Response ID ANON-JCJ6-7MY1-U

Submitted to Holyrood Park and the Road Network Submitted on 2021-09-29 21:20:12

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About You
1 Data Protection
I agree to the privacy notice : Yes
2 Are you responding as an individual or an organisation?
On behalf of an organisation, public body or charity
3 Where are you based? (please select one)
Scotland
4 If you are based in Scotland, please tell us your postcode. By providing your postcode, we can better understand your feedback in the context of a local or a visitor to Edinburgh (Optional)
Postcode: EH8 8HG
Organisation, Businesses and Community Groups
5 If responding on behalf of an organisation, business or a community group, please tell us its name. (Optional)
Enter the name of your organisation, business or community group: Spokes
6 Permission to publish
7 Do you give us permission to publish the response from your organisation or community group, with attribution to your organisation or community group?
Yes
You and Holyrood Park
8 How often do you visit Holyrood Park?
Daily
9 How do you travel to Holyrood Park? (please select all that apply)
Bike
Other (please specify):
10 When you visit, what do you in Holyrood Park? (please select all that apply)
Cycling
Other (please specify):
11 How easy is it for you to access and get around the park?
Very difficult

Please tell us a bit more:

Surrounding roads have no segregated cycling connection. The dual carriageway Holyrood Park Road is hostile with a design that encourages speeding and close passes by cars rat running through the park. The NCN1 Innocent Railway is currently closed due the risk of rockfall from the park above. This means there is no safe segregated cycle route from east Edinburgh into the Southside and Old Town. The diversion route is poorly signed and with the Low Road also closed means cyclists face a long diversion. The minimal safe connections prevent access to the existing shared use path along Queens Drive for many cyclists of various ages and abilities.

Weekend closures

12 To what extent do you agree or disagree with the following statements?

Weekend closure statements - Closing the roads on both Saturdays and Sundays has made the park a more pleasant place to spend time: Strongly agree

Weekend closure statements - Closing the roads at weekends has encouraged me to explore more of the park: Strongly agree

Weekend closure statements - The expanded road closures have had a positive impact on the park: Strongly agree

Weekend closure statements - These road closures have had a negative impact on the area surrounding the park: Strongly disagree

Weekend closure statements - The addition of Saturday road closures has made it harder for me to access the park: Strongly disagree

13 Do you have any comments or feedback on the weekend road closures?

Comments on weekend road closures:

Spokes Lothian, Spokes South Edinburgh & Spokes Porty welcome the extension of Sunday road closures to include Saturdays. We believe this has not negatively impacted the surrounding areas and has massively improved the experience for visitors to the park who cycle, including disabled cyclists. We also welcome the extension later into the evening, but would like to see further work to find a solution to the issues preventing overnight road closures. City of Edinburgh Council allow numerous road closures overnight for maintenance & other events, relying upon lights and reflective materials to reduce the risk of motor vehicles crashing into barriers. Anecdotally, vehicles tend to drive at much higher speeds at night, which hugely increases the risk of death / serious injury for vulnerable road users (VRUs). The risks to people travelling on bikes should not be discounted when completing a risk assessment of overnight closures.

The High Road

14 To what extent do you agree or disagree with the following statements?

Statements on the High Road - The closure of the High Road made the park a more pleasant place to spend time: Strongly agree

Statements on the High Road - Closing the High Road to traffic encouraged me to explore more of the park: Strongly agree

Statements on the High Road - The road closure has had a positive impact on the park: Strongly agree

Statements on the High Road - The road closure has had a negative impact on the area surrounding the park: Strongly disagree

Statements on the High Road - The High Road closure has made it harder for me to access the park: Disagree

15 What are your views on the partial reopening of the High Road? (please select all that apply)

The 24/7 closure of the High Road should be made permanent

16 Do you have any comments or feedback on the High Road?

Feedback on the High Road:

Spokes Lothian, Spokes South Edinburgh & Spokes Porty support the vision for an inclusive access hub that addresses many of the access issues rightly raised by community members at Holyrood Park. To date, the only accessible way to travel around the High Road has been by private motor vehicle. This is not equitable in a city in which 45% of residents do not have access to a car, promoting less car dependent lifestyles and induces conflict between VRU's & motor vehicles on a narrow uphill winding road.

An inclusive access hub can provide access for a variety of users through providing free hire of mobility equipment: power assistance for wheelchairs; mobility scooters; accessible cycles / eBikes. Re-opening the High Road for less able users skirts around the real issue at play: that by not enabling other forms of access, Historic Environment Scotland requires a car to reach Dunsapie Loch. This excludes those who do not have access to a private vehicle. Permitting unrestricted access for motor vehicles to the High Road during these times increases uncertainty for other users about the status of whether the road is open or closed, whether it is safe for their family to cycle together or whether they will have the space to drive their mobility scooter on the road side by side with their partner.

Therefore, we advocate for a consistent approach to access for motor vehicles in Holyrood Park and a 24/7 closure alongside a reasonable adjustment as required by the Equality Act 2010 such as an inclusive access hub.

17 Would you like to see further road closures or further opening of the road network in Holyrood Park to public vehicles?

I would like to see further road closures for vehicles in Holyrood Park

Please explain your answer:

Spokes Lothian, Spokes South Edinburgh & Spokes Porty support the principle that all of Holyrood Park's private road network should be closed to motorised through-traffic. This includes Duddingston Low Road, the High Road, and Queens Drive, but does not include the roundabouts between Holyrood Rd and the parliament, as these have been adopted by the Council.

Park roads are not only important for leisure. They are also critical strategic active travel routes. For example, when closed to traffic but open to cyclists, Duddingston Low Road forms part of a key safe route from the east of the city through to the city centre for people cycling. Unfortunately, when there is traffic on the road, many people are too afraid to cycle on it as they experience speeding and close-passing drivers. The parallel Innocent (shared use) Path is not a comfortable alternative for many, particularly in the dark, given its relative isolation, narrow width, and foliage cover. Moreover, the recent extended closure of the Low Road due to rock falls shows that the exclusion of motor traffic does not lead to gridlock in south-east Edinburgh, as some had predicted.

The safety and comfort of people on cycles is of particular concern in Holyrood Park, a popular utility and recreational cycling route and destination. A review of the Crash Map statistics for Holyrood Park's road network showed over 115 road casualties in Holyrood Park since 1999, including 24 pedestrian casualties, seven of which were defined as serious, and 43 cyclist casualties, 10 of which were serious. 14 of these casualties involved children, three of which were serious.

Across Scotland, cyclists account for 7.5% of road casualties, but account for 37% of road casualties in Holyrood Park – five times the national average. This appears to be increasing; over the last 5 years, cyclists accounted for 50% of road casualties in Holyrood Park, 15 of 30 reported casualties, nearly seven times the national average.

The existing disjointed provision of green cycle lanes isn't intuitive and doesn't connect to the entry / exit points or intermediate roundabouts along its length. The red paved pedestrian paths are the same colour as CEC's cycle areas such as advance start lines (ASL's). Generally surfaces are in good condition however their design is outdated for inclusive use.

Night time glare is a big issue with the prevalence of motor vehicles in the park especially along Queens Drive. The lack of reflective cats eyes or solar LED lights (like on the union canal towpath) means it is hostile to those who cycle.

Holyrood Park without motor vehicles would not just be safer, but also would contribute to the Scottish Government's climate aims, including increasing active travel journeys, reducing private car journeys (-20% km's driven by 2030) and implementing a just transition with an equitable transport system aligned with the sustainable transport hierarchy.

A traffic free park would protect the protected nature of the SSSI, and provide protection beyond that of the annual toad migration. For example the otters residing at Dunsapie Loch increase the quality of experience and improve residents and visitors' physical and mental health and wellbeing.

Historic Environment Scotland has an important role to play in Edinburgh and Scotland, leading the way on tackling the climate emergency and sustainable access to sites under Scotlish Ministers' control. We are aware that the emissions from 1km of Holyrood Park roads are equivalent to over 20% of HES's carbon emissions across its entire estate. Historic Environment Scotland cannot claim to be a climate leader without closing the private park roads to motorised through-traffic.

The effects of climate change / global heating are likely to be contributing to the current rockfall issues that are closing the Low Road & Innocent Railway paths. This has removed a vital car-free active travel corridor from use for many people (albeit a traffic free Duddingston Low Road would be more inclusive - see earlier comments on this.) If HES cannot play its part in tackling the climate emergency and putting in adaptation measures, what message does it send to park users?

Less cars in Holyrood Park does not make it inaccessible. Some disabled park users already access the space with accessible cycles, mobility scooters or wheelchairs on the additional paved and accessible space created when the road is 'closed' when really it is 'open' for use by those wheeling, walking and cycling. However, additional adjustments need to be put in place to enable as many people as possible to enjoy the space and discussions should be held with a wide range of disabled people to ensure that these adjustments are designed and developed in partnership with users.

We support Car Free Holyrood's vision of an inclusive access hub. There are a number of organisations and groups who would be interested in facilitating access under this banner. This hub would not only facilitate access, but also destignatise mobility equipment, create opportunities to try out different mobility equipment options at no cost and legitimise alternative and active travel mobility in a highly visible, nationally important site.

When considering the consultation results, Historic Environment Scotland should implement action plans which: reduce greenhouse gas emissions associated with the park; adapt to the changing climate by ensuring active travel routes remain open; facilitate inclusive access; increase the proportion of active travel journeys; protect and enhance local biodiversity and habitats; and promote the health and wellbeing of visitors and users of the park by ending traffic associated harms including injuries, noise, and vehicle domination. When setting action plans, Historic Environment Scotland should not be concerned about the impact of more closures on traffic management on CEC road network, of which it does not have control, or indeed a statutory duty to resolve.

Equalities and You

18 We will be using the results from this questionnaire to inform our Equalities Impact Assessment on the road network. Is there anything you wish to add about access to Holyrood Park and the impacts on people with protected characteristics that you have not already mentioned?

Please write your response :

- 19 Disabilities
- 20 Do you have any physical or mental health conditions or illnesses lasting or expected to last 12 months or more? (optional, please select all that apply)
- 21 Do you look after, or give any help or support to, anyone because they have long-term physical or mental health conditions or illnesses, or problems related to old age? (optional)

Not Answered

22 What is your age? (optional)

Not Answered