

FAO Cllr Stephen Jenkinson, Transport & Environment Committee, and Cllr Margaret Arma Graham, Traffic Regulation Orders Sub-Committee, /cc
Chief Executive Paul Lawrence & Head of Transport, Strategy and Partnerships
Deborah Paton, all at City of Edinburgh Council.

Dear Conveners,

We write to express our very deep concerns over the mode of consideration of the reports brought before the Traffic Regulation Order Sub-Committee for the '*Travelling Safely*' programme Experimental Traffic Regulation Orders (ETROs).

As you are aware, the TRO Sub-Committee voted to defer a decision on the East Areas ETRO on May 12th and August 7th, and that there may now be insufficient time for a decision to be made and the order to be granted.

The mode of consideration given to this ETRO also raises grave worries over the remaining '*Travelling Safely*' ETROs, and possibly future traffic orders, all of which are key to build on the city's nascent cycle network approved as part of the City Mobility Plan.

The continued deliberation over objections to the materials used in the ETRO risks the removal of safe routes to schools, businesses and places of work, used daily by cycle users from all walks of life. From our campaigning interactions, we know that many users of this 'temporary' infrastructure aren't even aware that these are not already permanent schemes, and rely on them to travel safely, being in place as they have for the last five years. We have included an appendix with brief testimonials provided to us specifically about the East Areas ETRO from users of the route, in their own words. The scope for loss of both amenity and the benefits gained from the Travelling Safely programme are all too real, and will be significant for the city.

TRO Scope

This Traffic Regulation Order is concerned with parking, loading, waiting and bus lane restrictions, not the nature of any carriageway materials. It is the traffic order itself that councillors are being asked to make permanent, not the carriageway materials.

We are concerned that the most recent deferral in making the Traffic Regulation Order was influenced by implementation details and cost considerations — already part of an approved programme of rolling upgrades — both of which are outside the remit of the TRO Sub-Committee, being instead the responsibility of the Transport & Environment Committee (TEC).

Procedural Issues and Remits

From our understanding of the TRO making process, all questions asked of Officers pertaining to the timeline for replacement of Rosehill Rubber Cycle Lane Defenders, the nature of those materials, and the costs involved, are outwith the scope of the Committee. This is also clear from the lack of information provided by Officers, who expected to undertake detailed design work only after the measures in this ETRO were made permanent.

This is also reflected in the way that the Active Travel team have provided for funding through the CMP Capital Investment Plan 'prioritisation' process - receiving approval from TEC for a five year rolling programme of £500k per annum under 'Travelling safely - upgrading to permanent materials'. Officers have outlined that the approach to upgrading ETRO infrastructure is to take a city-wide approach, using this central rolling fund, to upgrade materials first where it is most needed - by assessing risks and reports of existing issues, and prioritising.

There is a fundamental disconnect between this city-wide approach and the way that the TRO Sub-Committee are requesting information from Officers, who are being tasked with potentially abortive work in order to provide reassurances for an ETRO limited to closures, parking, loading / waiting and bus lane restrictions.

We agree with Officers (referring to 38:15 in the transcript at shorturl.at/Ux1Qd) that consent to install segregation units is provided separately by the Roads Scotland Act. From this, and a review of similar ETROs across Scotland, we understand it is the traffic order itself that councillors are being asked to make permanent, not the carriageway materials, and this is also likely the reason the Sub-Committee was not furnished with such information by Officers initially.

Objectors to the particular types of infrastructure are able to raise this at TEC, where such discussion is appropriate, and could continue to lobby councillors on this at any time in the future. Infrastructure type is not a concern of traffic orders, and so such changes can be made in future without a further order.

Road Safety

Road safety is important, and the committee is laudable in their desire for improvement. However, the 'Travelling Safely' measures have been subject to a Road Safety Audit from independent auditors, totalling 3 pairs across the scheme. From a review of the audits in the East ETRO, released under a Freedom of Information request, we understand location-specific issues are being monitored with improvements actioned when necessary and that no inherent safety issues have been identified with the types of road materials used. We note that only one road safety audit raised an innate risk of trip hazards; this was discounted by designers AECOM

who said the segregation units '*were approved for use on the highway in the manner in which they are deployed under this scheme*'. This was agreed by CEC Officers, and the units were selected for their high visibility, with later improvements of reflector tape. This is similar to other local authorities across Scotland and the UK. Additionally, all segregation units that were implemented are accompanied by a painted mandatory cycle lane line which helps delineate them from the carriageway asphalt.

We understand the appropriate processes are being followed in the implementation of the 'Travelling Safely' scheme. We note any future renewals and improvements will continue to follow this process and offer potential secondary reassurance.

Consideration of Support

We note the ETRO processes require consideration of objections, but not of support - even though the many users and supporters of the existing routes would be severely impacted by the removal of the Travelling Safely infrastructure. We believe there is a continued right of use for people already using the infrastructure in the East of the city, who may not even be aware of the schemes' temporary nature.

We urge the committee to listen to the voices of cycleway users, and of groups such as Parsons Green Primary School Bike Bus and Duddingston Primary Parents' Road Safety Group, who provide children with the skills and confidence to cycle with the help of this infrastructure. We note, for example, that the measures on Duddingston Rd, Duddingston Rd W and Milton Rd pass several schools and are an asset to their school travel plans. To only consider the objections received in this area would set aside the amenity gained by the local community in having facilities within which to journey safely, and introduce far more road danger than it would purport to solve.

We call on the wider leadership at CEC to ensure the TRO Sub-Committee is acting within its lawful remit and the relevant TRO Legislation. We call on councillors to put aside the objections 8, 9, 11, 14 and 24 on the basis that the 'soft segregation' units lie outside the scope of the ETRO, are a product compliant with UK standards for use on public roads, have elements to enhance their visibility to all road users, and were subject to a Road Safety Audit — and additionally note the rolling programme of future improvements TEC has committed to.

Co-signed by the following Active Travel Organisations:

Spokes, the Lothian Cycle Campaign

edi.bike

Better Edinburgh for Sustainable Travel

*Jarlath Flynn, Edinburgh Bike Bus
Project Coordinator*

Blackford Safe Routes

Low Traffic Corstorphine

CityCyclingEdinburgh Forum

Critical Mass Edinburgh

*Duddingston Primary Parents' Road
Safety Group*

Edinburgh Cycle Training

Edinburgh Festival of Cycling

Infrasisters

Parsons Green Bike Bus

Pedal on Parliament

Porty Community Energy

SW20

The Bike Station

Wee Spoke Hub



PORTY
COMMUNITY
ENERGY



APPENDIX - East Area Cycleway Testimonials

1. *"Re: cycle infrastructure at risk, especially in the East of Edinburgh. I use these temporary cycle lanes to get to work from home in Leith to the Royal Infirmary - a journey I don't think I'd want to make by bike if there weren't segregated spaces on these busy roads. I have no choice but to cycle to work (no parking permits for local staff to park at the RIE) so I'd really like to keep the route as safe as possible for me and the many colleagues who use it on a daily basis."*

2. *"If not for the temporary lanes now in place, I would likely have to avoid a large section of the city and a vital connection between Picardy Place, Joppa and Musselburgh. Delays in considering and deciding on the cost for making temporary paths permanent creates a glaring gap that undermines the transformative investment in the City Centre East West Link just a short distance away where cycling traffic has soared as safety has increased. For me, this link is a key artery that allows active travel because it is safe, direct, and reliable year-round."*

3. *"I started cycling at age 61 because of the temporary structures. Before that, I never dared to cycle around Edinburgh. I am now a confident cyclist who keeps to the cycle paths and cycle ways to avoid other traffic. I cycle to work a couple of times a week and often to classes and to visit friends on other days. I'm less likely to be a bother to the NHS in the future as I am now keeping fit and active. I hope that sense can prevail to maintain the cycle lanes."*

4. *"As a family of 4, with teenage kids, we regularly use the East ETRO protected bike lanes to visit my brother and mother. Without those lanes, we would not feel safe to travel by bike, and would need to make a slow and awkward journey by bus instead. Our eldest teenager is at the stage where he can travel independently around the city, provided the bike lanes on his route are protected. This enables his independence and development, and frees us as parents from ferrying children to friends, family and activities. To remove these bike lanes would be enormously regressive for the city, and sends the message that drivers are prioritised over the safety and welfare of children. I do hope the council follow the evidence and make the temporary measures permanent, rather than allowing disruptive councillors to filibuster and delay"*

5. *"Cycling around this city with our kids as passengers on our cargo bike is only made possible for us by segregated cycle lanes on busy roads. I've also been involved in projects building the confidence of new adult riders, and young people who are learning to ride - without safe routes we'd be significantly increasing the risks for them (and everyone.) Not only do they have a right to use the road but it's in line with council policy to increase active travel around the city, it removes pressures in parking and public transport as well as reducing pollution. Removing safer routes would be a huge step back." — Hazel Darwin-Clements, Parsons Green Primary School Bike Bus*