

Response ID ANON-3SXQ-K6Y3-V

Submitted to Braid Road and Comiston Road – local resident engagement
Submitted on 2021-10-10 20:33:41

About you

1 Your details

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Yes, I consent to being contacted about this engagement activity:

Yes

2 If you are responding in an official capacity on behalf of an organisation, what is the name of that organisation?

Organisation name::

Spokes South Edinburgh

3 To help us understand where people responding to this survey are based, please tell us your postcode or group's postcode.

Postcode::

EH10 6LR

Braid Road proposals

Option 1 - Braid Road fully open in both directions

Option 2 - Braid Road South open in both directions

Option 3 - Braid Road fully open Northbound, southbound restriction at Hermitage Drive

Option 4 - Braid Road open southbound only with Modal Filter at Hermitage Drive

Braid Road preferred options

4 Please rank the options for Braid Road in order of preference.

Preferred options ranked - Option 1 - Braid Road fully open in both directions:

4

Preferred options ranked - Option 2 - Braid Road open in both directions south of Hermitage Drive:

Preferred options ranked - Option 3 - Braid Road fully open northbound, southbound restriction at Hermitage Drive:

Preferred options ranked - Option 4 - Braid Road open southbound only with Modal Filter at Hermitage Drive:

1

None of the above:

No

Comiston Road – Bus Lane

5 Do you support the introduction of a bus lane at this location?

No

Comiston Road – deliveries and drop-off / pick-up

6 Do you support the removal of loading restrictions where possible on Comiston Road?

No

Any other comments or suggestions

7 Please use the space below for any comments or suggestions regarding the proposals for Braid Road and Comiston Road.

Comments:

This is a submission by Spokes South Edinburgh, a local chapter of Spokes the Lothian Cycle Campaign, and local stakeholder in response to the consultation on Braid & Comiston Roads

Summary

We are disappointed that the Council is still considering reopening Braid Road to 2-way traffic, given the Council's commitment to reduce private car travel and the positive response by councillors to the recent letter from 144 health professionals urging the retention of Spaces for People measures. Furthermore, the Scottish Government's hugely ambitious target to reduce car-km by 20% will require full participation by local authorities, and certainly not the opening up of additional motor traffic capacity.

Options 1-3 in the consultation all include reopening Braid Road to 2-way motor traffic and a greater or lesser loss of cyclist protection. We strongly believe that only option 4 provides sufficient safety and comfort to make the road cyclable for children or less confident adults. Even with option 4, further measures are needed at the Braid Rd/ BraidburnTerr junction, for people cycling south and needing to turn right into Braidburn Terrace.

Comiston Road - Unfortunately all the questions in the Council's survey are just yes/no, although there is one box for other comments at the end. We will therefore be answering 'no' for the 2 questions posed, but will be adding further comments, summarised below, in the comments box. The proposals for Comiston Road, as they stand, will mean that it will return to being unuseable by children or less confident adults if their journey includes these sections.

Comiston Road - northbound bus lane extension south to Comiston Springs Avenue

Lothian buses say that there are delays in this section. We accept the need for reliable public transport and some form of bus lane, even though that means removing the defenders from this stretch. However, the Council is proposing merely a peak-period bus lane (and weekdays only) and this will undoubtedly mean kerbside parking at other times of day. Thus cyclists will be weaving in and out of the traffic lane so as to overtake parked cars, not to mention the risk of 'dooring.'

Spokes would, however, for the greater good, not object to removal of the defenders if there was a 24/7 bus lane, which should largely prevent incursion by cars. Ideally this would also be monitored by camera (or by cameras in the bus in the future if that were legally permitted). Without this 24/7 lane, we have to object to removal of the defenders.

Comiston Road - new loading gaps

It is proposed to remove occasional defenders to allow kerbside access for loading and deliveries at parts of Buckstone Terrace. We are very concerned about this, as it is highly likely that some drivers will take advantage for lengthy kerbside parking, again forcing cyclists to weave in and out of the traffic lane. We believe that in most cases alternative parking spaces are available, and we are asking for detailed discussion on this.

There is a need to shift journeys from private cars to active travel and bus as part of the council commitment to climate change, and options 1 to 3, would allow the opposite to happen.

We strongly believe that option 4 is the only option that would provide sufficient safety and comfort to make the area usable for cycling for children, or less confident adults. We could not recommend that people, especially families, continue to cycle the route if any of the other options are implemented. Moreover even for Option 4, we believe that further essential improvements are required, specifically to the right turn option for southbound cycling at the key Braid Rd/ BraidburnTerr junction.

Summary - Comiston Road

Bus lane

It is important that buses are not held up by traffic, and that bus users are able to rely on timetables for busses. We support the role of buses in the sustainable travel hierarchy, where they fall below walking and cycling, and above private vehicles.

The consultation option seems to be the worst of all solutions, since lack of enforcement will ensure that kerbside parking will be resumed for all, not just blue badge, with a loss of the safety that currently exists for cyclists behind the parking enclosures.

We believe that one solution, which we could support, and which would benefit cyclists and bus users would be an enforced and enforceable 24 hour bus lane.

Loading gaps

Introducing more gaps in the segregated cycle lane for 'loading', especially uphill, would render the lane ineffective and unsafe and should only be done when alternatives have been explored with stakeholders including ourselves because of the danger of drivers exploiting the space and forcing cyclists to pull out into traffic uphill.

Detailed Comments - Braid Road

Induced Traffic

We are very disappointed that re-opening Braid Road Northbound is even being considered. CEC has already successfully suppressed traffic by closing Braid Road one way to motor vehicles, which will go some small way to helping achieve ambitious climate targets for private car travel. The risk of inducing overall traffic is noted as a 'drawback' in options 1, 2 and 3 as well as the significant increase in traffic across the Braid Estate increasing noise, danger for the vulnerable, and pollution. We don't understand why these options are up for consultation. The consultation proposals offer residents a blinkered choice, unhampered by the fast approaching time when the Council is going to have to take action to significantly reduce private car travel. It would have been better to be honest with residents about this, rather than raising false expectations.

Safety on Braid Road

The consultations proposals state that options 1, 2 and 3 all reduce benefits for walking, and wheeling to the benefit of cars in spite of the transport hierarchy, which is embedded in council policy.:
Safety is compromised in the following ways

Options 1,2 and 3 replace segregation with paint for a significant section on Braid Road, but painted lanes are demonstrably less safe than segregated lanes. Studies in London have shown segregation increases safety by 40% over painted lanes, or unmarked roads, so to remove segregation is to significantly reduce safety <https://road.cc/content/news/advisory-bike-lines-increase-risk-cyclist-casualties-279553>

According to counts provided by the council officers more than 9,000 vehicles per day used the junction at Braid Road/Hermitage Drive/Braidburn Terrace when Braid Road was open in both directions. Re-opening (options 1-3) all increase the number of streams of traffic through the junction, making it once again a dangerous place for Cycling. Travelling Southwards on the quiet Route to reach Braid Road or Comiston Road, would mean crossing or being sandwiched between 3 or 4 different streams of traffic. Council Officers described the execution of a right turn into Braidburn Terrace as 'challenging' in a meeting of community council representatives. This is not acceptable for a lone cyclist, never mind a cyclist with children on board, a cargo bike or a recumbent bike, all of which are to be seen regularly at the junction just now.

We welcome the widened pavements on Braid Road and especially around the junctions between Braid Road / Hermitage Drive / Braidburn Terrace although careful design will be necessary to protect pedestrians / cyclists from unnecessary conflict with one another. However, pre Covid consultations on the area around Braidburn Terrace found that crossing 2 lanes of traffic on Braid Road near The Hermitage was sufficiently risky to require a toucan crossing to allow walking, wheeling, cycling to reach Braidburn Terrace. This proposal returns 2 way traffic to that crossing without a toucan crossing.

Impact on Greenbank to Meadows Quiet Route

The Braid Road junction at Hermitage Drive/Braidburn Terrace is the key connection between the Quiet Route Greenbank to Meadows and the two roads that take people further south (Comiston and Braid Road). However, in options 1-3 this dangerous junction severs a section of the Quiet Route thus rendering the Quiet Route ineffective.

Active travel throughout the Braids estate would also be impacted by the increased vehicular traffic across the Estate (as documented in the drawbacks of Options 1, 2 and 3) making all streets more busy, and making visits to other local spaces including the tennis club, allotments, Blackford Hill, more dangerous to navigate by active travel.

We therefore recommend option 4 as the only suitable option. Even if selecting that, we would like to see a safer option for cyclists turning right from Braid Road as contraflow on Braidburn Terrace. The current giveaway signs would not allow them to see oncoming traffic before turning into a narrow opening. We would like to see an alternative way of navigating the junction for slower or less confident cyclists. For example a zebra style crossing to let them cross first Hermitage Drive then Braid Road before using the shared pavement to join Braidburn Terrace in contraflow.

Comiston Road - Details

Safety in a bus lane

Cycling by Design 2021 states the following in section 3.7 about cycle lanes; "Where used, careful consideration of cycle lanes within the overall network is needed to ensure that less confident cycle users are not suddenly 'exposed' to sections of cycle lane, having been more comfortable in protected cycle tracks earlier in their journey."

Comiston Road

Proposal to extend the Northbound bus lane further South beyond Comiston Springs Avenue.

We fully understand and support the need to keep public transport moving on Comiston Road, and the existing Bus Lane Northbound does a good job of both allowing buses to move past traffic queues whilst also providing a safe corridor for cyclists.

Due to there being no active street frontages on this side, this Bus lane, whilst only in force during peak times, is neither parked in nor driven in by drivers. However the extension of this lane further South, and removing parking protected segregated cycle lanes, will significantly degrade the safety there and even though downhill, will feel noticeably less safe to the less confident cyclists who are now using it.

As per Cycling By Design 2021; Shared bus and cycle lanes - any "benefits are limited to experienced and confident cycle users only". "For these reasons, cycle networks should offer an alternative cycle route to a shared bus and cycle lane and new cycle facilities should not be planned to share space with buses."

From the proposal drawings we cannot see the proposed width of the bus lane being proposed. Cycling By Design 2021: 3.7.14 states; "Shared bus and cycle lanes should be a minimum of 4.0m wide. A width of 4.6m is more desirable and provides a higher level of comfort for cycle user". Whilst 3.7.16 states "Lane widths between 3.2 m and 4.0 m should be avoided. Note: Lane widths between 3.2 m and 4.0 m have potential to encourage unsafe overtaking of cycle users within the lane." Therefore can Council Officers confirm the width of lane being proposed.

The proposal will allow for car parking in the Bus Lane at off peak times, with more enforcement required from the overstretched parking attendants. With no segregation drivers will park at the kerb, leaving cyclists to weave in and out of traffic as well as staying out of the door zone (without a buffer zone as now). We base this assumption on the behavior of drivers on the new bus lane at the end of the Southbound section on Buckstone Terrace where drivers who want to turn left at Fairmilehead use it, apparently with impunity. Camera enforcement will likely be required.

This proposal means that there will only be 4.5 hours a day of safer cycling on Comiston Road. (Only 18.75%) Spokes SE believe safe cycling should be 24/7 and should facilitate the implementation of the Scottish Government's Sustainable Travel Hierarchy.

The lack of weekend safe cycling provision is especially regressive as Comiston Rd is a popular leisure cycle connection to the Pentlands and Midlothian. If a 24 hour bus lane had been suggested we may have recommended approving this option but as currently suggested we find it unsafe and can't recommend supporting it.

Detailed Comments - Comiston Road

Remove loading restrictions

No additional information is given about where this would be required on Buckstone Terrace but every opportunity that is taken to load directly outside a house means less protection for cyclists who will have to swing out into traffic, especially difficult for less confident cyclists on the uphill sections. We would like officers to consider all opportunities residents have for loading, including using existing parking enclosures, using their own driveways, or nearby side streets before agreeing to remove some of the loading restrictions.

For example many householders on Comiston Road employ a gardening firm who park their trucks in gaps in the cycle lane for the duration of their visit, rather than using the owners driveway, a side road, or a nearby parking enclosure until loading is actually required.

Cycling by Design 2021 - 3.7.4 states; "Parking should be tightly controlled and enforced to ensure no motor vehicles stop or wait within the cycle lane." Therefore can the City of Edinburgh Council confirm how this proposal meets the guidance of the Scottish Government and facilitates the implementation of the Scottish Government's Sustainable Travel Hierarchy.