

## **Edinburgh Street Design Guidance – Draft Cycle Parking Factsheet Consultation**

Comments from Spokes, Feb 2021

Spokes welcomes the opportunity to comment before the Council's draft cycle parking factsheet is finalised. Overall we are impressed by the level of detail and thought which has gone into this draft.

Many of our comments are general in nature but where appropriate we have indicated page references where they are linked to more specific points in the draft.

### **Private Cycle Parking Provision and Permitted Development Rights**

We appreciate that the focus of the draft document is on locating and providing appropriate cycle parking in public places but we consider it would be worth adding a prominent section about private provision, particularly in the light of the soon to be implemented (April 2021) permitted development rights for cycle parking in front gardens (see page 2, section 4 of [the link](#) for specifics). Perhaps a summary of what individuals can do themselves could be made with links to more specific detailed requirements and limitations. To some extent the more this is publicised and taken up, the more it will reduce demand and thereby the need for public provision.

### **Rules and Exceptions**

We question the wisdom of making sweeping absolute rules such as long term cycle parking on the footway – “not permitted” (page No 2) or in relation to On Street Cycle Parking - No provision within 10m of signal controlled junction stop line or crossing (Page 3).

We appreciate and agree with the principles that give rise to these statements. Pedestrians should not have to divert to avoid cycle parking and road users should not have sight lines compromised by cycle parking. However, we can see how exceptions will be possible. For example in some places where footways are very generous or there are dead spots that pedestrians do not go, for example next to the railings on the corner of Princes St and north Bridge, outside the old GPO or north east of the junction of Tollcross and Lauriston Place. Locating long stay cycle parking at appropriate points at such places would seem reasonable.

In relation to junctions we note that the Council has placed a taxi rank on Haymarket Terrace within 2 metres of a traffic controlled junction, so we wonder why cycle parking is to be treated so differently. It's not that we are advocating cycle parking at 2 metres from junctions but needing to be ten metres back in every case with no exceptions seems to rule too much out.

Rather than absolute rules we would prefer to see things expressed such that where they can be justified, exceptions will be permitted.

### **Cycle Parking Design Principles (page No2)**

We'd like to see the principles include the need for parking to be sited on a suitable well drained surface that will prevent users getting wet or dirty feet.

## **Cycle Parking Options [page 11]**

- This table is basically a summary and lead-in to subsequent pages. As such the introduction should say that each type of parking is described in detail on subsequent pages. Ideally page numbers should be included, to make this very obvious. For example “Hinge Topped Units [p24]”
- Most of the terms used in this table are self-explanatory, except for the term “Standalone Storage Units”, which could be taken to include 2-tier storage, particularly given that 2-tier is nowhere mentioned in this table. Given the drawbacks of 2-tier in various situations, it would be best if they are specifically listed here (with a page reference) so that readers are aware that there is a separate page on these

## **Residential Cycle Parking (page 13) and also employee cycle parking (15)**

We would like the factsheet to provide a clear definition of both 1)secure storage and 2) the need for management to maintain this. In this regard we suggest the following. Secure means that access is limited to those who have been issued keys, passes or codes, which are necessary to get into the store. In relation to management we wish to see developers committing over the lifetime of the development to measures that ensure secure remains secure. So there needs to be an ongoing means of issuing and receiving back the means of access as residents come and go. In addition, where it is clear that security has been compromised, keys passes or codes need to be changed by the building managers as soon as possible.

This section should contain a section describing the special needs of large cycle stores which may be associated with flatted developments. These need to : contain a variety of locking points to support different bicycle types. To this end we suggest that

- no more than 80% of the spaces should be of any one type (e.g. not all two tier cycle parking)
- at least 20% of the floor space should be provided for larger bicycles such as tandems, cargo bikes and bike trailers with appropriate locking points.

We wish to see the factsheet express standards of access to bike stores to ensure this is straightforward. So the following should be avoided

- the need to negotiate steps;
- long convoluted routes between bike stores and the roadway; and
- doors that are difficult to open when wheeling a bike.

We would like the issue of residents entitlement addressed. We expect that in ten years time, for example residents of a two or three bedroom apartment will still be entitled to two cycle parking spaces. So developers and/or owners need to be prevented from repurposing cycle parking stores following approval by Planning or from determining their own rules of entitlement different from those of the Council. In other words a failure to sustain an entitlement provided for during a planning application, should be enforced by the Planning service in the same way a window that is out of keeping with permitted types would be enforced.

We would like the factsheet to address what can and cannot be stored in bicycle stores. We would expect that in addition to bicycles and trailers, push scooters and mobility scooters would be permissible but storage boxes would not. Perhaps a definition of permitted items would be *items that support travel*.

In addition, the existing spacial dimensions mentioned on page no 14 should make clear that these are per flat dimensions rather than for a block of flats.

### **Cycle Parking at Retail outlets (page 15)**

Bike parking at retail outlets tends to be short term and involves 'luggage.' As such...

- two-tier racks should not be used
- there should be space, allowing locking, for cargo bikes, adapted bikes, trailers, etc.

### **Hinge top / Roll Top Parking (Pages 24 and 35)**

The loading and unloading of bikes should be parallel to the running lane or towards the footway when space and pedestrian desire lines permit. It should never be towards the running lane.

### **Two Tier Storage [page 31]**

We would like to see the specifications for two tier storage much better defined. Reasonable vertical and horizontal spacing to allow access for locating bikes and locking them is required. The spacing at Waverley and Haymarket is adequate but that at Cameron Toll is very bad and contributes to the parking being virtually unused. A further consideration is the need for plenty space to allow the ramp for higher tier bikes to be lowered and a bike to be wheeled (rather than lifted) onto the ramp. We would like to see acceptable two tier standards fully defined in the final Council version of the factsheet.

We support the suitability criteria listed, but under "not suitable" it should explicitly include retail outlets (reasons provided above), particularly given that some retail outlets have already installed them, with unsatisfactory results.

### **Additional Comment**

For Spokes, and we suspect organisations like ourselves, consultations by PDF document are not as good as by more open document formats like MS Word ,Apache Open Office or Google Documents. This is because using these latter types, a draft document can be circulated and track changes used to capture proposed changes and make them clear to others interested in commenting. We appreciate that a disadvantage of editable documents is that a definitive version can be difficult to establish, however, this would not seem important at the drafting stage. Consequently we would urge the Council to consult in editable document format and only change to a non editable file format when a final document is set.