

Introduction.

SEStran welcomes the opportunity to comment on the City of Edinburgh Council's consultation and is pleased to note that responses will be used by the Council to help shape final proposals.

SEStran supports the principles behind extending bus lane operational hours in Edinburgh. More dedicated operational hours for bus (and taxi and bike) is a means to securing more reliable bus passenger journey times for services within, to and from Edinburgh.

Policy view.

SEStran considers that the proposals are strongly aligned to, and support, national commitments around travel behaviours:

- the significant financial commitment in the Scottish Government's Programme for Government 2019, to initiatives and investment to tackle the negative impact of congestion on bus services.
- the Scottish Government's Climate Emergency Declaration, which requires coordinated action at all levels of governance,
- the new investment hierarchy expressed within the draft National Transport Strategy and the adopted road user hierarchy outlined in Designing Streets guidance. Both hierarchies prioritise active and then public transport modes above the facilitation of private vehicle use.

SEStran takes the view that the proposals are strongly aligned to SEStran Regional Transport Strategy 2015-2025, which identifies that key public transport corridors will be more intensely used, and capacity and level of service in these corridors will have to reflect these increasing pressures¹. Due to regional population growth, commuting pressures in the SEStran region mean bus travel needs to continually, and rapidly improve. There is an urgent need to address increased bus journey times across the region. There is an urgent need to decrease overall numbers of individual car journeys in the region to reduce congestion. The population is increasing, and public transport reliability and numbers of journeys by public transport need to outstrip car-based travel. This will ensure the region's economic growth can be as inclusive as possible to those outside the city.

By extending bus lane operation beyond current peak hours, bus service and journey time reliability can be improved. An extension to the operational hours will have many positive impacts for bus passengers in and beyond the City of Edinburgh Council area.

Bus lanes should be viewed as a key part of a comprehensive set of policy tools to reduce traffic density, alongside 20mph, Low Emission Zones (LEZs), congestion zones, pedestrianisation, one-way streets and complementary regional measures. In fact, only with a wide range of policy interventions including bus lanes, will other initiatives, such as the Council's major LEZ proposals, fully succeed.²

In addition, SEStran considers that the extension of bus lane operating hours may provide better and safer access for bike users on roads where there is no option for bike lane provision. Proposals

¹ [Regional Transport Strategy 2015-2025](#) pp21-23 Chapter2 "SEStran Area – Key Trends and Issues"

² Boogaard et al (2012) say that using a comprehensive set of tools may be the key determinant; "where in addition to the LEZ – **traffic intensity** was reduced 'soot', NO2 and NOX concentrations decreased significantly".

therefore accord with the established Scottish hierarchy of transport users and may support active travel targets of the Council. However, the interaction of bus and bikes in standard-width bus lanes is not ideal, with competition for space and issues near bus stops. For this reason, SEStran would welcome a longer-term strategy to address this interaction.

Practical considerations for implementation.

There is strong justification to increase the operational hours, as currently, bus lane hours do not meet the longer peak hours that are evident on roads into and out of the city (with disbenefit to bus passengers, people travelling by bike and taxi).

However, SEStran notes the Council faces very complex challenges, to try and balance competing needs at bus lane locations where small business loading is also evident. It is difficult to consult on these kinds of policy decisions in isolation of a wider range of transport and movement considerations. It is noted that at this stage, there are no changes proposed to loading, parking or other arrangements. Impacts of bus lane interaction with parking provision are distinct from those associated with loading; for this response we focus on loading only. In locations such as St John's Road in Corstorphine, alternative arrangements for nearby loading are limited. If the Council pursues 12-hour bus lane operation, the view of SEStran is that a comprehensive plan will also be needed, identifying facilities for localised economic activity, commerce and residential access. Without this, it should be noted that optimum performance of the bus lanes can't be fully realised.

The performance of bus lanes under current operational hours can be further improved by more efficient enforcement: the data provided by the Council shows that bus journey times have increased in both peak, as well as off-peak times. A more comprehensive plan to introduce measures such as enforcement will help deliver better performance of the lanes. Lack of enforcement can also have an impact for the safety of those travelling by bike and using bus lanes.

Finally, SEStran considers that there are also other factors that can affect the reliability of journey times, including a loss of bus lane priority through or in advance of key junctions, and from locations or frequency of bus stop on some key routes. Commercial operators also have options to improve journey time reliability, by extending the hours / numbers of express services, or increasing two-door buses on key routes.

Conclusion.

The principle of extending bus lane operating times is fully supported. However, to be effective, enforcement is key, for the whole period of bus lane operation.

SEStran recognises the City of Edinburgh Council needs to take steps in delivering significant change, and that there are competing needs that are difficult to resolve in some locations.

SEStran would remain supportive if some amendments were to be made to final proposals, following consultation. This would be the case if the Council were to achieve significant extension of the peak hours and retain some standardised hours for loading related activities outside of bus lane hours (so long as these times are limited, and well outside of evident peak times seen in the city on key routes).