendix 3 (Section 1 to 4).

16	EH10 6BN	<p>The proposal to trial all day bus lanes to peak periods is contrary to the Council's Local Transport Strategy to encourage public transport use and cycle use over private car use. The proposal will delay buses and discourage bus use. The proposal 'will discourage off peak cycle journeys as cars & heavy lorries will be using the lanes' and will discourage pupils from walking home from school... as cars & heavy lorries will be passing close by the pavements making the roads seem more dangerous & uninviting'. 'Removing bus lanes is basically increasing the road capacity for private motor vehicles and will encourage modal shift toward the private car', increasing pollution levels. Removing bus lanes will also encourage illegal parking in the bus lanes during off-peak hours. 'Not aware of any proper consultation or study that was carried out to evaluate pollution, modal shift, illegal parking, cycle use or any 'unintended consequences''. Suggests all bus lanes should be 7.00 am to 7.00 pm, 'this would simplify matters for motorised vehicle drivers'</p>	<p>See Appendix 3 (Section 1 to 6). Parking restrictions are unaffected by the trials and therefore they do not impact on the Council's ability to enforce these restrictions.</p>
17	EH10 6BN	<p>Negative impact on modal shift, discourage car users using public transport, thus causing further congestion and longer journeys to work.</p>	<p>See Appendix 3 (Section 2 and 4).</p>
18	EH10 6PY	<p>The proposals are contrary to Council's Local Transport Strategy, including policies PubTrans1 and PubTrans7 and 'appears to be strongly in favour of the private car driver, who is very largely responsible for congestion in the city'. 'All-day bus lanes also provide significant safety benefits—at all times of day—to people using bicycles. This is because the lanes help ensure that private motor vehicles are kept at a distance...'</p>	<p>See Appendix 3 (Section 1, 4 and 5).</p>
19	EH11 1HZ	<p>Contrary to the Council's Local Transport Strategy and the Active Travel Action Plan 'under which council committed to improving and expanding bus lanes, not reducing their hours of activity'. Encouraging more private car use will increase city centre congestion, 'cannot see how this will help Edinburgh deal with its air pollution targets'. Bus lanes provide 'cyclists with a small respite from traffic on some of our busiest roads'. Allowing motorcycles into bus lanes will make bus lanes more dangerous for cyclists and discourage people from cycling.</p>	<p>See Appendix 3 (Section 1, 2, 4 and 5).</p>

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| 20 | EH11 1PN | <p>The proposals are contrary to the Council’s Local Transport Strategy including policies PubTrans1 and PubTrans7. Reducing the bus lane hours is ‘prioritising those motorised vehicles over buses’ and will encourage modal shift towards cars, traffic levels will increase as well as pollution levels. Accident levels will also increase. ‘Bringing cars closer to pavements will bring that pollution closer to pedestrians. Heavy vehicles and motorcycles (the fastest vehicles on the road) will be inches away from pedestrians. Motorcycles will be using the bus lanes at all times’, putting cyclists at greater risk.</p> | See Appendix 3 (Section 1 to 5). |
| 21 | EH11 1QE | <p>‘The bus lanes are completely unusable for cyclists at the times when car drivers are allowed in them. The effect of these orders will be to take cyclists’ especially hesitant cyclists, like children, off the roads and increase car traffic.</p> | See Appendix 3 (Section 1 and 4). |
| 22 | EH11 1RT | <p>The proposals are contrary to the Council’s Local Transport Strategy ‘which promises to prioritise buses and enhance bus lanes’. Bus lanes provide a wide area of road space in which this “domination by moving or parked vehicles” is significantly reduced. Off-peak lanes are really important when using a bike for shopping, school travel, and a multitude of other off peak journey types. Many of these trips are by the less confident cyclist, who is understandably deterred by the constant presence of cars. Allowing motorcycles into bus lanes at all times will also deter more cyclists from using them. Overall these proposals will deter cyclists. The proposal to change all day bus lanes into peak periods bus lanes ‘will make walking more difficult for 22 kilometres of footway along Edinburgh arterial roads’ and this will lead ‘to increased pollution, noise, splashing, scariness and, on occasions, danger, for pedestrians’. It will ‘particularly hit school children walking home as well as families out walking to the shops or the park on Saturdays’.</p> | See Appendix 3 (Section 1,2,3 and 5). |

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| 23 | EH11 1TN | <p>The proposals are contrary to the Council's own Local Transport Strategy, policies PubTrans1 and PubTrans7. They will discourage cycle use, and make cycling more dangerous and unpleasant as cars and lorries will be using the lanes. Increasing road capacity for private vehicles will encourage more use of them, thus increasing pollution and accident risk. There was no prior public consultation regarding the proposals.</p> | See Appendix 3 (Section 1,2,4,5 and 6). |
| 24 | EH11 3HU | <p>The proposed bus lane changes, to make all lanes part-time only, will have an adverse impact on pedestrians and cyclists, since general traffic will be closer, making air pollution worse and putting them in greater danger. The proposals 'would most likely result in reducing the number of cyclists, since the lanes would no longer be attractive'. The proposals are contrary to the Council's Local Transport Strategy, policies PubTrans1, PubTrans 7, and the section on Cycling, 9.2). Objects to motorcycles being allowed access to bus lanes - 'A similar trial in London resulted in an increase in m/c casualties, in m/c speeds and in numbers of motorcyclists exceeding the speed limit, which even after interventions, was as high as 40-60%. Again, this will act as a deterrent to cycling, and worsen conditions for pedestrians'. Lack of public consultation, the proposals 'should be withdrawn pending wider consultation' and there should be wider public consultation including considering all day and 24 hour bus lanes options.</p> | See Appendix 3 (Section 1,2,3,5 and 6). |

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| 25 | EH12 5TF | <p>Believes that the proposals ‘will have negative impacts on cyclists and pedestrians as it reduces segregation of cyclists from traffic and will lead to an increase in injuries and deaths’.</p> <p>‘The proposal to allow motorcycles access to this lane has been statistically proven in trials in London, to lead to increased speeding by motorcyclists and an increase in accidents and injuries to themselves. This will inevitably have an impact on other road users, in particular those exposed to more risk, pedestrians (the elderly and children especially) and cyclists’. ‘Traffic pollution’ – the proposals will make ‘the road network a more unpleasant place for public health and will discourage people from taking up cycling. The proposals are contrary to the Council’s Local Transport Strategy, that is, ‘priority for a bus and cycle network and encouraging a move away from private car usage’.</p> | See Appendix 3 (Section 1 to 5). |
| 26 | EH12 5TF | <p>The proposals are contrary to the Council’s Local Transport Strategy. ‘Off-peak lanes are really important when using a bike for shopping, school travel, and a multitude of other of peak journey types. Many of these trips are by the less confident cyclist, who is understandably deterred by the constant presence of cars and lorries..’</p> | See Appendix 3 (Section 1, and 5). |
| 27 | EH12 8HJ | <p>Recognise that harmonising operating times would eliminate the confusion regarding operating times. Suggest 7.00am to 7.00pm (as a minimum) or 24 hour bus lanes rather than peak periods bus lanes. ‘What evidence was used to determine that part time is the right answer’?</p> | It must be stressed that the ETROs' proposals are not permanent but relate to trials that will allow data to be collected to assess the impact of the proposals. Before and after surveys will be undertaken to measure bus journey times, traffic volumes |
| 28 | EH12 8SU | <p>‘All-day bus lanes provide a range of benefits for more vulnerable road users like cyclists and pedestrians’. The proposal to trial peak periods bus lanes in all day bus lanes will have a negative impacts on more vulnerable road users. Objects to the trial to allow motorcycles access to bus lanes for the reason that ‘a minority of motorcyclists will be tempted to speed due to the free lane and pedestrians and cyclists will be negatively impacted ‘.</p> | See Appendix 3 (Section 1 and 3). |

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| 29 | EH12 8UH | <p>Objects to the proposal to allow motorcycles into bus lanes based on selective data from the London studies; increase in speeding by motorcycles and an increase in motorcycle injuries. Speeding motorcycles, 'in close proximity to vulnerable road users such as cyclists and adjacent to pavements will discourage these forms of active travel'. The proposal to trial making all day bus lanes to peak period bus lanes is contrary to the Council's Local Transport Strategy, policies PubTrans1 and PubTrans7. Allowing general traffic access to all day bus lanes in the interpeak and Saturdays 'will increase the level of toxic air being breathed by pedestrians'. 'To ensure less confusion between when bus lanes are active and inactive a wiser change would seem to be making all bus lanes operational for the longer period'.</p> | See Appendix 3 (Section 1 to 5). |
| 30 | EH12 8XW | <p>Changing all day bus lanes into peak periods bus lanes and allowing motorcycles into bus lanes will reduce 'the safety offered' by bus lanes, thus discouraging cycling, especially new cyclists commuting.</p> | See Appendix 3 (Section 1). |
| 31 | EH13 OHT | <p>These proposals will make cycling more dangerous. These proposals are counterproductive as they will encourage 'even more people to start taking cars into work' The city should encourage more people to use public transport and the bike for environmental as well as congestion reasons.</p> | See Appendix 3 (Section 1 and 4). |
| 32 | EH13 ORQ | <p>The proposals are detrimental to the safety of pedestrians and cyclists and contrary to the need to promote walking and cycling in Edinburgh.</p> | See Appendix 3 (Section 1 to 3). |

- 33** EH14 1LN The proposal to trial making all bus lanes into peak periods bus lanes are contrary to the Council’s Local Transport Strategy, policies PubTrans1 and PubTrans7. ‘Bus lanes provide a wide area of road space in which this “domination by moving or parked vehicles” is significantly reduced. Off-peak lanes are really important when using a bike for shopping, school travel, and a multitude of other off peak journey types. Many of these trips are by the less confident cyclist, who is understandably deterred by the constant presence of cars and lorries...’. That the proposed change to bus lane operating hours will, in affected areas, downgrade pedestrian facilities, by allowing general traffic and motorcycles into bus lanes, during the interpeak and Saturdays, bring them closer to pedestrians and this will increase pollution, ‘noise, splashing, scariness and, on occasion danger’. The proposal to trial making all bus lanes into peak periods bus lanes ‘will particularly hit school children walking home as well as families out walking to the shops or the park on Saturdays’. The proposal to trial allowing motorcycles into bus lanes is likely to reduce the attractiveness of bus lanes for cycling, thus discouraging cycling. The proposals are being implemented without prior public consultation. See Appendix 3 (Section 1,2,3, 5 and 6).
- 34** EH14 1NR Reducing the bus lane on Slateford Road and allowing motorcycles into bus lanes 'will make it much more dangerous for me to cycle into town. It's already a difficult road to cycle along, this will make it even trickier!' See Appendix 3 (Section 1).

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| 35 | EH14 2DT | <p>The proposals are contrary to the Council’s Local Transport Strategy, policies PubTrans1 and PubTrans7. ‘Will act to discourage cycling by increasing the conflict between cyclists and other vehicles’ and ‘will act to discourage walking by making the road close to the pavement busier and more polluted than at present’. Allowing ‘motorcycles in bus lanes will likely reduce the attractiveness of bus lanes for cycling, thus cutting use, contrary to the Council’s policies and targets. Reports of a London trial show no clear impact on pedestrian or cyclist casualties, but a significant rise in motorcyclist injuries, in motorcyclist speeds, and in motorcycles exceeding the speed limit. The proposals will ‘encourage more low-occupancy vehicles onto the road and will discourage people from taking the bus, cycling or walking’, increasing air pollution. There has not been no public consultation about these proposals.</p> | <p>See Appendix 3 (Section 1 to 6).</p> |
| 36 | EH14 3EA | <p>The proposals are contrary to the Council’s Local Transport Strategy. Allowing motor cycles into bus lanes ‘will deter less confident cyclists as some motor cyclists will use excessive speed and pass cyclists too close’. There was no public consultation.</p> | <p>See Appendix 3 (Section 1,5 and 6).</p> |
| 37 | EH14 5HR | <p>Proposals contrary to the Council's Local Transport Strategy, 'in particular they represent a significant downgrade of these facilities for both pedestrians and cyclists'.</p> <p>Believes 'there is inadequate justification for the benefits of letting people drive (or more properly, park) in all of the city's bus lanes during daylight hours. Suggest harmonising the remaining part-time bus lanes with the all-day ones.</p> | <p>See Appendix 3 (Section 1,3 and 5). Parking restrictions are unaffected by the trials and therefore they do not impact on the Council's ability to enforce these restrictions.</p> |

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| 38 | EH14 7ER | <p>The proposals are contrary to the Council’s Local Transport Strategy, including policies PubTrans1 and PubTrans7, ‘of encouraging public transport use and cycle use over private car use’. Will discourage cycling as cars and heavy lorries will be using the lanes. Will discourage walking ‘ pupils from walking home from school, as cars and heavy lorries will be passing close by the pavements making the roads seem more dangerous & uninviting’. The proposals by increasing the road capacity for private motor vehicles will encourage modal shift toward the private car, increasing pollution’. ‘No proper consultation or study was carried out to evaluate pollution, modal shift, illegal parking, cycle use or any ‘unintended consequences’</p> | See Appendix 3 (Section 1 to 6). |
| 39 | EH14 7ER | <p>The proposals are contrary to the Council’s Local Transport Strategy, including policies PubTrans1 and PubTrans7, ‘of encouraging public transport use and cycle use over private car use’. Will discourage cycling as cars and heavy lorries will be using the lanes. Will discourage walking ‘ pupils from walking home from school, as cars and heavy lorries will be passing close by the pavements making the roads seem more dangerous & uninviting’. The proposals by increasing the road capacity for private motor vehicles will encourage modal shift toward the private car, increasing pollution’. ‘No proper consultation or study was carried out to evaluate pollution, modal shift, illegal parking, cycle use or any ‘unintended consequences’</p> | See Appendix 3 (Section 1 to 6). |
| 40 | EH15 1JY | <p>‘Bus lanes are an important contributory factor towards public and active transport and ‘further use by private motor vehicles is regressive and will only promote further private vehicle use’. The proposals are contrary to several local and national transport policies and strategies. ‘Bus lanes should be extended and all made 24/7’.</p> | See Appendix 3 (Section 1,3,4 and 5). |

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| 41 | EH15 1LP | <p>The proposals are contrary to the Council's Local Transport Strategy and 'its commitment to prioritise buses and enhance bus lanes'. 'The proposals ignore the impact on cyclists and pedestrians - bus lanes provide a relatively traffic-free space for cyclists, this is essential if cycling is to rise along arterial routes in the absence of segregated cycle provision. Walking on pavements in the city is already too often dominated by the noise, fumes and splashes of heavy traffic; bus lanes provide some much needed gap between traffic and pedestrians. Allowing motorcyclists to use bus lanes at all times will make them less safe and less attractive for cyclists, and will likely encourage more people to travel by motorbike making the problem worse - and based on London experience, will increase injuries to motorcyclists'. Any changes to bus lanes ' should be in the opposite direction: extending coverage; extending the hours of operation; and vigorous enforcement'.</p> | See Appendix 3 (Section 1 to 5). |
| 42 | EH15 1NB | <p>Believes that the proposals to change the bus lane hours will have a serious negative impact on the safety of cyclists and pedestrians and that it will greatly increase illegal parking in bus lanes which is already a serious safety issue for all road users. No reference to the impact on pedestrians and cyclists. Use of bus lanes by motorcycles - 'concern is that there are clearly safety issues for other road users. Simplification/unification of bus lane operating times would be better achieved by making them all day, every day'.</p> | See Appendix 3 (Section 1 and 3). Parking restrictions are unaffected by the trials and therefore they do not impact on the Council's ability to enforce these restrictions. |
| 43 | EH15 2HE | <p>The proposal to trial changing all day bus lanes to peak periods bus lanes 'goes against current Council policy on increasing the use of public transport and cycling by making it more attractive than private vehicles'. Bus lanes throughout the city should operate as all day bus lanes. The proposal to allow motorcycles access to bus lanes will make bus lanes less attractive to cyclists. Both proposals 'contravene Council policy, and will work against other efforts to increase cycling use. There is a target in place for cycle use by the year 2020'.</p> | See Appendix 3 (Section 1,4 and 5). |

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| 44 | EH16 4NA | <p>The proposals are contrary to the Council’s Local Transport Strategy, policies PubTrans1 and PubTrans7. The proposals do not give any consideration to cyclists and pedestrians. ‘Bus lanes provide a wide area of road space in which this “domination by moving or parked vehicles” is significantly reduced’. Bus lanes are also cycle lanes and they ‘form an important buffer between heavy vehicular traffic (such as lorries) and pedestrians’. These proposals will deter ‘the less confident cyclist, who is understandably deterred by the constant presence of cars and lorries’. Allowing general traffic and motorcycles into bus lanes will mean ‘increased pollution, noise, splashing, scariness and, on occasions, danger. The proposals will ‘greatly increase the chances of an accident and actual bodily harm to people using bikes and to pedestrians near the kerb’. Also, ‘allowing motorcycles into bus lanes ‘is likely to reduce the attractiveness of bus lanes for cycling’ thus discouraging cycling’. The proposal to trial changing all day bus lanes to peak periods bus lanes will ‘particularly hit school children walking home as well as families out walking to the shops or the park on Saturdays’. These proposals will adversely affect the Council’s ‘ability to move towards a publicly proclaimed target of 10% of all trips by bike by 2020’. The proposals are being implemented without prior public consultation.</p> | See Appendix 3 (Section 1 to 6). |
| 45 | EH16 4SN | <p>As a cyclist and a pedestrian I do not think it will enhance safety.</p> | See Appendix 3 (Section 1). |
| 46 | EH16 5JR | <p>Edinburgh is already a city where biking can be intimidating and dangerous'. The proposals will only discourage people from adopting or continuing with a more sustainable life style.</p> | See Appendix 3 (Section 1). |

47	EH16 5RR	<p>Reducing the hours of operation to peak periods will mean removal of cycle infrastructure and the limited protection that bus lanes provide, 'which includes the times school children are making their way home'.</p> <p>Powered two wheel vehicles are substantially heavier and faster than cyclists, and as such present a real and perceived danger to cyclists. Such a situation will result in cyclists being discouraged from using the bus lanes, again at a time when the Council's goal is to encourage cycling. These proposals will discourage cycling.</p>	See Appendix 3 (Section 1 and 3).
48	EH16 6JR	<p>Objects solely to a specific peak periods bus lane on Liberton Gardens. If motorcycles are allowed into this bus lane, being fast moving, he is concerned about an increased risk of an accident. The objector gives no reasons for objecting to the proposal to trial making all day bus lanes into peak period bus lanes.</p>	This bus lane operates during the peak periods and the proposals to allow motorcycles into this bus lane does not obviate drivers from taking due care and attention. To ensure consistency throughout the city it is recommended that this bus lane is not excluded from the motorcycle trial.
49	EH16 6PR	<p>The proposals represent 'a deterioration in cyclist provision in the city' by allowing motorcycles and general traffic into the bus lanes. These proposals will discourage cyclists 'as they will perceive it as making their environment much more dangerous' and the proposals will impact negatively on the Council's target of achieving 10% of all journeys by bike by 2020.</p>	See Appendix 3 (Section 1).
50	EH17 8UA	<p>'My main means of transport is my bike and 'bus lanes greatly add to my feeling of safety'. The Council should reconsider the proposals, 'in light of meeting the target of 10% of all trips to be by bike by 2020'. The Council should consider making all bus lanes 24 hours.</p>	See Appendix 3 (Section 1).
51	EH2 2AS	<p>The proposals will allow car and motorcycles into bus lanes making it more dangerous for cyclists and this 'will actively reduce the number of people using bikes and walking. Not to mention the increase in delays to buses'. This trial 'will cause accidents and injury, as well as give no benefit to anyone'.</p>	See Appendix 3 (Section 1,3 and 4).

52	EH21 6AG	<p>Concerned that reducing bus lane hours will make cycle journeys less safe. Cycles to work 'and regularly experience close and dangerous passes from cars, buses, motorbikes, vans and lorries. Whenever I use a bus lane I feel safer and better protected from careless or dangerous driving'. Concern that if bus lane hours are reduced 'there will be more parked vehicles in bus lanes when they are not in operation which, again, would make it less safe for cyclists who would have to often swerve out to avoid parked cars or just join the main flow of traffic'. Freeing up road space will create more traffic and thus increase air pollution. Allowing fast moving motorcycles into bus lanes 'will perhaps discourage any new and inexperienced cyclists or even those who might otherwise have considered taking up cycling as a transport option. Even as a pedestrian, walking would seem like a less pleasurable experience when motorcycles could come speeding down a bus lane close to the kerb'.</p>	<p>See Appendix 3 (Section 1 to 4). Parking restrictions are unaffected by the trials and therefore they do not impact on the Council's ability to enforce these restrictions.</p>
53	EH26 OLZ	<p>'On roads without bus lanes a huge percentage of drivers pass far too close already, within inches (when it should be a metre) and without the protection of a bus lane, this will mean real danger for cyclists and will discourage cycle journeys'.</p>	<p>See Appendix 3 (Section 1).</p>
54	EH28 8RF	<p>This will result in motorists undertaking and putting cyclists at risk. 'As both a motorist and cyclist I object to the council taking the backwards step of allowing all motorised vehicles to use bus lanes out of peak time'.</p>	<p>See Appendix 3 (Section 1).</p>
55	EH28 8RF	<p>Objects on grounds of the proposals' impact on cyclists, will result in 'slower drivers sticking to the normal lanes because they don't understand the variable pattern and are worried about being fined by the greenways cameras, and as a result faster drivers undertaking in the bus/cycle lane' (A71) thus making it more dangerous for cyclists. A change to the bus lane hours will 'discourage cycling and be a negative step given the progress that has been made so far'. Also proposals are contrary to the Council's Local Transport Strategy.</p>	<p>See Appendix 3 (Section 1 and 6).</p>

- 56** EH3 2DR Contrary to the Local Transport Strategy of encouraging public transport use and cycling over private car use. Will discourage off peak cycle journeys as cars & heavy lorries will be using the lanes. Will discourage pupils from walking home from school, as cars & heavy lorries will be passing close by the pavements making the roads seem more dangerous & uninviting. Increasing the road capacity for private motor vehicles will encourage modal shift toward the private car, increasing pollution. 'No proper consultation or study was carried out to evaluate pollution, modal shift, illegal parking, cycle use or any 'unintended consequences''.
- 57** EH3 5AE Cycles regularly on Leith Walk, concerned that the proposal to trial peak periods bus lanes in place of all day bus lanes will make it more dangerous, 'perpetually double-parked cars along with heavy traffic makes it feel incredibly dangerous to cycle already. Making the bus lanes peak time only will make the situation worse'.
- 58** EH3 5HY Impact on cyclists - removal of amenity and protection making it more dangerous, thus discouraging cycling. Impact on pedestrians - bringing traffic closer to pavement rendering walking less pleasant and potentially more dangerous. Contrary to Council's Local Transport Strategy - policy PubTrans 1 and PubTrans7 'Reducing the availability of bus lanes seems to fly in the face of the Council goal to have 10% of all trips made by bike by 2020'. 'See no evidence that there has been any consideration of the effect on cyclists'.
- See Appendix 3 (Section 1 to 6).
- See Appendix 3 (Section 1 and 7). Parking restrictions are unaffected by the trials and therefore they do not impact on the Council's ability to enforce these restrictions.
- See Appendix 3 (Section 1,2,3 and 5).

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| 59 | EH3 5JH | <p>The proposed change to make all day bus lanes into peak periods bus lanes will encourage private car use to the detriment of other transport modes. The proposals are contrary to the Council's Local Transport Strategy and they will increase air pollution.</p> <p>Bus lanes are 'a small haven from general motor traffic that are useful on direct routes into the city. Having to share these lanes with general traffic makes them much less appealing to cyclists'.</p> <p>General traffic driving next to the pavement will also make walking less pleasant, 'especially important during school home time which won't be covered by the part time operation of the bus lanes'. 'By letting motorcycles use it they will be more likely to overtake whilst in the bus lane and not give sufficient space. This will increase the risk to cycling and make it less appealing'.</p> | See Appendix 3 (Section 1 to 5). |
| 60 | EH3 5JN | <p>'In a crowded city there is not the space for everyone to travel through congested areas by car. Therefore you should be prioritising mass public transport and cycling. We need more and better bus/cycle lanes, not less'.</p> | See Appendix 3 (Section 1 and 4). |
| 61 | EH3 5JX | <p>Impact on cyclists - removal of amenity and protection, will make it less safe, thus discouraging cycling. Impact on Modal Shift - long term modal shift away from buses and cycling to the car. Objects to allowing PHCs into bus lanes.</p> | See Appendix 3 (Section 1 and 4). PHCs are not part of the trial. Committee on 26 August 2014 agreed not to change its Policy to allow PHCs access to bus lanes during their operational hours. |

62	EH3 6QA	<p>The proposal to trial to change all day bus lanes into peak periods will reduce the bus lane hours to 22½ hours/week and will ‘fundamentally destroy the value of the lanes.’ The proposal will reduce the ‘predictability of journey times’ in the off peaks. Objector’s main concern, however, is cycling safety. He cycles to school and back with his son, ‘who is now, at the age of 13, demanding to cycle on his own. The bus lanes make this somewhat safe, primarily because the lanes are near traffic free during school journey hours. Specifically, the afternoon journey will offer no safe cycling options for our family’. Feels that the bus lanes will not be safe on the homebound journey and therefore will use the car’, ‘with consequences for congestion and pollution’. The proposals ‘represent a fundamental U-turn in council policies, going from one encouraging walking and cycling to school, to one that is actively discouraging it’.</p>	See Appendix 3 (Section 1 to 5).
63	EH3 7PX	<p>Objects to the proposals to change all day bus lanes to peak periods bus lanes, that is to losing interpeak and Saturday bus lanes as he feels that the bus lanes add to his safety.</p>	See Appendix 3 (Section 1).
64	EH3 8HX	<p>Contrary to the Council's Local Transport Strategy of encouraging public transport use and cycle over private car use. The proposals will discourage off peak cycle journeys and pupils from walking home from school as cars & heavy lorries will be using the lanes and general traffic will be closer to pedestrians. 'No proper consultation or study carried out to evaluate changes in pollution, modal shift, illegal parking, cycle use and pedestrians.</p>	See Appendix 3 (Section 1 to 6). It must be stressed that the ETROs' proposals are not permanent but relate to trials that will allow data to be collected to assess the impact of the proposals. Before and after surveys will be undertaken to measure bus journey times, traffic volumes (including changes in lane activity and modal shift), traffic speeds, collision data, cycling surveys, pedestrian surveys, air quality analysis, and legal/illegal parking in bus lanes.
65	EH3 9AF	<p>Impact on cyclists - removal of amenity and protection will discourage cycling. The proposals would be detrimental to cyclists, pedestrians and bus users</p>	See Appendix 3 (Section 1,2 and 4).

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| 66 | EH3 9LP | <p>As a cyclist appreciates ‘being able to use the bus lane even when off peak. Traffic creates a lot of pollution: allowing cars into these lanes brings them closer to pedestrians’. Wants bus lanes extended not reduced.</p> | See Appendix 3 (Section 1 to 3). |
| 67 | EH3 9LR | <p>‘Bus lanes should remain for just buses and bicycles so that cyclists can feel safe. Although this may ease traffic flow in the short term, it will just make driving more attractive and we will be back to congestion again quickly. Also more traffic on the road will cause more air pollution...’ .</p> | See Appendix 3 (Section 1,2 and 4). |
| 68 | EH3 9PL | <p>The proposals are contrary to the Council’s Local Transport Strategy, policies PubTrans1 and PubTrans7. The proposals do not give any consideration to cyclists and pedestrians. ‘Bus lanes provide a wide area of road space in which this “domination by moving or parked vehicles” is significantly reduced’. Bus lanes are also cycle lanes and they ‘form an important buffer between heavy vehicular traffic (such as lorries) and pedestrians’. These proposals will deter ‘the less confident cyclist, who is understandably deterred by the constant presence of cars and lorries’. Allowing general traffic and motorcycles into bus lanes will mean ‘increased pollution, noise, splashing, scariness and, on occasions, danger. The proposals will ‘greatly increase the chances of an accident and actual bodily harm to people using bikes and to pedestrians near the kerb’. Also, ‘allowing motorcycles into bus lanes ‘is likely to reduce the attractiveness of bus lanes for cycling’ thus discouraging cycling’. The proposal to trial changing all day bus lanes to peak periods bus lanes will ‘particularly hit school children walking home as well as families out walking to the shops or the park on Saturdays’. These proposals will adversely affect the Council’s ‘ability to move towards a publicly proclaimed target of 10% of all trips by bike by 2020’. The proposals are being implemented without prior public consultation.</p> | See Appendix 3 (Section 1 to 6). |
| 69 | EH30 9PR | <p>‘Cutting bus lanes causes congestion for bus users, slowing their journey times, and endangers cyclists who use bus lanes for travel. It also encourages car use’.</p> | See Appendix 3 (Section 1,2 and 4). |

70	EH32 0QT	Believes 'that the Council should be further promoting public transport, cycling and walking and I believe that these orders sacrifice these aims for the purpose of promoting car and motorbike use'.	See Appendix 3 (Section 1,3 and 4).
71	EH4 5NG	The proposal to reduce bus lane hours is contrary to the Council's Local Transport Strategy and Active Travel Active Plan including improving and expanding the bus lanes and increasing the usage of public transport, walking and cycling over private car use. The objector has never found that there is much congestion in the areas affected by these proposals at off-peak times. Increasing the amount of road space available to motorists will actually increase the number of motorists driving on these routes due to the induced traffic effect which will lead to increased city centre congestion and even higher levels of pollution. 'Main concern is that these proposals will lead to significant delays and inconvenience to bus passengers with the bus lanes becoming blocked by antisocially parked or waiting vehicles'.	See Appendix 3 (Section 1,4 and 5). Parking restrictions are unaffected by the trials and therefore they do not impact on the Council's ability to enforce these restrictions.
72	EH4 7HF	Contrary to the Council's Local Transport Strategy of encouraging public transport use and cycle over private car use. Will discourage off peak cycle journeys as cars & heavy lorries will be using the lanes Will discourage pupils from walking home from school, as cars & heavy lorries will be passing close by the pavements making the roads seem more dangerous & uninviting. Increasing the road capacity for private motor vehicles will encourage modal shift toward the private car, increasing pollution. 'No proper consultation or study was carried out to evaluate pollution, modal shift, illegal parking, cycle use or any 'unintended consequences''	See Appendix 3 (Section 1 to 6).
73	EH40 3AD	The proposals will be implemented without prior consultation'. The proposals appear to contradict the Council's Local Transport Policies. 'Paid little attention to the affect of the proposals on cyclists and walkers'. 'Possible increases in cycle and pedestrian accidents and traffic pollution increases'.	See Appendix 3 (Section 1 to 6).

- 74** EH42 1RF The proposals are contrary to the Council's Local Transport Strategy 'to favour public transport, pedestrians and cyclists over private motorised vehicles'. Traffic studies in London 'have shown that motorcycles which have been allowed to use bus lanes have a marked increase in speeding over the limit'. Allowing general traffic to use bus lanes outwith the peak periods and motorcycles to use them at all time 'will effectively eliminate any advantage to cyclists and will no doubt increase the conflict between traffic modes that must inevitably lead to more collisions, which are near universally to the detriment of cyclists'. The bus lanes in the absence of dedicated cycles lanes 'are the only protection and advantage cyclists have'. Also they provide 'a buffer between pedestrians and the main traffic lanes, for noise and more importantly for toxic air pollution'. See Appendix 3 (Section 1,3 and 5).
- 75** EH45 9AY The proposals are contrary to the Council's Local Transport Strategy, policies PubTrans1 and PubTrans7. The proposals do not give any consideration to cyclists and pedestrians. 'Bus lanes provide a wide area of road space in which this "domination by moving or parked vehicles" is significantly reduced'. Bus lanes are also cycle lanes and they 'form an important buffer between heavy vehicular traffic (such as lorries) and pedestrians'. These proposals will deter 'the less confident cyclist, who is understandably deterred by the constant presence of cars and lorries'. Allowing general traffic and motorcycles into bus lanes will mean 'increased pollution, noise, splashing, scariness and, on occasions, danger. The proposals will 'greatly increase the chances of an accident and actual bodily harm to people using bikes and to pedestrians near the kerb'. Also, 'allowing motorcycles into bus lanes 'is likely to reduce the attractiveness of bus lanes for cycling' thus discouraging cycling'. The proposal to trial changing all day bus lanes to peak periods bus lanes will 'particularly hit school children walking home as well as families out walking to the shops or the park on Saturdays'. These proposals will adversely affect the Council's 'ability to move towards a publicly proclaimed target of 10% of all trips by bike by 2020'. The proposals are being implemented without prior public consultation. See Appendix 3 (Section 1 to 6).

76	EH5 2GB	<p>Contrary to the Local Transport Strategy of encouraging public transport use and cycle over private car use. Will discourage off peak cycle journeys as cars & heavy lorries will be using the lanes. Will discourage pupils from walking home from school, as cars & heavy lorries will be passing close by the pavements making the roads seem more dangerous & uninviting. Increasing the road capacity for private motor vehicles will encourage modal shift toward the private car, increasing pollution. 'No proper consultation or study was carried out to evaluate pollution, modal shift, illegal parking, cycle use or any 'unintended consequences''.</p>	See Appendix 3 (Section 1 to 6).
77	EH5 3ND	<p>The proposals are contrary to the Council's Local Transport Strategy. Bus lanes 'provide an area of relative safety on the road' and 'they make a huge difference.' The proposals will discourage cycling and they 'will also have a detrimental effect on pedestrians - bringing fast moving vehicles closer to the pavement'.</p>	See Appendix 3 (Section 1,3 and 5).
78	EH53 OLS	<p>Impact on cyclists - removal of amenity and protection making it more dangerous, 'the freedom of use of bus lanes is essential for safe cycling'. Will discourage cycling and encourage modal shift to car. The proposals will 'make Edinburgh a less sustainable city by increasing vehicle numbers, increasing the proportion of bike accidents per mile'.</p>	See Appendix 3 (Section 1 and 4).
79	EH6 4BS	<p>Cycles to work on Leith Walk,' and generally feel safe doing so. Part of the reason for this is that I am separated from the majority of traffic'. The proposals will discourage cycling.</p>	See Appendix 3 (Section 1 and 7).
80	EH6 4PR	<p>'The introduction of clearly delineated and permanent bus lanes has eased traffic flow for all forms of transport, including cars. It has made cycling, both uphill and downhill, somewhat safer, as the lanes are segregated from car traffic and bus driver training has greatly improved interactions between buses and cyclists. It would be folly to downgrade the bus lanes.</p>	See Appendix 3 (Section 1).

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| 81 | EH6 5AT | <p>The proposals are contrary to the Council's Local Transport Strategy , policies PubTrans1 and PubTrans7. 'They will discourage cycle use, and make cycling more dangerous and unpleasant as cars and lorries will be using the lanes. Increasing road capacity for private vehicles will encourage more use of them, thus increasing pollution and accident risk. In addition the bus lanes currently reduce car pollution immediately next to the pavement where walkers are by providing a buffer zone. Removing the bus lanes during non-peak hours will also increase congestion for buses, adding to travel times, making buses less attractive to users so increasing car use. There was no prior public consultation regarding the proposals'.</p> | See Appendix 3 (Section 1 to 6). |
| 82 | EH6 5LD | <p>In relation to Leith Walk proposals, where the Council did not provide a segregated cycle path along the full length of the street, the proposals to trial making all day bus lanes, 'that give cyclists a modicum of safety', into peak periods bus lanes adversely impacts on cyclists. 'Even as an experienced, fit cyclist when I cycle on roads with temporary bus lanes and have to be in high speed traffic, or swerving around parked cars, it is terrifying and unsafe'.</p> | See Appendix 3 (Section 1 and 7). |
| 83 | EH6 5PY | <p>'Currently the bus lanes offer a safer, less congested area in which fewer vehicles travelling at lower speeds pose a lower collision/fatality risk. Removing these safer zones will increase these risks'. Co2 emissions will increase as fewer people opt for a more sustainable transport choice. Such as cycling or public transport'.</p> | See Appendix 3 (Section 1,2 and 4). |

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| 84 | EH6 6LQ | <p>The proposals will make the bus lanes ‘much more dangerous with more traffic in them at more times’ and ‘will lessen the protection for vulnerable roads users’. ‘If you wish to reduce traffic in the city centre you must make alternative forms of transport such as cycling more attractive to those who do not use it’. The proposal will discouraging cyclists, especially the less confident, ‘very few, if any children will be allowed to use these bus lanes if this goes through so they will continue to be driven around by their parents’. Bus lane hours should be extended to all times.</p> | See Appendix 3 (Section 1,3, and 4). |
| 85 | EH6 7NT | <p>Motorcycles - Opposes their access to bus lanes as they are a threat to cyclists. Impact on cyclists - removal of amenity and protection, will make it less safe, thus discouraging cycling. Local Transport Strategy - 'devaluing' the bus lanes goes against the aims of the Local Transport Strategy and Active Travel Plan. 'If they need to be harmonised, make them 24/7 or at least 0700-1900. If there is so little advantage to buses using them out with rush hours then there must logically be no advantage to other traffic to be permitted to use them; if there is an advantage to buses outwith commuting rush hours then preserve it. Active bus lanes also discourage unauthorised parking/waiting/loading. They buffer the footways from traffic'.</p> | See Appendix 3 (Section 1 and 5). |
| 86 | EH6 8AT | <p>‘Bus lanes allow for safer travel by bike without vehicles, other than buses, being allowed in the same lane’. ‘To open bus lanes up to all other vehicles outside of peak hours will increase the dangers to cyclists and encourage more vehicle use’ These proposals will not encourage those who'd like ...to make more journeys by bike’. ‘Bus journeys will be slower with other vehicles in the bus lane and may tempt those who've made the switch to bus travel recently to switch back to car use’. ‘With a target of 10% of all trips by bike in 2020... should not be removing the segregated bus lane facility’.</p> | See Appendix 3 (Section 1 and 4). |

- 87** EH6 8DB The proposal to reduce all day bus lanes to peak periods bus lanes appears to directly contradict the Council's Local Transport strategy ' which promises to prioritise buses and enhance bus lanes'. Concerns over the impact of these proposals will have on the public transport system and on the safety of cyclists in the city. See Appendix 3 (Section 1,4 and 5).
- 88** EH6 8DG The proposals are contrary to the Council's Local Transport Strategy, policies PubTrans1 and PubTrans7. The proposals do not give any consideration to cyclists and pedestrians. 'Bus lanes provide a wide area of road space in which this "domination by moving or parked vehicles" is significantly reduced'. Bus lanes are also cycle lanes and they 'form an important buffer between heavy vehicular traffic (such as lorries) and pedestrians'. These proposals will deter 'the less confident cyclist, who is understandably deterred by the constant presence of cars and lorries'. Allowing general traffic and motorcycles into bus lanes will mean 'increased pollution, noise, splashing, scariness and, on occasions, danger. The proposals will 'greatly increase the chances of an accident and actual bodily harm to people using bikes and to pedestrians near the kerb''. Also, 'allowing motorcycles into bus lanes 'is likely to reduce the attractiveness of bus lanes for cycling' thus discouraging cycling'. The proposal to trial changing all day bus lanes to peak periods bus lanes will 'particularly hit school children walking home as well as families out walking to the shops or the park on Saturdays'. These proposals will adversely affect the Council's 'ability to move towards a publicly proclaimed target of 10% of all trips by bike by 2020'. The proposals are being implemented without prior public consultation. See Appendix 3 (Section 1 to 5).
- 89** EH6 8EG Impact on cyclists - removal of amenity and protection will make cycling more dangerous. Objector believes that 'the abandonment of the bus lanes on Leith Walk will make it even more dangerous for cyclists'. See Appendix 3 (Section 1 and 7).

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| 90 | EH6 8ES | <p>The proposals will ‘dramatically reduce the safety of the bus lanes for cyclists’.</p> <p>‘The fact that separate cycle lanes have not been provided in the upgrades to Leith walk is bad enough, however reducing the provision for some separation of traffic would make that situation a whole lot worse and more dangerous. It flies in the face of the redesign of Leith walk having anything at all to do with raising the priority of pedestrians and cyclists’.</p> | <p>See Appendix 3 (Section 1,3, and 7).</p> |
| 91 | EH6 8NZ | <p>Lack of public consultation and 'lack of consideration for walkers, children, families, wheelchair users and users of prams/pushchairs in proposals (impact on both long-term health and general safety are ignored)'.</p> | <p>See Appendix 3 (Section 2 and 6).</p> |
| 92 | EH7 4NA | <p>‘Where they exist, bus lanes mean that I do not have to worry much about HGVs, cars and motorcycles passing close to me. I also suspect that the air quality is better than it would be if other vehicles were allowed in bus lanes. I observe that peak-hours bus lanes are not often used by vehicles other than buses and cycles outwith peak hours, and that there is not much traffic congestion that would be helped by allowing other vehicles into bus lanes. I would therefore suggest that the greenways concept of all-day bus lanes should become the norm, rather than peak-hours bus lanes. This would reduce driver confusion and help to continue the progress that Edinburgh has made in encouraging cycling and walking’.</p> | <p>See Appendix 3 (Section 1 and 2).</p> |

- 93** EH7 5HG The proposals are contrary to the Council's Local Transport Strategy 'of encouraging public transport use and cycle use over private car use'. It will discourage off peak cycle journeys and pupils walking home from school as cars and heavy lorries will be using the lanes, bringing them closer to the pavements making the roads 'seem more dangerous and uninviting'. Will increase road capacity for cars and that will encourage modal shift toward the private car, increasing pollution. The proposals to change the bus lane hours will encourage illegal parking in the bus lanes during the interpeak. 'No proper consultation or study was carried out to evaluate pollution, modal shift, illegal parking, cycle use or any 'unintended consequences''.
- See Appendix 3 (Section 1 to 5). Parking restrictions are unaffected by the trials and therefore they do not impact on the Council's ability to enforce these restrictions.
- 94** EH7 5JX Impact on cyclists - removal of amenity and protection - 'bus lanes provide a small solace for cyclists at many times during the day. The use of them make a number of cyclists feel considerably safer'. Impact on Public Transport - adverse effect on bus services and patronage. Impact on Modal Shift - long term modal shift away from public transport to the car.
- See Appendix 3 (Section 1 and 4).

95 EH7 5PA

The proposals are contrary to the Council's Local Transport Strategy, policies PubTrans1 and PubTrans7. The proposals do not give any consideration to cyclists and pedestrians. 'Bus lanes provide a wide area of road space in which this "domination by moving or parked vehicles" is significantly reduced'. Bus lanes are also cycle lanes and they 'form an important buffer between heavy vehicular traffic (such as lorries) and pedestrians'. These proposals will deter 'the less confident cyclist, who is understandably deterred by the constant presence of cars and lorries'. Allowing general traffic and motorcycles into bus lanes will mean 'increased pollution, noise, splashing, scariness and, on occasions, danger. The proposals will 'greatly increase the chances of an accident and actual bodily harm to people using bikes and to pedestrians near the kerb'. Also, 'allowing motorcycles into bus lanes 'is likely to reduce the attractiveness of bus lanes for cycling' thus discouraging cycling'. The proposal to trial changing all day bus lanes to peak periods bus lanes will 'particularly hit school children walking home as well as families out walking to the shops or the park on Saturdays'. These proposals will adversely affect the Council's 'ability to move towards a publicly proclaimed target of 10% of all trips by bike by 2020'. The proposals are being implemented without prior public consultation.

See Appendix 3 (Section 1 to 6).

- 96** EH7 5SD The proposal to trial making all day bus lanes to peak periods bus lanes will increase 'road capacity for cars will have several negative effects, including: increasing car use, discouraging bus and cycle journeys, and making walking to school less attractive and potentially more dangerous for pupils'. Air pollution will also increase. 'Finally, and in my mind most importantly, allowing cars to use bus lanes will simply have the same result that can already be seen in peak-time-only bus lanes. Namely, the lanes are used as de facto loading bays and waiting zones for lorries, trucks, and private cars. This means that cyclists are forced to essentially slalom into and out of the fast-moving lanes in an effort to avoid collisions, and bus journeys take much longer' 'Extremely disappointed that the Council has not seen fit to submit this proposal for public consultation, nor have any studies been carried out to assess the pros and cons of the proposal. 'If, as stated, the aim is to simplify bus lane regulations for car users, the easiest way to do this would be to extend the hours of operations to a 24/7/365 schedule'.
- See Appendix 3 (Section 1 to 4). It must be stressed that the ETROs' proposals are not permanent but relate to trials that will allow data to be collected to assess the impact of the proposals. Before and after surveys will be undertaken to measure bus journey times, traffic volumes (including changes in lane activity and modal shift), traffic speeds, collision data, cycling surveys, pedestrian surveys, air quality analysis, and legal/illegal parking in bus lanes.
- 97** EH7 5UA The proposals are contrary to the Council's Local Transport Strategy and Active Travel Action Plan 'to improve and expand the bus lanes and increase the usage of public transport and cycling over private car use. 'The bus lanes provide a form of respite for cyclists, where they have a safe refuge from the main flow of faster, motorised traffic'. 'Furthermore it is intimidating and unsafe for cyclists to constantly have to move around obstructions in the bus lane and into the outside lane of faster traffic'. This propose to trial making all day bus lanes into peak periods bus lanes 'will do nothing to discourage the use of private motor vehicles in the city centre, which are a major contributor to the legally unacceptable levels of atmospheric pollutants'.
- See Appendix 3 (Section 1,2,4 and 5).

- 98** EH8 7LY 'Bus lanes are the closest thing that cyclists have to a safe space on the road in this city and furthermore they cover the most important and dangerous roads for commuting and getting out of the city. The proposal to make them part time will have a drastic impact on the safety and quality of life for cyclists and pedestrians who otherwise enjoy the benefit of separation from fast paced and polluting motor traffic'. 'The speed differential between a motorcycle and push bike is massive and will certainly make the environment feel unsafe if not actually unsafe, and seeing as a similar scheme in London resulted in a drastic increase in speeding by motorcycles I am of the opinion that it will do the same here and decrease the physical safety of more vulnerable road users'. The proposals conflict with the Council's aims to increase active transport in the city and will result increased levels of traffic. 'They will make active travel less attractive and more dangerous for a great many people for little benefit'.
- See Appendix 3 (Section 1 to 5).
- 99** EH8 8BG The proposals are contrary to the Council's Local Transport Strategy. Allowing cars into bus lanes will delay public transport. Will discourage off peak cycle journeys as cars & heavy lorries will be using the lanes. Will discourage pupils from walking home from school, as cars & heavy lorries will be passing close by the pavements 'making the roads seem more dangerous & uninviting'. Increasing the road capacity for private motor vehicles will encourage modal shift toward the private car, increasing pollution. Suggest bus lanes should be extended, for example 7.00am to 7.00pm, 'as this would simplify things for drivers knowing when to use and when not to use them'. 'Not aware of any proper consultation or study was carried out to evaluate pollution, modal shift, illegal parking, cycle use or any 'unintended consequences''
- See Appendix 3 (Section 1 to 6).

100	EH8 8ES	The proposal to trial changing all day bus lanes to peak period bus lanes is contrary to the Council's Local Transport Strategy including policies PubTrans1 and PubTrans7. 'The majority of bus lanes were in fact extended rather than curtailed'. Issue with 'vehicles parking in or otherwise obstructing bus lanes, both within and outwith the hours of operation. This has a significant effect on the progress of buses along the road and the flow of traffic in the other lane as buses are forced to move around the parked vehicles. Cyclists are similarly disadvantaged and put at risk by having to avoid these obstacles'. 'The presence of fast traffic (in particular motorcycles) will act to discourage cycling'.	See Appendix 3 (Section 1 and 5). Parking restrictions are unaffected by the trials and therefore they do not impact on the Council's ability to enforce these restrictions.
101	EH8 9QF	The proposal to trial changing all day bus lanes into peak period bus lanes will encourage more cars into the city (modal shift) and increase pollution levels. Bus lanes should be made all day to encourage use of park and ride and discourage car use in the city, which in turn will reduce noise and air pollution.	See Appendix 3 (Section2 and 4).
102	EH8 9QN	Lack of consultation, 'almost complete failure' to consider the proposals effects on cyclists. These proposals will endanger and discourage cyclists. Bus lanes are 'priority lanes for cyclists, too, and provide significant protection during their hours of operation'. Contrary to the Council's vision of discouraging car use, and encouraging other forms of transport, a sustainable approach to reducing traffic congestion.	See Appendix 3 (Section 1,4,5 and 6).
103	EH8 9QS	'This policy will make it less convenient for me to take the bus. It will make it less safe to ride my bike, less pleasant to walk to the shops, and less easy to cross the road. It is in direct contradiction to everything that this council has worked hard to do to make Edinburgh a nicer place to live. The council's policies are working, bus use is up, bike use is up, there are more people walking in our city and fewer people driving. This progress has not come easily, every small positive step has been a hard battle by campaigners and council leaders. That the council would imperil this progress with an ill thought through retreat on bus lanes mystifies me'.	See Appendix 3 (Section 1 to 5).

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| 104 | EH8 9RZ | <p>'Very concerned that a full public consultation was not carried out and that the needs of pedestrians and cyclists were not adequately considered. The proposals are detrimental to green modes of transport and instead will only increase motorised traffic in the city where priority should be to provide safe streets with good air quality for all residents of Edinburgh. The bus lane is an important buffer zone for pedestrians on the walk way and an essential space for the city cyclist'. Concerns about speeding motorcyclists and allowing them access to bus lanes 'will be a deterrent to less confident cyclists as well as being noisy and sometimes dangerous for pedestrians'. 'Decreasing bus lane provision sends entirely the wrong message from a council which should be committed to promoting active and green transport in our city'.</p> | See Appendix 3 (Section 1,2,3,4 and 6). |
| 105 | EH9 1BW | <p>Feels extremely vulnerable on the road, 'bicycle lanes are all that really allow me to feel safe enough to use a bike as my main form of transport and exercise' and 'these measure that will be detrimental to many peoples' ability to travel around the city'.</p> | See Appendix 3 (Section 1). |
| 106 | EH9 1BW | <p>Proposals will make her as a cyclist 'feel extremely vulnerable on the road, cycle lanes are all that really allow me to feel safe enough to use a bike' The proposals ' will be detrimental to many peoples' ability to travel around the city'.</p> | See Appendix 3 (Section 1 and 3). |

107	EH9 1BW	<p>Contrary to the Council's Local Transport Strategy 'of encouraging public transport use and cycle use over private car use' and policy PubTrans7. The proposals 'will discourage 'off peak cycle journeys as cars & heavy lorries will be using the lanes'.</p> <p>They will also 'will discourage pupils from walking home from school, as cars & heavy lorries will be passing close by the pavements making the roads seem more dangerous & uninviting'. Will increase 'the road capacity for private motor vehicles will encourage modal shift toward the private car, increasing pollution...'. Encourage illegal parking in the bus lanes during off-peak hours. 'No proper consultation or study was carried out to evaluate pollution, modal shift, illegal parking, cycle use or any 'unintended consequences'.</p>	<p>See Appendix 3 (Section 1 to 6). Parking restrictions are unaffected by the trials and therefore they do not impact on the Council's ability to enforce these restrictions.</p>
108	EH9 1DX	<p>The proposals ' to allow other vehicles into the bus lanes this will have an awful impact on cycling, it is already difficult enough to cycle in this city without you doing this to make it dramatically worse. The Council should be moving to make the city more suitable to cyclists not less!'</p>	<p>See Appendix 3 (Section 1 and 4).</p>
109	EH9 1DX	<p>The proposals 'will lead to higher emission rates, noise pollution and possibly even more accidents on the road'. The proposals are contrary to the Council's Local Transport Strategy which aims to encourage people to cycle and walk more as well as to use more public transport. The proposals could make cycling more dangerous. 'As a pedestrian, I do not want to walk next to roads which host a great amount of traffic, and are possibly more difficult and dangerous to cross'.</p>	<p>See Appendix 3 (Section 1 to 5).</p>
110	EH9 1HG	<p>The current use of bus lanes is ignored by a section of the community and this will just worsen the situation. All in all they seem contrary to making the city more accessible by bike and public transport.</p>	<p>See Appendix 3 (Section 1 and 4).</p>

111 EH9 1HN

The proposals will remove the amenity and protection for cyclists and, 'will have a serious adverse impact on cyclists and even pedestrians in Edinburgh'. Opposes motorcycle access to bus lanes as they endanger cyclists 'on account of their extreme acceleration and unpredictability'. Impact on Air Quality - proposals will negatively impact on air quality due to increase motorized traffic in bus lanes, adversely affecting cyclists and pedestrians. Impact on pedestrians - traffic in bus lanes will be closer to pedestrians and cyclists. Bus lanes provide a relatively quiet "buffer zone" separating pedestrians from the main flow of traffic. These proposals will also discourage cycling. Contrary to the Council's Local Transport Strategy and Active Travel Plan. Impact on modal shift, the proposals will increase motorized traffic. There was lack of public consultation regarding the proposals.

See Appendix 3 (Section 1 to 6).

112 EH9 1HZ

'I greatly value the fact that as a cyclist I am able to use the bus lanes and that, since these are always free of cars and lorries, I feel much safer. It is for this reason that I use my bike all around Edinburgh. I urge the Council to please maintain the bus lanes as car and lorry free and not allow these other vehicles to use them so that I can continue to cycle safely'.

See Appendix 3 (Section 1).

- 113** EH9 1LW The proposals are contrary to the Council's own Local Transport Strategy, policies PubTrans1 and PubTrans7. The Transport and Environment Committee report (26 August) which proposed the trials 'does not address the impact of the cutback in bus lane hours on pedestrians or cyclists'. 'Off-peak lanes are important for cyclists going shopping, to and from school, and many other off-peak journey types. Many of these trips are by the less confident cyclist. A council with a target of 10% of ALL trips by bike in 2020 should not remove this facility until segregated cycling provision is made'. The proposal to trial changing all day bus lanes into peak periods bus lanes 'will affect school children walking home as well as families out walking to the shops or the park on Saturdays'. 'London experience showed a significant rise in motorcyclist injuries, in motorcyclist speeds, and in motorcycles exceeding the speed limit when motor cycles were allowed in bus lanes and this is clearly an unacceptable risk to take for other road users'. These proposals 'will likely cause increased accidents'. There was no prior public consultation regarding the proposals. See Appendix 3 (Section 1,2,3 and 5).
- 114** EH9 1LY Reduced bus lane operational times will have an adverse impact on pedestrians and cyclists. Contrary to the Council's Local Transport Strategy (LTS), policies PubTrans1 and PubTrans7. Will discourage cycling, "The attractiveness of cycling is dependent on the degree to which the road network is dominated by moving or parked motor vehicles." (LTS, Cycling section 9.2) Pollution - operational bus lanes are likely to reduce the pollutants breathed in by walkers and, to a lesser extent, cyclists using the bus lanes. See Appendix 3 (Section 1,2,3 and 6).

- 115** EH9 1QT ‘Allowing other types of traffic in bus lanes will make them less attractive or safe for cyclists’. The proposals are contrary to the Council's policy on transport which is to encourage the use of bicycles, public transport and reduce private vehicle use. The proposals will have the opposite effect. ‘Reducing the active hours of bus lanes will tempt car drivers to try to use their own vehicles off-peak to get into the city centre, so making the congestion there worse’ and this will result in an increase in pollution and make bus journeys slower.
- See Appendix 3 (Section 1,2,4 and 5).
- 116** EH9 2AG ‘The proposals are contrary to the Council's own Local Transport Strategy , policies PubTrans1 and PubTrans7. ‘Little or no consideration’ has been given to the safety of cyclists and pedestrians . The proposals will ‘result a significantly higher number of vehicles closer to the footway making walking less attractive and potentially more dangerous’. Reducing the operation times of all day bus lanes will ‘convert what is effectively a 2 lane road into 4 lanes, which may also result in an increase in traffic speeds’. ‘Allowing more vehicles into bus lanes is likely to lead drivers to consider them just ordinary stretches of road, and illegal parking may become even more problematic if not well enforced. This could easily have a negative impact on bus timetables, and thus patronage, with the potential for modal shift away from buses increasing the number of vehicles in the city centre still further’.
- See Appendix 3 (Section 1 to 5). Parking restrictions are unaffected by the trials and therefore they do not impact on the Council's ability to enforce these restrictions.
- 117** EH9 2AZ Contrary to the Local Transport Strategy of encouraging public transport use and cycling over private car use. Will discourage off peak cycle journeys as cars & heavy lorries will be using the lanes. Will discourage pupils from walking home from school, as cars & heavy lorries will be passing close by the pavements making the roads seem more dangerous & uninviting. Increasing the road capacity for private motor vehicles will encourage modal shift toward the private car, increasing pollution. 'No proper consultation or study was carried out to evaluate pollution, modal shift, illegal parking, cycle use or any ‘unintended consequences’’.
- See Appendix 3 (Section 1 to 6).

118	EH9 2LW	<p>Contrary to the Local Transport Strategy of encouraging public transport use and cycling over private car use. Will discourage off peak cycle journeys as cars & heavy lorries will be using the lanes Will discourage pupils from walking home from school, as cars & heavy lorries will be passing close by the pavements making the roads seem more dangerous & uninviting. Increasing the road capacity for private motor vehicles will encourage modal shift toward the private car, increasing pollution. 'No proper consultation or study was carried out to evaluate pollution, modal shift, illegal parking, cycle use or any 'unintended consequences''.</p>	See Appendix 3 (Section 1 to 6).
119	EH9 3JH	<p>A major reason for not choosing the bicycle as a means of commuting and other travel is the perception of safety, speed of traffic and general squeeze of traffic throughout the city. I believe that the changes suggested through ETRO/14/38A and ETRO/14/38B will detract from promotional work to highlight all off-road and segregated routes throughout the city to existing and new cyclists'.</p>	See Appendix 3 (Section 1).
120	FK7 7RJ	<p>The proposals 'represent a retrograde step in the provisions for active and public transport'. The proposals to remove 'a key part of protection for cyclists and pedestrians (by keeping most traffic away from the kerb) for most of the day, and all of the weekend lie contrary to the current modal shift in transport'. 'These benefits will be lost to both these groups'.</p>	See Appendix 3 (Section 1,3 and 4).
121	G41 2AZ	<p>The proposals, if enacted, will make me less likely to use buses or cycle (and more likely to make me resort to driving)'. </p>	See Appendix 3 (Section 1 and 4).
122	KY11 1AW	<p>'The bus lanes are not perfect, but reducing their hours and allowing motorcyclists in them will adversely affect the policies the Council has been following for years to make the city an example of how to best provide for walking, cycling and public transport'. These proposals were 'planned without public consultation'.</p>	<p>See Appendix 3 (Section 1 to 6). It must be stressed that the ETROs' proposals are not permanent but relate to trials that will allow data to be collected to assess the impact of the proposals. Before and after surveys will be undertaken to measure bus journey times, traffic volumes (including changes in lane activity and modal shift), traffic speeds, collision data, cycling surveys, pedestrian surveys, air quality analysis, and legal/illegal parking in bus lanes.</p>

123	TD12 4EF	The proposals are contrary to the Council's Local Transport Strategy, including policies PubTrans1 and PubTrans7. There should be a presumption against 'the curtailing of the hours of operation and against the opening of the bus lanes to more classes of motorised traffic'. These proposals will discourage cycling by allowing general traffic and motorcycles into bus lanes. The proposals are 'not going to positively impact' on the Council's target of 10% all journeys made by cycle by 2020. Allowing general traffic and motorcycles into bus lanes, bringing them closer to pedestrians, will make pavements less attractive. To simplify the bus lane operational hours, make them all 24 hours, 7 days per week.	See Appendix 3 (Section 1 to 5).
124	Objector 1	Proposals conflict with the Council's own Local Transport Strategy. Loss of amenity - 'Bus lanes physically overprint cycle lanes on the road surface. There is a current problem... bike lanes disappear when bus lanes time out'. The proposals puts cyclists at greater risk.	See Appendix 3 (Section 1 and 6).
125	Objector 2	'This is an objection to increasing the availability of bus/cycle lanes to more vehicles. As a regular cyclist the city needs to make cycling more safe. This measure would have the opposite effect. The important point is that bus lanes are also used by bikes and, indirectly, help to minimise car journeys. This would be a regressive step'.	See Appendix 3 (Section 1 and 4).
126	Objector 3	Feels safe when no other vehicles except buses and taxis are passing. Reducing the restrictions on these bus lanes will have an adverse effect on the cycling community making them more vulnerable to incidents especially the A71 Calder Road where the speed limit is 40mph.	See Appendix 3 (Section 1).
127	Objector 4	'If the bus lanes are made peak hours only I can foresee issues with drivers parking in the "off-duty" bus lanes, which could easily lead to problems when drivers "slalom" to avoid the parked cars - most accidents occur at nexus points - intersections and lane changes'. Discouraged from cycling during the "off duty" hours, 'bus lanes provide me with a safe environment'. The Council has a policy to encourage cycling and the proposals 'will add nothing towards that goal'.	See Appendix 3 (Section 1). Parking restrictions are unaffected by the trials and therefore they do not impact on the Council's ability to enforce these restrictions.

128 Objector 5 The proposals will 'make it more difficult to get around the city by healthy travel modes'. The proposals are contrary to policies in the Council's Local Transport Strategy, 'including PubTrans1, PubTrans7, Walk1, the Cycling section in general and the basic idea of reducing road danger'. See Appendix 3 (Section 1 and 5).

Appendix 5 – Objections to ETRO/14/38A

No	ID	Objection Summary	Response
1	Corstorphine Community Council	Allowing motorcycles into bus lanes will increase traffic and congestion in bus lanes, thus delaying permitted classes of vehicles.	The Council believes that allowing motorcycles to use bus lanes will not affect their operational efficiency. Before and after travel volume and speed surveys will be undertaken.
2	EH10 4SL	Objects to motorcycles having access to bus lanes as they will impede and endanger cyclists, 'motorbikes overtaking me would be truly terrifying'. Objects to Private Hire Cars getting access to bus lanes 'Would undermine all the strategic goals that Edinburgh purports to hold.'	Transport for London (TfL) undertook two extensive trials. Following these trials, TfL decided to give motorcycles permanent access to the majority of the Capital's red routes. TfL states on its website that 'the safety of motorcyclists and other vulnerable road users is unaffected' and 'benefits include reduced journey times for motorcyclists and less carbon dioxide emissions'. The Council will monitor road traffic collisions throughout the trials to ensure that any serious concerns over the safety of cyclists, or any other user groups, are identified and addressed quickly. PHCs are not part of the trial. Committee on 26 August 2014 agreed not to change its Policy to allow PHCs access to bus lanes during their operational hours.
3	EH10 5LQ	Opposes motorcycles having access to bus lanes as they will impede and endanger cyclists. 'It is an erosion of the scant provisions in place for cyclists in Edinburgh'.	See paragraphs 1 and 2 of the response given to Objector 2.

4 EH10 5LQ	<p>'Bus lanes offer the only protection for cyclists in large parts of Edinburgh where motorised traffic is particularly heavy. Allowing motorbikes to share bus lanes will reduce that protection even further'. The proposal conflicts with the Council's Local Transport Strategy 'commitment to encourage more non-motorised forms of transport around the city' and should 'at least maintain what protection there already is for cyclists'.</p>	<p>See paragraphs 1 and 2 of the response given to Objector 2. The Council will undertake before and after cycle surveys to ascertain if there is any significant change in cycling levels during the trials. Opinion surveys will also be undertaken to record cyclists' views on the impact of the changes.</p>
5 EH16 5NX	<p>Objects to cycles sharing bus lanes with motorcycles as they 'swerve in and out at great speed in comparison to a push bike and are very dangerous for cyclists' and that bus lanes 'should not be cluttered up by more petrol or diesel vehicles'.</p>	<p>See paragraphs 1 and 2 of the response to given to Objector 2. Before and after travel volume and speed surveys will be undertaken.</p>
6 EH7 5JA	<p>The proposals to allow motorcycles into bus lanes do 'not go far enough by not allowing motorcycles to use bus lanes at bus gates and contra flow bus lanes'.</p>	<p>Bus gates are usually installed to prevent general traffic 'rat running' through residential areas while maintaining access for public transport. Contra flow bus lanes are usually installed for specific traffic management reasons. It would not therefore be appropriate to allow motorcycles access to these specific types of bus lane.</p>

Appendix 6 – Objections to ETRO/14/38B

No	ID	Objection Summary	Response
1	Edinburgh Napier University	Napier University's travel surveys indicate that staff and students travel to their three campuses outwith peak travel hours. 'The route along Calder Road, Dalry Road and Gorgie Road is a significant detraction towards encouraging new and prospective cyclists to increase the number of commute journeys out to our Sighthill Campus'. As 'Calder Road will remain at 40mph for the most part, the risk to cyclists in the shared space of a lane, with mixed vehicles travelling at speed must be high'.	<p>The Council will undertake before and after cycle surveys to ascertain if there is any significant change in cycling levels during the trials.</p> <p>Opinion surveys will also be undertaken to record cyclists' views on the impact of the changes.</p> <p>The effect of the trials on all bus lane user groups will be monitored and before and after bus journey times will be undertaken.</p> <p>Collision data will be monitored throughout the trials and, if at any stage serious concerns regarding safety emerge, they can be abandoned at short notice.</p> <p>The trials will produce evidence that will allow decisions to be taken on the future operation of the city's bus lane network, taking account of the actual impact of these changes on all bus lane user groups.</p>

2 Scottish Association for Public Transport 'At a time when public transport usage in Edinburgh is healthily increasing, and when there is a need to reduce emissions from road traffic, a move to effectively increase road space for private cars in Edinburgh is incomprehensible and sends out entirely the wrong message. Buses suffer less from road congestion at off-peak times during the day. But it is equally true that private vehicles do not face congestion at these times, so allowing these vehicles to use bus lanes at these times will be of little benefit to them. Retaining the prohibition for private vehicles using bus lanes during the day Monday-Friday 07.30-18.30 and Saturday 08.30-18.30 would, we believe, cause less confusion than introducing peak-period restrictions which require car drivers to check the time of day before knowing whether to avoid bus lanes, leading to a greater probability of illegal use of the bus lanes by private vehicles'.

See main report, Impact on air quality (paragraphs 3.14 to 3.17) and Impact on modal shift (paragraphs 3.18 to 3.19). Also see response to Objection 1.

3 EH13 OHT

Firstly: there is a discrepancy in the title of the order between the Statutory Advertisement and the published Draft Order itself, per the City of Edinburgh's own Website. The former styles the Draft Order as "The City of Edinburgh Council Various (Various Bus Priority Lanes, Edinburgh) (Amended to Times of Operation) Experimental Traffic Regulation Order 201_ - ERT0/14/38B" whereas the latter title is "The City of Edinburgh Council (Various Bus Priority Lanes, Edinburgh) (Amended to Times of Operation) Experimental Traffic Regulation Order 201_ - ERT0/14/38B" i.e. omitting the initial 'VARIOUS.

Secondly: Schedule 2 (page 5 of 7) in the Draft Order contains a chronological incoherence in that "Variations ETC TO THE CITY OF EDINBURGH COUNCIL (GREAT JUNCTION STREET, LEITH, EDINBURGH) (BUS PRIORITY LANE) AND (VARIOUS STREETS) (PROHIBITION OF WAITING) (VARIATION) ORDER 2001 apparently proposes that the "VARIATIONS" shall substitute "7:30a.m. and 9:30a.m and between 4 a.m. and 6.30 p.m. Mondays to Fridays both inclusive.) This would render the 'times of operation' incoherent.

I submit these inaccuracies in legal documents render the Council's process in this matter incompetent.

In the advert the word "various" appeared twice in the title, side by side. This is only a typographical error and would not misdirect anyone looking for a copy of the order after reading the advert.

Due to the administrative error in ETRO/14/38B, relating to the title and operating times for the part of the ETRO relating to Great Junction Street and North Junction Street, this part was re-advertised as ERT0/14/38B(i) between 20 February and 13 March 2015. The amendment to correct the error will be incorporated into TRO/14/38B, should Committee give its approval to make the Order.

4 EH4 8BY

Impact on cyclists - removal of amenity and protection will make it less safe, thus discouraging cycling. Keep the existing bus lane times or extend them to 24/7, 'providing more bus lanes will help encourage active travel', 'will allow for more safe cycling and more cycling will reduce congestion and pollution'.

See main report, Impact on cyclists (paragraphs 3.7 to 3.9), Impact on air quality(paragraphs 3.14 to 3.17). Also see response to Objection 1.

5	<p>EH10 7BB</p> <p>'The all-day bus lanes operate in what must be the busiest streets in the city, and therefore the streets where anyone cycling needs more protection from the greater volumes of traffic. 'I welcome the relative haven provided by bus lanes from the rest of the traffic which often passes far too close for comfort'. 'If the city council wants to reduce emissions and air pollution in the city, it should be doing more rather than less to encourage active travel. While reducing the bus lanes to peak times only may not have an adverse effect on bus services, it is highly likely to discourage cyclists'.</p>	<p>See main report, Impact on cyclists (paragraphs 3.7 to 3.9), Impact on air quality(paragraphs 3.14 to 3.17). Also see response to Objection 1.</p>
6	<p>EH16 5AY</p> <p>Impact on cyclists - removal of amenity - 'Opening up bus lanes makes a mockery of them being also being cycle lanes.' Impact on Public Transport - adverse effect on bus services during the interpeak - 'Opening up bus lanes leaves buses at the mercy of off-peak congestion, such as during football matches, large events etc'.</p>	<p>See main report, Impact on cyclists (paragraphs 3.7 to 3.9). Also see response to Objection 1.</p>
7	<p>EH12 5PL</p> <p>The proposals to reduce all day bus lanes to peak periods bus lanes 'will make the main roads even more dangerous for cycling not to mention slowing the movement of buses'. The roads will be 'more unpleasant for pedestrians, who will be closer to vehicle emissions'.</p>	<p>See main report, Impact on cyclists (paragraphs 3.7 to 3.9), Impact on air quality(paragraphs 3.14 to 3.17). Also see response to Objection 1.</p>
8	<p>EH6 8DB</p> <p>The proposal to trial making all day bus lanes to peak periods is contrary to the Council's Local Transport Strategy which 'calls for encouragement of Active Travel and the prioritisation of buses'. Bus lanes are also priority lanes for cyclists and 'provide significant protection during their hours of operation. 'The biggest barrier to cycling for those that do not currently ride on the roads is acknowledged to be the perception of safety', implementing the proposals 'will not improve the take-up of cycling'. 'Pedestrians will have to put up with the extra pollution and the intimidation of vehicle traffic right next to them along those footways that run next to existing bus lanes'. 'There has been no public consultation on this issue, as far as I am aware'.</p>	<p>See main report, Impact on cyclists (paragraphs 3.7 to 3.9), Impact on modal shift (paragraphs 3.18 to 3.19), Impact on air quality (paragraphs 3.14 to 3.17), Contrary to Council's Local Transport Strategy (paragraphs 3.20 to 3.24) and Lack of Public Consultation (paragraphs 3.25 to 3.31). Also see response to Objection 1.</p>

9 EH12 8GD

The proposals will discourage cyclists using bus lanes, speed up traffic and will encourage 'motorised forms of transport'. 'The bus lanes provide a safer lane to travel in for cyclists, and the buses are unhindered'. 'I feel safer in a bus lane with buses and taxis as these drivers by enlarge are used to cyclist being in that lane. Non bus lane users are less used to cyclists and would therefore be seen as an issue. Pedestrians can also feel safer that cars are not speeding past'. 'There is maybe more of a need to move bus lanes to full time, as opposed to changing full time to only peak times'.

See main report, Impact on cyclists (paragraphs 3.7 to 3.9), Impact on modal shift (paragraphs 3.18 to 3.19) and Impact on air quality (paragraphs 3.14 to 3.17).
Also see response to Objection 1.

<p>10 EH4 5LZ</p>	<p>Basis of objection is 'the downgrading of the city's limited network of bus lanes, even for a period of only 9 months, is totally contrary to all of the Council's own travel policies, which include prioritising the pedestrian environment, cycle safety, reducing car use and car dependency, as well as pollution reduction'.</p>	<p>See main report, Impact on cyclists (paragraphs 3.7 to 3.9), Impact on air quality (paragraphs 3.14 to 3.17), Impact on modal shift (paragraphs 3.17 to 3.18) and Contrary to Council's Local Transport Strategy (paragraphs 3.20 to 3.24).Also see response to Objection 1.</p>
<p>11 EH11 1NR</p>	<p>The proposal to trial making all day bus lanes into peak periods bus lanes is 'a step backwards in achieving both active travel policy goals (due to deleterious effects on pedestrians and cyclists), will appear to have no benefit to general traffic flow and will reduce the attractiveness of buses compared to private vehicles (by subjecting both to the same traffic conditions during non-peak periods)'.</p> <p>According to the statement of reasons document the rationale for the order appears to be to "reduce confusion amongst drivers" and the justification is that "all-day bus lanes [appear] to offer no additional benefit to buses compared to peak-period lanes under normal traffic conditions"</p> <p>'If reduction in driver confusion is indeed the only goal then I contend that an equally effective method of achieving this goal would be to convert all peak-period bus lanes to all-day bus lanes, seemingly with no impact on general traffic flow either'.</p> <p>The proposal is 'not only removing bus lanes, but cycle facilities too'. 'In particular the Leith Walk, Gorgie Road, Lothian Road and Calder Road all-day bus lanes make these roads far more agreeable to cycle upon'.</p> <p>'The width of bus lanes also moves traffic well away from pedestrians walking on the affected streets. This has advantages both in making the journey more pleasant (fewer fumes and noise, fewer vehicles to splash pedestrians in rainy weather) and in safety (pedestrians do not have to cross 2 lanes of general traffic on each side of the road)'.</p>	<p>The trial is not removing bus lanes, but trialling the reduction of bus lane operational hours in all day bus lanes.</p> <p>See main report, Impact on cyclists (paragraphs 3.7 to 3.9), Impact on modal shift (paragraphs 3.18 to 3.19) and Impact on air quality (paragraphs 3.14 to 3.17).</p> <p>Also see response to Objection 1.</p>

12 EH16 5SQ

‘Reducing the bus lane hours will not address any existing problem, but will make the transport situation much worse for the majority of people’. The proposal ‘will make cycling in the city much more dangerous and unpleasant. Most arterial routes have no bicycle infrastructure and bus lanes offer the only protection’. The objector mentions his experiences on bus lanes on Liberton Road and the Nicolson Street/South Bridge corridor
In the objector’s experience ‘there is no need for additional road capacity during off-peak times. There is very little congestion in Edinburgh and almost nothing outside peak hours, and bus lanes would not contribute much road capacity anyway as they are usually full of parked cars at those times’.
‘As bus user, I find the bus system in Edinburgh often already inefficient and slow, as the bus lanes are often blocked, buses have to change lanes frequently and are held up behind cars. Reducing bus lanes hours will make buses even slower, again it would be more important to enforce bus lanes and reduce parking, to encourage more users into public transport.

See main report, Impact on cyclists (paragraphs 3.7 to 3.9), Impact on air quality (paragraphs 3.14 to 3.17) and also see response to Objection 1.
The proposal does not impact on the bus lanes on Liberton Road and the Nicolson Street/South Bridge corridor as they are already peak period bus lanes.

13 EH7 5YG

Concerns over the impact of these proposals on cyclists who see bus lanes as ‘de facto cycle segregation’. These proposals ‘will neuter any ability to enforce double parking on Leith Walk, an area of high anti-social parking’. The proposal to change all day bus lanes to peak periods bus lanes is contrary to the Council’s Local Transport Strategy.

See response to Objection 1 and the main report, Contrary's to Council's Local Transport Strategy (paragraphs 3.20 to 3.24). The trials will not affect the enforcement of parking restrictions, as these will remain unchanged.

14 EH14 5QE

As the objector regularly cycles along Calder Road to Park and Ride at Hermiston and his comments mainly relate to Calder Road, the objection focuses and generally comments on conditions on Calder Road. Feels 'that the bus lane gives me an extra bit of space that if it was taken away would make my daily commute much more dangerous. Also I don't think that amending the times on this particular road would improve traffic flow. This is because the delay is usually at the roundabout at the bypass and is caused by traffic coming from the Livingston direction stopping across the entrance to the roundabout thus stopping road users leaving Edinburgh from progressing further'. I see this again and again at the same place. On Calder Road 'the proposal is very likely to result in higher cyclist casualties and increased emergency response times'. Would like to see the bus lanes changed to 24 hours.

See main report, Impact on cyclists (paragraphs 3.7 to 3.9). Also see response to Objection 1.

15 EH12 5DX

The proposals to change the bus lane hours will allow cars into bus lanes thus make cycling 'a whole lot harder and far more dangerous'.

See main report, Impact on cyclists (paragraphs 3.7 to 3.9) and also see response to Objection 1.

16 EH9 1AN

The proposal to trial to change all day bus lanes into peak periods bus lanes is contrary to the Council's Local Transport Strategy, Pubtrans1 and Pubtrans7. The proposal will 'significantly' discourage cycling by reducing its attractiveness; reducing segregation from general traffic making travel in bus lanes less safe and this will 'significantly' discourage cyclists. To reduce confusion amongst drivers, a simpler solution would be to make all bus lanes at least all-day bus lanes.

See main report, Impact on cyclists (paragraphs 3.7 to 3.9), Contrary to Council's Local Transport Strategy (paragraphs 3.20 to 3.24). Also see response to Objection 1.