

Spokes welcome this opportunity to respond to the [Consultation on Management Rules for Parks, Beaches and Greenspace](#) which are due to be considered by the Culture and Communities Committee on the 15<sup>th</sup> of May 2025.

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We refer to proposed rule 4.19, which would prohibit padlocking or securing cycles or attach other items to any railings, gates, poles, or other infrastructure not dedicated or provided for this purpose in or around any Park, Beach, or Green space.

Spokes strongly oppose this proposed rule, which does not reflect how people use parks in Edinburgh today. Attaching a cycle to railings or other infrastructure is often required in parks across the city due to a lack of cycle parking. Prohibiting this act would potentially discourage people from using their cycle to travel to Edinburgh's parks, beaches and greenspace.

An average of 43000 Shopping, personal business and social trips are cycled in Edinburgh each day<sup>1</sup>, yet public cycle parking capacity is just 14000<sup>2</sup>.

Railings are relied on at many locations, such as Portobello Promenade Amusements where the nearest cycle parking is more than 200m away and the Meadows Compass which lacks cycle parking entirely.

Additionally, railings and posts provide an opportunity to secure cycles not suited to typical cycle parking stands, such as those used for carrying young children. This can disproportionately affect cycles modified for disabled groups, such as Tandem cycles used by the Edinburgh blind and partially sighted group VIE Velo.

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We refer to proposed rule 7.4, which would prohibit cycling within Princes Street Gardens, Saughton Winter Garden, or Lauriston Castle formal garden areas. This appears to contradict proposed rule 7.2 and is not compatible with the regulation of Core Path CEC21 in West Princes Street Gardens.

Spokes suggest Princes Street Gardens should be omitted from rule 7.2 and that rule 7.4 should be deleted. This would be in line with current management rules, prohibiting cycling off the paths in woodland, or other areas sensitive to environmental damage only. Formal garden areas and grass under renovation could be clarified as included within areas sensitive to environmental damage.

Spokes see no need to prohibit cycling on the expanses of gravel and flat grass at the bottom of East and West Princes Street Gardens. These areas are suitable for teaching young children to ride a bike, as well as being destinations.

<sup>1</sup> 11,400,000 Shopping, personal business and social trips cycled in 2023, [Sustrans Edinburgh Walking and Cycling Index 2023](#)

<sup>2</sup> City of Edinburgh Council – [Cycle Parking Dataset](#)