# Transport and Environment Committee 

10.00am, Thursday, 2 March 2023

## Leith Connections Phase 1A Representations to Traffic Regulation Orders and Redetermination Order

## Executive/routine Wards <br> Council Commitments

## Executive

13 - Leith

## 1. Recommendations

1.1 It is recommended that Transport and Environment Committee:
1.1.1 Notes the representations received to the advertised Traffic Regulation Orders TRO/21/22A and TRO/21/22B and Redetermination Order RSO/22/01 for Phase 1A of Leith Connections and the Council's comments in response;
1.1.2 Notes that implementation of the restrictions on moving traffic contained within Traffic Regulation Order TRO/21/22A, in combination with the future promotion of an Experimental Traffic Regulation Order for additional trial measures in the east of the project area, will allow implementation of the Leith low traffic neighbourhood (Phase 2 of Leith Connections);
1.1.3 Approves setting aside the 21 remaining objections to Traffic Regulation Order TRO/21/22A and making the Order as advertised;
1.1.4 Approves setting aside the 13 remaining objections to Traffic Regulation Order TRO/21/22B and making the Order as advertised; and
1.1.5 Approves referring the 13 objections to Redetermination Order RSO/22/01 to Scottish Ministers for determination.

## Paul Lawrence

Executive Director of Place
Contact: Daisy Narayanan, Head of Placemaking and Mobility
E-mail: daisy.narayanan@edinburgh.gov.uk

## Leith Connections Phase 1A Representations to Traffic Regulation Orders and Redetermination Order

## 2. Executive Summary

2.1 This report provides details of the representations received following the public advertising of the Traffic Regulation Orders (TROs)and Redetermination Order (RSO) for Phase 1A of the Leith Connections project and the Council's comments in response.
2.2 It recommends setting aside all relevant objections to the Traffic Regulation Orders and making these Orders. It also recommends referring the representations to the Redetermination Order to Scottish Ministers for determination.
2.3 Implementation of the restrictions on moving traffic contained within Traffic Regulation Order TRO/21/22A, in combination with the future promotion of an Experimental Traffic Regulation Order for additional trial measures in the east of the project area, will allow implementation of the Leith low traffic neighbourhood (Phase 2 of Leith Connections).

## 3. Background

3.1 The Council, in partnership with Sustrans, is developing proposals for a high quality segregated cycle track and associated street improvements along a route between the Foot of the Walk and Ocean Terminal. A commitment to deliver these improvements is contained within the Trams to Newhaven Final Business Case and they will be delivered as Phase 1 of the Leith Connections project.
3.2 The Leith Connections project is a multi-million pound scheme that will transform the quality of walking, wheeling and cycling connections within the project area and create new public realm area for people to spend time in and enjoy their local streets. The project area and phases are shown in the maps provided in Appendix 1.
3.3 The background and rationale for the proposed introduction of the Phase 1 route between the Foot of the Walk and Ocean Terminal (and the aims of Low Traffic Neighbourhoods (LTNs), both in general and for Leith) were set out in a report to Committee on 18 August 2021.
3.4 The project will be delivered in three main phases:
3.4.1 Phase 1 - an active travel link between the Foot of the Walk and Ocean Terminal, via Henderson Street and Commercial Street. Phase 1A is from the Foot of the Walk to the northern end of Dock Street;
3.4.2 Phase 2 - a low traffic neighbourhood (LTN), including measures in the east of the project area which will initially be installed on a trial basis, under a future Experimental Traffic Regulation Order (ETRO); and
3.4.3 Phase 3 - a safe and attractive active travel link along a west-east corridor in the north of the project area, between the Hawthornvale Path and the shared use path to Portobello which commences at Seafield Street.
3.5 The project will also deliver various Transport Actions contained in the Council's Local Development Plan Action Programme, as approved by Planning Committee on 1 December 2021. These include:
3.4.1 Phase 1 - closing Henderson Street to general traffic; and
3.4.2 Phase 3 - improvements to the Lindsay Road/Commercial Street junction; improving the public realm in Bernard Street and providing safe active travel infrastructure on Salamander Street.
3.6 Various complementary measures will be installed as part of the project. These include:
3.6.1 Decluttering footways: for example bins, bus stops and bollards are to be removed from the north side of Great Junction Street, providing an increased effective footway width;
3.6.2 Installation of footway build outs with dropped kerb crossings and tactile paving at existing and new informal crossing points, including on Duncan Place and East Hermitage Place;
3.6.3 Reallocation of carriageway space, to provide opportunities for new areas of seating, planting, community spaces, residential secure cycle hangars and bike racks;
3.6.4 Introduction of cycle contraflows on a trial basis; and

### 3.6.5 An Enterprise Car Club promotion.

3.7 Sustainable drainage features will be introduced along the Phase 1A route, including raingardens, porous paving and underground attenuation to slow storm water getting to the combined drainage system.
3.8 An artistic commission has been awarded to deliver street art, inspired by community engagement, at John's Place and outside the two primary schools.
3.9 The citywide Communal Bin Review project has over the last year installed new bin hub locations across the Leith area. Some minor amendments to these will be required as part of the project and local residents will be informed of any changes.
3.10 A Controlled Parking Zone is proposed to be introduced in Leith in mid-2023 as part of the Strategic Review of Parking Phase 1 roll out. The Leith Connections Phase 1A TROs and RSO have been designed to be complimentary to the Controlled Parking Zone proposals.

## 4. Main report

## Summary of the Traffic Orders

4.1 Advertising of the Phase 1A TROs and RSO commenced on 25 November 2022 and ended on 23 December 2022. The Orders were advertised in The Scotsman newspaper and the Edinburgh Gazette, and the associated documents were available to view through the Council's Traffic Orders webpage. Street bills were posted on relevant streets and physical copies of the orders were made available at Waverley Court.
4.2 240 letters were delivered to properties recorded as business addresses, located within 50 m of the measures, informing them of proposed changes to parking and loading arrangements.
4.3 The following TROs and RSO were advertised (plans are shown in Appendices 2 and 3 ):
4.3.1 TRO/21/22/A - this TRO includes various restrictions on moving traffic:
4.3.1.1 Prohibition of motor vehicle restrictions on Yardheads and on Parliament Street at their junctions with Henderson Street; on Burgess Street at its junction with the Shore; at the eastern end of Coalhill; on Coburg Street at its junction with Dock Street; and at Sandport Place bridge; and
4.3.1.2 A proposed southbound bus lane (with an exemption period in the morning to allow loading) on the southern section of the Shore. Together with the current 24 hour northbound bus lane, this will make this section of the Shore bus, cycle and taxi only during afternoon and evening hours. The new southbound bus lane will be enforced by the same camera currently used for the northbound bus lane.
4.3.2 TRO/21/22/B - this TRO introduces or amends waiting and/or loading restrictions on Dock Street, Coburg Street, Quayside Street (including the introduction of a loading bay), Coalhill, the Shore, Parliament Street, Yardheads, Henderson Street, Henderson Gardens (including the relocation of disabled parking bays) and Great Junction Street.
4.3.3 RSO/22/01 - this RSO redetermines areas of the street to footway, cycle track and carriageway, as required to form the cycle track and new public realm landscaped areas.

## Representations Received

4.4 Representations were received from 31 individuals or organisations. Of these, 21 were objections to TRO/21/22A, 14 were objections to TRO/21/22B and 13 were objections to RSO/22/01. Some objections applied to more than one Order.
4.5 One representation expressed neither objection nor support for the proposal but contained comments.
4.6 Key themes arising from the objections, along with the Council's comments in response are summarised in Appendix 4.
4.7 Over half of the objections raised concerns about the impact of the scheme on traffic levels and air quality on surrounding roads, including delays which may be caused to public transport.
4.8 Other objections included the following concerns:
4.8.1 The use of bus stop bypasses;
4.8.2 That the plans would be discriminatory to certain groups;
4.8.3 Reduction in the resilience of the traffic network; and
4.8.4 That the area will no longer be accessible to those with motor vehicles.
4.9 Objections from organisations and service providers were received from: Lothian Buses, Leith Links Community Council; and Leith Newhaven and Harbour Community Council.
4.10 Lothian Buses have expressed concern that the signalisation and provision of pedestrian crossings at Henderson Street/ Great Junction Street junction may result in increased journey times and increased cost for Lothian Buses. They are also concerned about reduction in width of Henderson Street.
4.11 Following responses provided to objectors, one objection to TRO/21/22B was withdrawn by the objector.
4.12 There were nine supportive representations received. Examples of these are provided in Appendix 5.
4.13 Some representations included suggestions for changes to the TROs and the RSO, or general suggestions. A number of these were not related to the measures proposed within the TROs and the RSO. A summary of these is provided in Appendix 6.

## 5. Next Steps

5.1 In accordance with the requirements of the Roads (Scotland) Act 1984, all representations to a RSO must be referred to Scottish Ministers. The process that Scottish Ministers use to reach their conclusion on the RSO is at their discretion.

They may decide to hold a public hearing to consider the representations, but this is not a mandatory requirement.
5.2 Subject to approval of the recommendations in this report, the Council will proceed to make the TROs and will refer the representations to the RSO to Scottish Ministers for determination.
5.3 The response to the RSO from the Scottish Ministers will be required before any work can commence on the permanent works to the cycle track and public realm that require redetermination of footway or carriageway.
5.4 It is intended to proceed with measures set out in the TROs (along with trial measures in the east of the project area to be introduced under a future Experimental Traffic Regulation Order) to introduce the LTN layout and the intended benefits to the community. The measures along the Phase 1A route, will therefore initially be installed in temporary materials, with the intention that they would be made permanent at a later date, should the RSO be confirmed by Scottish Ministers.
5.5 It is likely that Yardheads and Parliament Street will require to be maintained as motor traffic routes as part of the temporary traffic management arrangements required during construction of the Phase 1A route. The proposed prohibitions of motor vehicles at their junctions with Henderson Street are therefore not likely to be implemented until the end of the Phase 1A construction works.

## 6. Financial impact

6.1 Funding for implementation of the project is primarily being sought from the Scottish Government, via Sustrans' Places for Everyone fund.
6.2 The Places for Everyone grant scheme provides for $100 \%$ of pre-construction costs, up to a maximum of $10 \%$ of the overall project value. Construction costs are match funded, $70 \%$ from Sustrans and $30 \%$ from Council capital expenditure.
6.3 Funding for the design work for Phases 1 and 2 has been secured and, at the time of preparing this report, an application for funding for construction of Phase 1A has been submitted to Sustrans. Construction costs for the initial implementation of the LTN will be met by Places for Everyone funding which has already been secured.
6.4 On 14 October 2021, Committee approved an updated Active Travel Investment Programme (ATInP) to 2025/26. This has also been agreed with Sustrans. A total budget of $£ 6.7 \mathrm{~m}$ is allowed for within the ATInP for Phases 1 and 2 of this project.

## 7. Stakeholder/Community Impact

7.1 An Integrated Impact Assessment has been prepared for the Leith Connections project and will be updated as the project progresses.
7.2 It is expected that the proposals set out in this report will advance equality of opportunity by improving Edinburgh's walking, wheeling and cycling infrastructure, and make it more attractive, safer and accessible for less confident users, including children and older people.
7.3 There will also be positive impacts on rights to standard of living and health through improving the attractiveness of walking, wheeling and cycling, and through promoting healthier forms of travel and development of landscaping and place.
7.4 Negative impacts of the proposals include the removal of uncontrolled parking affecting those that are elderly, disabled and carers. These same groups may be impacted by the introduction of bus stop bypasses, which although regularly used around the country and worldwide are a relatively new concept in Edinburgh. There may be negative impacts to business during construction works. Mitigation measures will include continued project communication and engagement and undertaking design and construction works in line with best practice guidance.
7.5 The proposals set out in this report will:
7.5.1 Reduce carbon emissions by contributing towards the core objectives of the Council's Active Travel Action Plan to increase the number of people walking, wheeling and cycling in Edinburgh;
7.5.2 Increase the city's resilience to climate change impacts by providing more opportunities for sustainable travel through improvements to walking, wheeling and cycling infrastructure. They will also allow the reallocation of current carriageway space for sustainable drainage measures; and
7.5.3 Help achieve a sustainable Edinburgh through the promotion of healthier forms of travel.

### 7.6 The programme design complies with Cycling by Design (a national standard, published by Transport Scotland) and with the Edinburgh Street Design Guidance (ESDG).

7.7 A comprehensive monitoring and evaluation programme for the project is planned and monitoring has commenced, with work undertaken to date including:
7.7.1 Various manual traffic counts during project design;
7.7.2 Installation of automatic monitoring camera at Tolbooth Wynd Bridge;
7.7.3 A route user intercept survey;
7.7.4 On street market research;
7.7.5 Focus groups with groups with particular characteristics;
7.7.6 Business surveys; and
7.7.7 Deployment of air quality monitoring equipment.

## 8. Background reading/external references

8.1 Business Bulletin - Transport and Environment Committee, September 2022
8.2 Leith Connections Engagement Report for Foot of the Walk to Ocean Terminal -
Stage 1 (February-March 2021)
8.3 Leith Connections Engagement Report Low Traffic Neighbourhood - Stage 1 (February-March 2021)
8.4 Leith Connections Engagement Report Low Traffic Neighbourhood - Stage 2 (JuneJuly 2021)
8.5 Leith Connections Phase 3 Engagement Report(June-July 2022)
9. Appendices
9.1 Appendix 1 - Leith Connections project area and phasing plans
9.2 Appendix 2 - Phase 1A TRO drawings
9.3 Appendix 3 - Phase 1A RSO drawings
9.4 Appendix 4 - TRO/RSO objections by theme and the Council's comments in response
9.5 Appendix 5 - TRO/RSO supportive representation key themes
9.6 Appendix 6 - Suggestions contained within representations and the Council's comments in response

Appendix 1 - Leith Connections project area and phasing

C



















## Appendix 4 - TRO/RSO objections by theme and the Council's response

|  |  | Number of objections under this theme |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Theme | (quotations from representation) | $\begin{aligned} & \mathbb{K} \\ & \mathbb{N} \\ & \underset{N}{N} \\ & \mathbf{N} \\ & \mathbf{O} \\ & \mathbb{N} \end{aligned}$ | TRO/21/22B | $\begin{aligned} & \bar{\sigma} \\ & \text { N } \\ & \text { No } \\ & 0 \\ & \text { O} \end{aligned}$ | Response |
| General/ no reason given | I'm objecting to the proposed vehicle restrictions in Leith. | 1 | 0 | 0 | N/a |
| Unnecessary/ counterproductive | I wish to object to the above in its entirety as completely unnecessary and counterproductive. <br> No need to close roads for again the minority | 4 | 2 | 3 | The development of a route from Foot of the Walk to Ocean Terminal was agreed as part of the Trams to Newhaven Final Business Case due to the southern portion of Constitution Street becoming restricted to pedestrian and tram access only. Project objectives and specific features of Phase 1A and the project overall also contribute to aims of the Local Development Action Programme, the pedestrian crossing programme, the City Mobility Plan and the Circulation Plan (in development). <br> The area has a history of complaints to elected members and council officers of intrusive through traffic. Leith is an area of lower than average car ownership and commuting by car than the rest of the city. Recent research in Edinburgh has shown that $66 \%$ of residents make trips by walking at least five days a week and $26 \%$ per cent of residents cycle at least once a week. The research also shows what residents feel needs to be done to improve conditions to enable even more people to travel by foot, wheel or bike, particularly for shorter journeys. 64\% of residents said they would be helped to cycle more by better facilities such as more cycle tracks along roads that are physically separated from traffic and pedestrians, such as that proposed to be introduced by this scheme. <br> Over 800 responses were received to our first community engagement survey and $75 \%$ of survey respondents strongly supported/supported the aim for improving cycling conditions in Leith. $80 \%$ of survey respondents |


| Theme | Example responses (quotations from representation) | Number of objections under this theme |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | $\begin{aligned} & \mathbb{1} \\ & \text { N } \\ & \text { N } \\ & \text { N } \\ & \text { Or} \\ & \end{aligned}$ | gZZ/LZ/Oप\& |  | Response |
|  |  |  |  |  | strongly supported/ supported the aim for improving walking conditions in Leith. |
| Objection to use of bus stop bypasses | The proposals for the introduction of so-called 'floating bus stops' represent a breach of Edinburgh City Council's Public Sector Equality Duties because the arrangements the Council proposes to make for pedestrians and bus users who are disabled, including visually impaired, will represent a deterioration in accessibility and useability, and in addition the material published about these proposals does not show the equality impacts of the proposals or how those have been assessed. <br> This seems to be inherently less safe than the current arrangements for passengers to board and alight from buses on this busy street as there would appear to be a risk that a wheelchair user would disembark a bus, using the ramp, straight into the path of a bicycle, potentially travelling at speed. <br> The proposals for floating bus stops, requiring pedestrians to cross cycle | 4 | 4 | 4 | Bus stop bypasses have become a standard feature of street design across the continent and in the UK as the safest way to manage pedestrian, cycle and vehicle interactions around bus stops. <br> The bus stop bypass will be designed as per best practice guidance in Cycling by Design and Edinburgh Street Design Guidance. This will includes use of zebra crossing markings as suggested by research. We will keep up to date with forthcoming research from Living Streets and take note of any recommendations. <br> The footway will not be shared with cycles, the cycle track will be at existing carriageway level segregated from vehicles on the carriageway. It will rise up to footway level at appropriate crossing points to aid pedestrians where there will be tactile paving on the footway. Zebra markings of the cycle track will also be provided at cycle track crossings around the bus stop bypasses. <br> It should be noted that the design will allow for the removal of street furniture such as bins, bollards and the bus shelter which currently narrows the effective footway along Great Junction Street. Contrary to the objections this will create more space for pedestrians including bus users than the current arrangement creating a safer and more pleasant pedestrian environment. |


| Theme | Example responses (quotations from representation) | Number of objections under this theme |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | $\begin{aligned} & \mathbb{K} \\ & \text { N } \\ & \text { N } \\ & \text { N } \\ & \text { O } \\ & \end{aligned}$ | $\begin{aligned} & \text { M } \\ & \underset{N}{N} \\ & \underset{N}{N} \\ & \text { O} \\ & \end{aligned}$ | 「 N N O © © | Response |
|  | lanes in fairly confined areas is unwelcome for pedestrians and bus users and creates conflicts in what is ordinarily a busy shopping area. This will be off putting to pedestrians and bus users alike and could also make Grt Junction Street less attractive a shopping destination due to the conflicts between cyclists and pedestrians this design will cause. I live and shop locally and will find sharing the pavement with cyclists very off putting <br> Floating bus stop on Great Junction St. South-East - with pedestrians having to cross ?2-way (sic) cycleway. Safety concerns for people with disabilities and the elderly Floating bus stops are particularly dangerous, and there has already been experience of this on Leith Walk. On Great Junction Street and Henderson Street, stops of this type are proposed, whereby passengers have to queue to wait for bus, and must board and alight from buses on a narrow strip of pavement at the road |  |  |  | There will be a dedicated area for pedestrians to wait for the bus in the new design which will be additional to the current footway which is noted as being crowded. A new shelter will be also be installed. |


| Theme | Example responses (quotations from representation) | Number of objections under this theme |  |  | Response |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | $\begin{aligned} & \mathbb{1} \\ & \text { N } \\ & \text { N } \\ & \text { N } \\ & \text { Or } \\ & \end{aligned}$ | $\begin{aligned} & \infty \\ & \underset{N}{N} \\ & \underset{N}{N} \\ & \mathbf{O} \\ & \underset{\sim}{1} \end{aligned}$ | 「 N N O © ■ |  |
|  | edge, with a broad two-way cyclepath behind them, between them and the pavement. No information is provided about the width of the strip of pedestrian space provided for bus users to get on and off the bus, how many people the strip can contain and whether or not there will be a bus shelter at the stop. The bus stop on Great Junction Street is a particularly busy stop and we would anticipate that at times there will be far more people queueing, and trying to both alight and board than this narrow strip can safely accommodate without 'overflow' into the cycleway. People with buggies and wheelchair users will be especially vulnerable to collision with cyclists in such a restricted space. <br> People with visual impairments are greatly at risk. Floating bus stops of this type have been roundly condemned by The National Federation of the Blind UK, who have recently sent a petition to the UK Government on safety and accessibility at bus stops. This |  |  |  |  |


|  | Example responses (quotations from representation) | Number of objections under this theme |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Theme |  |  | $\begin{aligned} & \infty \\ & \underset{N}{N} \\ & \underset{N}{N} \\ & \mathbf{O} \\ & \underset{\sim}{n} \end{aligned}$ | 「 N N O © © | Response |
|  | petition was supported by 160 organisations, stressing that blind and visually impaired people want to be able to get on and off the bus directly from the pavement without having to cross or step into a cycle lane. |  |  |  |  |
| Interaction of pedestrians and cycles at crossings of cycle track including at south of Shore | The area identified is not very spacious or safe for mix of pedestrians/ children/ cyclists <br> The 'proposed segregation' being installed may protect cycle track users with kerbs and paving stones but need to be safeguard pedestrians as well (sic) | 2 | 2 | 2 | The footway will not be shared with cycles, the cycle track will be at existing carriageway level and will be segregated from vehicles on the carriageway. It will rise up to footway level at appropriate crossing points to aid pedestrians. These crossing points will be designed in line with best practice. <br> Segregation kerbs will protect cycle track users from motor vehicles and the installation of the segregation and cycle track will also move motor vehicles further away from pedestrians. As motor vehicles cause by far the greatest level of potential dangers to pedestrians, this will reduce risk to pedestrians. <br> At the southern end of the Shore, pedestrians will be provided with a significantly enlarged area of pedestrian only space compared to the current layout. <br> Footways on the bridge are currently approximately 1.5 m width on either side, which will be increased to approximately 5 m on the northern side. |
| Removal of bus stops | removal of bus stops along the route. bus stop removed on East side of road (outside The Vaults) | 2 | 2 | 2 | Bus stops do not form part of the traffic order, but no bus stops will be removed as part of this scheme. Some bus stops will be moved given the opportunities presented by the new landscaped areas by closing the |


| Theme | Example responses (quotations from representation) | Number of objections under this theme |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | $\begin{aligned} & \mathbb{\nwarrow} \\ & \text { N } \\ & \text { N } \\ & \text { O} \\ & \text { © } \end{aligned}$ | aZZ/LZ/Oप\& | Г N N O © ■ | Response |
|  | We object on the grounds that many aspects of the proposed changes are inconvenient for pedestrians, and especially for elderly and disabled people who will be required to walk further to/from bus stops, parking spaces, etc. <br> - are disruptive for bus services, and their users <br> The removal of existing bus stop (which were originally placed where they are for a good reason - i.e. where they best meet the needs of bus users) and resulting increase of distance between bus stops will impact negatively on pedestrians and bus users (all bus users are also pedestrians at points in their journeys). For example, elderly shoppers visiting the Kirkgate shopping Centre will have too far to walk from Yardheads if the bus stops serving the St. Anthonys Street entrance are removed. Stops seem to be removed further down Henderson Street (at the Vaults and Boda Bar?) as well. As well as removing some |  |  |  | Yardheads and Parliament Street junctions at Henderson Street to motor traffic. Bus stops will be placed in these areas with new hard and soft landscaping. <br> This will move bus stops from general carriageway into newly landscaped areas with associated new shelters. <br> Also bus stops are proposed to be staggered on opposite side of the road on Great Junction Street to assist with traffic flow on the carriageway. A maximum bus stop move of approximately 45 m is proposed. The adjacent carriageways will be narrowed and new signalised and informal crossing points provided, making the carriageway easier to cross than the current situation. <br> The bus stop will not be removed outside The Vaults and will be unaffected by the proposals. |


| Theme | Example responses (quotations from representation) | Number of objections under this theme |  |  | Response |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | $\begin{aligned} & \mathbb{Z} \\ & \mathbb{N} \\ & \mathbf{N} \\ & \mathbf{N} \\ & \mathbf{O} \\ & \mathbb{N} \end{aligned}$ | $\begin{aligned} & \text { M } \\ & \underset{N}{N} \\ & \underset{N}{N} \\ & \mathbf{O} \\ & \underset{\sim}{r} \end{aligned}$ | $\begin{aligned} & \bar{O} \\ & \text { N } \\ & \text { N } \\ & \text { O } \\ & 0 \\ & 0 \sim \end{aligned}$ |  |
|  | stops, it seems that bus shelters are being removed. <br> Increased walking distance to bus stops, the need to cross a cycle lane in order to access crossings and bus stops creates barriers and conflicts between different users. |  |  |  |  |
| Abuse of power | I object formally in the strongest possible terms to TRO/21/22A. This is a monstrous abuse of power which deliberately discriminates against a sizeable section of the community for ideological reasons, motivated by extraterritorial interference in the guise of the UN Common Agenda otherwise known as Agenda 2030. Ultimately this amounts to treason. These measures have been subversively advanced while the focus was on the Covid 19 plandemic lockdown. <br> The entire motivation is flawed. You claim to be making a route from the Foot of the Walk to Ocean Terminal. However what you are creating is a roundabout route. The most direct route is along Great Junction Street | 1 | 1 | 1 | Following three periods of community engagement on the project, the statutory process for the traffic and redetermination orders has now been followed. The rationale and benefits of this and other such schemes are as set out elsewhere in this report and the strategies referenced. <br> Route alignment choices were developed during early stakeholder workshops as discussed by Committee in August 2021. |


|  | Example responses (quotations from representation) | Number of objections under this theme |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Theme |  | $\begin{aligned} & \mathbb{Z} \\ & \mathbb{N} \\ & \mathbf{N} \\ & \mathbf{N} \\ & \mathbf{O} \\ & \mathbf{N} \end{aligned}$ | TRO/21/22B | $\begin{aligned} & \bar{O} \\ & \text { N } \\ & \text { N } \\ & \text { O } \\ & \text { © } \end{aligned}$ | Response |
|  | and North Junction Street. Therefore you have no justification on the grounds of ease of route. |  |  |  |  |
| Personal safety issues | As a local resident I object to the proposal on the following grounds :- <br> ...Personal safety issues <br> By reducing traffic in this area you will also continue the expansion of areas that now feel unsafe to walk in when it's dark as there are less people about | 2 | 1 |  | Research conducted in well-established new low traffic neighbourhoods such as in Waltham Forest (London) records that the introduction of a low traffic neighbourhood was associated with a $10 \%$ decrease in total street crime and this effect increased with a longer duration since implementation. There was a larger reduction in violent crimes and no associated displacement to other areas. By encouraging more use of our streets, more walking, wheeling, cycling and creating pleasant streets to spend time in the concept of "eyes on the street" as neighbourhoods become places for people to be on the street not just pass through in vehicles. <br> Vehicle related crimes and related road traffic injuries are also shown to reduce with increased levels of road safety for trips by walking, cycling and driving. <br> The emergency services have been consulted throughout the development of the plans. |
| Lack of parking facilities for residents | Lack of parking facilities for local residents <br> Properties and businesses will have no access/exit to parking/entrance, at east end of bridge <br> They will also lose many much-needed parking spaces. A CPZ will not solve | 3 | 3 | 2 | There will be reduction of parking on residential streets around Henderson Street, Quayside Street and Dock Street to enable construction of the cycle track and associated landscaping improvements. <br> Access to parking at east end of the bridge is unaffected. |


|  |  | Number of objections under this theme |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Theme | (quotations from representation) |  |  |  | Response |
|  | the problem of an inadequate number of spaces. |  |  |  |  |
| Lack of parking/ loading for businesses | Making the whole of one side of Great Junction Street a cycletrack will conflict with deliveries to the shop <br> Properties and businesses will have no access/exit to parking/entrance | 4 | 4 | 3 | Loading surveys have been undertaken and the loading provision provided that will cater for the requirements of the area. Businesses in the area have been sent a letter and leaflet informing them of proposed changes. There will be further communication prior to construction and implementation of loading changes. <br> Access to parking at east end of bridge is unaffected. |
| Increase traffic levels, congestion and pollution on main roads. Including that this will lead to delays to public transport and emergency services. | You seek to cut off every entrance and exit from Henderson Street. Have you been observing how gridlocked Great Junction Street, Duke Street and Henderson Street are lately. Do You think magically the traffic will disappear when you impose your despotic scheme? This is social engineering on a grand scale we have not seen since World War II. You must allow for the free movement of traffic. Where will delivery vehicles go? What about emergency vehicles that are held up with subsequent increasing death rates? <br> All this is doing is causing more congestion and more pollution on main roads and hindering access for | 13 | 8 | 8 | It is acknowledged that outcomes are likely to vary on a case-by-case basis but evidence from similar schemes shows that measures to reduce through traffic from residential areas do not simply shift traffic from one place to another. In the short term there may be a slight increase in displaced traffic to other roads and the Council will be monitoring this and taking appropriate actions to minimise this. Over time, we see an overall reduction in the numbers of motor vehicles on roads, as people reduce the number of car journeys they make, take different routes, and replace some vehicle journeys with walking, cycling or public transport as these options have become more accessible and attractive. This is known as traffic evaporation and has been observed in various road schemes around the world. <br> Although it's very difficult to predict the impact a specific scheme will have and modal shift, changes to trips and behaviours, an examination of over 70 case studies of roadspace reallocation from 11 countries, and the collation of opinions from over 200 transport professionals worldwide notes that when schemes such as pedestrianisation, wider pavements or cycle |


| Theme | Example responses (quotations from representation) | Number of objections under this theme |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | $\begin{aligned} & \underset{\sim}{N} \\ & \underset{N}{N} \\ & \underset{N}{\mathrm{~N}} \\ & \mathbb{N} \end{aligned}$ | 「 N N O ® | Response |
|  | emergency vehicles. I would like the Council to justify why, if minor roads are being closed off for cyclists, it is necessary to install cycle lanes on main roads? Cyclists should be using the closed off roads and cycle paths leaving main roads for cars and buses. <br> My wife and I currently use (by car) most of the roads destined for closure, since the alternative main roads are already too busy. With the planned introduction of the above TROs the congestion along the other (open) roads will therefore naturally increase and make a bad situation worse. If you wish to close off these smaller routes then you need to find a way to speed up traffic flow along the remaining routes. <br> Closing the suggested routes also amplifies current gridlock in the area of Bernard street, salamander street, seafield. Lochend road, restalrig road, duke street and great junction street. will increase the road congestion in the are (sic) and also have an impact on |  |  |  | lanes or bus (and other priority vehicle) lanes or road closures are introduced predictions of what will happen to traffic levels are usually excessively pessimistic. A recent study by the University of Westminster of 47 low traffic neighbourhood schemes showed little indication of traffic being simply displaced onto boundary roads stating that, "average decreases in motor traffic on roads within LTNs are almost ten times higher than average increases in motor traffic on boundary roads. This suggests that not only do LTNs have substantial benefits inside their boundaries by creating an overall reduction in traffic, but they can also contribute to wider traffic reduction goals." Edinburgh and Scotland have ambitious targets to reduce the number of car kilometres driven and schemes such as this can support these targets. <br> Emergency services have been involved in the development of the scheme and indicated their support acknowledging the potential reduction in vehicle crime and injuries. |



| Theme | Example responses (quotations from representation) |  |  |  | Response |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | $\begin{aligned} & \stackrel{\text { N }}{\bar{I}} \\ & \stackrel{\text { x }}{1} \end{aligned}$ |  |  |
|  |  |  |  |  |  |


| Theme | Example responses (quotations from representation) | $\begin{gathered} \text { Number of } \\ \text { objections under } \\ \text { this theme } \end{gathered}$ |  |  | Response |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | $\begin{aligned} & \stackrel{\text { N }}{\bar{I}} \\ & \stackrel{\text { x }}{1} \end{aligned}$ |  |  |
|  |  |  |  |  |  |


| Theme | Example responses (quotations from representation) | Number of objections under this theme |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | $\begin{aligned} & \mathbb{N} \\ & \mathbb{N} \\ & \mathbf{N} \\ & \mathbf{N} \\ & \mathbf{O} \\ & \mathbf{N} \end{aligned}$ | $\begin{aligned} & \text { M } \\ & \underset{N}{N} \\ & \underset{N}{N} \\ & \mathbf{O} \\ & \underset{\sim}{\sim} \end{aligned}$ |  | Response |
|  | for Lothian Buses. Any increase cost may lead to longer times between buses and a subsequent downgrading of the public transport offer in Leith. <br> Pushing all traffic on to the peripheral routes around Leith, and at the same time narrowing the carriageway on such routes <br> (Great Junction Street, and, intended in Phase 3 of LC, Bernard Street \& Commercial Street) will not only cause increased congestion but will also lead to increased pollution from emissions which will negatively affect pedestrians and cyclists. Also narrowing of carriageways because of cycleway, will increase congestion and pollution. |  |  |  |  |
| Reduce resilience of road network | The proposals will reduce the resilience of the road network in the area. Some redundancy is necessary as there are incidents from time to time that require traffic to be re-routed, often at short notice. Such incidents include road traffic accidents, building fires, sewer collapses and so on. | 3 | 3 | 3 | It is acknowledged that there have been aspirations to consider pedestrianisation of Shore, and this has come up during the periods of community engagement. Engagement early in the project with Lothian Buses and the network management team lead to Sandport Bridge rather than the Shore being taken forward for pedestrian and cycle use as moving bus route further away from central area of Leith between Shore and Constitution Street was not desirable. |


| Theme | Example responses (quotations from representation) | Number of objections under this theme |  |  | Response |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | $\begin{aligned} & \text { M } \\ & \text { N } \\ & \text { N } \\ & \text { N } \\ & \end{aligned}$ | $\bar{o}$ N O on n |  |
|  | There are also planned incidents that require alternative routes to be found. One of these is probably imminent, as I think the Shore has reached the stage where closure will be required soon to where closure will be required soon to allow for carriageway reconstruction. The Council's previous decisions mean that Constitution Street is unavailable now and in future even for buses and a closure of the Shore would mean substantial bus diversions and absence of service to a large part of the route of the 16,35 and 36 . The of North Junction Street and Great Junction Street as a diversion route is already busy. Sandporsal to alter the usage of make it impossible for buses to use it, as they are often used now for resilience/detours when the Shore is closed. More widely I object to the closure of Sandport Bridge to vehicular traffic and consider the Council should instead be pedestrianizing the Shore, diverting buses via Sandoort Bridge |  |  |  | Even after closure to motor vehicles, it will still be possible to use Sandport Place Bridge for ad-hoc infrequent planned diversion purposes utilising temporary traffic lights and with some minor implementation works. However, it is of course acknowledged that this would come with some additional cost, planning and construction works compared to the current situation. The nature of usage of the bridge for those time periods as a pedestrian and cycling only space would also be changed. |


| Theme | Example responses (quotations from representation) | Number of objections under this theme |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | $\begin{aligned} & \infty \\ & \underset{N}{N} \\ & \underset{N}{N} \\ & \mathbf{O} \\ & \underset{\sim}{n} \end{aligned}$ | 「 N N O © © | Response |
|  | This bridge is also main diversion route for vehicles, including buses, if there are road closures/emergencies on Commercial Street, Bernard Street or The Shore. <br> So causing such a major change as completely closing Sandport Bridge to traffic is overkill, as it will only meet the needs of a proportion of cyclists but will have other bad effects all down the line. For example, we know that Sandport Bridge is an important 'escape route' for buses, providing resilience in the form of relief diversionary route for buses when there are roadworks or obstructions on the Shore. This has been needed on several occasions in recent years, and is a route that can ill afford to be lost, because the only other alternatives mean huge detours, causing yet more delays, congestions, increased emissions and problems for pedestrians/ bus passengers. |  |  |  |  |
| Discriminatory to certain groups | People with young children and elderly or disabled relatives are going to be penalised by these actions | 2 | 1 | 2 | These proposals, as with all those set out in the City Mobility Plan, are designed to provide more transport choices for all users of our streets. |


| Theme | Example responses (quotations from representation) | Number of objections under this theme |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | $\begin{aligned} & \underset{\sim}{N} \\ & \underset{N}{N} \\ & \underset{N}{\mathbf{N}} \\ & \text { N } \end{aligned}$ | ㄷ N N O © | Response |
|  | I consider the proposals to be highly discriminatory. They will prioritise cycling - mainly the preserve of physically fit young men and (to an extent) women - over all other users, including pedestrians and bus passengers. Bus passengers include a significant number of elderly people, and people with mobility issues of one kind or another. Delaying their journeys, disrupting them more than necessary if there are road closures and expecting people with visual problems to use floating bus stops safely are all indications of a misguided approach. <br> We object on the grounds that many aspects of the proposed changes are dangerous for pedestrians, and especially for elderly and disabled people, and for public transport users, as they are expected to share space with cyclists |  |  |  | Private car access will be maintained to all addresses meaning anyone who cannot walk, wheel or cycle or chooses to use a private car, taxi or public transport will still be able to. As there will be less vehicles on the streets within the low traffic neighbourhood, it may also be easier for these people to use their cars. The proposal has broad support from the Edinburgh Access Panel. <br> Data shows that people with disabilities are more likely to be injured by a motor vehicle than able bodied persons. Therefore, by reducing vehicle numbers and speeds we are seeking to ensure all members of the community can travel in a safer manner around our streets. <br> Car ownership levels are low across the ward and car ownership levels for people whose day-to-day activities are limited by a long term health or disability problem or are over 65 are lower still. By 2011 census data, 66\% of people in the project area postcodes whose day-to-day activities are limited a lot by a health problem or disability live in a household that does not have access to a car. <br> Improving conditions for walking, wheeling and cycling in the area will improve accessibility for all to bus and tram stops in the area and support people who choose to travel by public transport. <br> High quality cycling infrastructure can also be used by those in mobility scooters, wheelchairs and those that use cycles as mobility aids in a safer and easier manner. |


|  | Example responses (quotations from representation) | Number of objections under this theme |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Theme |  | $\begin{aligned} & \mathbb{N} \\ & \text { N } \\ & \text { N } \\ & \mathbf{N} \\ & \underset{\sim}{n} \end{aligned}$ | $\begin{aligned} & \infty \\ & \underset{N}{N} \\ & \underset{N}{N} \\ & \mathbf{O} \\ & \underset{\sim}{2} \end{aligned}$ |  | Response |
|  |  |  |  |  | Improvements to pedestrian conditions are being introduced as part of these proposals including decluttering of the footways, introduction of continuous footways, improvements to footway condition and new signalised and informal pedestrian crossings. <br> The main cycle track route will not be shared with pedestrians and will be at existing carriageway level with a minimum of 50 mm kerb height to the footway in line with best practice guidance. |
| Difficult to understand | no clear explanation and difficult to understand <br> We are disappointed and frustrated by how poor quality these consultation materials are, and how difficult the Council has made it to respond. The TRO designs are unclear and difficult to read and cross check with earlier versions, are missing details, and provide what appear to be out of date map tiles, with very inadequate legends. Collaboration between the teams working on Leith connections, the CPZ and the location of bin hubs appears to be defective, as there are clashes between them. | 2 | 2 | 2 | Three periods of community engagement have provided information on the project prior to this statutory process and further information is available at the project website. All proposals in this traffic order process have been presented as statutory requirements. <br> Bin hubs have now been installed across the area, however, bins do not form part of the traffic order so would therefore not be shown on these traffic order drawings. There will be some minor movements to bin hubs which will be communicated to relevant local residents. Controlled parking zones proposals are not yet made orders, therefore are not represented in the current map tiles for current restrictions. There has been ongoing communication between relevant project teams throughout development of the projects. |


| Theme | Example responses (quotations from representation) | Number of objections under this theme |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | $\begin{aligned} & \mathbb{1} \\ & \text { N } \\ & \underset{N}{N} \\ & \mathbf{N} \\ & \mathbf{O} \\ & \end{aligned}$ | $\begin{aligned} & \infty \\ & \underset{N}{N} \\ & \underset{N}{N} \\ & \mathbf{O} \\ & \underset{\sim}{2} \end{aligned}$ | 「 N N O © ■ | Response |
| Lack of access by motor vehicle | You seek to cut off every entrance and exit from Henderson Street. <br> These roads are essential for me to contact with family and indeed essential shops and GP facilities restricts the access to my workplace to only one access point by car, from the north side onto the shore <br> We are concerned about access to the area for residents (and visitors, but residents are felt to be more of a priority). For many residents within the area, closing Henderson Street, the Shore, Coburg Street, Dock Street and Sandport Place leaves a question mark over how they will be able to enter and leave their own homes by car. <br> Tradespeople and delivery drivers will have difficulty finding entry and exit routes.. Drivers face an extended diversion and greatly increase journey time, which would add to emissions and congestion on nearby roads. | 5 | 4 | 3 | Every property will still be accessible by motor vehicle, however, the routes that need to be taken to access properties may in some cases be different. The overall aim of the low traffic neighbourhood scheme is to reduce the through traffic in the area which are not accessing the properties, services or amenities of the area but simply passing through. During implementation, temporary and long term signage updates will be installed as appropriate, as well as general project communications for local residents and updates to mapping and satnav systems. |
| Insufficient consultation | rushed through without thorough public explanation, consultation and review | 1 | 1 | 1 | Following on from two periods of community engagement in 2021 on the Phase 1 route and Phase 2 low traffic neighbourhood proposals where |


|  | Example responses (quotations from representation) |  | umb <br> tion <br> is th | of under ne |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Theme |  |  | gZZ/LZ/Oपम |  | Response |
|  |  |  |  |  | feedback was received, plans for Phase 3 were then presented and feedback sought in Summer 2022. Stakeholder/ community engagement activities have included: over 10,000 leaflets delivered throughout the project area; online co-design workshops; use of lamppost wraps; press articles; drop in sessions; meetings with the Community Reference Group; visits to community council meetings; feedback via online surveys; meetings with adjacent third party projects such as Coalie Park and Earth in Common; business letters and drop ins; stakeholder meetings including emergency services, schools and Lothian Buses. <br> For the Phase 1A TRO/ RSO the statutory advertising process has also now been followed. |
| Narrowing of Great Junction and Henderson Street reducing vehicle capacity and/ or causing issues with vehicles passing | It appears that certain streets, such as Henderson Street, will have much reduced widths available for general traffic. This will delay not only private cars but, more importantly, buses and emergency vehicles. If the Council's aim is to reduce car use the proposals should surely make the main alternative, namely public transport, at least as attractive as at present and ideally improve it. <br> - On Henderson Street the section between Spier's Place and Henderson | 3 | 3 | 3 | Research shows that 57\% of residents support building more cycle tracks physically separated from traffic and pedestrians, even when this would mean less room for other road traffic. <br> Bus stops have been staggered in the design of Great Junction Street and Henderson Street to ensure that buses stopped on opposite side of the roads do not obstruct traffic flow. <br> Narrowing of these streets is in line with street design guidance to encourage compliance with 20 mph speed limits. <br> There will be a reduction in general through traffic on Henderson Street meaning easier navigation for buses, remaining widths will allow for passing of buses alongside vehicles parked in future Controlled Parking |


| Theme | Example responses (quotations from representation) | Number of objections under this theme |  |  | Response |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | $\begin{aligned} & \text { M } \\ & \text { N } \\ & \text { N } \\ & \text { N } \\ & \end{aligned}$ | $\bar{o}$ N O on n |  |
|  | Gardens has been narrowed to an unacceptable width. If any out of was parked in the parking area buses may not be able to pass and the wider area would be left without a public transport service. At regular intervals it is likely that buses will delayed as they and will be unable to pass other vehicles such as refuse collection unnecesssary and should be fully efore the final plans are advertised general traffic, including buses, to only one lane in each direction, which will access for buses to bus stops. They will also prevent general traffic from overtaking westbound buses when numbers 39-43 Great Junction Street, thereby generating westbound traffic tailbacks across the Foot ond the Walk junction to Duke Street and onto Leith Walk, creating deays for the tram. |  |  |  | Zone spaces. This is similar to current situation where cars parked on both sides of the street means that buses currently have to navigate an informal give and go arrangement over a longer stretch of the street. |

## Appendix 5 - TRO/RSO supportive representation examples

Below are direct quotations as example of some of the nine supportive representations received:

- "As the most densely populated part of the city, the off-road cycling infrastructure is majorly lacking in Leith and the shore are, due to cobbles and traffic congestion, is wildly dangerous for cyclists at the moment"
- "My principal concern regarding the current arrangement on Sandport Bridge is safety. The Water of Leith Path end abruptly with a blind corner on the bridge on which the downward slop creates extra momentum for traffic. This means that pedestrians (often with prams, pets and bicycles) are put directly into harm's way due to the business of the route, the tiny pavements and the increased speed of motorists. This is particularly acute in summer when the path is busy. I have witnessed a number of nearmisses and it is only a matter of time before a serious incident occurs. Another safety consideration is the inadequate pavement sizes that result in pedestrians stepping into the road when they meet another pedestrian coming the other way (which considering the area's popularity is very often) and therefore moving into the direct path of oncoming traffic. The TROs can instantly solve these issues and arguably should have been done years ago."
- "Would just like to comment that i am hugely in favour of the proposed segregated cycle path and therefore support these required road closures. As the most densely populated part of the city, the off-road cycling infrastructure is majorly lacking in Leith and the shore are, due to cobbles and traffic congestion, is wildly dangerous for cyclists at the moment."
- "Just a message to voice my strong support for the closure of Coburg Street as part of the Leith LTN. We've lived here for over 10 years and feel that the benefits - safety, reduced noise pollution, environmental, and a generally improved living environment - far outweigh any potential disadvantages. We are $100 \%$ in favour of the closure."
- "This will form part of an essential route from the City Centre via Leith Walk to Victoria Quay, Ocean Terminal Newhaven, as well as towards Portobello via Seafield."


## Appendix 6 - Suggestions for the TRO/RSO or project contained within representations

In addition to reasons provided in Appendices 4 and 5 for objecting or supporting the proposals, nine representations included suggestions for changes to the TRO and RSO or general suggestions. A number of suggestions are not related to the actual TRO and RSO measures themselves.

- A number of suggestions were that the surface materials of Henderson Street are unsuitable and a smoother setted or asphalt surface should be installed.
- There were also suggestions that supported the further use of continuous footways and concerns over areas of reduction in cycle track width.
- One representation stated they feel it would be appropriate to give cyclists warning of the Dock Street parking bays on their approach.
- One representation noted that the proposed short section of cycle segregation on the eastbound approach to Henderson Street is preceded by a short no waiting area and that vehicles will often stop in such locations, blocking the access to the cycleway. It suggested clear indication to ensure drivers are deterred from blocking access to the cycle segregation.
- From the representations which were objections, suggestions within five. representations were that the works should not be implemented prior to operation of the Trams to Newhaven route. One representation suggested that the measures should not be put in place until the Trams to Newhaven route has been in operation for 12 months.
- The response from Leith Links Community Council includes other suggestions, such as that Parliament Street should remain open, perhaps as one way only and that Coburg Street should be closed to through traffic at the eastern end. They also state that, "consideration be given to creating new 'pocket' car park(s) around the fringes of the LTN, for example along Salamander Street (instead of inappropriately dense blocks of flat - we need collaboration between Transport and environment, Active Travel, and Planning) and they restate their support for pedestrianisation of the Shore rather than Sandport Place Bridge.

In response to the above suggestions, and in addition to Council response to the representation themes in Appendix 4, it should be noted that:

- Should the recommendations of this report be accepted, it is proposed to introduce motor vehicle prohibitions in April 2023 and commence works on the segregated cycle track in late summer/ early autumn 2023 subject to response from Scottish Ministers on the Redetermination Order. The Trams to Newhaven route is proposed to be operation for service in Spring 2023.
- The current design proposes a combination of asphalt, porous asphalt, and smooth setted surface for the cycle track. However, this may be subject to further assessment and value engineering.
- The advertised order proposes closing Coburg Street at the eastern end.
- Giving cyclists warning of the upcoming parking spaces will be considered in the final lining and signing design.
- Clear indication of the no waiting area will be provided to drivers.
- Introduction of new car parks is outside the scope of this project but is unlikely to be compatible with other council properties including the City Mobility Plan and Parking Action Plan.

