

## **'Travelling Safely' ETROs ... TRO/21/26 to TRO/21/30**

### **Spokes response to the Stakeholder consultation, December 2021**

Spokes welcomes the Travelling Safety project. Representative surveys such as the Council's recent survey, and the Edinburgh Bike Life survey, confirm the public desire for schemes which make cycling and walking safer, even where this involves reallocating some roadspace. We are therefore pleased to see the temporary main-road Spaces for People schemes moving to this experimental stage, as a step towards improvement and permanence.

Although welcoming the ETROs, we see significant scope for improvement over the current Spaces for People provision, both in relation to the traffic restrictions in the ETROs and in relation to the designs and layouts of schemes.

#### **Introduction and nature of response**

The ETROs currently being consulted on concern only traffic restrictions - waiting, loading, traffic bans, bus lanes etc.

However, the extent of traffic restrictions in each scheme is not specified - there is only a general statement of what restrictions will apply at unspecified locations within each scheme. In particular, and very unusually, the actual draft ETROs have not yet been made available. We understand this will only be done at the final public advertisement stage.

This makes a detailed response to each scheme impossible at this stage. Nonetheless, we have various concerns on the proposed traffic restrictions, and these are set out below under 'general' and 'specific.'

#### **What this response does not cover**

- We see significant scope for improvement in aspects of design and implementation of schemes. Most of these concerns are not relevant to the ETRO, and are therefore not described here, but are laid out in the appendix to our [April SfP consultation response](#). It is vital however that they are considered by the designers.
- Secondly, we are likely to have many comments which relate to the detail of the traffic restrictions in the ETROs. However, since the ETROs have not yet been published, we do not know the exact coverage of each specific restriction, and therefore in most cases we will only be able to comment on such points when the ETROs are published, at the final public advertisement stage.

## General - issues needing addressed in all the ETROs

- We understand that once an ETRO is approved by Committee, the traffic restrictions in the Order cannot be tightened during the operational period of the Order, but can be relaxed. Therefore it is vital that the draft Order at the outset includes the maximum restrictions that may conceivably be required.
- It is our understanding that once the ETROs are in force the Council, during the experimental period, has the power to change layouts and designs, several times if necessary, as long as the designs remain compatible with the ETRO traffic restrictions. For example, defenders can be added, moved, or replaced by kerbing; signs can be changed, and so on, provided compatibility is retained with the traffic restrictions in the Orders. Please advise if this is incorrect.
- For protected cycle lanes to be effective and reliable, and to cater for users who fear traffic, it is essential that kerbside parking in such lanes is avoided. For many potential cyclists, the need to pull in and out of the traffic stream, let alone the added danger of 'dooring,' makes the entire route unusable. This is particularly important for corridors specifically designed to encourage cycling, such as the Travelling Safely corridors. Therefore:
  - **Where loading is allowed** this should be outside the cycle lane, not kerbside. Furthermore, to ensure that vehicles do not stop kerbside, the cycle lane should be protected by defenders at such locations.
  - We recognise the need to cater for **disabled parking**, unloading of wheelchairs, etc. Each potential location should be carefully assessed and treated on its merits, avoiding kerbside parking wherever possible for the reasons above, notably that such parking may result in some categories of cycle lane user, such as children, being prevented from using the cycle lane at all. However, if there are locations where such kerbside parking is nonetheless unavoidable, measures should be undertaken to maximise the safety and confidence of cyclists pulling out into traffic to pass vehicles parked in these areas. Furthermore, physical and enforcement measures should be built in to guarantee that the parking spaces are used solely for the allowed purposes.
  - **All bus lanes** should be 24/7). This is the most effective way to avoid, or substantially reduce, kerbside parking in bus lanes. 24/7 should apply even where there is a protected cycle lane to the left, as in London Road - see below.
- Where **speed limits** have been lowered in the SfP TTROs, these should be retained in the ETROs in all cases.
- Where **one-way traffic** is proposed (whether or not it is pre-existing) there should always be a cyclist exemption, in line with Council policy.
- We request to know what ongoing monitoring and evaluation is planned for each project. Will regular traffic counts be undertaken, and journey times be measured, for example?

## Specific - City Centre

- **CC2 Cockburn Street** There should be a cyclist exemption to the one-way, in line with Council policy. Also we request the rationale for the vehicle exemptions listed and whether this overrides the existing “Pedestrian Zone” (excl. Loading 06:30 - 10:30am) at all times. This zone operated successfully for decades and it is deeply concerning to see vehicles driving and parking at all times through what should be a safe pedestrian and cycle zone.
- **CC3 Victoria Street** We presume that, although traffic will be 2-way, there will be a closure at the Grassmarket end (with turning circle) so that Victoria Street is not a through-route. The closure should allow cycle access. Also we request the rationale for the vehicle exemptions listed and whether this applies at all times. It is concerning to see vehicles driving and parking at all times through what should be a safe pedestrian and cycle zone.
- **Addition - The Mound** Whilst it has been good to see the replacement of the original wand units with the more robust defenders on most of the Mound, it is extremely concerning that at the tightest points the cycle lane has been made unprotected. We are aware this is supposedly necessary because of the lengthy North Bridge closure to northbound buses. However the fact that buses previously operated successfully here suggests this is unjustified. There are already multiple photos on social media of motor traffic encroaching into the cycle lane on these corners. To thus endanger cyclists, particularly during a period when north / south routes are limited, is extremely concerning. **This needs urgent attention**, whether or not that requires an amendment to the ETRO.

## Specific - North

- **N2 Bellevue to Canonmills & Broughton Street** Significant changes are likely to be needed to the ETRO. We are concerned that cycle facilities have been removed between Canonmills and Broughton Road, and that there is a lack of clarity about the status of the measures at Broughton Street and at the roundabout, as these are not shown on the consultation map (we understand this may be a mistake). The ETRO must include traffic restrictions which allow for safe and convenient cycle routes throughout. **We are particularly concerned** that no restrictions on waiting or loading are shown on **Broughton Street**, as the uphill cycle lane here is extremely valuable for cyclist safety and confidence. Furthermore, this cycle lane should be extended to the top of street - it is clearly possible given that the inside lane here is currently closed as part of the tramworks Traffic Management Plan. Finally, any waiting/loading restrictions that support the roundabout safety measures must be retained and extended to provide for direct pedestrian crossing facilities at the footway “buildouts”.
- **N4 Ferry Road** Waiting by coaches should not be permitted, and nearby parking should be sought. Even if drop-off only is permitted, this brings the alternatives either of a large group of people exiting from the bus into the cycle lane, or, if the parking is kerbside, forcing cyclists out into the main traffic lane outside of the bus.

## Specific - East

- **E1a Seafield Street.** No comments
- **E1b Seafield Road East** This is marked on the plan between the bridge and the south end of Seafield Way (800m). So far as we know there are no current SfP changes on this section and there is no reference to it in the text.
- **E2 Kings Place** There is currently an attempt to provide some blue badge parking at the foot of Kings Road but as this is just a couple of signs on a barrier and presumably unenforceable it is routinely ignored. Should enforceable blue badge parking spaces be included in the ETRO?
- **E3 Duddingston Road** There are two primary schools fronting onto this road. It is essential that the full length of the protected cycle lanes is protected at all times, but particularly during school drop off and pick-up times so that parents can rely on the safety of the cycle lanes for their children. The need for protection is discussed further above, under the 'General' subheading.
- **E4 Stanley Street.** The current situation is that Hope Lane is fully open and drivers can drive down and park as far as the end of the pedestrian bridge. This means pedestrian and cycle traffic has to cross a 'live' road again, on a tight bend where drivers are often reversing, turning or parking. We recognise that local residents have asked for this space and that drivers are normally slow. However, the ETRO needs to cover a sufficient section of Hope Lane to allow for any changes to be tried out here to improve pedestrian safety.
- **E5 Duddingston Road West** The speed limit should be retained at 20mph, as per general points above, There are issues with the current layout around Old Church Land and the bends at Bawsinch. Any ETRO needs sufficient restrictions to allow for adjustments to the layouts to be trialled in these areas.
- **E6 A1 Corridor** The bus lane should be 24/7, for the reasons in the General section above. Secondly, we are concerned over the interruptions to the continuity of the cycleway: to allow this to be rectified during the experiment loading and waiting restrictions may need to be added to the ETRO. Finally, we highlight a further bus lane issue, though we are not sure if remediation would require further changes to the ETRO beyond the 24/7 change. The London Road protected cycle lane is in part "kerbside," to the left of the bus lane. However, there are buildouts at the bus stops where cyclists have to use the bus lane - this would be less serious if the lane were 24/7, but the position even then is much worse when a bus is at the stop, as the cyclist then has to move out yet further, into the main traffic lane. Redesign is vital, and the ETRO should include any further restrictions that might be required for this, as part of the experiment.

## Specific - South

- **S4 Old Dalkeith Road** We are concerned about the extent of this ETRO as the plan only indicates its scope being from Cameron Toll roundabout in the north to Craigmillar Castle Park Cemetery entrance, whereas the SfP scheme extends to the Royal Infirmary.
- **S5 Gilmerton Road** The scheme should be extended southwards, at least as far as Gilmerton Primary School. Also, as in the general comments above, the bus lanes on Liberton Road should be made 24/7, in order to make it easier and safer to cycle between Gilmerton Road and Minto Street.
- **S6 Quiet Corridor – Meadows to Greenbank** We are extremely concerned that only two modal filters are shown (those south of Cluny Garden) whereas under the existing scheme there are a further three (one on Canaan Lane and two more on Whitehouse Loan).
- **S8 Comiston Road** The bus lane should be 24/7, in line with the decision by the Transport Committee of 11.11.21 as well as our general comments above. Secondly we are concerned about safety in relation to the planned relaxations on loading - see the general note above about loading issues. Finally, as officers know, we are very concerned about safety at the junction with Braid Hills Drive, and have suggested as one option that motor traffic use an alternative (nearby) location - this would presumably need to be included in the ETRO.
- **Addition - Morningside Road** We believe that removal of the uphill protected cycle lane was a major mistake in terms of cyclist safety. It has been widely condemned by users. The reason given for removal was road width, and yet the space is now often occupied by parking vehicles, narrowing it even more than did the cycle lane. We therefore urge that the South ETRO is amended to ensure the powers to re-install a protected uphill lane.

## Specific - West

- **W3 Silverknowes Road North** "Prohibition of vehicles" should read "Prohibition of motor vehicles," in line with Council policy.
- **W8 Fountainbridge** The opportunity to make the Dundee Street/West Approach Road junction safe for cyclists should be taken. An ETRO is an ideal opportunity to trial a closure of the junction. We are also concerned over suspending "No loading at any time" - particularly given that traffic restrictions are allowed to be relaxed during the course of the experiment should that prove necessary, whereas if they are relaxed now they cannot be re-introduced during the experiment.