

Introduction

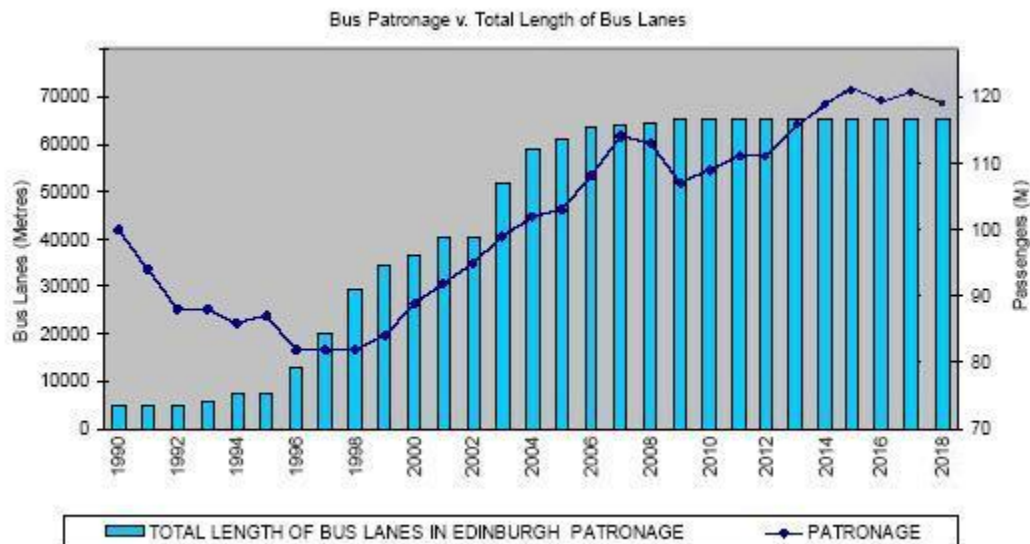
Edinburgh Bus Users Group (EBUG) is pleased to comment on bus lane operating hours. EBUG is a voice for bus users and potential users; it is committed to protecting and improving Edinburgh's bus network. EBUG is concerned with bus services operating within the Edinburgh Council area and those crossing its boundary.

Analysis

It is important to establish some first principles. Firstly, what is the purpose of bus lanes? This may seem obvious, but is sometimes lost sight of in discussion. A report to the Transport and Environment Committee on 2 June 2015 stated 'The primary purpose of bus lanes is to provide journey time reliability and time savings for buses by allowing them to bypass congestion during busy traffic periods. This increases the attractiveness of travelling by bus, compared to taking the car.' This statement is reflected on the current consultation webpage¹, and is perfectly adequate for current purposes.

Secondly, do bus lanes currently fulfill this purpose in Edinburgh? EBUG's answer to this is 'they do, but could do much better'. Unfortunately, it appears there is little if any data to quantify their impact. Therefore we must rely on secondary data, for example:

- Personal experience of our members; journey times are reduced and more reliable when and where bus lanes operate.
- Observations by bus operators; it is clear that most if not all operators consider that they do.
- Is there a correlation between bus use and bus lanes? The graph below is powerful evidence.



The graph was produced by Transform Scotland from data originally supplied by the Council, which appears to have stopped updating it around 2015. It does not show the reduced total bus lane length in recent years, or the recent cuts to operating hours. The

¹ <https://consultationhub.edinburgh.gov.uk/sfc/bus-lane-operational-hours/>

patronage data is from the Lothian Buses group only; it does not isolate additional patronage from the expansion of LB group routes beyond the Edinburgh urban area. What it does show is declining patronage until bus lanes began to be expanded in the late 1990s; growing patronage as bus lanes are expanded, both reaching a peak in 2007; a drop in patronage associated with disruption during tram construction, followed by a return to growth until 2015. Since 2015, however, patronage has leveled off. BUT patronage then began to include the 'Country' routes. Clearly within the city it has declined, although it is not possible to deduce how much.

- In 2015 the Scottish Household Survey researched bus use. The main reason for not using public transport to work, where it was possible (e.g. where a bus service is available) was that it takes too long (48%, sample 5,200), followed by no direct route (30%). When asked what discourages them from using buses more often, 16.3% (of 7,750) said 'nothing' followed by 15.6% who said it 'takes too long'.

Recent history

On 26 August 2014 it was reported to TEC that a review had been completed, and an Experimental Traffic Order (ETRO) should be promoted cutting peak hour bus lanes. It claimed 'all-day bus lanes offer little additional operational benefit to buses compared to peak periods lanes, under normal traffic conditions.'

The 2 June 2015 report recommended that objections to the ETRO be set aside. It stated that bus lane camera experience showed widespread confusion over operating hours. This appears to be the reasoning for adopting uniform operating hours (although the 'widespread confusion' was not quantified). It missed the point that it is the responsibility of road users to familiarise themselves with regulations applying to the roads they use (as with parking restrictions).

Consultation had produced 151 objections to cutting off-peak hours, primarily because it affected cycles, air quality, modal shift, and was contrary to the Council's Local Transport Strategy. No bus/tram operator objected, but there were apparently few or no expressions of support. Objections were received inter alia from Spokes, Living Streets, Transform Scotland, Scottish Association of Public Transport, Friends of the Earth, Greener Leith, Gorgie/Dalry and Leith Central Community Councils, Napier University and Sustrans. EBUG did not exist at that time.

As a number of objectors noted, if the Council wished to adopt uniform hours, it would be just as logical to adopt universal all day operation. Indeed, all day operation is arguably less confusing than two peak periods.

In paragraph 3.16, the report noted 'interpeak surveys...of all day bus lanes, showed that general traffic in the adjacent lane was generally flowing freely...*and therefore there is little advantage to be gained by general traffic from using the bus lane...It is therefore reasonable to expect a considerable proportion of general traffic to continue to use the general traffic lane*' as commonly seen outwith operating hours. This begs the question of what would be achieved by allowing general traffic to use bus lanes.

It highlights the flawed logic of a frequent argument i.e. 'there's no need for off-peak bus lanes, because buses are not delayed by congestion off-peak'; in which case, why does general traffic need to use them?

Uniform peak-hours only, Monday to Friday bus lanes were then implemented. A subsequent report to TEC, on 1 November 2016, noted Lothian Buses '*did not show a conclusive effect on transit times but did show a consistent marginal increase... The bus lane network needs to be regularly reviewed to identify new locations as well as identifying redundant lanes. For bus lanes to be effective they need to be kept clear during their hours of operation; this requires enforcement of parking and loading restrictions which are frequently ignored*'.

Significantly, we see no evidence of the bus lane network being regularly reviewed, rigorous enforcement of operating hours or of parking and loading restrictions.

On 21 March 2017, a report to TEC recommended that objections to making the ETRO permanent be set aside. It noted that Spokes and Living Streets had argued that 63% of survey respondents supported bus lanes operating on Saturdays and Sundays. Compared to before the experiment '20%-40% of respondents felt that conditions were now worse, compared to just 3%-10% who felt they were better'. Spokes and Living Streets cited Prof David Begg: 'When (Greenways) were first introduced, Edinburgh was the only city in the UK to show a consistent improvement in bus journey times. However, since then bus journey times in Edinburgh have reverted to the UK norm and have been increasing by 10% every decade'. They noted the Council had no evidence that the experiment speeded up car trips or reduced congestion, and most cars had stayed out of the bus lanes 'Therefore the benefit of allowing cars into bus lanes off-peak, when the main traffic lane usually has more than adequate capacity, is hard to fathom. Given therefore that bus lanes are vital for buses in the peak, and have no great value for cars in the offpeak, the obvious solution for simplicity and consistency would be the 7-7-7 policy'.

Looking forward

We have set out the recent history of bus lane hours at some length, because it illustrates that the decisions to reduce their operating hours were:

- The product of flawed logic
- The subject of faulty (if not partial) analysis
- Supposed to be subject to mitigating actions which were not implemented

Understanding this points clearly to the way forward.

EBUG fully supports the proposal to introduce uniform bus lane operating hours from 7am to 7pm, 7 days per week, for the following reasons:

1. Encouraging modal shift towards more sustainable modes, including buses, is at the heart of the Council's general transport strategies and specific programmes e.g. City Centre Transformation.

2. Given the Council's reliance on income from Lothian Buses' dividend (notably for Tram phase 2), there are major budgetary implications if the Council does not provide an environment in which bus services prosper.
3. It is the 'right thing to do' for a host of social, economic and environmental reasons which should not need restating here.
4. There are a range of ancillary benefits for other bus lane users (e.g. cyclists, taxis, emergency vehicles) which contribute to the council's wider goals. We have not set these out here as we assume others will make these points.

Indeed, we ask why the current presumption is that the case for extending bus lanes and/or hours must be made in each instance. Why not adopt a default position that there should be bus lanes wherever there is a bus service UNLESS there is a case AGAINST doing so?

The Council's consultation webpage notes that it is taking 12% longer to travel by bus than in 2006 at peak times and 14% off-peak, while buses are travelling nearly 8% slower. This bears out Prof Begg's comment, as quoted by Spokes and Living Streets (above). Clearly the reduction in operating hours from 2015 was a misstep, and there is now an excellent opportunity to rectify it, and align the hours with today's needs.

We support the proposed hours (rather than, say 7:30am to 7:30pm) because they fulfil the Council's clear preference for the hours to be clear, simple, and easily understood.

We support the inclusion of Saturdays and Sundays for the same reason, but primarily because modern travel patterns are such that congestion is a similar problem at weekends as on weekdays.

We do not have a strong view on whether exemptions should apply on major public holidays (i.e. Christmas Day and New Years Day). 'Secondary' public holidays such as 2 January and/or Good Friday/Easter Monday etc are now, we consider, probably as busy as 'working' days, and exemptions should probably not apply. Other 'public' holidays (e.g. traditional Edinburgh Monday holidays) are increasingly indistinguishable from universal working days, and there is no case for exemptions then.

Although social media is an unreliable guide to support or opposition, we reviewed it to understand any qualitative arguments against this proposal. It is not extensive, but the main stated theme of opposition appears to be that better enforcement is required. (Also cited by supporters) Of course, it is not an either/or issue. We have suggested above that all-day bus lanes are easier to self-enforce by virtue of reducing any confusion.

Some opponents argue that bus lanes are mostly empty off-peak (few, if any, oppose peak-hour lanes). We refer to paragraph 3.16 of the 2 June 2015 report (above). Our experience is that few/no buses are empty (and operators would quickly withdraw any unused services). It is the number of people, not vehicles, that is important. The distinction is even more marked if we include the time that cars are completely unoccupied (i.e. parked on the road).

Enforcement

It is clear from feedback we have received that bus lane enforcement is equally important. Whilst outwith the scope of the current consultation, it needs to be reviewed by the Council. This includes bus lanes, bus stops and adjacent parking/loading bay stay times.

As population and travel around the city grows, one would expect that enforcement resources and vigour would increase. However, despite the welcome introduction of some bus lane cameras, we consider that enforcement has not improved commensurately.

Related issues

The following points are outwith the consultation scope, but related and important:

- Total bus lane mileage in Edinburgh has declined. The commitment to regularly review bus lanes implies that, as the city grows, mileage would to, but it has not. The consultation webpage notes Edinburgh's population has grown by 12.5% in the last decade. By 2023, it will be 23,000 higher.
- There are issues with particular road layouts and traffic conditions. A full review of the location and length of bus lanes relative to traffic junctions should be conducted before introducing stricter enforcement. Bus driver training also needs to reinforce the importance of pulling into bus stops, not queuing on a junction/across a pedestrian crossing, not in a bus stop when awaiting driver changeover.