

Deputations

Transport and Environment Committee

10.00 am Thursday, 19th August, 2021

Virtual Meeting - via Microsoft Teams

Deputations

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CITY OF EDINBURGH COUNCIL
TRANSPORT AND ENVIRONMENT COMMITTEE

Item No 3

19 August 2021

DEPUTATION REQUESTS

Subject	Deputation
<p>3.1 In relation to Item 7.1 on the agenda – Active Travel Measures – Travelling Safely (formerly known as Spaces for People) – Report by the Executive Director of Place</p>	<p>Joint Deputation – Spokes and Better Edinburgh for Sustainable Travel (BEST) (written and verbal)</p> <p>South West Edinburgh 20 Minute Neighbourhoods (written)</p> <p>Better Broughton (written)</p>
<p>3.2 In relation to Item 7.2 on the agenda – Strategic Review of Parking – Results of Phase 2 Consultation and General Update – Report by the Executive Director of Place</p>	<p>Murrayfield Community Council (written and verbal)</p> <p>Constituents from Edinburgh Eastern Constituency (written)</p>
<p>3.3 In relation to Item 7.3 on the agenda – George Street and First New Town – Final Concept Design and Operational Plan Update – Report by the Executive Director of Place</p>	<p>George Street Association (written and verbal)</p> <p>Essential Edinburgh (written and verbal)</p>
<p>3.4 In relation to Item 7.4 on the agenda – Leith Connections – Foot of the Walk to Ocean Terminal route and Low Traffic Neighbourhood – Report by the Executive Director of Place</p>	<p>Living Street Edinburgh (verbal)</p> <p>Leith Links Community Council (written)</p> <p>Spokes (written)</p>

CITY OF EDINBURGH COUNCIL
TRANSPORT AND ENVIRONMENT COMMITTEE

19 August 2021

DEPUTATION REQUESTS

<p>3.5 In relation to Item 7.5 on the agenda – Corstorphine Connections Low Traffic Neighbourhood – Community Engagement on Concept Design and Commencement of Statutory Process for Experimental Traffic Regulation Order – Report by the Executive Director of Place</p>	<p>Low Traffic Corstorphine (written)</p> <p>Corstorphine Community Council (written and verbal)</p>
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Transport and Environment Committee – 19th August 2021

Item 7.1 Active Travel Measures – Travelling Safely

Deputation from Better Broughton re Items 4.28/29 Revisions to Canonmills (North of the Rodney Street Junction) and adjacent schemes

Dear Committee Members,

Better Broughton is very pleased to see that the Spaces for People measures on Broughton Street, Broughton Street Roundabout and beyond to Canonmills are in the main to be carried forward under the title of “Travelling Safely”.

These have been a boon to both pedestrians and cyclists, especially on Rodney St and Broughton St, where the cycleway provides additional space for pedestrians, and for shortening the crossings at Broughton St roundabout and reducing traffic speed making it safer for cyclists and pedestrians.

However, Better Broughton is gravely concerned about the proposed changes at the Broughton Road junction. The proposed scheme seems to put southbound cyclists, especially those going straight ahead, at very high risk of being struck by vehicles turning left. Straight ahead cyclists would normally be advised to take a prominent position in the signed straight-ahead lane – ie the right hand lane of the 2 proposed. Whereas, the proposal is that they should be on the inside of the left-turn lane. The situation is made even more dangerous due to the uphill topography on this section, meaning that it is difficult for cyclists to cycle with the traffic.

We would very much like to be involved in discussion as to a safer solution to address the traffic problems that have been raised.

There do appear to be issues with the traffic signal phasing that may be contributing to the reported congestion and bus delays. There is a major traffic flow from Brandon Terrace to Broughton Road (and vice versa) that is not well catered for by the signalling, For example, traffic from Brandon Terrace being released into an already stationary queue of traffic on Canonmills and then being held on a red light for a considerable time. Ideally the signals would be synchronised so that traffic could flow through to Broughton Road.

Our view is that:

- The current scheme was safer than that which is proposed as the cycleway was wider and segregated (although to some extent the segregation makes the cyclists “invisible”); the single traffic lane meant that left-turning drivers were more likely to expect cyclists to be going straight ahead across their path; that drivers were in a shared traffic lane and would be driving more slowly, being more thoughtful about making the left turn
- It seems that to us that cyclists would be best served by infrastructure to support them taking primary position in the straight-ahead and left-turn lanes. This could take the form of extending the lane markings to cover the wide space to the north of the proposed markings; narrowing the lanes; adding cycle logo (elephant’s foot) markings to the centre of the 2 lanes and across the junction; retaining the ASL; making the left turn radius sufficiently tight to slow vehicles

Other points:

1. 4.29 - Removal of pedestrian buildouts on both sides of Canonmills
The removal does not appear to be shown on the drawings. Which build-outs are affected?

2. 4.29 – Installation of 1.25m mandatory cycle lane
It is claimed that the cycle lane will “discourage close passes” – we think the opposite will be the case.
The cycle lane needs to be wider to give cyclists a better alignment for going straight ahead.
3. 4.29 Creating of red screed advisory cycle lane across Broughton Road at junction – measure improve safety for cyclists
The red screed is not shown on the drawing. It forces cyclists into an exposed position conflicting with left-turning vehicles. Cyclists in the straight ahead lane taking a primary and direct position in the traffic flow will probably frustrate drivers who will think that they should be in the exposed cycleway.
4. 4.29 Change to segregation layout after Warriston Road junction – improved road layout for transport operators
There are no details of this proposal. Which separators are to be removed? Does this introduce additional risk to pedestrian or cyclists?

We note that the report states that the schemes on Broughton Street and at the Broughton Road roundabout will be reviewed, with the aim of progress towards an ETRO. We hope that we, as a local group, will have an opportunity to participate in and contribute towards that review process

We look forward to working with officers to achieve a better solution.

Better Broughton

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Deputation to City of Edinburgh Council, Transport & Environment Committee from South West Edinburgh 20 Minute Neighbourhoods

Active Travel Measures – Travelling Safely

[South West Edinburgh 20 Minute Neighbourhoods](#) wants to build more resilient communities with thriving local businesses and services that will help tackle climate change, inactivity and air pollution. Simply put to *live better locally*. Therefore we warmly welcome the Transport Convenor's message that investment in public transport, pedestrian improvements and a safe, coherently designed cycling network should be prioritised.

We welcome the commitments from the [UK](#), [Scottish](#) and [local governments](#) to tackle the problematic vehicle use that is harming public health. This will help groups like [SW20](#) to help communities access schools, local businesses and green spaces more sustainably. All political parties representing South West Edinburgh stood on manifestos that promised to prioritise walking, cycling and public transport. We ask that where they are opposing schemes that make improvements in our area, [they present alternatives](#).

The [stark climate change warnings from the IPCC](#) will mean that in the future we must move around our city differently. This will be the defining issue of the 21st century and the sooner we make these changes, the less challenging the Net Zero transition will be.

We have mixed views about the proposals being debated today. They can be summarised as follows:

- We warmly welcome the retention of many schemes and hope that the ETRO process will allow for further consultation, improvements and final designs for these schemes – especially Longstone, Inglis Green, Murrayburn and Slateford Roads – to be delivered in a timely manner.
- It's obvious that these schemes need to be better connected - for example linking Longstone cycle lanes properly with Lanark Road and also from Lanark Road through Juniper Green to reach quieter streets.

We draw the committee's attention to two serious road incidents that took place recently outside the boundaries of the Lanark Road scheme: on a busy afternoon in Juniper Green a driver had to be cut free after rolling their car following a crash into a parked car, while at Longstone the driver of a van crossed the oncoming carriageway and pavement before crashing near the builder's yard. These and similar incidents erode the community's confidence in reaching the improved road layouts and underline the need to extend these schemes.

- Many walking and cycling improvements will not bear fruit until there are further end-to-end journey investments (e.g. pedestrian crossings, segregated junctions



and connected cycle networks) and we urge the council to be cautious about usage data from schemes which are not yet connected to other safe routes, especially while the majority of offices in the city are still closed due to the pandemic.

- We welcome the [‘cut the clutter’](#) partnership with Living Streets. It should be extended based on the survey data currently being collected.
- We urge CEC to build upon the success of school streets with permanent designs where possible. In the 1970s [70% of children walked to school](#) – this should be our target.
- The choice between parking and better active travel is a false one. Reallocation of road space from active travel back to private vehicles does not align with UK, Scottish or local government policies to reduce car use:
 - We are very disappointed that pedestrian improvements in shopping streets, the cornerstone of 20 minute communities, are being removed. COVID has transformed home working - there is an opportunity to use local shops in a sustainable way.
 - Adding parking and reallocating pavements and cycle lanes to private vehicles simply induces further private car use. This harms bus journey times too. Public transport hesitancy appears likely to persist and without providing safe alternatives congestion will increase.
 - Replacing safe segregated cycle lanes with advisory lanes that will [make it less safe](#) and [much less likely for people to cycle](#) is hugely disappointing. Roads with segregated cycle lanes are [safer for all road users](#) including pedestrians of all ages and abilities. To be clear, you will be voting to worsen safety for vulnerable road users.
- We welcome the lack of any serious incidents around floating parking since the committee last met, and we support the principle of well-implemented floating parking, but believe that the community urgently needs to see the vision for these layouts in a permanent state, rather than the temporary materials which may be suppressing local support.
 - We note that in addition to any potential benefit to cyclists, floating parking seems to significantly reduce cycling speed, potentially reducing both the frequency and severity of collisions with people exiting their cars.
 - Floating parking can also move pavement cyclists (who are unwilling to use the main traffic lane) into a well defined area of the road and away from vulnerable pedestrians. We urge the council to take all such factors into account when establishing final designs.

Finally, we wholeheartedly support consultations to help residents and business voice support or concerns about policy proposals or specific schemes. We strongly urge the Council to follow the statutory processes to help understand how policies can be adapted. However, we do not believe the council should delay indefinitely or compromise the core objectives of these schemes by seeking consensus in an area where significant



behavioural change is required – opponents will seek to delay many schemes, irrespective of consultations. COVID has taught us that delaying because of election cycles will simply mean more unequal change when decisions have to be made rapidly. The harm being caused by climate change, inactivity and emissions cannot be filibustered.

Please make your decisions in that context.

Yours,

[South West Edinburgh 20 Minute Neighbourhoods](#)

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BEST/ SPOKES Joint Deputation to TEC, Thursday 19th August 2021

Item 7.1. Agenda Paper: Active Travel Measures - Travelling Safely (Formerly Spaces for People)

Spokes, with over 1000 members, has campaigned since the late 1970s for improved cycling conditions, in the context of a city transport system built around public transport, active travel and accessibility for all. BEST – Better Edinburgh for Sustainable Travel – is a recently formed collective of community groups and businesses from across the city seeking an Edinburgh where everyone can travel easily by sustainable means, whoever they are and wherever they need to go.

1. Overall, we welcome the recommendations set out in the report to retain many of the SfP measures, moving them towards TRO and ETRO. This commitment to support and enable higher levels of walking, wheeling and cycling in the city is in line with many other progressive and prosperous cities/places both within the UK and abroad. Together with existing and proposed schemes (CCWEL, forthcoming junctions review etc) this puts Edinburgh on a trajectory towards increased levels of cycling for everyday journeys. We note the new emphasis on travelling safely, and support a vision of safe and inclusive transport for all. We applaud this approach.
2. We note that the overall effect of SfP measures has been to speed up the process of creating a network of cycling infrastructure across the city. This network is fundamental to the continued success of cycling measures in Edinburgh, and the importance of continuity and coherence in that network should not be underestimated.
3. As in previous deputations, we note that the promotion of walking, wheeling and cycling helps the council to achieve multiple policy goals on carbon reduction, air quality, public health, 20 minute neighbourhoods, healthy city, road safety and vision zero. Active travel has a key role to play in the decarbonisation of the city's transport system - now an extremely pressing policy goal in the light of the IPCC's most recent report.
4. We are delighted to see the retention and reinstatement of school street measures around the city's schools. Enabling children to move safely and independently to

school is fundamentally important, and this provides an excellent platform for future consideration of active routes to school in each school catchment. It should be noted that the communities around school buildings also benefit from these measures to limit vehicle movements and prioritise walking, wheeling and cycling.

5. Although we support many of the recommendations in the report, we are concerned about some of the proposals for removal or revision of SfP measures. In our view, the future of SfP measures should be considered in relation to three key issues:
 - a. conformity with the sustainable transport hierarchy as set out in national and local policy
 - b. impact on the integrity of the city's network of cycling infrastructure; and
 - c. equalities issues, particularly the experiences and perceptions of women, ethnic minorities, migrants, refugees, and asylum seekers, adapted cycle users (e.g. handcycles, trikes, wheelchair tandems) and those carrying children (e.g. cargo bikes, trailers and tag-alongs)

With these three issues in mind, we now offer some detailed comments about specific recommendations for Forrest Road, George IV Bridge, Morningside Road, Canonmills and Fillyside.

6. On George IV Bridge and Forrest Road (plus some others) the report recommends the removal of SfP measures on the basis of concerns about traffic flow, loading arrangements and public transport operations. However, this reasoning is not compatible with the transport hierarchy, which prioritises pedestrians then wheelers and cyclists. These modes should take priority over public transport and private vehicles. It is not right to remove successful and very heavily used pedestrian spaces (e.g. George IV Bridge) in order to resolve loading issues for businesses and timetabling issues for bus operators. Given that there are longer term plans for both Forrest Road and George IV Bridge, it would be preferable to find new ways of servicing local businesses rather than go back to kerbside loading bays at this point in time. Alternative solutions might include use of the central meridian as a loading space plus the use of cargo bikes (as in Leith Walk). In Morningside, it is disappointing that the protected cycle lane and pavement widening measures are - in part - being removed for aesthetic reasons. Again, this is not consistent with the transport hierarchy or any extant transport policy at local or national level.
7. Forrest Rd and George IV Bridge are both important parts of the city's cycling network. The *protected* cycleways here are really well used, and provide a critical link in the cycling network between the north and south of the city. Removing or revising them - even in anticipation of new schemes in the future - **would be a very significant step backwards**. We urge that further thought be given to ways of securing the continuity of the network **in time** as well as space. Infrastructure hokey-cokey where measures are put in, taken out and then put back in would be unthinkable for any other transport mode! SfP has begun the process of creating a network of cycling infrastructure in the city - losing key links like these undermines that work, reducing the overall viability of the network. We recognise the legal challenges presented by the regulatory context of TRO/ETROs. We suggest that

efforts are made to find a bridging measure that would maintain the safety profile of the route. Network thinking should also be exercised in relation to the Fillyside/Seafield Road crossing. Although this SfP intervention would be very small and limited, it is a key link in the active travel network in the north of the city, and it is very disappointing that the recommendation is not to progress the scheme at this time.

8. We are particularly disappointed by lines of thinking in the report which advocate for downgrading protected cycleways to mandatory lanes (Morningside Rd, Forrest Road) or advisory lanes (Canonmills). These approaches fail badly on equalities issues because in short: **paint is not infrastructure**. Research from Australia (2019) shows that painted-only cycle lanes significantly reduce the space motorists give cyclists - which we know affects perceptions of safety for riders. The paper¹, published in *Accident Analysis and Prevention*, argues that the focus of on-road cycling infrastructure must be on providing infrastructure that separates cyclists from motorists with a physical barrier. Other evidence shows that women in particular are much less likely to find unsegregated infrastructure attractive and safe. In addition, we see throughout Edinburgh **that motorists regularly abuse painted cycle lanes - even mandatory lanes - by driving and parking in them**. If a cycle lane is mostly occupied by parked vehicles then it is not cycling infrastructure it is parking infrastructure. Cyclists who are not confident in traffic must be able to rely on safe protected lanes - if they cannot they will use other means of travel - often private cars.

To summarise, overall this is a very welcome report which continues the City's progress as a place that is safe and pleasant for walking, wheeling and cycling. We are pleased that many cycle lanes and school street measures are being retained and moved to TRO/ETRO processes. However, we are concerned that flawed reasoning is being used to justify the removal or modification of some SfP measures, erroneously prioritising aesthetics, loading and public transport operations above walking, wheeling and cycling. We think that more weight should be given to the integrity of the network of cycling infrastructure in the city, and that attention should be given to the road safety and equalities impacts of downgrading protected cycle lanes to mandatory or advisory painted lanes. In particular, we urge the Committee to reconsider the specific locations we have highlighted today. Travelling safely in the city is a laudable goal - but it cannot be achieved with paint. Let's build Edinburgh back better.

¹ *How much space do drivers provide when passing cyclists? Understanding the impact of motor vehicle and infrastructure characteristics on passing distance*. Beck, B, Chong, D et al. (2019) *Accident Analysis & Prevention*, 128, 253-260. <https://doi.org/10.1016/j.aap.2019.03.007>

Detailed Comments

As an appendix to the above, we offer these more detailed comments on a number of individual projects and/ or recommendations for change contained within the report.

(1) Meadows to Greenbank Quiet Route - impact outside James Gillespie's Primary School.

Since the introduction of the Meadows to Greenbank Quiet Route we have seen uptake of walking and cycling to school in far greater numbers than previously. The area outside the school is crucially free of traffic, which means the children are able to cross throughout the day (not just at start at finish times) to go to their PE lessons on the Bruntsfield Links. It also means that social distancing has been possible and children and parents have had spaces to meet on the Links and allow their children - even from P1 - to cross more safely and enter the school by themselves or in groups.

In future, the independence that children have gained by parents feeling that it is safe enough for them to walk to school unaccompanied will greatly benefit not only the children but also the parents who are more free to work and contribute societally.

The most notable impact has been on the P1 year groups, where new parents - not yet accustomed to the serious traffic volume outside the school - chose to walk and cycle up Whitehouse Loan. The previous dangerous traffic volumes have made existing parents wary of attempting to come to school by bike or on foot, contributing to the vicious circle of car dependency.

This safe route forms part of a route for six primary schools (as evidenced in previous video deputations) and four high schools. But the benefits extend well beyond the school's pupils, parents and teachers, and include the wider community of citizens such as students and professionals travelling from the south to the city centre. The route provides a safer environment for people to travel actively. This has multiple benefits environmentally, socially and economically and enables physical activity as a part of everyday journeys. Physical inactivity is a significant public health issue, and this route makes an important contribution to a healthier and more connected place.

(2) Seafield Road/Fillyside

We are bitterly disappointed by the recommendation that the temporary Spaces for People scheme on Seafield Road/Fillyside not be progressed, and instead a permanent crossing added in 2022/23. While we welcome the commitment to a permanent scheme, we are calling on the Committee not to agree to this, and to take the temporary scheme forward until the permanent scheme can be implemented.

The current situation at the entrance to Seafield Promenade is extremely dangerous, with pedestrians and cyclists being put at daily risk by drivers on what should be a traffic-free shared use active travel corridor. This is unsafe both for those using the shared use path on the north side, as well as those crossing Seafield Rd from Craigentenny via Fillyside. No parking should be permitted on the shared use path except for occasional service vehicles. Both the temporary and permanent schemes should physically restrict parking where

possible, and, where not possible, restrictions must be enforceable and enforced, so that the only vehicles accessing the route are essential service vehicles.

We understand that Craigentenny and Meadowbank Community Council raised the crossing as an issue several years ago and tried, through the Neighbourhood Partnership, to get a shared crossing linking Craigentenny with the promenade. Sadly it was never built.

(3) Morningside Road / Bruntsfield/ Tollcross

The loss of pedestrian zones to be replaced by parking is a retrograde step, moving away from making Morningside Rd an attractive pedestrian friendly shopping street. This road has a poor pedestrian safety record with two pedestrian fatalities in the last five years. In Morningside (& elsewhere), defenders help to shorten crossing distances and prevent illegal parking around them. The replacement of a much appreciated short stretch of uphill segregated cycle lane is likely to increase tensions between drivers and cyclists. The inevitable obstacles in the 'mandatory' painted lane (e.g. parked cars/vans) will force cyclists into the main carriageway, slowing down the traffic behind.

The same observation could be made further north. The pavement widening scheme in Bruntsfield has provided much needed space for pedestrians, particularly outside businesses that generate queues, and we note that Bruntsfield Place has seen a number of slight and serious traffic incidents over the past five years. Pavements in Tollcross are often well short of minimum pavement width standards, despite resurfacing works taking place within the last three years.

Pedestrian Crossings:

Safe pedestrian crossings are critical pieces of infrastructure if more trips by car are being encouraged by returning road space to parking spaces. At Morningside Community Council on 11.08.21 we were informed that the sections of extended pavements at the pedestrian crossings are not being retained as they are unsuitable aesthetically for use on a historic street. It seems contradictory for them to also be retained opposite the entrance to Waitrose. We would like to seek clarification about this glaring inconsistency.

If no parking is allowed on zig zags then surely defenders can remain (or be replaced with more suitable permanent materials) to prevent illegal parking and narrow the crossing for pedestrians. Pedestrian crossings and narrowing act to calm motor vehicle traffic around cyclists on the road. They also allow less confident cyclists to cross the road in order to cross and connect to the Greenbank to Meadows Quiet Route, residential areas and employment hubs such as the hospitals surrounding.

Has a safety audit been undertaken to assess any safety impacts of the removal of protective barriers/ separators from crossings, as is being proposed?

Northbound (Uphill) Cycle Lane:

Further to the extended pavement removals we had previously thought the uphill segregated cycle lane was also to be retained. This has improved safety on a steep and busy uphill section of road. It now seems that this is to be replaced with a "mandatory painted lane" to allow for parking to be reinstated at the Chalmers Church opposite. We are

surprised as after a meeting between Morningside Traders Association and Lloyd Richardson (in an email 07.04.21), it seemed that there was support to retain the uphill cycle lane as a shared space for the benefit of cyclists, as well as spill out for pedestrians, due to the lower speed of cycles uphill.

Experience from before the SfP project is that two buses cannot pass on this section when cars are parked, as seems likely to occur despite the “mandatory” classification. This will delay public transport as well as endanger cyclists (thus, a decision contrary to the title “Traveling Safely”, supporting neither the Scottish Government’s nor the Council’s Sustainable Transport Hierarchy.)

(4) Canonmills

The proposed solution (to the north of the Rodney Street junction) looks highly dangerous. Reinstating the left turn lane and putting cyclists in a narrower unprotected lane and having to cross left-turning traffic in order to travel straight ahead is a recipe for disaster - a near-duplication of the Portobello High Street (King's Road) Junction. The traffic signalling seems to be very badly timed with traffic being released from Brandon Terrace into already-stationary queuing traffic on Canonmills. A potential improvement would be a white line to separate the two lanes at an earlier point with cycle markings in primary position on the straight ahead lane - that is the only position to cycle here in order to avoid being left-hooked. It is not clear what is proposed for the segregation further north.

(5) Drum Brae North

The recommendation to remove part of this downhill, separated lane is not supported by the argument provided in the report. This deals forensically and elegantly with the main objections raised to the presence of this lane and finds none of them to possess merit. Accordingly, the appropriate conclusion would be to retain the lane in its current form, rather than to compromise its effectiveness (removal of segregation units will undoubtedly lead to the lane being blocked by parked cars). Indeed, we would urge the Council to extend the segregation here over the length of Drum Brae to create a north-south active travel corridor that increases safety and integrates better with other routes in North-West Edinburgh.



The Scottish Parliament
Pàrlamaid na h-Alba



Ash Denham

Member of the Scottish Parliament for Edinburgh Eastern Constituency

Elected Member of the
Transport and Environment Committee
City of Edinburgh Council
Edinburgh

Our Ref: AD7977

17 August 2021

Dear Councillor

I write to you on behalf of a great number of constituents in Edinburgh Eastern constituency who are concerned about proposals set out within the Strategic Review of Parking, which will be considered on Thursday by Edinburgh Council's Transport & Environment Committee, of which you are a member.

There is a clear understanding that the City of Edinburgh Council have set many objectives to reduce congestion and car use within the city by my constituents. However, the consultants who make the recommendation to approve the proposed CPZ in Willowbrae North, Easter Road and West Leith, all of which impact directly onto my constituency, recognise themselves that these current proposals alone will not achieve this and will simply push congestion and parking problems into neighbouring areas that are not yet proposed.

Whilst I note that a community consultation process has been undertaken, the constituents who have reached out for my support have concerns that parking restrictions will be implemented in streets where local residents do not believe it is needed. This is confirmed by the Council's own evidence as the following excerpt shows;

" A migration of parking pressures from any area where new controls are introduced is an anticipated outcome. In almost every case, the areas that have indicated that they currently experience no parking problems are located directly adjacent to areas that are likely to become controlled parking zones. Mitigating against migration is a key consideration for all Phase 2 areas"

I have previously pointed out that the proposed restrictions would force households to purchase parking permits at further cost to already stretched household expenses during a particularly challenging time, financially, for many. The areas within my constituency includes some of the poorest areas in the city. I have not yet been made aware of any mitigation that the Council will offer to support my constituents. I would also like to ask if there are any plans to include a reduction in the cost of a permit to households who are not in a position to easily afford it? Many of my constituents with low incomes will rely on their own transport to travel to work. Others, particularly the elderly and those with mobility issues feel that their car is their only way to live independently.

Ash.Denham.msp@parliament.scot

On a separate but linked point - if we want people to leave cars behind we must offer them a sustainable alternative. In the past 18 months or so constituents have sought my support over the changes/withdrawal to a number of valued bus routes in my constituency, including the 13, 19 and 69. I once again, ask the Council and Lothian Buses to reconsider these decisions and look to reinstate fully these routes when possible.

All of these routes have been removed from areas now included in the proposed CPZ. I believe, if we want to reduce reliance on cars, and therefore reduce the need for controlled parking zones, we cannot continue to reduce or cut vital bus services that run in and around the city. These issues go hand in hand and must be considered together.

I would respectfully suggest that the Council increase public transport provision, particularly to the areas around Lochend, Restalrig and Meadowbank that now find themselves included in the proposals. By doing so, you will give an alternative to the car, to those who need it most. The recommendations you will consider on Thursday, actually point out that by agreeing these CPZs, you will migrate the issues to other areas. The area between Portobello (Phase 4) and Easter Road (Phase 2) is a densely populated area that has been hugely impacted by the loss of the bus services mentioned above.

I would further suggest that the Councillors recognise that residents have used the democratic process to voice their concerns and this should not be disregarded. I submit that the proposed CPZs are delayed to allow and progress public transport options to offer more sustainable transport alternatives for all of the residents affected and to encourage increased use on public transport and decrease reliance on private vehicles.

Yours sincerely

Ash Denham MSP
Edinburgh Eastern Constituency

SAUGHTONHALL CONTROLLED PARKING ZONE

SUBMISSION FROM THE MURRAYFIELD COMMUNITY COUNCIL TO THE CITY OF EDINBURGH COUNCIL TRANSPORT & ENVIRONMENT COMMITTEE

OBJECTIONS

As a local Community Councillor, I write on behalf of the residents of Saughtonhall to object to the proposed CPZ for the area:

- The scheme as it is proposed would not achieve its primary objective of ensuring residents are able to park near their homes. To the contrary, the current scheme would increase parking pressures & detrimentally impact on residents' ability to park near their own home.
- There is no evidence of current parking pressures in this area – the proposal is based on only 2 sample days in November 2018. This data is far too limited and is no longer relevant as it does not take account of the change in parking demands / needs in light of Covid-19
- There is little if any support from local residents for implementation of such a scheme
- The Council failed in its duty and responsibility to properly consult with local residents affected by the proposed changes.

BASIS FOR THE REVIEW/ PROPOSED SCHEME

The Transport and Environment Committee Paper (5 March 2019) suggests that there were "long-standing and significant indications of intrusive commuter parking, particularly in streets adjacent to the A8". This statement has been used to define an objective of reducing this commuter parking across a wide area to the West of Edinburgh, despite there being no evidence of such.

There is nothing to substantiate the claim, with the study relying on responses from residents in a survey undertaken only in Corstorphine. It is also the case that Corstorphine is a very different district centre from Saughtonhall.

The area of Saughtonhall is special in that its approx 1,600 households reside in close proximity to 2 primary schools; 2 rugby stadia; a church; a residents' association hall with grounds; local shops; several 18-hole golf courses; an ice rink; a curling rink; 2 bowling greens; a tram stop; it borders on Edinburgh Zoo, and is used by football fans attending matches at Tynecastle Stadium. While many have on-site parking, inevitably there can be an overspill into the local streets.

Having lived in the area for 30 years, myself, neighbours, family and friends have seldom had a problem parking outside their home. The current white lines outside properties with drives are well respected by all types of visitor and the custom and practice where residents do not have private driveways is for local residents to park free of charge outside or close to their own homes.

There is therefore no basis on which to apply a restrictive parking policy applicable in the Corstorphine area and apply these across an entire corridor, when these areas are very different indeed, such as Saughtonhall.

THE PARKING STUDY

Having read the Strategic Review of Parking Results of Area 1 Review and Corstorphine Consultation Results from 5th March 2019 and it is evident that this is based on very little quantifiable evidence and many assumptions.

The requirements under CEC's Controlled Parking & Priority Parking Protocol (March 2017) suggests that the evidence should consider the following: "Undertake initial monitoring of area over a six month period starting from the date that the requester was notified of the criteria/process. Monitoring to include regular, detailed site visits, recording parking levels and instances of obstructive or inconsiderate parking, as well as recording any additional correspondence received"

However, the survey was undertaken on only 2 sample days on 14th & 15th November 2018 and these were between 10am and 5pm. There was no assessment of parking in the evenings or weekends. There is also no way to identify what was residential and non-residential parking. To assume that because the surveys took place between 10am and 5pm, parking was due to non-residential vehicles is too simplistic and does not take account of the occupation / lifestyle of Saughtonhall residents.

Saughtonhall benefits from a good level of transport links, encouraging residents to use bus & trams for many journeys, which means that cars are more likely to be parked on-street on weekdays, with greater use of cars taking place on evenings and at weekends. If non-residential / commuter parking was an issue, then you would expect to see a change between the kerbline capacity on different days and different times of day – but surveys were not conducted on a sufficient number of days and at different times to support this.

On this basis, the CPZ study is inferring is that, because the Saughtonhall neighbourhood is subject to a 'medium' level of on-street parking occupancy, that there must an issue with residents adopting sustainable travel behaviours; and the proposed CPZ would penalise residents for this.

Para 2.2.2 of the Council report states that "The parking pressure survey was undertaken through observations of usable kerb - side space to determine the severity of the identified parking pressures. The level of severity was measured based on the percentage of usable kerb-side space occupied by parked vehicles on a road-by-road basis and has been shown either as low, medium or high"

A 'high' car parking ratio is itself not an issue if the street or area are simply fulfilling its purpose of meeting the on-street car parking demand of residents living on it – and this is the case in Saughtonhall. There is no reference in the report as to how the available 'occupancy' has been determined so there is no way to calculate the parking pressures that are suggested.

To propose such sweeping & long-term changes based on less than a handful of days, using methodology that is questionable and does not meet your own protocols, does not stand up to scrutiny.

Saughtonhall Heat Map

In Para 4.19.1 is it stated that: "Although many roads in the area are residential, medium to high levels of parking pressure have likely been observed as a result of limited access to off-street parking causing vehicles to be parked on the carriageway."

This is indicative of the fact that many properties in the area do not benefit from driveways. As such, the kerblines fulfil an important function in terms of accommodating the natural car parking from residents.

The subsequent paragraph is less than conclusive when stating that: "The southern section of Balgreen Road and Baird Drive had particularly high levels of parking pressure due to probable commuter parking associated with the Balgreen tram stop. On the site visit obstructive parking and loading activity was observed outside the Scotmid Co-operative which raised road safety concerns at the Balgreen Road / Saughtonhall Drive junction and the signalised pedestrian crossings at the junction."

If something is described as 'probable', this casts significant doubt on the robustness of the observations made. Equally, the activities associated with the deliveries to the Scotmid on the corner of Saughtonhall Drive and Balgreen Road are no more than normal but infrequent practices associated with the delivery and servicing arrangements.

If such arrangements are considered to be a problem, there is a loading bay on Balgreen Road which could be marked for this purpose only, rather than be available for all vehicles to use. This would be a relatively easy solution compared to the implementation of area-wide parking restrictions in attempting to resolve a perceived problem, which is neither quantified nor real.

THE PROPOSED ZONING

The current zoning proposal would significantly reduce the availability of parking with large swathes of streets being assigned with double yellow lines, thus precluding parking at any time. In most streets the majority of remaining spaces are to be designated as 'residents only' bays with limited 'visitor parking/ shared bays'

However, some streets, the Southern half of Saughtonhall Drive in particular, would have no designated residents' bays and large sections marked as single yellow lines. With very limited 'visitor' parking in surrounding streets due to the high proportion of resident only bays and double yellow lines, non-residents would be funnelled to Saughtonhall Drive to park.

The resultant effect of these changes would undoubtedly increase the pressure on parking and residents of Saughtonhall Drive would have to compete to secure a parking space with the occupants of 137-151 (and opposite) also denied any parking outside their residences (due to yellow lines) or nearby.

Perhaps there was an assumption that each property in the 'yellow line' zone was a single dwelling and, as such, could use the driveway. But this is NOT the case. They DO NOT have access to off street parking as they only have one access route to their property and this is shared between two households. The 'driveway' cannot accommodate a car for each of the two households and, as there is no separate path to the houses, they would have to navigate a very narrow area around any car to access their front door if a car is parked off street.

To deny residents parking outside their homes is clearly contrary to the principal objective of the proposed scheme.

There are also significant environmental considerations in relation to this scheme. Have the negative effects on wildlife, lack of rainfall run-off (in an area immediately bordering on extensive flood prevention measures), pedestrian right of way, or the effect on the street aesthetics?

In addition to increasing parking pressures the scheme, if implemented, would have a hugely detrimental impact on the look of our streetscapes. Having spoken to many neighbours and residents of the area, they have significant concerns that they will be denied parking outside their homes and believe that their only option will be to convert their front gardens into parking spaces.

THE CONSULTATION PROCESS

The consultation process was badly flawed. The Council did not inform all affected households of the Consultation on the proposed Saughtonhall CPZ, nor did they provide adequate information on the details of the proposal or the opportunity for residents to engage in the process.

The leaflet provided no substantive information on the proposed changes. Given the demographics of residents, many either have no internet access or are without the skills to log onto a Microsoft Teams meeting, or to navigate an interactive map to view the proposals. It is understandable that a public meeting couldn't be held due to Covid restrictions, but the opportunity for an open, democratic consultation has been denied to the residents in Saughtonhall.

When queried about the online consultation, a Council official stated in an email response there had been a "good attendance" at the two online meetings. Having attended the first on 22 February, there were only 14 people present and this number included Council official, Andrew Mackay, and survey company representative, Jess Lloyd. At the second consultation meeting, there were 18 attendees in total. Several residents were frustrated to be left in the waiting room and unable to join the meetings.

To suggest that 28 total resident attendees out of some 1,600 households indicates a good representative sample of the area is ludicrous and does not bear scrutiny.

The Council has a duty to ensure that information is readily accessible to all residents and this is clearly not the case. Without access to the information people were denied the opportunity to offer informed comments / provide input on the plans.

After considerable pressure, The Council announced an extension of the consultation deadline (a tacit admission I would suggest that Council officials got that consultation wrong). However, notification of the extension was only communicated via email to those who had already returned the survey.

The survey was also poorly designed with questions, possibly intentional, to suggest that there is a parking problem in the area e.g. "what parking improvements would you like to see?; "If parking improvements are to be introduced, during what times.."

"Further comments" were restricted to 255 characters - approx 50 words for clarification or comment, hardly enough. 50 words is less than this current and the previous paragraph. Any further comments had to be sent by email.

CONCLUSION

Implementation of the CPZ would result in significantly less space, creating the very parking pressures the Council claim they are looking to address & there is no substantive evidence

for the designation of residents, shared bays, single & yellow lines being applied to various streets within the Saughtonhall area.

The (suggested) commuter parking pressures on which the study was predicated in late 2018 is no longer pertinent or relevant to the area in 2021. This historical survey data is no longer relevant as the assumptions about non-residential parking and commuting to work were made before Coronavirus.

The Covid-19 situation has resulted in increased home working and there is noticeably less parking /traffic in the area. It remains to be seen how work patterns and daily commuting will look post-pandemic. It may be that the need for non-residential parking will be considerably lower as, is widely suggested in the media, an increasing proportion of workers choose to work from home.

This Council-wide “strategic pro-active approach” (Council CPZ leaflet) fails to take into account changed social and work patterns and local democratic opinion; and these propose sweeping ‘one size fits all’ changes are not needed, not wanted and cannot be supported by the parking study undertaken.

On behalf of the residents of Saughtonhall we would like the proposed scheme is withdrawn.

Alternatively, we would request that any final decision be deferred for a period of at least two years until travel and work patterns are re-established and a new, comprehensive parking review of the Saughtonhall area taking into account post-Covid work and leisure patterns is undertaken.

I appreciate your consideration of this submission and would be happy to discuss the proposals, issues & objections as they pertain to Saughtonhall.

Thank you.

David Dawson
Murrayfield Community Council
14 June 2021

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LEITH LINKS

COMMUNITY COUNCIL

Leith Connections – Low Traffic Neighbourhood proposal from Edinburgh City Council – June / July 2021

Consultation response and representations from the Leith Links Community Council – 9 July 2021

About us and our area

1. Leith Links Community Council (LLCC) is established by statute to act as a voice for our local area. The LLCC is composed of people who care about our community and want to make our area an even better place to live, work, study, volunteer or visit. Community Councillors are volunteers. We raise matters of concern with our elected representatives or directly to public bodies. We also work to improve our local community by taking part in partnership work and by undertaking our own projects.
2. Our area is bounded by Lochend Ave/Restalrig Crescent/Thornhill Side and the Academy/Constitution Street/Salamander Street-Seafield. It includes all of Leith Links and the south side of the Foot of the Walk area. The area is very mixed and populous. Relatively close to Edinburgh city centre, the area includes several primary schools and one secondary school, care homes, nurseries and GP surgeries, one of Edinburgh's crematoriums, a large Police Scotland office with a number of emergency vehicles present at all times, a major sewage treatment works operated by Scottish Water, a range of industrial business including scrap metal yards and builders merchants along a key route towards Leith Docks and a major visitor attraction The Royal Yacht Britannia, parts of a busy shopping and transport interchange hub, many small businesses, including garages, and pubs and restaurants, a number of hotels, as well as residential areas built from the 1830s to the present day and ranging in size from detached whole dwellings to flats, including a mix of owner occupied, private rented and social housing.
3. Part of our area is within the Leith Conservation Area, and the whole area, including the Links, has historical/heritage significance. Because of the number of post-industrial brownfield sites, our area is seeing many new, large residential developments, which is causing a very significant rise in the local population. Leith Links itself is a well-used public realm premier park that includes public tennis courts and playing fields used by Leith Athletic FC and Leith Franklin cricket club. As well as people moving around within our area and between our area and other parts of Edinburgh, many people travel into our area for work, education, services and leisure every day.

Summary and recommendations

4. The LLCC:
 - a. **Supports in principle CEC developing proposals to address problems in the local area where the public consider there is excessive traffic volumes, and where pavements and public realm areas need to be improved to make Leith a better place to live and work.** Decisions as to what to implement, and when, should be made in light of high-quality evidence and the views of the public should be taken into account properly.
 - b. Notes that Leith is already an area of relatively low car ownership where many journeys are already made by walking, cycling, and public transport. Parts of our area are well served by bus routes and frequencies, although there has been significant deterioration and loss of services due to the tram-works disruption. Notably, as a result of both the tram-works and the closure of Links Gardens since March 2020, there is no bus service now serving the north side of Leith Links and the growing community of residents in Salamander Place/Salamander Street which is seeing a great deal of new residential development. Improvement in the bus services to our area should be a priority.
 - c. Notes that the CEC is currently undertaking one major transport and construction project (tram-works) at the heart of the proposed Leith LTN which has itself had a very significant impact on ease of movement in, out and within the local area whether by walking, public transport or vehicle, and that project is ongoing for another 2 years, until April 2023. Public transport networks within our area have already been badly affected by this project in terms of routes and journey times making public transport less attractive. The area has also been blighted by the volume of construction, dirt, dust and noise, making all the public shopping and leisure areas linked to Constitution Street - and life for residents and visitors - very unpleasant, with more to come.
 - d. Notes that no information has so far been provided about the proposed 'post tramworks' bus network in the Leith area and yet this is a consideration of key importance for planning transport and travel in this area that **should** be fundamental to any consideration of an LTN, even on an experimental basis. At our request a recently received CEC project Gantt chart seems to indicate work on this 'stream' is only just starting now.
 - e. Notes that the CEC is also proposing to introduce, in 2021, controlled parking in certain areas of Leith and considers that this proposal is likely to have the effect of changing local residents' car use, and reduce visitor traffic into Leith and around parts of Leith Links. Leith Links Community Council have asked several times to see the final design for the Controlled Parking Zone(CPZ) for the Leith area which includes the area of the proposed LTN and Leith Connections. The CPZ will presumably influence the LTN design and the proposed road closures forming part of the LTN may not be required as non-local traffic may be reduced as drivers seek to avoid parking restrictions.

5. Notes, separate, but clearly linked to the LTN project, CEC is proposing to create a **segregated cycle route** from Foot of the Walk to Ocean Terminal which will have the effect of closing Sandport Bridge, if it is implemented as proposed. This project also seems to be a foregone conclusion as the Traffic Regulation Order (TRO) proposed is not experimental.
6. The LLCC:
 - a. **Objects to the lack of opportunity to scrutinise the segregated cycle way proposal more closely prior to implementation.**
 - b. Notes that this proposed segregated cycle route closes off the opportunity to improve the Shore area by pedestrianizing the Shore itself, which has long been a popular idea.
 - c. Notes that in response to the February/March engagement on Leith Connections¹ only 10 respondents out of 800, said they were prevented from cycling to Ocean Terminal (fig 5.7) (and partly this was due to roadworks as well as traffic). This must surely call into question the need for this particular investment?
 - d. Notes that this proposal alone would limit the potential for through traffic within the proposed LTN area (which will also displace traffic to the peripheral routes as a result) and thus in itself it arguably reduces the case (if any exists) for additional measures such as those proposed in the LTN.
7. **LLCC recommends, in light of the above, that the CEC should do the following:**
 - a. **Before proceeding with any of the three projects (CPZ, LTN and Segregated Cycle way) the plans for all three projects should be published together as a single proposed programme of changes with the expected impacts of each clearly set out so the public can make informed comments on a comprehensive proposal. A post tram-works public transport plan for the area should be presented with that.**
 - b. **Postpone implementation of the LTN even on an experimental basis until after the completion of the tram-works in 2023, and until the effects of the Leith CPZ (assuming that is introduced by CEC earlier) have been evaluated.**
 - c. **Undertake fresh traffic monitoring** covering volumes, nature, speed and air quality of the area, especially of the peripheral routes before and after the introduction of the CPZs in 2021/2022 and also after the tram-works are completed.
 - d. **Undertake better community engagement about the problem of traffic in Leith before re-presenting any LTN proposal.**
 - e. **Publish, before completion of the tram-works, an integrated proposal for post tram-works public transport** for the entire Leith area which takes account of post-covid travel patterns, and all forecast developments within the area, including the expected impact of both the St James Centre and any development of Ocean Terminal as a retail or leisure destination, and the large population increase due to new housing development in the area.

¹ https://consultationhub.edinburgh.gov.uk/sfc/leith-connections/results/leithconnectionslt_n_report_v.5.pdf

- f. **Reconsider the route for the segregated cycle lane to Ocean Terminal in favour of pedestrianising the Shore** and re-routing any post-tram-work bus routes through the Henderson Gardens area across Sandport Bridge.
 - g. **Bring forward proposals for improving pavements and public realm in and around the proposed LTN area including the Kirkgate, which was the priority identified by the public in the LTN public engagement in Feb/March 2021.**
 - h. **Investigate the impact that the Duke Street/Easter Road/Lochend Rd/VanburghPlace junction changes have had/are having on congestion and bus journey times in the area, and make changes to improve traffic flow.**
 - i. **Publish plans for car club growth including car club parking spaces and pricing strategy in and around the proposed LTN area.**
 - j. **Explore the issue of a safe crossing on Duncan Place outside Leith Primary, but avoiding road closure / excessive restrictions.**
 - k. **Explore and propose ways of making a safer crossing at the foot of Johns Place, that does not narrow the road excessively.**
8. If the Council nevertheless persists in introducing the proposed LTN it must:
- a. **provide evidence on the expected impact the proposed LTN will have on the following issues:**
 - Traffic volumes and journey times for vehicles, including buses, on all the peripheral roads to the area, which are already regarded by the public as experiencing high volumes of traffic, supported by the [undated] published traffic data;
 - Access issues and journey times for disabled people living in the LTN area;
 - Access and journey times for emergency vehicles into and out of the proposed LTN area;
 - Vehicle miles that taxis, delivery routes and other service vehicles will incur before and after if the journeys and deliveries involve a number of addresses in different parts of the area covered by the LTN.
 - b. **introduce a thorough traffic monitoring system on all peripheral routes bounding the proposed LTN area, with before and after data and public transport journey time data.** The information collected must be published frequently throughout the experimental area.
 - c. **Reconsider a number of aspects of its proposed LTN working closely with the community reference group to ensure that evidence from public feedback is properly taken into account, particularly:**
 - the proposed bans on left/right turns at Links Place/Gardens;
 - the introduction of ‘pocket parks’ adjacent to existing parks (Johns Place and Henderson Gardens particularly) – these seem to us to be superfluous and lack a joined-up approach with the adjacent parks – instead the funds available for these initiatives should be deployed towards benches and gardening/landscaping within the parks adjacent to those proposed area.
 - Safe crossings on Duncan Place and Johns Place, as above.

The rest of this response explains our engagement in the consultation and our understanding of and views of the proposal, including drawing on evidence the CEC has published about earlier engagement. We also have comments on the approach to engagement at this stage and advocate that the engagement exercise should be re-done with better traffic data, projected outcomes and impact assessment and better methods of community engagement.

Our engagement

1. LLCC has **engaged actively** in this consultation, taken time to consider the information presented and given the proposal serious consideration, applying the local knowledge we have from our role and from our ongoing interaction with members of the local community.
2. LLCC received a presentation on the Low Traffic Neighbourhood (LTN) proposal at its meeting on 28 June 2021. Almost all members of the LLCC have attended one of the three online consultation sessions organised by the City Council and have had the opportunity to respond to the online survey. The LLCC is also represented on the Community Reference Group (CRG) set up by the Council in relation to this project and we have reviewed the reports of an earlier engagement exercise in February/March 2021 to which 801 people responded, 56% of those living in the proposed LTN area and the vast majority living within 1km of the area. ²
3. In addition, as well as promoting the consultation via our own website and social media, members have distributed leaflets about the consultation in streets where it appeared the Council had not distributed information, when it had done so at the Feb/March stage in the development of the LTN proposal,

Overall views on the proposed LTN

4. We understand that the primary objective of an LTN would be to reduce the volume of vehicular traffic in a given area. In the case of the proposed Leith LTN a number of road closures are proposed within a small part of Leith, effectively creating a number of dead-end roads which will have the effect of diverting any through traffic, including traffic that starts within the area, around the edge or periphery of the LTN area.
5. **The Leith Links Community Council (LLCC) would very much like to see improvements to the local area to address issues of traffic congestion and the overall quality of the roads, pavements and the local environment. This seems to be supported by respondents to the February/March 2021 engagement.**

² https://consultationhub.edinburgh.gov.uk/sfc/leith-connections/results/leithconnectionslt_n_report_v.5.pdf

6. Our comments on the quality of evidence, the nature of the proposal and the approach to consultation so far, are set out below.

Quality of evidence/proposals not linked to evidence

7. **We are disappointed that the scope and nature of the proposed LTN does not address the actual problems the public have articulated about traffic on particular streets, and could indeed make some congestion and volume of traffic on those streets worse, especially in the context of the ongoing tram-works until 2023.**
8. **We are very concerned about the validity and currency of ‘traffic data’ as presented (very briefly) at our LLCC meeting on 28 June, and at the online engagement events.** If this data is being used to back up and make the case for the LTN proposal we see a number of problems with it. First, it is clearly not current and needs to be refreshed. We requested the data and the slides have now been published. No dates are given for the traffic data presented and it is not possible to tell if it was gathered before any of the present tram-works diversions. It is however clear that the data all predates March 2020 when Links Gardens was closed as a Covid-19 Spaces for People . The analysis appears to show traffic volumes per hour in the am and pm peaks of between 224/548 vehicles East Bound and 147/417 vehicles West Bound on Links Gardens. As no dates are given for the published traffic count data it is impossible to tell if this traffic count was taken when Links Gardens was also being used as a Tram-works diversion, and/or if the volumes might relate to the Leith Links primary school in term time or both.
9. Nevertheless, it is clear even from the undated traffic volume data that **those roads with the most significant volumes of traffic at that time in the area are all on the periphery of the proposed LTN area**, notably Duke Street, Great Junction Street and Salamander Street. Local people would argue that traffic on all those roads – and also East Hermitage/Hermitage Place which feeds into Easter Road and Duke Street – has become a lot worse due to the tram-works as through traffic into the ‘centre’ of Leith has been displaced to peripheral routes, plus there has been a lot of additional construction traffic into and out of the area serving these works and other projects including building on Salamander Street and Place and demolition of council housing in Coatfield Lane.
10. Additionally, we would suggest that analysis of some of the traffic volume data is superficial and misleading. For example, quoting public comments that traffic levels are high on ‘roads around Leith Links’ as a potential danger to the school children in those areas ignores the fact that a large proportion of such traffic is actually **generated** by the schools themselves (parents picking up and dropping off etc.). Traffic counts need to be carried out across different times of day; we believe that a very different picture of traffic volumes would be shown outside school peak hours, suggesting more nuanced solutions than just closing roads off.

11. **CEC should also draw on the evidence from and views of the public as to where the particular problems are in our area and be making proposals which can clearly link back to the views expressed by the public. This current proposal does not meet that test.**
12. CEC's engagement with the public in February and March 2021³ supports our view, and the CEC should give it closer attention. LLCC and the public seem to have a quite different view from the Council as to where the traffic problems actually are in our area.
13. For example, according to the CEC's report of the Feb/March consultation exercise of the 801 people who completed an online survey about the proposed LTN for Leith 456 – or 56% – live in the project area with 333, or 41.5%, living up to 1km outside the project area and 76 living 1km- 5km outside the area.
14. A large number of respondents highlighted problems with high traffic levels in the area, and were asked to mention particular streets. See particularly in that report Q12b/fig 5.24. 334 people said traffic levels were too high on their street, although when asked to name a street, 54 of those then said they had no issues with traffic levels. However, **the roads named by the public as having traffic levels 'too high' were all on the edges of the proposed LTN – Great Junction Street, Salamander Street, Easter Rd, Commercial Street, Restalrig Road.**
15. If the LTN proposal is indeed being made with the aim of tackling volume of traffic on certain streets then fig 5.25 of the CEC's own report shows that on the basis of the number of mentions from **the public of traffic volume they perceive the problem currently lies with roads on the boundary of the proposed LTN.** Fig 5.27 of the Feb/March engagement report similarly shows the streets most mentioned by the public as having high traffic levels are **Great Junction Street, Commercial, Duke Street, Leith Walk, Salamander, Easter Road and roads around Leith Links.**
16. Additionally:
 - Walking was the top method for travel to local destinations (Q4A)
 - 46% feel walking conditions are good or very good (fig 5.10) – though there are clearly opportunities to improve
 - A large number feel that pavements could be improved

³ https://consultationhub.edinburgh.gov.uk/sfc/leith-connections/results/leithconnectionsln_report_v.5.pdf

17. **From the February/March engagement exercise and members' own lived experience of the Leith Links and wider Leith area it would seem to us that the CEC should be making proposals to address volume of traffic on the roads that are peripheral to the proposed LTN area.** It is not clear how the current proposals address the concerns raised by the public at all, and indeed they could make matters worse.

Perfect storm from multiple disjointed proposals and disruption

18. We understand the proposal is to introduce an LTN in part of Leith on an 'experimental' basis from late 2021. This proposal to introduce an LTN in part of Leith is being made at a time when a number of significant projects affecting movement of people and traffic, and public transport are ongoing, or planned (although without much detail as yet on some of those). As CEC is aware, these are:

- a. Ongoing work to complete the **Edinburgh Tram project** through Leith to Newhaven which has closed Constitution Street for a significant period, with traffic detours (including for HGVs serving the construction) in place. Part closure of Leith Walk and diversion of traffic to Easter Road has also affected our area. Road closures, disruption and detours are expected until **2023**. Tram-works have yet to be completed crossing the Foot of the Walk and the Constitution Street junction with Queen Charlotte Street which is likely to cause further disruption.
- b. Proposals to introduce, in 2021 (?), **controlled parking in certain areas of Leith**. This proposal is likely to have the effect of reducing residents' car use and visitor traffic into Leith and around parts of Leith Links.
- c. Proposals for early implementation of a **segregated cycle route** from Foot of the Walk to Ocean Terminal which will have the effect of closing Sandport Bridge, if it is implemented as proposed. This proposal on its own will limit through traffic within the proposed LTN area (and may displace traffic to the peripheral routes as a result). Yet to be undertaken work to plan '**post tram-works' bus network in the Leith area**. This is an important consideration for planning transport and travel in this area and should have been done first as it is fundamental to any consideration of an LTN, even on an experimental basis.

19. We think **this combination of projects all cause disruption and displacement of traffic and people within the area, and should be considered together as a whole - but currently do not seem to be at all joined up or integrated together**. An integrated plan should be produced showing clearly how all these projects, including temporary phases of construction, are supposed to link together and the impact on traffic and people movements that are expected before any of the new non-tram proposals are moved to implementation.

Learning lessons from elsewhere?

20. A key concern of the LLCC – supported by public consultation/feedback - is the volume of traffic already on peripheral routes in our area and the potential for an LTN as proposed to displace otherwise through traffic – including traffic that starts within the LTN area – onto the outside or peripheral routes. These routes are also residential areas – they are not major strategic distribution routes.
21. When this issue was raised in one of the online consultation meetings, participants were told that all the evidence from LTNs ‘down south’ (presumably in London) was that traffic did not increase on peripheral routes. With respect, this is not supported by recent published monitoring reports from Lambeth Borough Council which introduced several LTNs due to Covid-19. Their first 3-month monitoring reports do indeed show reduced car and goods vehicles within the LTN areas – not surprising when roads are closed with substantial fines for breaching. But most of their LTN schemes also show **fairly significant increases on the peripheral routes**, with concomitant knock-ons to public transport journey times. From [Low traffic neighbourhood monitoring reports | Lambeth Council](#) we can see that:
- Oval/Stockwell LTN the volume of cars and goods vehicles counted on peripheral roads were up 10% and 13% respectively.
 - Ferndale LTN cars were up 23% and goods vehicles up 17% on the periphery.
 - Streatham/Tulse Hill LTN, car volumes on the periphery were up 44% and goods vehicles up 19% resulting in this case to a net increase in cars and goods vehicles across the LTN and peripheral areas combined.
22. Some of the press coverage about LTNs in London highlights community concerns about socio-economic inequality: the wealthier occupants of roads within the Oval LTN enjoying a significant reduction in through traffic while those who live on Clapham Road, who are not so well off, see their road blighted by even more / heavier traffic. Also, equality impact assessments and monitoring have found real difficulties for people with disabilities who drive or need to be driven accessing and egressing the area they live in, impacting the liveability of the area for them and, where they use taxis, the cost of journeys. The Met Police Commissioner has recently said that the LTNs are helping criminals to evade the police. Elsewhere in London, in Greenwich, the Council has recently had to remove bollards as part of an LTN at the request of the ambulance service and requested that the Royal Park re-open the central road in Greenwich Park (which had been closed by them during Covid-19) to alleviate the severe congestion caused to both sides of the park as a result of a number of LTN type measures on residential streets.⁴ This latter example particularly illustrates the knock on effects that an LTN can have. More generally a senior Councillor in

⁴ Sources can be provided for these references, including copies of London Ambulance Service reports of delays to category 1 calls due to ‘planter’ and locked bollard type LTN street closing measures requesting ANPR systems.

LB Greenwich has recently commented with regret that introducing LTNs has had an impact to divide and cause communities to fight with each other.

23. We recognise that every LTN area will be different on a factors including the socio economics and the impact that change will have. But there must surely be some learning points from quite recent evidence of these new LTN projects in London which could be highlighting issues that need to be anticipated by CEC? Not least because the instinct of local people would be to expect to see displacement to peripheral roads when an LTN is introduced and the evidence elsewhere tends to back this up. In Leith the peripheral roads are all also residential streets not strategic out of town feeder routes, and they are roads that have already been highlighted by the public as most problematic for traffic volumes.

Quality of engagement

24. LLCC's overriding focus is on ensuring **effective engagement with the public and that the public's views are properly listened to and acted on.** We and our members have several points about the quality of engagement for this exercise which leads us to question its effectiveness and validity. We have three concerns – distribution of information, quality of information and approach to online engagement events. Further explanation is given below.

Failure to leaflet as widely as in the Feb/March phase of engagement.

25. According to the recent (June) report of the first phase of engagement on the project in February,⁵ the Council distributed 6000 leaflets about the proposal at that time. LLCC members – including those who live on peripheral routes to the proposed LTN – received that and received a leaflet then about the proposed segregated cycle lane to Ocean Terminal and the proposed CPZ. However, at least half of the LLCC members did not receive any leaflets about the **current** phase of consultation on the LTN but found out about it via Twitter. The first phase engagement report relating to the LTN proposal highlights that CEC received 800 responses. A postcode analysis shows that some of those respondents lived well beyond the proposed LTN area, up to 5km away – indeed only just over half (56%) of respondents were identified as coming from the proposed LTN area. This shows that many people outside the area are interested in the proposal. This is not surprising as it will affect them.
26. It is not clear to the LLCC how the CEC has drawn the boundary for issuing the latest leaflets to households but IF the evidence base justifying taking forward the proposals to the next stage includes views of people living up to 5km away there should have been leafleting/communication to at least the peripheral road dwellers in this second phase of engagement. Also, given that the roads mentioned most often in the February survey as having a traffic problem are predominantly on the periphery of the proposed LTN then at

the very least CEC should have included people in Great Junction Street (and Duke Street), all the peripheral roads to Leith Links, even Restalrig Road, Lochend Road and Easter Road as people responding in February said there were traffic problems in those roads.

27. The reason this is important is that respondents to the first exercise might be expecting proposals to address the problems they highlighted, but they would find it hard to see that in what is actually being presented by the Council. Also the appearance, late on, in the area of lamp post wrap posters on Duke Street and Vanburgh Place might give people the impression that the LTN proposals are aimed at addressing the heavy traffic on those roads – whereas that is absolutely not the case. So, the approach to communication at this phase really needed to be expanded and communicated more fully rather than contracting the area of engagement. Not only so that there is engagement with the people for whom this proposal is not addressing the problems they reported in February but also given the ongoing restrictions on community and public events, due to Covid. In this context the Council needs to work harder to reach and include everyone in the community and to engage effectively, especially with people who are not digitally included or people who need assistance to understand communications, for whom hard copy communications will be vital.
28. LLCC members sought to redress this and as well as promoting the consultation on our website, meetings and social media we undertook leafletting to a number of peripheral roads, and to buildings within the LTN area where no leaflets had been received.

Quality of the LTN leaflet – content and accessibility

29. The leaflet for the 2nd phase which LLCC members were given to distribute locally was not only out of date but very poorly presented and made no reference to the online events. Using the medium of Teams for its engagement events means that the Council is only going to be able to recruit people who have the necessary IT kit and are confident and perhaps experienced in using it. It is therefore a pretty exclusive choice of engagement medium. The choice of A5 also limits the content that can be included and means that the leaflet conveys very limited information (The leaflet showed the area affected but failed to clearly show the key feature of the proposed LTN, i.e. road closures. And the illustration used, of white 'ghost people', was, additionally, verging on the ludicrous.)
30. In contrast the consultation leaflet people received about the proposed CPZ for 'West Leith' in February is much better from the quality of content and accessibility perspective. It is A4/4 page, quite large print; in the centrefold there was a full A4 page devoted to the map of the zone whereas your latest leaflet about the LTN offers the map very small in half of one A5 page, totally impossible for anyone with a visual impairment.
31. The CPZ leaflet also said clearly that the document could be obtained on tape, in Braille, in large print and various computer formats and could be translated into different languages

with a number to call. The LTN leaflet does not match this and simply offers response via online survey or via email and intimates that a paper copy of the information and survey can be obtained by writing, calling or emailing (although different content on this point seems to appear on different print run versions of the leaflet). Nevertheless, why did the LTN consultation take an approach to accessibility inconsistent with that used for the CPZ? Both proposals will also have to go through further regulated TRO processes so that cannot be the justification surely. In addition, the choice of using A5 and small print and printed white on navy blue background is problematic from an accessibility perspective – given that the people who can benefit most from a hard copy communication are those who are not digitally included and who may have a visual or sensory impairment. This leaflet does not look as though the needs of those people have been considered at all either from the perspective of including as much content as possible or to present it accessibly. RNIB suggest using at least 14-point (or up to 18pt for large print needs); a contrast of black on white or yellow is preferable – Gov.UK guidance highlights that white on a coloured background (as you have chosen) can make print look smaller, and glare.

Misrepresentation of engagement events and lack of transparency and best practice

32. Most LLCC members have joined an online ‘event’ about the consultation run by CEC. We do not agree that these were ‘co-creation exercises’ and calling these sessions ‘co-creation’ is inaccurate and misleading. They were a presentation of some fairly busy slides about a proposal (ie the proposal did not emerge from any sort of discussion of a problem that people were being asked to help co-create a solution to), some new data, and material was flashed up on screen and not circulated in advance with a limited opportunity to ask questions or give opinions. That is **not** a co-creation activity. Also, the slides should have been circulated in advance – including for the LLCC meeting presentation where much time was taken up showing slides rather than dealing with informed members’ questions. Importantly the traffic count data – which showed Links Gardens traffic data – really needed to be published and only after our requests has this been done. Any report/write-up of these sessions should be fed back to participants so they have an opportunity to validate it if these events are at all approaching ‘co-creation’ exercises.
33. Taken together the above matters represent **poor practice in engagement and communication with communities**, and even compares poorly with approaches taken in other parts of presumably the same Department of the Council.
34. We recommend that to redress the shortcomings in public engagement that before introducing the LTN at all, CEC at the very least undertakes to:
 - Produce a better more informative leaflet about the proposed LTN which contains more information, and is presented in a more accessible way. Learn from what your

colleagues did on the CPZ leaflet. Include location-specific information from the first survey and show how what people really told you is being taken forward, or not.

- Distribute that to all households/properties at least living within 1km of the boundary of the proposed LTN. People meeting that criteria accounted for the vast bulk of the respondents to the first February survey and so we have to conclude that your 6000 leaflets went widely beyond the proposed boundary of the LTN.
- Circulate to engagement event participants the slides used at any session they attended, and in advance to those attending future sessions so they are fully informed.
- Provide engagement event participants with a draft of any report on their session so they can correct any content.

We do however strongly advocate – as above - an approach to further engagement which presents all the clearly linked proposals affecting the area to be presented in a unified and joined up proposal.

35. We also think much more should be done on the street and in public places to make people aware and to encourage and facilitate engagement. With the potential move to remove social distancing requirements in Scotland within the next 4 weeks CEC should plan to extend the engagement activity to a time when you can have public engagement activities in public places like the Kirkgate, the Links, the Shore and Ocean Terminal and at all and any bus stops in the area.

Conclusions

36. From the evidence presented it is highly debatable how heavily trafficked the proposed Leith LTN area actually is, particularly if the volume of traffic simply caused by the ongoing tram-works is removed. The earlier engagement with local people highlighted this is an area of low car ownership and high propensity to walk and use public transport. The only proposals are to create dead end streets, nothing is proposed about public transport networks or hoped for modal shift from car to public transport.
37. Meanwhile respondents told you the worst streets for traffic were all **outside** of the proposed LTN area, the city mobility plan is said to be aimed at reducing vehicle dominance, but no proposals are being made for improvements to the streets local people told you were the worst from this perspective.
38. This damages faith in whole engagement process because people will see that the problems they say exist in the local area are not actually addressed, and indeed could be made worse. Ultimately that will embed the view that there is absolutely no point engaging or responding. As one participant to one of the engagement sessions wrote in comments on the Teams chat bar, before leaving the meeting because the technology was not working for her, *'this is not a consultation but a dictation'*.
39. LLCC really hope you will take on board feedback from local people and that steps will be taken to improve the quality and accessibility of the engagement exercise before the LTN proposal is advanced as suggested above.

LLCC

9 July 2021

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Transport and Environment Committee – 19th August 2021

Item 7.4 Leith Connections – Foot of the Walk to Ocean Terminal route and Low Traffic Neighbourhood

Deputation from Spokes – the Lothian Cycle Campaign

Dear Committee Members,

Spokes disagrees strongly with the recommendation to delay the implementation of Phase 1 – Foot of the Walk to Ocean Terminal cycle route.

This scheme is essential for providing a safe route for cycling between the Foot of the Walk and Ocean Terminal.

It has become necessary due to the cycle (and general traffic) ban at the South end of Constitution Street and the lack of cycling facilities on the remainder of Constitution Street and most of the way along the tram route to Ocean Terminal. The Trams to Newhaven programme has denied any responsibility to provide safe cycling facilities along this section of the route as they considered that the Phase 1 route would cover this requirement.

Prior to the tram project, the roads along the route were a popular and reasonably safe space for cycling. Henceforth there will be dangerous tram tracks to contend with and very limited space for cycling between the track and the kerb.

It was therefore agreed and documented in Section 7.29 Supplementary Projects of the Final Business Case that this route would be delivered “in parallel” with the tram project. The formal agreement has always been that the cycle route would be in place before the tram extension became operational.

1. Spokes can understand that there may be some traffic issues, whilst the tram works continue, but this has already been known and alternative traffic management planned.
2. There is no suggestion as to where cyclists might cycle whilst construction of the cycleway is in progress, as part of these proposals.
3. There also seems to be no consideration for temporary solutions to the problems raised at particular location such as Sandport Bridge and The Shore, where flexible options could be considered in the short term.
4. We are also concerned about the length of time that it is taking to finalise designs and the lack of detailed discussion opportunities that Spokes has been asking for over many months.
5. We are concerned that there is still no solution offered for the route from Commercial Street to Ocean Terminal and that we have not been involved in any discussions on a “separate project to develop Concept Designs for several prioritised Transport Actions in North Edinburgh, contained within the Council’s Local Development Plan Action Programme”.
6. We are also concerned about the lack of cycling access to/from and along Constitution Street from neighbouring streets/destinations and alternatives for access through to the streets along the tramway, where there is no support for cycling.

We would urge committee members to reject the proposal to delay implementation of the cycle route and to press for its completion as soon as possible.

Martin McDonnell
Spokes – the Lothian Cycle Campaign

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A deputation to the Transport and Environment Committee (TEC) 19th August 2021

Low Traffic Corstorphine is a group of local Corstorphine residents and business people passionate about bringing safer streets, better air quality and much improved accessibility to residents of all ages, genders and abilities whether they are walkers, wheelers, cyclers, drivers or passengers.

We write with respect to agenda item 7.5 'Corstorphine Connections Low Traffic Neighbourhood – Community Engagement on Concept Design and Commencement of Statutory Process for Experimental Traffic Regulation Order' on the 19 August Transport and Environment Committee (TEC) meeting to reiterate our support and ask you to vote for the council officer recommendations.

We have eagerly awaited the report and recommendations for the Corstorphine Connections LTN proposal and whilst we would like to note that we are broadly supportive of the proposals, we are disappointed that the plans do not go far enough in addressing intrusive traffic across the LTN project area and Corstorphine as a whole.

Council officers have listened to feedback from the community regarding the proposals for the area and adjusted plans accordingly. We note that there seems to be lots of concern and worry around the scheme based on consultation feedback. This is a common reaction from residents when low traffic neighbourhoods are consulted on, but evidence shows that well-considered designs are popular when implemented and the vast majority of concerns from locals are not borne out in practice. We hope that this first step in our area to make our streets safer is iterated on and improved, to help tackle the climate crisis we all currently face, enable more people to walk, wheel and cycle locally, and reduce vehicular domination and all its associated issues in our community.

In its current form, we are particularly pleased to see the plan to retain and improve the measures on Corstorphine High Street which were introduced as part of Spaces for People. We welcome the retention of the School Streets at Corstorphine Primary and Carrick Knowe Primary and the proposal to introduce a bus gate to the junction of Manse Road.

We would request that the timings for the Manse Road bus gate are adjusted to start at least 8am to allow for those families walking or cycling to Corstorphine Primary nursery as their day begins at 8.15am. We support the evening peak time remaining until 7pm to allow pedestrians returning from work to enjoy the same benefits as school families. We would like to suggest that a broader spectrum of operational hours is applied for as part of the ETRO (eg. 7am to 7pm) as our understanding is that hours can be reduced but not increased during the ETRO period. This would allow for more flexibility if needed during the trial period.

Finally, we would like to note our thanks to Council officers who have listened and tried to adapt the plans in response to often very mixed community feedback. We hope that the trial measures prove to be a success and make a start in creating safer, more pleasant streets in the Corstorphine area and that further, more wide ranging measures are introduced in the not too distant future.

Your sincerely



Chris Young and **Janis Ross-Williamson**
Co-Chairs Low Traffic Corstorphine

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