

# Licensing Sub-Committee of the Regulatory Committee

10.00am, Friday, 9 June 2023

## Low Emission Zone Network Mitigations – Representations to Traffic Regulation Orders and Redetermination Order

Executive/routine	
Wards	All
Council Commitments	

### 1. Recommendations

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- 1.1. It is recommended that Licensing Sub-Committee:
  - 1.1.1. Notes that all representations received to the advertised Traffic Regulation Orders TRO/23/04, TRO/23/05 and Redetermination Order RSO/23/03 associated with LEZ network mitigations were analysed by the Council;
  - 1.1.2. Notes that Traffic Regulation Order TRO/23/05 will now be approved as advertised, as no material objections were received;
  - 1.1.3. Notes that Redetermination Order RSO/23/03 will now be approved as advertised, as no competent objections were received;
  - 1.1.4. Sets aside the 17 representations to TRO/23/04 and approves making the Order as advertised; and
  - 1.1.5. Notes that these orders do not prevent future strategic re-allocation of street space on Morrison Street and surrounding streets, as set out in the emerging Circulation Plan and Edinburgh City Centre Transformation Programme.

**Paul Lawrence**

Executive Director of Place

Contact: Daisy Narayanan, Head of Placemaking and Mobility

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## Low Emission Zone Network Mitigations – Representations to Traffic Regulation Orders and Redetermination Order

### 2. Executive Summary

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- 2.1 The City of Edinburgh Council as Roads Authority, in accordance with the statutory scheme of delegation, considered that Traffic Regulation Orders (TROs) and Redetermination Order (RSO) were necessary network mitigations to support the implementation of the Council's Low Emission Zone (LEZ).
- 2.2 This report provides details of the representations received following the public advertising of TRO/23/04 and TRO/23/05 and RSO/23/03 for LEZ network mitigations and the Council's comments in response.
- 2.3 RSO/23/03 has been granted as advertised in accordance with the statutory scheme of delegation. TRO/23/05 has been granted as advertised, in accordance with the statutory scheme of delegation, as no statutory or material objections were received.
- 2.4 In accordance with the statutory scheme of delegation the Committee requires to determine whether to grant TRO/23/04 as advertised, as more than six material objections have been received from the public.

### 3. Background

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- 3.1. On 31 March 2022 the Council's Transport and Environment Committee approved the Low Emission Zone (LEZ) [Scheme Proposal](#), following legal processes. The city centre LEZ was approved by Scottish Ministers on 19 May 2022 and was introduced on [31 May 2022](#). Enforcement will start on 1 June 2024, following a two-year grace period for all. Glasgow's LEZ was enforced for all non-residents on 1 June 2023.
- 3.2. Edinburgh's LEZ has the following agreed objectives:
  - 3.2.1. Contribute towards meeting the air quality objectives prescribed under Section 87(1) of the Environment Act (1995);
  - 3.2.2. Contribute towards reduction of emissions in fulfilment of Part 1 of the Climate Change (Scotland) Act 2009;

- 3.2.3. Minimise the impact from traffic displacement across the city's transport network, related to LEZ;
  - 3.2.4. Strategically align with the Council's sustainable transport, active travel and placemaking objectives; and
  - 3.2.5. Strategically align with national funding provision policies, supporting individual and business adaptation.
- 3.3. The Council, in appraising LEZ options, sought to mitigate potential traffic displacement impacts resulting from non-compliant traffic that may choose to avoid the LEZ, as part of its network management strategy. The network changes required to achieve a diversion route to accommodate potential traffic displacement, have been summarised to the Transport and Environment Committee in [June 2021](#), [October 2021](#) and [March 2022](#).
- 3.4. The works proposed herein comprise layout changes to support this approach, ahead of LEZ enforcement, which begins on 1 June 2024. The works should be considered in the context of ongoing maintenance and will align with other such programmed works to minimise disruption, wherever feasible.
- 3.5. The works are located at Tollcross Junction, the section of Morrison Street between Morrison Link and Dewar Place and at the Morrison Street-Dewar Place-Gardner's Crescent Junction.
- 3.6. RSO/23/03 was made in terms of sections 1(1) and 152(2) of the Roads (Scotland) Act 1984. The detailed process for making a Redetermination Order (RSO) is set out in The Stopping Up of Roads and Private Accesses and the Redetermination of Public Rights of Passage (Procedure) (Scotland) Regulations 1986 (the 1986 Regulations). In terms of the 1986 Regulations where an objection has been competently made to a proposed RSO and remains unresolved then only the Secretary of State can determine whether to approve the RSO. If there are no competent unresolved objections to the proposed RSO then the Council as Roads Authority can proceed to approve it. In terms of the Council's statutory scheme of delegation the Executive Director of Place has the power to make RSOs provided no competent objections are received.
- 3.7. The Traffic Regulation Orders (TROs) were made in terms of Section 1 of the Road Traffic Regulations Act 1984. The detailed process for making a TRO is set out in the Local Authorities Traffic Orders (Procedure)(Scotland) Regulations 1999. In terms of the Regulations given the scope of TRO/23/04 and TRO/23/05 where there remain unresolved objections, it remains a matter for the Council as Roads Authority to determine whether to proceed to make each order as advertised.
- 3.8. In terms of the Council's statutory scheme of delegation the Executive Director of Place has the power to make TROs provided no statutory objections are received and no more than six material objections are received from the public.
- 3.9. Where the decision on whether to approve a TRO is referred to the Committee, due to more than six material objections being received from the public, the Committee may either:

- 3.9.1. Approve the TRO as advertised;
- 3.9.2. Approve the TRO with minor modifications. Provided such modifications would not extend the application of the order or increase the stringency of any prohibition or restriction contained in it (Regulation 10 of the 1999 Regulations).
- 3.9.3. Direct that a public hearing is to be held on the proposed TRO, in terms of Regulation 8 of the 1999 Regulations, chaired by an Independent Person.
- 3.9.4. Refuse the TRO;

## 4. Main Report

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### Summary of the Traffic Orders

- 4.1. Advertising of the TROs and the RSO commenced on 21 April 2023 and ended fully on 22 May 2023. 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](#). These documents included drawings and statements of reason which are available in Appendices B–D. Street bills were posted on relevant streets and physical copies of the orders were made available at Waverley Court.
- 4.2. The following TROs and RSO were advertised (plans are shown in Appendices B and C):
- 4.3. TRO/23/04 to:
  - 4.3.1. Remove the one-way restriction on Morrison Street from Dewar Place to Torphichen Place;
  - 4.3.2. Remove the banned left turn from Torphichen Place into Morrison Street;
  - 4.3.3. Introduce a banned right turn from Grove Street into Morrison Street;
  - 4.3.4. Introduce a no left turn from Morrison Street into Gardner's Crescent; and
  - 4.3.5. Remove the no right turn from Home Street into Brougham Street at Tollcross.
- 4.4. TRO/23/05 to
  - 4.4.1. Introduce 24 hour waiting restrictions and loading prohibitions on Dewar Place, Gardner's Crescent and Morrison Street; and
  - 4.4.2. Remove waiting restrictions (Mon-Sat 8.30am-6.30pm, Sun 12.30pm-6.30pm) on Dewar Place and Morrison Street.
- 4.5. RSO/23/03 to:
  - 4.5.1. Remove islands and central reservations on Morrison Street at junction with Dewar Place and Gardner's Crescent; and
  - 4.5.2. Introduce minor pavement 'build outs' on Gardner's Crescent and Morrison Street for signalised pedestrian crossings.

## **Summary of Representations Received**

- 4.6. Representations were received from 20 individuals and one organisation (Spokes). Of these, 17 were representations to TRO/23/04, 16 were representations to TRO/23/05 and 13 to RSO/23/03. Most representations stated that they applied to more than one Order.
- 4.7. Summaries of the representation themes and Council response are given below. Detail of the representations, by theme, are presented in Appendix E alongside the Council's full response.

### ***TRO/23/05 – 24 hour waiting restrictions and loading prohibitions on Morrison Street, Dewar Place and Gardner's Crescent***

- 4.8. None of the 16 representations received for TRO/23/05 are material objections. They are not material objections because they are not technically competent since they do not relate to the changes proposed in terms of this order.
- 4.9. Instead, these representations relate to a section of Morrison Street that is already covered by the existing Traffic Regulation Order TRO/17/91 which was made on 17 February 2021 and came into effect on 31 May 2022. It is no longer legally possible to object to these proposals.
- 4.10. The extent of the Order TRO/17/91 is shown in Appendix G and relates to the ongoing City Centre East West Link (CCWEL) project.
- 4.11. Following further engagement, Spokes have now withdrawn their objection to TRO/23/05 (see appendix F). It is worth noting that some of the objections received from individuals agreeing with the general reasoning behind Spokes' objection to TRO/23/05, were received before Spokes' subsequent withdrawal of their objection to that order.
- 4.12. As no material objections were received, Traffic Regulation Order TRO/23/05 will now be approved as advertised.

### ***RSO/23/03 – removing relic pavement 'islands' and adding pavement build-outs to support improvements to pedestrian crossings at Gardner's Crescent***

- 4.13. None of the representations received for RSO/23/03 are competent objections. They are not competent objections because they do not relate to the proposals to determine a small amount of carriageway to pavement in terms of this order.
- 4.14. Following further engagement, Spokes have now withdrawn their objection to RSO/23/03 (see Appendix F).
- 4.15. As no competent objections were received, RSO/23/03 will now be approved as advertised.

***TRO/23/04 – making part of Morrison Street (between Morrison Link and Gardner’s Crescent) two-way to all traffic and removal of right hand turn ban at Tollcross Junction (Home Street to Brougham Street)***

- 4.16. Officers noted objections relating to motor traffic volumes and lack of cycle infrastructure in introducing a two-way movement to modes on part of Morrison Street and removal of right hand turn ban from Home Street to Brougham Street at Tollcross Junction.
- 4.17. All 17 representations received for TRO/23/04 are material objections, as they relate to the proposals set out in the proposed order.
- 4.18. In respect to the agreed LEZ objective to reduce impacts relating to potential traffic displacement (see 2.2.3) and to make a more logical diversionary route avoiding the LEZ, the Council’s transport consultants (Jacobs UK Ltd) recommended making the section of Morrison Street between Morrison Link and Gardner’s Crescent two way to all motorised traffic and to remove the right hand turn ban from Home Street to Brougham Street at Tollcross Junction.
- 4.19. Without these changes to the network and according to this transport modelling conducted, non-compliant traffic potentially choosing to avoid the LEZ may cause traffic queuing onto West Maitland Street, impacting tram operation (Morrison Street) and may impact sensitive locations including primary schools (Tollcross)
- 4.20. The network mitigations subject of the traffic orders presented in this report have been informed by modelling and traffic survey data and are deemed reasonable and proportionate to support the LEZ’s operation. Traffic volumes on the section of Morrison Street subject of the orders presented are forecast to reduce by 11-13% once the network mitigations are introduced. Changes at Tollcross represent a minor improvement for pedestrian safety as they will formalise vehicles turning right from Home Street into Brougham Street. Currently some vehicles are already making this turn illegally (approximately. 19 vehicles per day) and reprogramming pedestrian signals to reduce potential for modal conflict will improve this situation.
- 4.21. Officers acknowledge that while none of the measures allocate space for cycle infrastructure in accordance with best practice and Council policy, the measures neither materially improve or worsen cycling conditions at Morrison Street or Tollcross.
- 4.22. Several objections seek the delivery of significant re-allocation of streetspace predominantly via provision of segregated cycle infrastructure. These modifications are beyond the scope of the proposed LEZ network mitigations as noted in further detail in section 8 of this report under ‘Consultation and Engagement’. Spokes raised several other suggested modifications to TRO/23/04 however these are considered either not to be feasible or not to be proportionate to the delivery of LEZ network mitigations.
- 4.23. Engagement and comments received in respect to the Council’s approaches to general traffic networks around the LEZ boundary are noted and will continue to be considered and reviewed as part of the emerging Circulation Plan.

- 4.24. The proposed TRO/23/04 is for necessary network mitigations to support the implementation of the Council's LEZ and none of the objections raise issues that outweigh the broader objectives of implement the LEZ.
- 4.25. Officers recommend that the Committee sets aside the 17 representations to TRO/23/04 and approves making the Order as advertised.

## **5. Risk, Policy, Compliance and Governance Impact**

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- 5.1 There is risk associated in not delivering network mitigations in terms of the joint procurement and delivery programme associated with all LEZ infrastructure.
- 5.2 There is also risk associated with potential traffic displacement effects with a 'do minimal' approach, though additional signage could be considered.

## **6. Equalities Impact**

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- 6.1 An [Integrated Impact Assessment](#) was updated for LEZ in March 2022.
- 6.2 Pedestrian improvements at Gardner's Crescent help to address users with protected characteristics.

## **7. Sustainability Impact**

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- 7.1 The overall impact of the LEZ is deemed to be positive in respect to sustainability. The LEZ is an important step towards achieving the Council's agreed transport strategies and statutory obligations in respect of air quality and climate change.

## **8. Financial Impact**

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- 8.1 Grant funding to support LEZ network mitigations has been received from Transport Scotland.

## **9. Stakeholder/Community Impact**

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### **LEZ Network Mitigations**

- 9.1 Officers engaged with Spokes on the Orders, both before they were advertised in January 2023 and after representations were received. Spokes raised concerns about lack of cycle infrastructure, cycle safety and high motor traffic volumes and asked officers if any improvements could be brought forward in the Morrison Street area.
- 9.2 Spokes' LEZ network mitigation objection letter is appended in full (Appendix F). An additional letter is included as part of that Appendix, which represents a follow-up to an engagement session between officers and Spokes on 25 May 2023.
- 9.3 Though pertinent topics of concern, comments received from Spokes generally do not relate to the scope of the LEZ project. Changes at Morrison Street do not materially worsen the environment or provision for cycling (acknowledging the

changes also do not significantly improve conditions for cycling). Overall traffic volumes on the section of Morrison Street becoming two-way are expected to fall (potentially by 11-13% according to modelling conducted). Similarly, air pollution from motorised traffic in the city centre is expected to fall due to the LEZ, though modelling indicated potential increases of NO<sub>2</sub> at some locations on the boundary. However, it should be noted that these were deemed proportionate in considering the wider population benefits of the scheme.

- 9.4 Officers noted support from Spokes for the LEZ itself and most elements of the pedestrian improvements at Gardner's Crescent. However, Spokes noted concern relating to the banned left turn from Morrison Street to Gardner's Crescent applying to all modes, including cycles. This is to give pedestrians priority for the key east-west movement on Morrison Street, in respect of 'green person' time offered by signals. Unfortunately, the current design cannot accommodate an exemption from this left-turn ban for cycles without dramatically reducing the green time afforded to pedestrians.

### **Delivering City Centre Transformation and emerging Circulation Plan**

- 9.5 Future significant re-allocation of streetspace to support active travel and public transport at Morrison Street will be in alignment with the Edinburgh City Centre Transformation Programme and the emerging citywide Circulation Plan. The Circulation Plan (also referred to as the Future Streets Framework) is currently undergoing public consultation alongside associated action plans relating to delivering the Council's approved [City Mobility Plan](#).
- 9.6 In April 2023, a [report](#) was presented to Transport and Environment Committee confirming that funding for Lothian Boulevard RIBA stages 0-2 has been successfully awarded and the project has now commenced. The Lothian Boulevard project area includes the full extent of Tollcross Junction. Subject to continued funding and approvals, construction to deliver Lothian Boulevard is estimated to start in summer 2028. Stakeholder engagement sessions on the Lothian Boulevard project is expected to commence in late summer 2023.
- 9.7 The Lothian Boulevard funding does not make provision for short-term temporary measures for improving pedestrian, cycle and public transport provision of Tollcross Junction. Options for these can however be explored with stakeholders during the forthcoming engagement sessions and subsequently reported to Committee for consideration. Thereafter, potential funding streams can be explored.

## **10. Background Reading/External References**

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- 10.1 Final Submission to Make an LEZ Scheme (The City of Edinburgh Council, [March 2022](#))
- 10.2 [Edinburgh Low Emission Zone Webpage](#).
- 10.3 [Low Emission Zone Guidance](#) (Transport Scotland, October 2021).
- 10.4 [Low Emission Zone Scotland](#) (Transport Scotland).

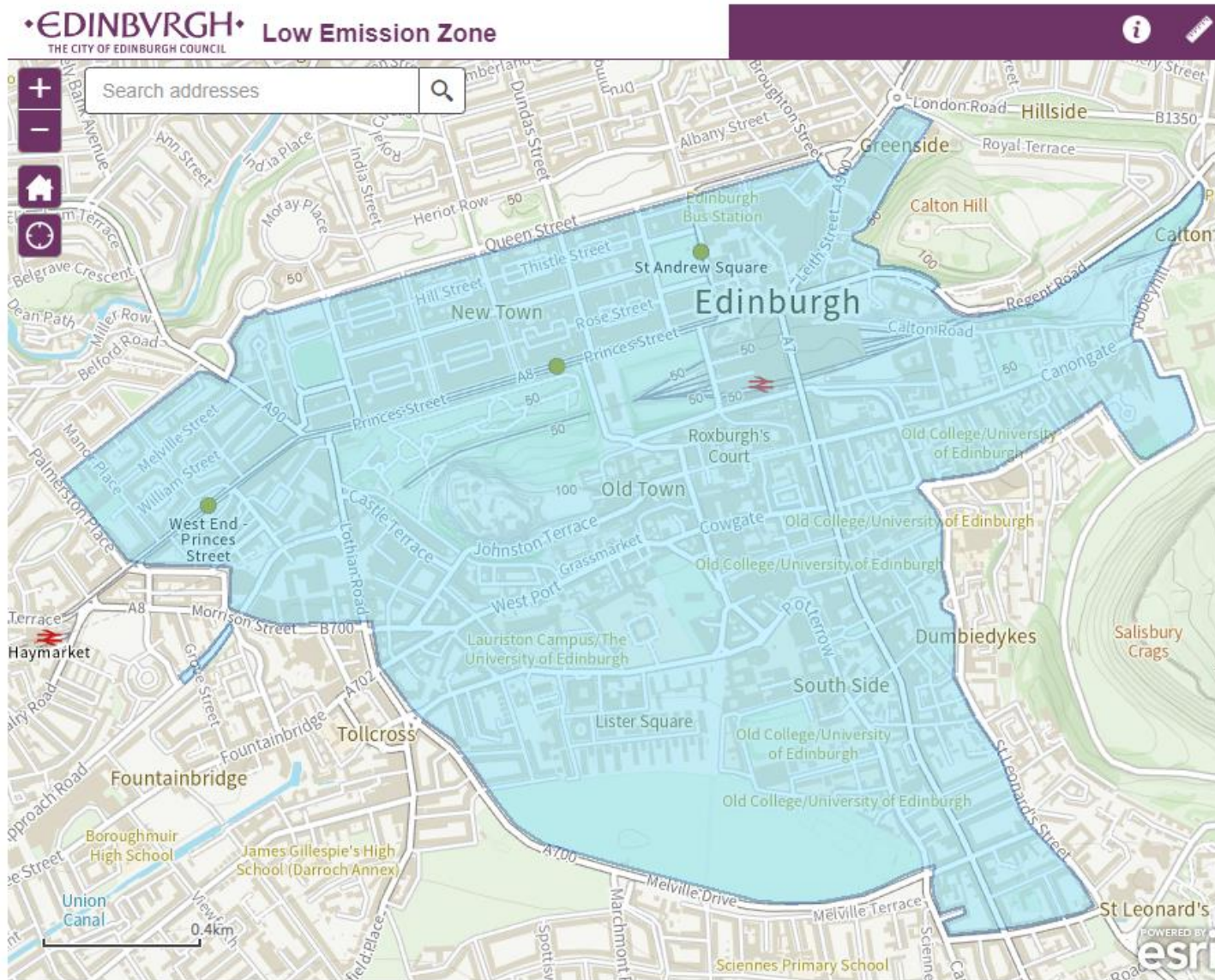


## **11. Appendices**

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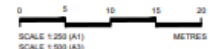
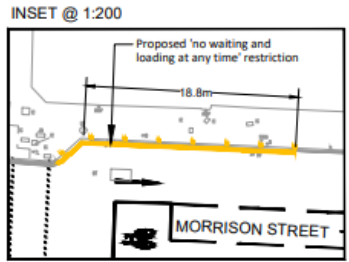
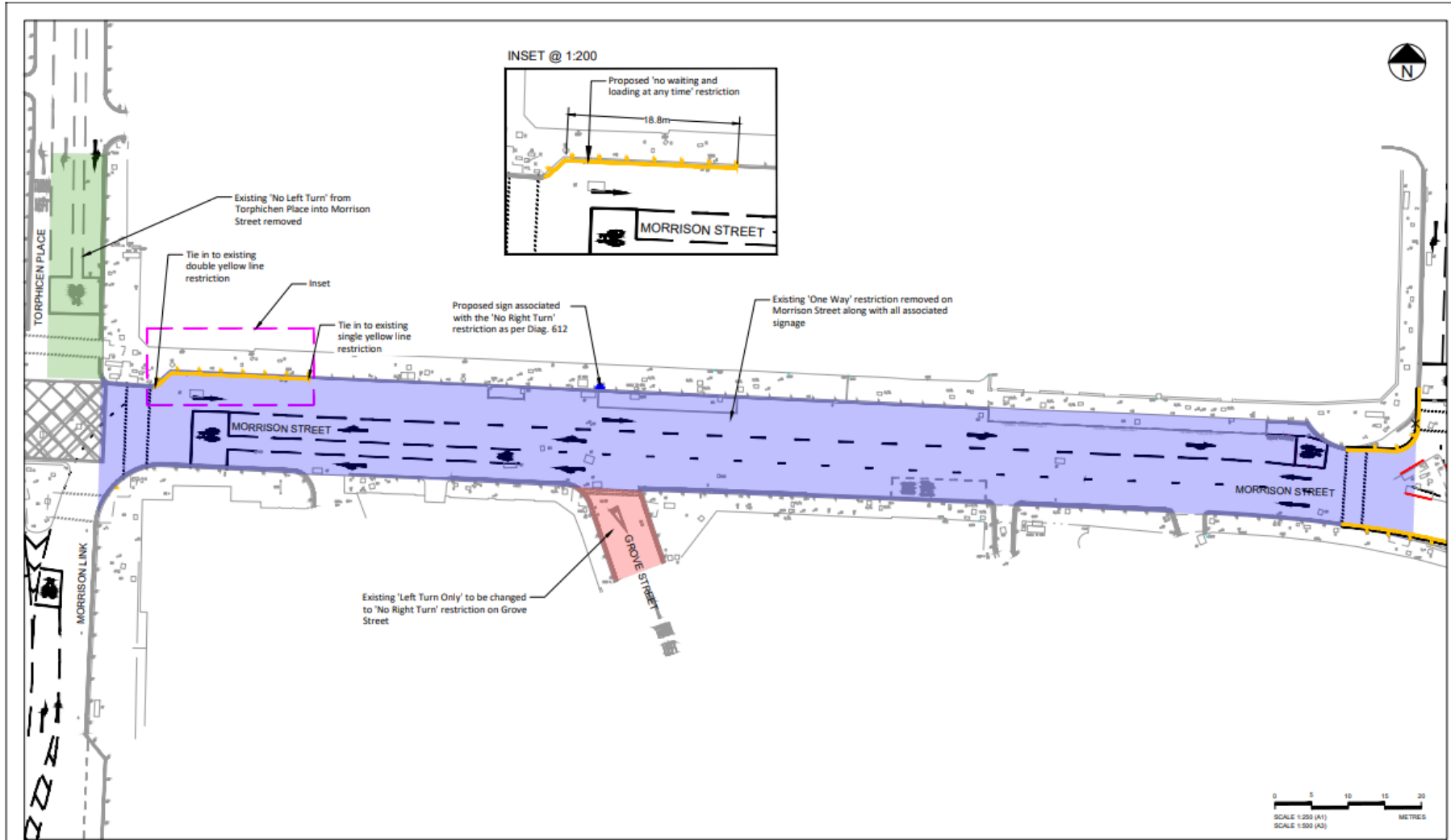
- 11.1 Appendix A – LEZ boundary (2022)
- 11.2 Appendix B – LEZ TRO drawings (2023)
- 11.3 Appendix C – LEZ RSO drawings (2023)
- 11.4 Appendix D – Statement of reasons for LEZ TROs and RSO (2023)
- 11.5 Appendix E – TRO/RSO objections by theme and the Council's comments in response (2023)
- 11.6 Appendix F – Spokes objection letters (2023)
- 11.7 Appendix G – CCWEL TRO/17/91 drawings (2018)

## Appendix A – LEZ boundary



# Appendix B – LEZ TRO drawings (2023)

TRO/23/04



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REF	DATE	FOR INFORMATION	ISS	REV	BY	CHK
001	23/03/2023	FOR INFORMATION	001	001	001	001

**NOTES**

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- THIS DRAWING SHALL BE READ IN CONJUNCTION WITH ASSOCIATED TRAFFIC REGULATION ORDER INFORMATION.
- EXISTING RESTRICTIONS RETAINED WITH THE EXCEPTION OF NEW / AMENDED RESTRICTIONS PROPOSED IN THE DRAWING.

Key	
	Proposed 'No Waiting and Loading at Any Time' restriction
	Removal of 'One Way' system
	Removal of 'No Left Turn'
	Proposed 'No Right Turn' restriction
	Proposed road markings (General)
	Existing road markings

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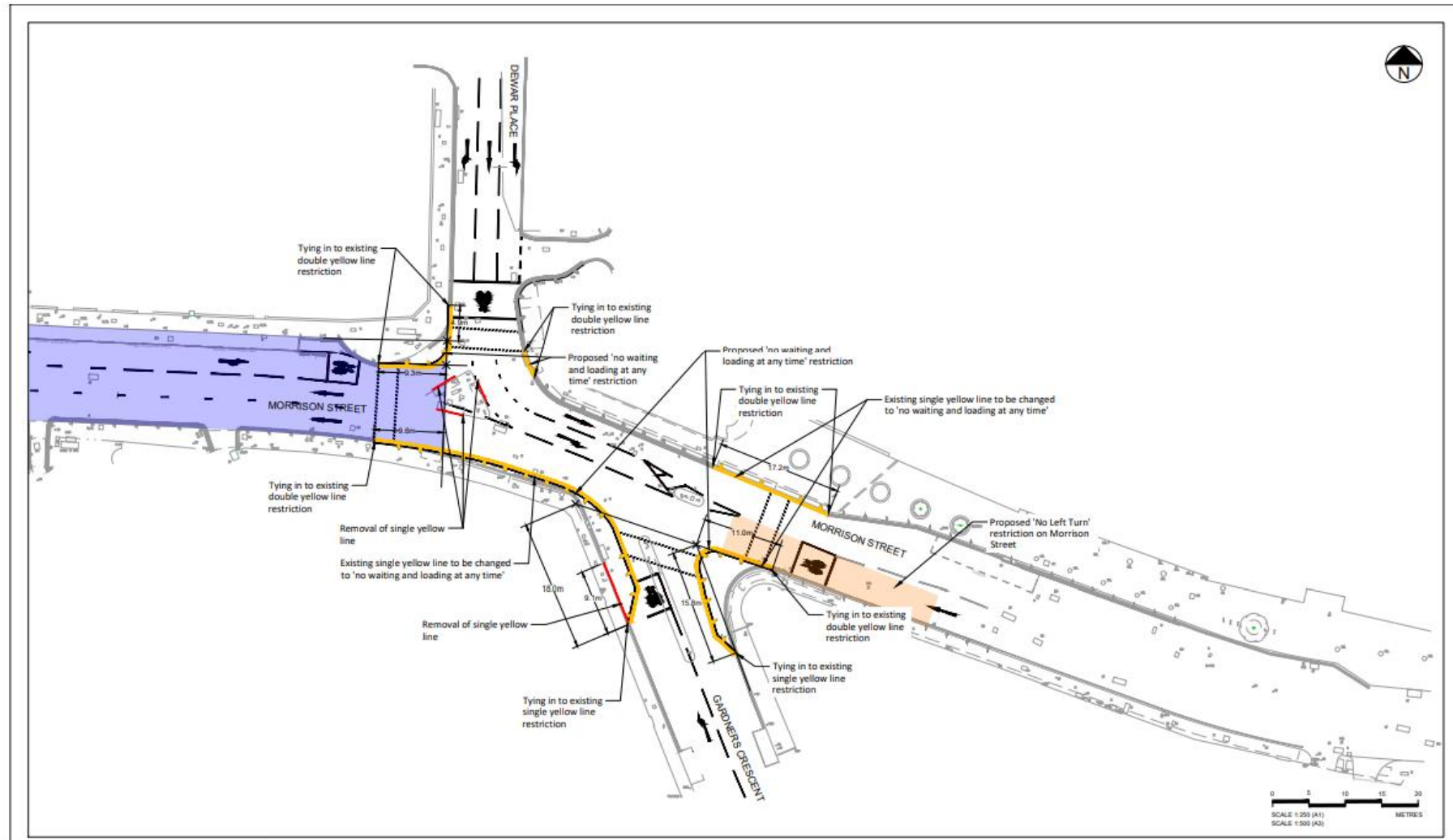
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THE CITY OF EDINBURGH COUNCIL

Project: **LOW EMISSION ZONE**  
EDINBURGH

Drawing title: **TRAFFIC REGULATION ORDER MORRISON STREET FROM TORPHICHEN PLACE TO DEWAR PLACE**

Drawing status: **FOR INFORMATION**

Scale: 1:200 @ A1	DO NOT SCALE
Job No: BESP0023	Rev: P01
Drawing number: <b>BESP0023-LEZ-MS-TRO-DR-0003</b>	



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Rev	Date	Author	Checked	Drawn	Scale	Notes
P01	15/10/2023	FOR INFORMATION				
P02	15/10/2023	FOR INFORMATION				

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- EXISTING RESTRICTIONS RETAINED WITH THE EXCEPTION OF NEW / AMENDED RESTRICTIONS PROPOSED IN THE DRAWING.

Key	
	Proposed 'No Waiting and Loading at Any Time' restriction
	Proposed 'No Left Turn' restriction
	Removal of 'One Way' system
	Proposed road markings (General)
	Existing restrictions to be removed
	Existing road markings

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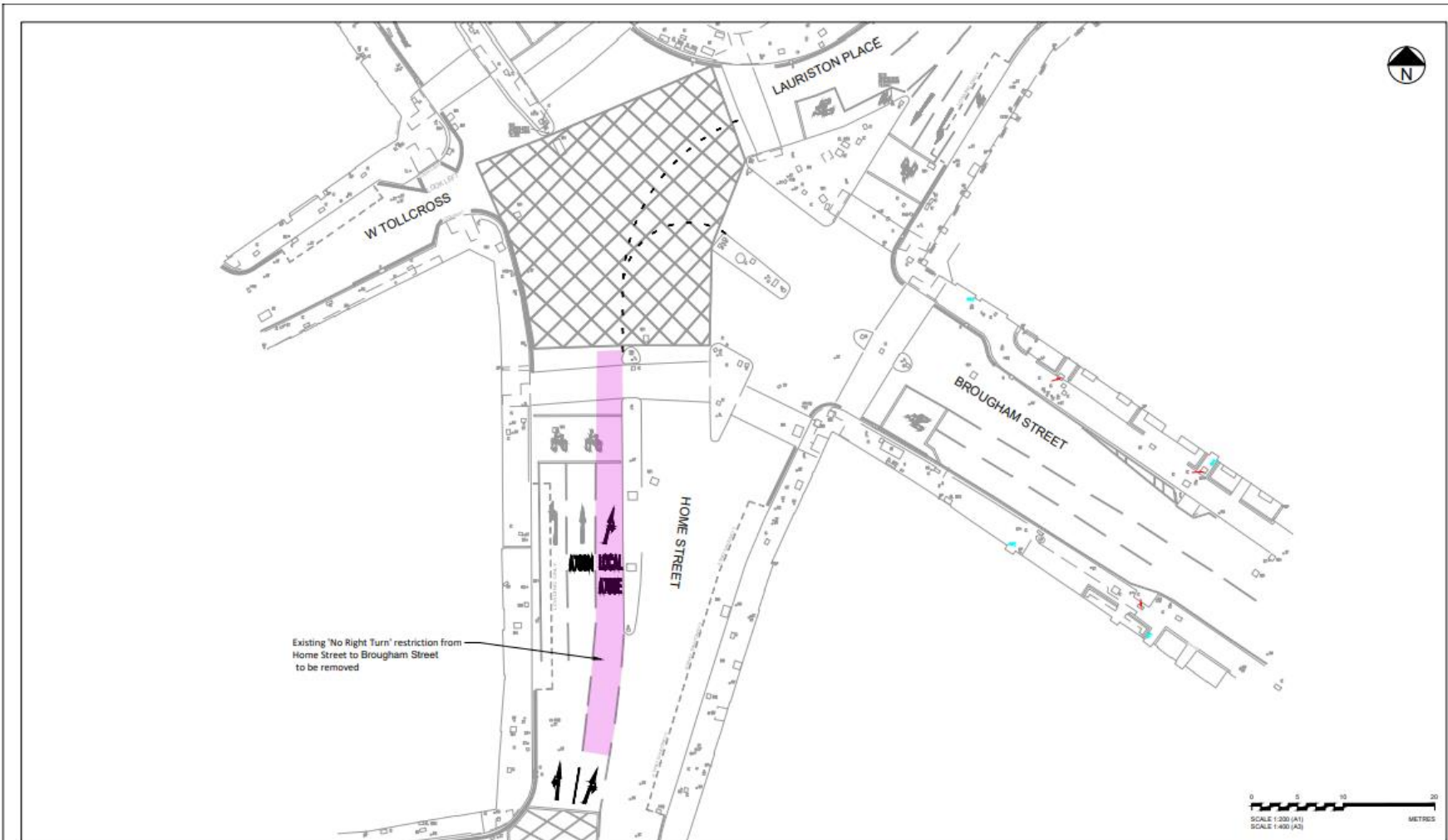
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Project: **LOW EMISSION ZONE**  
EDINBURGH

Drawing Title: **TRAFFIC REGULATION ORDER**  
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**/GARDNER'S CRESCENT**

Drawing Status: **FOR INFORMATION**

Scale: 1:250 @ A1	DO NOT SCALE
Project No: BESP003	Rev: P02
Drawing Number: <b>BESP003-LEZ-MS-TRO-DR-0004</b>	



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Rev	Rev. Date	Rev. Description	Drawn	Checked	Approved
001	15/10/2023	ISSUE FOR INFORMATION	DC	RS	DR
002	26/10/2023	FOR INFORMATION	DC	RC	DR

**Key**

- Removal of 'No Right Turn' restriction
- Proposed road markings (General)
- Existing road markings (General)

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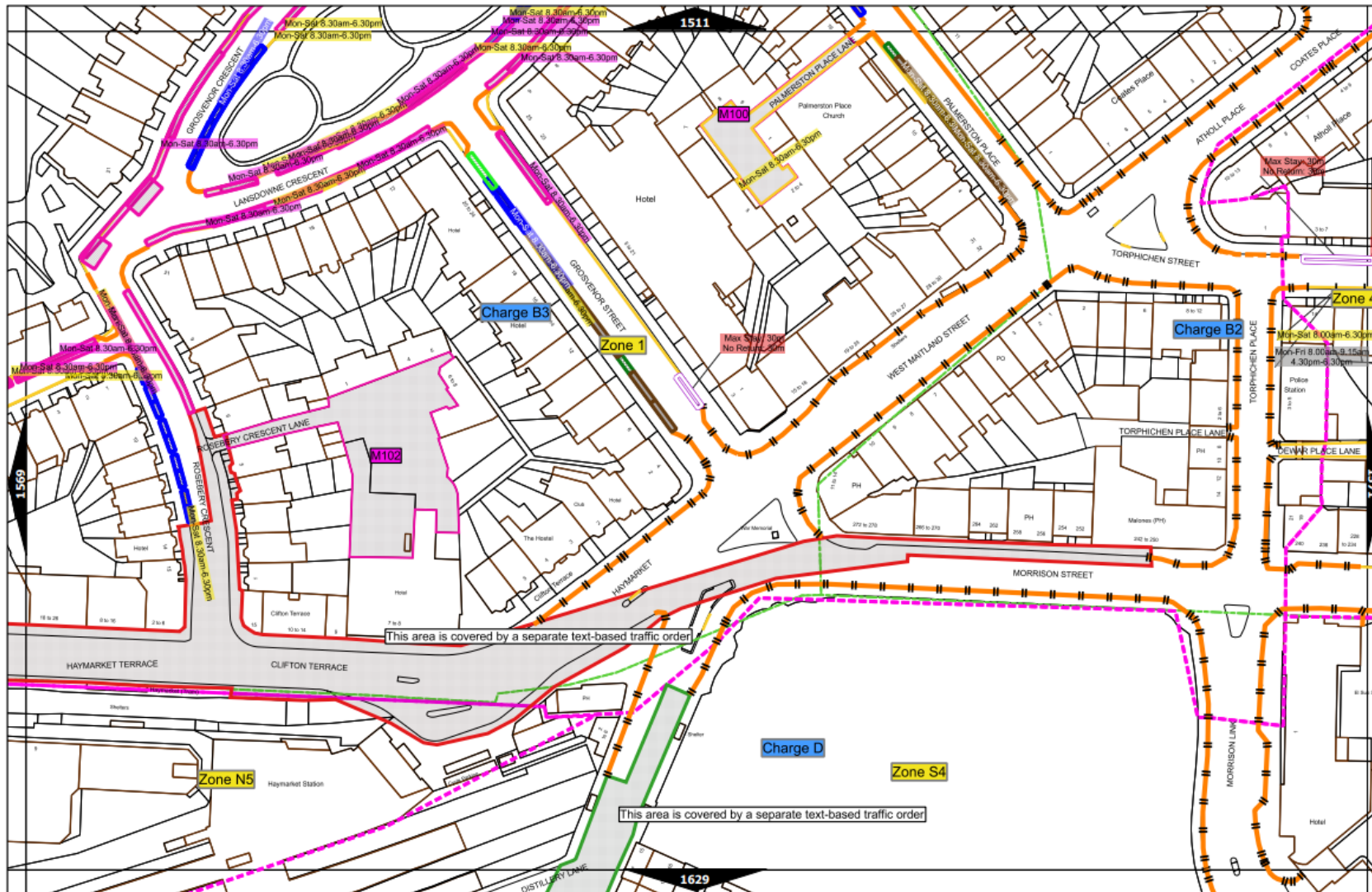
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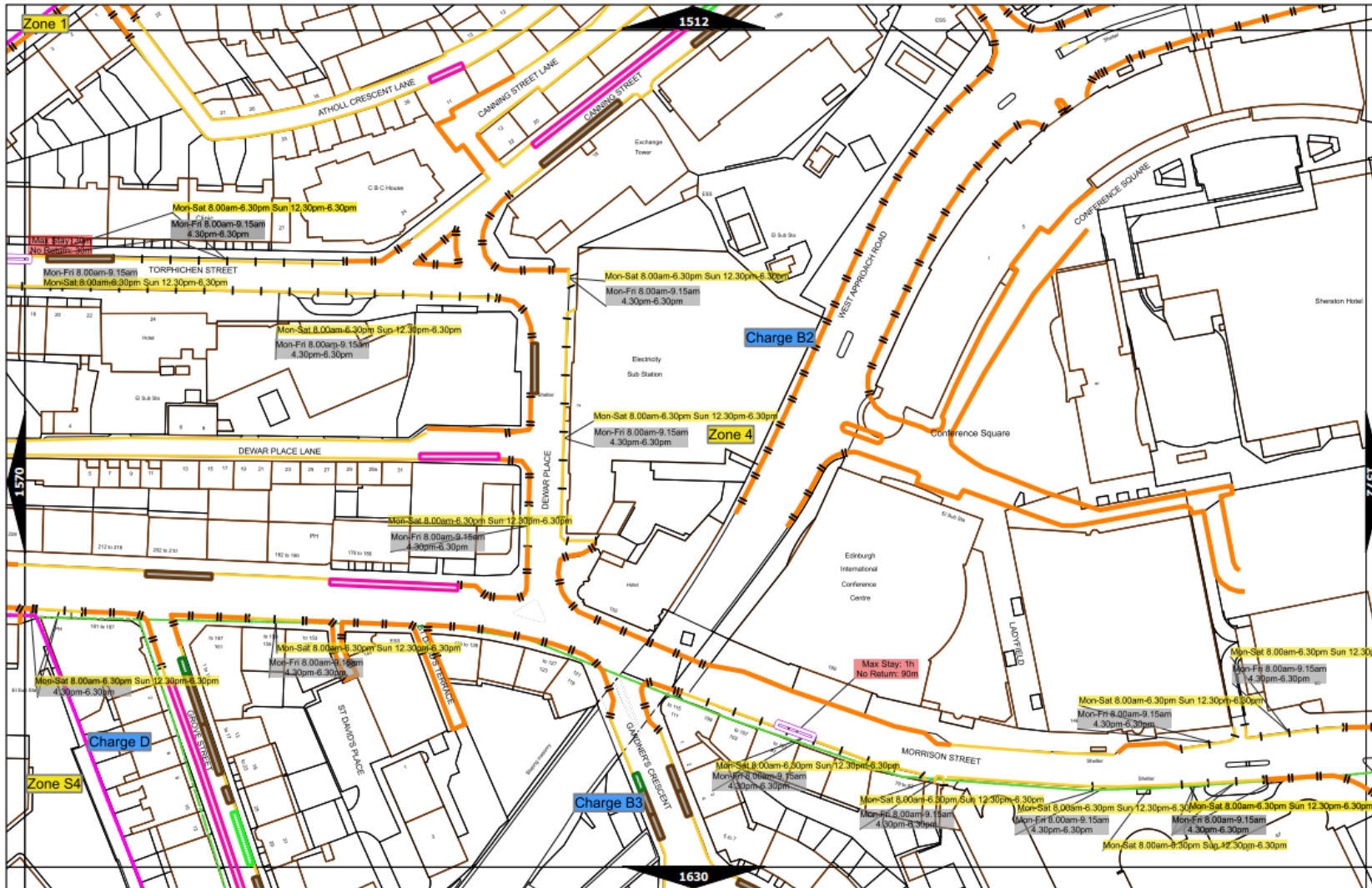
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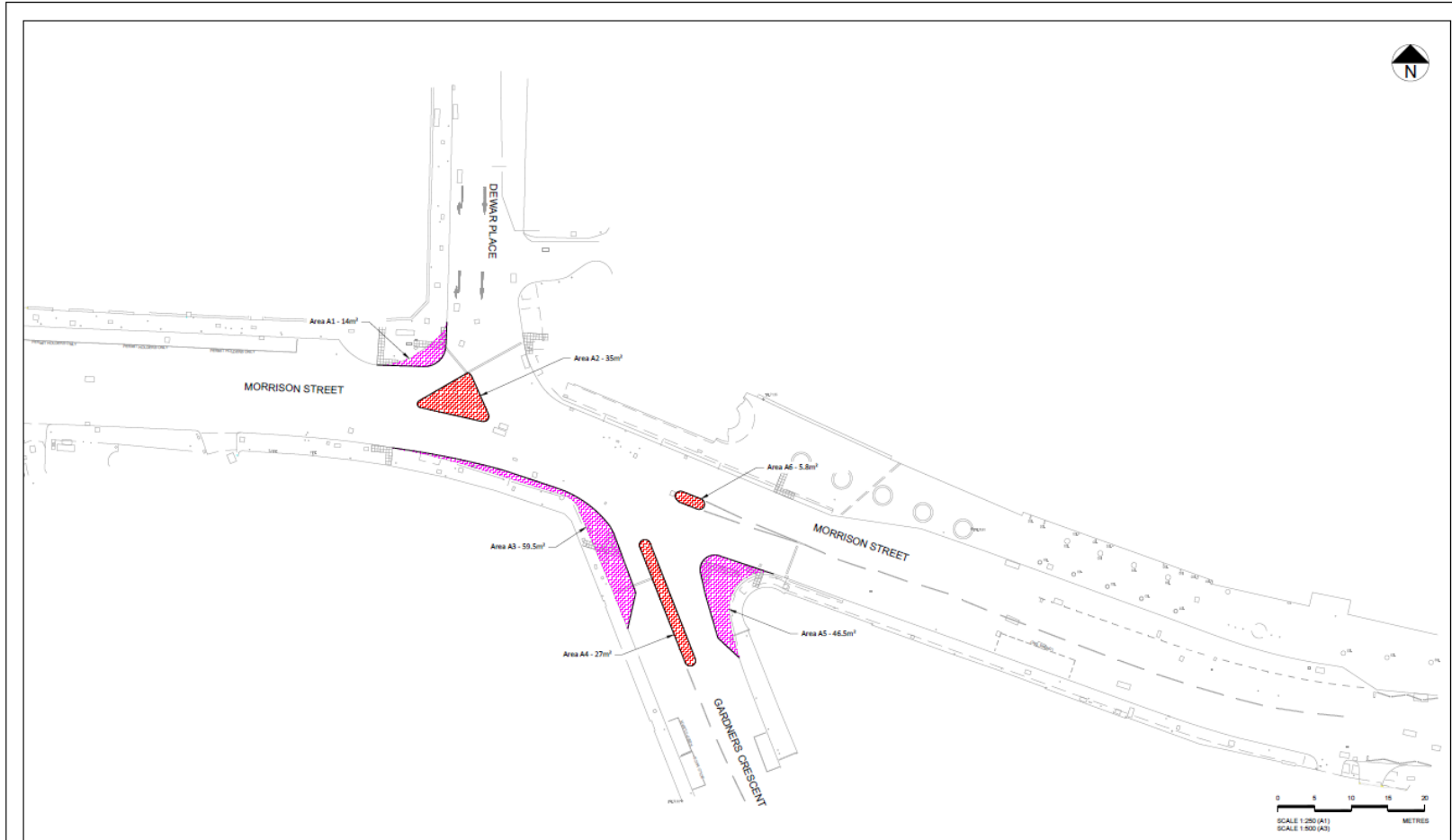
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**TRO/23/05**



# Appendix C – LEZ RSO drawing (2023)



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002	15/01/2023	FOR PUBLIC CONSULTATION	DC	MT	MS

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**Key**

- Area to be redetermined as footway
- Area to be redetermined as carriageway

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Project: **LOW EMISSION ZONE  
 EDINBURGH**

Drawing title: **REDETERMINATION ORDER  
 MORRISON STREET / B700  
 /GARDNER'S CRESCENT**

Drawing status: **FOR PUBLIC CONSULTATION**

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Drawing number: <b>BESP0023-LEZ-MS-RSO-DR-0001</b>	



## Appendix D –Statement of Reasons for LEZ TROs and RSO (2023)

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### TRO/23/04

#### Statement of Reasons

Tollcross Junction right hand turn from Home Street to Brougham Street is required to mitigate potential displacement impacts from non-compliant traffic associated with the LEZ, as evidenced by traffic modelling undertaken.

The formalising of this turn will improve safety at Tollcross Junction. Currently, an average of 19 vehicles per day make this movement illegally according to the 2022 traffic survey data.

The section of Morrison Street between Morrison Link and Dewar Place needs to become two-way to mitigate potential displacement impacts from non-compliant traffic associated with the LEZ, as evidenced by traffic modelling undertaken.

The Junction at Morrison Street-Dewar Place-Gardners' Crescent needs reconfigured to mitigate potential displacement impacts from non-compliant traffic, associated with the LEZ, as evidenced by traffic modelling undertaken and to improve safety for all users of the streets in question.

Improvements proposed at Morrison Street-Dewar Place-Gardners' Crescent Junction will improve accessibility including for those with protected characteristics, by reducing severance at this location.

Tollcross Junction, the entirety of Morrison Street and the Morrison Street-Dewar Place-Gardners' Crescent Junction are located in a sensitive City Centre location and have been identified in the Circulation Plan as areas where 'place' and sustainable modes should be prioritised, above others.

The Council declared a Climate Emergency in 2019 (which is ongoing) and transport accounts for over 25% of the City's total CO2 emissions. The works herein are considered minor in terms of all negative impacts yet are required for the Council to fulfil, in part, its statutory obligations in reducing harmful emissions via the LEZ scheme, as prescribed under Section 87(1) of the Environment Act (1995), in fulfilment of Part 1 of the Climate Change (Scotland) Act 2009 and towards achieving its net zero 2030 targets.

**TRO/23/05**

**Statement of Reasons**

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**RSO/23/03**

**Statement of Reasons**

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The Council declared a Climate Emergency in 2019 (which is ongoing) and transport accounts for over 25% of the City's total CO2 emissions. The works herein are considered minor in terms of all negative impacts yet are required for the Council to fulfil, in part, its statutory obligations in reducing harmful emissions via the LEZ scheme, as prescribed under Section 87(1) of the Environment Act (1995), in fulfilment of Part 1 of the Climate Change (Scotland) Act 2009 and towards achieving its net zero 2030 targets.

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## Appendix E – TRO/RSO objections by theme and the Council’s response (2023)

Ref no.	Theme	Representation received	Representation references:				Council response
			TRO/23/04	TRO/23/05	RSO/23/03	Technically competent objection?	
1	Motor traffic volumes	These proposals will make the road busier with motor traffic so more dangerous for cyclists on one of the council's main cycle routes. The proposals include no consideration for cyclists.	X	X	X	TRO/23/04 only.	<p><b>Motor traffic volumes</b> – the Council is committed to reducing car kilometres by 30% by 2030. Modelling indicates overall traffic volumes on Morrison Street are anticipated to reduce slightly (11%-13%) after the implementation of two way operation. Induced traffic as a result of opening Morrison Street eastbound is anticipated to be less than the level of westbound traffic displacement caused by capacity restrictions.</p> <p>The emerging Circulation Plan anticipates that Morrison Street will have future strategic roles for various key modes (active travel, public transport and general motorised traffic). General traffic/parking/loading capacity on Morrison Street would need to be reduced/relocated to accommodate appropriate walking and cycling infrastructure and to improve the public realm.</p> <p><b>Technical competency of objection</b></p> <p>Though the respondent made a representation to all three orders, the representation to TRO/23/05 and RSO/23/03 are not deemed technically competent as they do not relate to what is actually proposed by the orders. The representation to TRO/23/04 is technically competent and noted as an objection.</p>

2	<b>Cycle infrastructure/cycle safety</b>	The City Transformation Policy recognises Morrison Street as a key route for cycling across the city - the altered plans make unsuitable provision for cyclists.	X	X	X	TRO/23/04 only.	<p><b>Cycle infrastructure/cycle safety</b> – the Council is committed to rationally re-allocating street-space to sustainable modes according to its agreed City Mobility Plan. Morrison Street is identified as a 'primary network' for walking and cycling and public transport in the Circulation Plan.</p> <p>Morrison Street and surrounds have received provisional external funding from via the Active Travel Investment Programme (ATInP) but the project is currently in abeyance due to a lack of staff resource to progress. Note: the east section of Morrison Street (Gardner's Crescent to Lothian Road) is already in scope of the Lothian Road funded project.</p> <p>The emerging Circulation Plan anticipates that though Morrison Street will likely have a continued role for general motorised traffic, capacity will need to be reduced to accommodate appropriate walking and cycling infrastructure and to improve the public realm. This is also reflected in the approved Edinburgh City Centre Transformation Programme.</p> <p>The LEZ network mitigations proposed do not prevent future cycle infrastructure on Morrison Street and do not materially change the cycle provision in this area.</p> <p>The LEZ network mitigations proposed do not materially change the cycle provision in this area or worsen cycle safety. The Council follows best practice when installing new cycle infrastructure, including <a href="#">Cycling by Design</a> and the Edinburgh Street Design Guidance</p> <p>Following engagement with Spokes and comments received since January 2023, the Council have added three cycle early release signal phasing across the project area. These include:</p> <ul style="list-style-type: none"> <li>• Torphichen Place, southbound</li> <li>• Morrison Street, eastbound at Gardner's Crescent junction.</li> <li>• Gardner's Crescent, northbound.</li> </ul> <p>All arms were explored for cycle early release signals but impacts on traffic/congestion/air quality were not deemed</p>
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						<p>proportionate to stated LEZ goals in respect of potential air quality impacts.</p> <p><b>Motor traffic volumes</b> – see response(s) above</p> <p><b>Technical competency of objection</b></p> <p>Though the respondent made a representation to all three orders, the representation to TRO/23/05 and RSO/23/03 are not deemed technically competent as they do not relate to what is actually proposed by the orders. The representation to TRO/23/04 is technically competent and noted as an objection.</p>
3	<p>Cycle infrastructure/cycle safety</p> <p>Motor traffic volumes</p>	<p>I currently commute to work by bicycle 4 times per week from Corstorphine to the University of Edinburgh at Teviot Place. This means I cycle along Morrison Street a minimum of 8 times per week.</p> <p>These changes will make my commute more dangerous, more difficult and expose me to even more car fumes than at present. Given Edinburgh council's avowed intent to make active transport safer, easier and more convenient, these proposals represent a slap in the face.</p> <p>The people who have designed them have clearly decided they are willing to have a few cyclists experience possibly life-changing injuries in order to make life easier for a few car drivers.</p> <p>If you go ahead with this despite knowing that you will cause injuries that would otherwise not happen, you will end up paying out compensation to cyclists and/or bereaved relatives and have to spend money correcting your mistakes.</p> <p>I note also that I am a business owner in Edinburgh (owner of Union of Genius) that uses cargo bikes for deliveries. Our cyclists frequently need to use Morrison Street and will be exposed to greater risk because of your plans. If an employee is injured or worse while cycling on Morrison Street after these changes, we will look at our options.</p>	X	X	X	<p>TRO/23/04 only.</p> <p><b>Cycle infrastructure/cycle safety</b> – see response(s) above</p> <p><b>Motor traffic volumes</b> – see response(s) above</p> <p><b>Technical competency of objection</b></p> <p>Though the respondent made a representation to all three orders, the representation to TRO/23/05 and RSO/23/03 are not deemed technically competent as they do not relate to what is actually proposed by the orders. The representation to TRO/23/04 is technically competent and noted as an objection.</p>

4	Cycle infrastructure/safety	I write to express my objection to all the three of the above for their complete failure to make provision for cyclists in Morrison Street; this requires an abandonment of these designs and a return to the drawing board as they are not susceptible to amendment in any sensible way so starting again is the best solution to fulfilling, what after all is City Council policy, of providing support and allocations to cycling especially as this is an important cycle route.	X	X	X	To TRO/23/04 only.	<p><b>Cycle infrastructure/safety</b> – see response(s) above response</p> <p><b>Technical competency of objection</b></p> <p>Though the respondent made a representation to all three orders, the representation to TRO/23/05 and RSO/23/03 are not deemed technically competent as they do not relate to what is actually proposed by the orders. The representation to TRO/23/04 is technically competent and noted as an objection.</p>
5	Cycle infrastructure/safety	I herewith object to the traffic orders RSO/23/03, TRO/23/04 and TRO/23/05. My reasons are that they very likely make Morrison Street more dangerous and uncomfortable for cyclists. I use this street both as a cyclist and car driver. I own a battery EV.S	X	X	X	TRO/23/04 only.	<p><b>Cycle infrastructure/safety</b> – see response(s) above response</p> <p><b>Technical competency of objection</b></p> <p>Though the respondent made a representation to all three orders, the representation to TRO/23/05 and RSO/23/03 are not deemed technically competent as they do not relate to what is actually proposed by the orders. The representation to TRO/23/04 is technically competent and noted as an objection.</p>

6	<p>Cycle infrastructure/ cycle safety</p> <p>Motor traffic volumes</p>	<p>I write to you to object in full to RSO/23/03, TRO/23/04 and TRO/23/05 for Morrison Street, as they are all interdependent in how they affect the main issue I have: lack of cycling provision. Morrison Street is specifically designated in the City Centre Transformation policy document as a "main cycle route" and yet not only is this new redesign of the street failing to provide *any* cycling infrastructure at all, its primary stated goal of making the street capable of handling a higher volume of motor vehicle traffic will undoubtedly make it even more dangerous and less appealing as a cycling route. I am in full support of the objections lodged by Spokes, which explain the issues in technical detail.</p> <p>But beyond the failure of this design to adhere to published council policy, and further the result of that failure being an increase in the danger suffered by any cyclists who are forced to use the route in future, I would like to note that the entire premise of the design - that the LEZ will displace motor traffic out of the city centre and so surrounding streets must be redesigned to handle that additional traffic - represents a continued failure by the council and its officials to move beyond the 1960's in its understanding of traffic management and related policy. Nevermind increasing capacity or even preserving current levels, if the council is serious about its stated targets of reducing motor vehicle journeys it should be *reducing* capacity on roads like Morrison Street. Not just because that allows reallocation of street space for active travel routes, bus priority measures, and improved public realm, but because it has been repeatedly demonstrated in recent years that the most effective way to reduce traffic is to reduce capacity and allow the phenomenon known as "traffic evaporation" to play out.</p> <p>In short, less capacity will lead to longer journey times and increase tailbacks *in the short term*, which makes driving less convenient, which leads to less people choosing to drive in favour of alternative modes, and so in the *medium term* leading to an overall reduction in motor vehicle journeys. "Traffic" is not an immutable force of nature that must be accommodated, it is a *choice*, the result of designs - designs like the ones for Morrison Street to which I object. The council should abandon the current plans entirely and draft new ones featuring proper, segregated cycling infrastructure, improved streetscape for pedestrians, and a designed-in level of traffic reduction that is properly rooted in</p>	X	X	X	TRO/23/04 only.	<p><b>Cycle infrastructure/cycle safety</b> – see response(s) above</p> <p><b>Motor traffic volumes</b> – see response(s) above</p> <p><b>Technical competency of objection</b></p> <p>Though the respondent made a representation to all three orders, the representation to TRO/23/05 and RSO/23/03 are not deemed technically competent as they do not relate to what is actually proposed by the orders. The representation to TRO/23/04 is technically competent and noted as an objection.</p>
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		the council's stated policies and objectives regarding active travel, car mileage reduction, and combating climate change.				
7	Cycle infrastructure /cycle safety	<p>I would like to object to the plan to make Morrison street two way without any separated cycle infrastructure. I live on this street and attempt to cycle it every day. It is extremely dangerous and have been knocked off my bike once in the last year by a taxi that didn't signal.</p> <p>Please find attached the spokes objection letter. I am in full support of this and would like to see a consultation for residents of this street.</p>	X	X	X	<p>TRO/23/04 only.</p> <p><b>Cycle infrastructure/cycle safety</b>– see response(s) above</p> <p><b>Technical competency of objection</b></p> <p>Though the respondent made a representation to all three orders, the representation to TRO/23/05 and RSO/23/03 are not deemed technically competent as they do not relate to what is actually proposed by the orders. The representation to TRO/23/04 is technically competent and noted as an objection.</p>
8	<p>Cycle infrastructure/ cycle safety</p> <p>Motor traffic volumes</p> <p>Walking/public realm improvements</p>	<p>I am emailing to object to the TRO prepared to make Morrison Street two way for motor traffic. This street is designated in the City Centre Transformation policy as a main cycle route, but all of these improvements are designed for cars, not people walking or wheeling. There are no published improvements for non-motor vehicles, which goes against the agreed upon transport hierarchy and Edinburgh's 2030 car reduction targets.</p> <p>If the LEZ is going to encourage more cars to divert along Morrison Street it is even more important that any plans include segregated cycle lanes to keep people using active travel safe from even more cars.</p> <p>The Orders do at least make improvements for pedestrians at the awful Gardners Crescent junction, but, despite comments from Spokes, cyclists will continue to mix with the (increased and more polluting) traffic – and, eastbound, will place you in an uphill traffic lane next to parked cars. This is not just failing to provide the promised cycling improvements, but it is making conditions significantly worse, on this route used by many cyclists, and designated by the Council themselves as a 'main cycle route.'</p>	X	X	X	<p>TRO/23/04 only.</p> <p><b>Cycle infrastructure/cycle safety</b> – see response(s) above</p> <p><b>Motor traffic volumes</b> – see response(s) above</p> <p><b>Technical competency of objection</b></p> <p>Though the respondent made a representation to all three orders, the representation to TRO/23/05 and RSO/23/03 are not deemed technically competent as they do not relate to what is actually proposed by the orders. The representation to TRO/23/04 is technically competent and noted as an objection.</p> <p><b>Support for walking/public realm improvements</b> Notes support for improvements at Gardner's Crescent</p>

9	Air pollution	<p>I am objecting the proposed changes to traffic flow on Morrison street mentioned in RSO/23/03, TRO/23/04 and TRO/23/05 Specifically, I am one of many pedestrians who regularly walk up Morrison street from Haymarket to Lothian Road on my way to work. My daughter walks the same route to get to school. Routing traffic not permitted in the LEZ (by definition, polluting traffic) up hill on a busy road next to large numbers of pedestrians will expose these pedestrians to high levels of air pollution.</p> <p>I suffer from asthma and the only time I need my inhaler is when passing idling diesel engines (usually the taxi rank at Haymarket) and I worry about the level of diesel fumes on Morrison street if this goes ahead.</p>					<p><b>Air pollution</b> — the LEZ is designed to reduce harmful emissions from vehicles and to protect human health which is damaged by tailpipe nitrogen dioxide (NO<sub>2</sub>). The LEZ network mitigations proposed have considered the impacts of potential displaced traffic avoiding the LEZ. Modelled air quality impacts indicated potential increases of NO<sub>2</sub> at some locations on the boundary as well as other problem locations in the City Centre. However, it should be noted that these were deemed proportionate in considering the wider population benefits of the scheme.</p> <p>In addition, monitoring of NO<sub>2</sub> has been increased in the area and will continue beyond the LEZ implementation. The most recently available annual data (2021) shows concentrations are well below the statutory health-based objectives for NO<sub>2</sub>. The assessment of monitoring data is made on an annual basis as part of the Local Air Quality Management regime, prescribed under the Environment Act (1995) as amended, and an Annual Progress Report is submitted to the Scottish Government which must identify any location where breaches of the objectives are likely and if necessary, describe what the Council is doing to reduce pollution.</p> <p><b>Technical competency of objection</b></p> <p>Though the respondent made a representation to all three orders, the representation to TRO/23/05 and RSO/23/03 are not deemed technically competent as they do not relate to what is actually proposed by the orders. The representation to TRO/23/04 is technically competent and noted as an objection.</p>
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10	Cycle infrastructure/cycle safety	I am objecting to RSO/23/03, TRO/23/04, TRO/23/05 on the grounds that there hasn't been any segregated cycle infrastructure included on a key East-West route into and out of the city centre and to Gorgie and Dalry.	X	X	X	TRO/23/04 only.	<p><b>Cycle infrastructure/cycle safety</b> – see response(s) above</p> <p><b>Motor traffic volumes</b> – see response(s) above</p> <p><b>Technical competency of objection</b></p> <p>Though the respondent made a representation to all three orders, the representation to TRO/23/05 and RSO/23/03 are not deemed technically competent as they do not relate to what is actually proposed by the orders. The representation to TRO/23/04 is technically competent and noted as an objection.</p>
11	Cycle infrastructure/cycle safety  Motor traffic volumes	<p>I would like to register my objection to the above proposals in relation to plans for traffic flow on Morrison Street.</p> <p>I currently cycle to Haymarket Station to commute to Livingston by train, and the current unsegregated painted cycle lane offers no protection from the heavy traffic on Morrison Street. This makes for a very intimidating experience for any one on a bicycle.</p> <p>Under the council's own transformation plan to encourage active travel, including increasing cycling, Morrison Street is to be designated as a main cycle route. In the above proposals, Morrison Street would become open to two way traffic. However, there is no provision for a segregated cycle lane here, which essentially undermines the council's own plan.</p> <p>As I was knocked off my bike in a painted cycle lane by someone opening a car door, sustaining two fractures as a result, I am unfortunately only too well aware of the lack of protection offered by painted cycle lanes next to parked cars.</p> <p>I would therefore encourage the above plans be amended to incorporate a segregated cycle way on this very busy road by removing the proposed car parking spaces, and thereby encouraging more people to cycle safely.</p>	X	X	X	TRO/23/04 only.	<p><b>Cycle infrastructure/cycle safety</b> – see response(s) above</p> <p><b>Motor traffic volumes</b> – see response(s) above</p> <p><b>Technical competency of objection</b></p> <p>Though the respondent made a representation to all three orders, the representation to TRO/23/05 and RSO/23/03 are not deemed technically competent as they do not relate to what is actually proposed by the orders. The representation to TRO/23/04 is technically competent and noted as an objection.</p>

12	<p>Cycle infrastructure/ cycle safety</p> <p>Motor traffic volumes</p>	<p>I would like to register my objection to TRO/23/04 due to the lack of appropriate safe cycling provision.</p> <p>As a busy main road, providing safe segregated cycle lanes is essential if the city is to meet its 30% car usage reduction target. The provision on the altered layout is totally substandard and inadequate.</p> <p>In particular, the use of the central feeder lane to the Advanced Stop Lane on the westbound approach of Morrison Street to the junction with Morrison Link/Torphicen Place and southbound on Torphicen Place goes against guidance in Cycling by Design, which states that "Central approach lanes can place cycle users in a vulnerable position and are not generally recommended for less confident cycle users and alternative layouts, described previously, are likely to offer a much better solution."</p> <p>Segregated cycling infrastructure here would be transformative, allowing many more people to cycle safely and comfortably to Haymarket Station and access the new CCWEL cycle link. To make Morrison Street two-way and not take the opportunity to enable safe cycling is something I cannot support and so must object to this TRO</p>	X			TRO/23/04 only.	<p><b>Cycle infrastructure/cycle safety</b> – see response(s) above</p> <p><b>Motor traffic volumes</b> – see response(s) above</p> <p><b>Technical competency of objection</b></p> <p>Though the respondent made a representation to all three orders, the representation to TRO/23/05 and RSO/23/03 are not deemed technically competent as they do not relate to what is actually proposed by the orders. The representation to TRO/23/04 is technically competent and noted as an objection.</p>
13	<p>Air pollution</p> <p>Motor traffic volumes</p>	<p>I would like to object to the Orders RSO/23/03, TRO/23/04 and TRO/23/05 as I live on Morrison St and have concerns about:</p> <ol style="list-style-type: none"> <li>1. Increased traffic flow (and resultant increase in pollution and fumes)</li> <li>2. Safety if/when these changes would be made. I expect there would be a lot of confusion and fear that there could be collisions.</li> </ol>	X	X	X	TRO/23/04 only.	<p><b>Air pollution</b> – see response(s) above</p> <p><b>Motor traffic volumes</b> – see response(s) above</p> <p><b>Technical competency of objection</b></p> <p>Though the respondent made a representation to all three orders, the representation to TRO/23/05 and RSO/23/03 are not deemed technically competent as they do not relate to what is actually proposed by the orders. The representation to TRO/23/04 is technically competent and noted as an objection.</p>

14	<p>Air pollution</p> <p>Cycle safety</p> <p>Motor traffic volumes</p>	<p>Hello</p> <p>I walk up and down Morrison Street every day and am horrified at this proposal. In principal I am pro LEZ, but the increase in pollution on Morrison Street after its implementation was already very marked.</p> <p>The increase in traffic complexity would</p> <ul style="list-style-type: none"> <li>- increase the already horrendous air quality</li> <li>- increase the waiting time of all motorised traffic, in turn increasing fumes and increasing driver irritation therefore reducing safety</li> <li>- increase the likelihood of cyclists being knocked down.</li> <li>- once the new buildings on Morrison Street are finished, I presume there will be an expansion of traffic due to its occupiers, I note that there is a bicycle park in it, I doubt that the prospective users will be brave enough to use Morrison Street to get there.</li> </ul> <p>I think this should be reconsidered.</p>	X	X	X	TRO/23/04 only.	<p><b>Air pollution</b> – see response(s) above</p> <p><b>Cycle safety</b> – see response(s) above</p> <p><b>Motor traffic volumes</b> – see response(s) above</p> <p><b>Technical competency of objection</b></p> <p>Though the respondent made a representation to all three orders, the representation to TRO/23/05 and RSO/23/03 are not deemed technically competent as they do not relate to what is actually proposed by the orders. The representation to TRO/23/04 is technically competent and noted as an objection.</p>
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15 - SPOKES	<p>Cycle infrastructure/Cycle safety</p> <p>Motor traffic network</p> <p>Walking/public realm improvements</p> <p>Statement of reasons – need for changes</p>	<p><b>Also available in APPENDIX F</b></p> <p><b>Letter 1 – May 2023</b></p> <p>We welcome the LEZ introduced by City of Edinburgh Council to clean the air in the city centre, and we appreciate that mitigation measures may be needed in surrounding areas. This should aim to minimise rat-running (not to cater for it) given the majority of motor vehicles are LEZ compliant and to prioritise and encourage travel by active means.</p> <p>However the proposed RSO and TROs provide more car options and are a missed opportunity as regards the issues cycle users face around Tollcross junction and Morrison Street, despite the promises for Morrison Street in the City Centre Transformation policy, and the Council's recent Major Junctions Review.</p> <p>Enabling more people to walk / wheel / cycle here ties in with reducing motor vehicle movements across the city, not just the city centre, in line with council policy. Making active travel safer will actually help to reduce the need for motor vehicles here. This helps to prevent rat running by through traffic of streets that should be safe to travel actively and also prioritise / encourage modal shift to public transport.</p> <p>Furthermore, encouraging increased numbers of non-LEZ-compliant polluting vehicles into Morrison Street now will also make it politically more difficult for the Council to expand the LEZ area in future.</p> <p>We urge City of Edinburgh Council to therefore prioritise the redesign of Tollcross and Morrison Streets to improve safety of active travel users and not encourage more motor vehicle use. Especially given Tollcross and Haymarket were ranked second and third most dangerous junctions in the entire city in the Council's own recent Major Junctions Review.</p> <p>We therefore object to elements of the proposals put forward, and we urge the council to review our detailed comments below carefully.</p> <p>Detailed comments</p> <p>The following notes are based on Spokes Lothian Planning Group (Spokes PG) correspondence with CEC Officers in Jan 2023 during the initial stakeholder consultation for these</p>	X	X	X	TRO/23/04 only.	<p><b>Cycle infrastructure/Cycle safety</b> – see response(s) above.</p> <p><b>Motor traffic volumes</b> – see response(s) above</p> <p><b>Support for walking/public realm improvements</b> – see response(s) above.</p> <p><b>Statement of reasons – need for changes</b> – see response(s) above. The proposed LEZ network mitigations have been informed by modelling evidence presented during the project appraisal and made available to the public during consultation and beyond. <a href="#">It is available on our dedicated evidence webpage.</a></p> <p>The Council will continue to consider strategic general motorised networks at the city centre and citywide as part of its Circulation Plan, in respect of its agreed policies and impacts for all road users</p> <p><b>Technical competency of objection</b></p> <p>Though the respondent made a representation to all three orders, the representation to TRO/23/05 and RSO/23/03 are not deemed technically competent as they do not relate to what is actually proposed by the orders. The representation to TRO/23/04 is technically competent and noted as an objection.</p>
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		<p>draft Orders.</p> <p>1. Spokes Lothian is extremely concerned that there is no segregated cycle provision being proposed on Morrison St. The existing unsegregated (painted) central filter lanes (which remain unchanged in the proposals) are currently only used by the most confident cyclists whereas the Council wishes to grow cycle use by all categories of people.</p> <p>As kerbside parking retention is prioritised in the proposals, cycles headed east along Morrison Street will be in the door swing zone at additional risk of conflict and increased likelihood of injury or fatality. This is not acceptable and not in line with the Sustainable Transport Hierarchy.</p> <p>Morrison St is part of an east-west cycle route avoiding tram tracks of Shandwick Pl &amp; Princes St and is shown as a 'main cycle route' in the Council's Transformation policy. These Orders go nowhere to assist this City of Edinburgh Council (CEC) policy.</p> <p>2. Spokes also urges Dewar Place to include a protected uphill cycle route southbound. Clearly this must be designed carefully given the sharp left at the top, and also not to make life difficult for cyclists wanting to go straight ahead into Gardners Cres. If Morrison St is planned to become bidirectional for cars Spokes considers space should be reallocated for cycle users.</p> <p>3. At Tollcross Spokes considers the right turn allowance unnecessary pending the imminent wider review of the whole junction under the Lothian Road Boulevard project. Tollcross has been identified as a high priority dangerous junction for those who cycle. It is a multilane signalised junction which only the most confident road cyclists can use. There is already an alternative loop for motor vehicles that must undertake this journey via Ponton Street, Semple Street, Morrison Street and then Lothian Road / Earl Grey Street</p> <p>Spokes believe this route (with clear signage for drivers) would act as a deterrent for some motor vehicle journeys, whereas if avoiding the LEZ is facilitated then it will mean the aims of encouraging cleaner air will be lost as polluting vehicles will be present in higher numbers around the LEZ.</p>				
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	<p>Spokes welcomed the information that it is estimated that only ±19 vehicles undertake this manoeuvre daily, incl. several cycles (but with no information as to whether it includes ambulances and fire engines). What is the problem that needs this solution?</p> <p>4. Spokes is also concerned an additional light phasing may mean pedestrians wait even longer to cross Brougham Place at Tollcross, where the existing banned turn would be revoked. Again we consider this proposal as not being in line with the Sustainable Transport Hierarchy.</p> <p>5. CEC intends implementing the proposals soon, whereas the longer-term aspirations to improve conditions for walking/wheeling and cycles at Tollcross and Morrison Street are years away - and furthermore this added traffic will restrict active travel options at that time. The Dangerous Junctions review flagged Tollcross as the second most dangerous junction in Edinburgh and Haymarket (at the west end of Morrison St) as third worst. The present proposals do nothing to improve safety of vulnerable road users at these junctions, and the future proposals are entirely speculative</p> <p>6. Spokes welcomes the improved junction at Gardner's Crescent for pedestrians. However, we oppose the banned left turn without an exemption or alternative for cyclists (Page 204, Cycling by Design 2021). We would also strongly support early release phasing for cycles.</p> <p>Finally, there are other cities in the UK with LEZs who use prominent warning signage and public information campaigns well in advance of the LEZ areas in order to reduce traffic in and around the LEZ. This, together with other Council traffic-reduction policy measures, and SatNav technology, should reduce traffic in these areas and render some of the proposals in the draft Orders redundant anyway.</p> <p>Our primary objection, however, remains that the draft Orders aim to smooth the way for additional motor traffic here, in an already busy area, including at recognised dangerous junctions; and do not create the high quality cycling facilities promised for Morrison Street in the City Centre Transformation policy – and indeed make that harder to achieve in the future.</p> <p>We are told that CEC has future undefined proposals that</p>					
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		<p>may improve conditions for active travel in Morrison Street. However the current LEZ mitigation proposals bake in and strengthen the status quo of motor vehicle dominance. This seems contrary to the City's 30% car km reduction target.</p> <p><b>Letter 2 – 26 May 2023</b></p> <p>Further comments from Spokes Planning Group, 26 May 2023</p> <p>RSO/23/03 - redetermining of sections from footway to carriageway and vice-versa</p> <p>TRO/23/04 - changes in turnings, one-ways, etc</p> <p>TRO/23/05 - changes in waiting/ loading etc</p> <p>We're grateful for the recent meeting to discuss the mitigation measures for the Low Emission Zone.</p> <p>After further consideration, Spokes now withdraws our objections to RSO/23/03 and TRO/23/05. This is to enable the junction improvements at Gardner's Crescent, which provide a significantly improved pedestrian environment. However, we remain disappointed that there will be no significant improvements to cycling here, particularly at the existing and planned uphill approaches.</p> <p>However we maintain our objection to TRO/23/04.</p> <p>Spokes strongly supports the Low Emission Zone and its aims, however the proposed changes to Morrison Street will worsen conditions for active travel, introducing further traffic and pollution to a street that is identified as a key cycle route.</p> <p>Crucially, by removing one westbound lane, the proposed measures will make future planned improvements to Morrison Street far harder, or even impossible, to deliver. Morrison Street is already identified as part of the primary cycle network in the City Mobility Plan and as a main cycle route in the City Centre Transformation plan.</p> <p>We reiterate that:</p>					
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		<ul style="list-style-type: none"><li>• If the Council is serious about its 30% car-km reduction target, it must start designing for less motorised traffic, not more. Morrison Street has significant cycle traffic, and would have even more if it was made safer to cycle on.</li><li>• Morrison Street is a core route to Haymarket and West Edinburgh from Lothian Road, Tollcross and the Southside.</li><li>• Morrison Street, Torphichen Street, Torphichen Place and Dewar Place are all identified as part of the Primary Cycle Network in the draft City Mobility Plan, with Morrison Street also identified as a location for Place, Wheeling and Walking priority. Morrison Street is further identified as a main cycle route in the City Centre Transformation plan.</li><li>• The Circulation Plan says it should prioritise active travel over other modes.</li><li>• It is likely to be literally years before Morrison Street is made cycle-friendly (as promised), no details are known of likely facilities, and the existing Traffic Orders will make high quality cycle provision much more difficult to provide.</li></ul> <p>We urge early implementation of the following:</p> <ul style="list-style-type: none"><li>• Protected cycleways in both directions on Morrison Street and uphill on Dewar Place. This could be achieved initially at low cost using temporary materials.</li><li>• Early release lights for cyclists at all junctions, but particularly on the steep uphill exit from Dewar Place</li><li>• Allow cyclists to turn left into Gardner's Crescent, possibly using an Ardmillan Terrace/Gorgie Road-style cycleway.</li><li>• Provide a one-way exemption for cyclists on Grove Street.</li><li>• Remove the ban on cycling west on West Maitland Street.</li></ul> <p>Some of these changes require adjustments to traffic sequences and reallocation of road space from motor vehicles to active travel. However, they are the kind of changes the council must be willing to adopt if it is to make Edinburgh a city where cycling is a realistic choice for all -</p>				
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		and if it is to properly implement its own policy documents referenced above.				
16	Taxi rank/loading	We would like to object to the proposed taxi rank in front of our business, Morrison Street, as this will be detrimental to business as we will be unable to load/unload deliveries.		X		<p>No technically competent objection received.</p> <p><b>Taxi rank/loading</b></p> <p>To accommodate a proposed taxi rank and as part of the City Centre West East Link (CCWEL) project, a 40-metre section of loading and unloading bays on the north side of Morrison Street at the junction with Haymarket, may be removed according to TRO/17/91. The changes at this location were contained within a previous legal process under TRO/17/91, which was advertised in draft form for statutory consultation between Friday 20 April 2018 and Friday 18 May 2018, under powers granted by the Roads Traffic Regulation Act 1984 and in line with requirements of associated regulations.</p> <p>This legal process has now concluded, with the Order being made on 17 February 2021 and coming into effect on 31 May 2022. This does mean that it is no longer legally possible to object to these proposals.</p> <p><b>Technical competency of objection</b></p> <p>As the representation herein does not apply to the proposals of TRO/23/05 (i.e. removal of 20 metre section of loading on the north side of Morrison Street at the junction with Torphichen Place), it is not considered a technically competent objection.</p>

17	<p>Taxi rank/loading</p> <p>Parking</p>	<p>Dear Sir/Madam</p> <p>I refer to above traffic order for Morrison St with the introduction of 24 hour waiting restrictions.</p> <p>I object to this parking restrictions because,</p> <p>Businesses need delivery of supplies, customers parking close by to shop/eat etc.</p> <p>We are already struggling with Covid 19,road works/closures in Haymarket and the cost of living and this will be a big blow to businesses in the area.</p> <p>Please let me know</p>		X	No technically competent objection received.	<p><b>Taxi rank/loading</b> – see response(s) above</p> <p><b>Parking</b> – The LEZ network mitigations proposed are not removing parking provision.</p> <p><b>Technical competency of objection</b></p> <p>As the representation herein does not apply to the proposals of TRO/23/05 (i.e. removal of 20 metre section of loading on the north side of Morrison Street at the junction with Torphichen Place), it is not considered a technically competent objection.</p>
18	<p>Taxi rank/loading</p> <p>Parking</p>	<p>I am writing to object on behalf of my constituents to Order 202_- TRO/23/05.</p> <p>My constituents with businesses on Morrison Street are very concerned about the impact of waiting restrictions and loading prohibitions on their businesses, particularly concerning delivery of goods, delivery drivers picking up takeaways and customers parking.</p> <p>Additionally, we understand that a feeder taxi rank is due to be put in Morrison Street. Will taxis also be subject to the waiting restrictions, as with delivery wagons or customer's cars?</p> <p>If you could provide more details of the restrictions for my constituents that would be much appreciated.</p>		X	No technically competent objection received.	<p><b>Taxi rank/loading</b> – see response(s) above</p> <p><b>Parking</b> – see response(s) above</p> <p><b>Technical competency of objection</b></p> <p>As the representation herein does not apply to the proposals of TRO/23/05 (i.e. removal of 20 metre section of loading on the north side of Morrison Street at the junction with Torphichen Place), it is not considered a technically competent objection.</p>

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19	<p>Air pollution</p> <p>Cycle infrastructure/cycle safety</p> <p>Motor traffic volumes</p>	<p>Regarding the removal of the one-way restriction on Morrison Street (TRO/23/04).</p> <p>I have owned a basement flat on Morrison Street for over 20 years and have invested a significant amount of money bringing the flat up to a high standard from the condition I purchased it in.</p> <p>I object to the proposal for the following reasons:</p> <p>1. The introduction of the LEZ will have a severely detrimental impact on Morrison Street and my property since both Morrison Street and Dewar place lie on the boundary. The increased traffic in an already busy area will be catastrophic for the air pollution and noise with the introduction of the LEZ and will be added to even more so with the removal of the one-way.</p> <p>2. With the new office development at Haymarket, Morrison Street, with it's wide pavements, has the potential to become a 'go-to' street for outdoor eating and drinking - this is already the case with bars like Thompsons etc. as the evening sun hits the side of the road with wide pavements. The new office development will encourage new and better establishments into the current carpet shops etc. With this proposed measure, stagnant traffic and the resulting air pollution and noise, will ensure this will not happen. Morrison Street has the potential to be the gateway to Edinburgh centre as people exit Haymarket - please don't spoil this unique opportunity.</p> <p>3. From a personal standpoint, the idling traffic outside my flat at the top of Morrison Street and junction of Dewar Place will be unbearable - making it impossible to sleep in the front bedroom and relax in the living room. This is already and heightened levels due to traffic idling in Dewar Place - please don't make it worse.</p>	X			TRO/23/04 only.	<p><b>Air pollution</b> – see response(s) above</p> <p><b>Cycle infrastructure/cycle safety</b> – see response(s) above</p> <p><b>Motor traffic volumes</b> – see response(s) above</p> <p><b>Support for walking/public realm improvements</b> – see response(s) above.</p> <p><b>Technical competency of objection</b></p> <p>The representation to TRO/23/04 is technically competent and noted as an objection.</p>
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	<p>4. During the pandemic I was unfortunately exposed to the roads around my flat being used by drivers with little concern - cars, often with illegal and noisy retrofitted exhausts, would "rev" their exhausts from a standstill at each traffic light, as they performed laps of the streets. This will encourage and exacerbate the situation.</p> <p>Please carefully consider the above - the LEZ is going to be very detrimental for my property already and this will make it much worse.</p> <p>I also believe that cramming the already busy street full of more cars will remove the opportunity that the new office establishment at Haymarket will provide.</p> <p>There is the opportunity to add cycle lanes rather than more traffic which would make the street better, not much worse.</p>					
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20	<p>Air pollution</p> <p>Motor traffic volumes</p> <p>Statement of reasons – need for changes</p>	<p>We (my family and I) strongly oppose the proposal TRO/23/04 which would allow two way traffic on Morrison street.</p> <p>The street already has a very low air quality, particularly during times of heavy traffic.</p> <p>Morrison street slopes downhill to the west, with traffic lights at the junction of Morrison Link and Torphichen Place. This currently means that the noise level is bearable as the traffic slows as it approaches the junction to the west.</p> <p>The proposal would allow uphill traffic in the Easterly direction... which would likely more than double the noise pollution and significantly worsen the air quality for the residents, many of which are families.</p> <p>The proposed traffic lights (for Eastbound traffic) at the junction with Torphichen Street (and Gardner's Crescent) would result in a significant amount of stationary traffic outside the residential properties numbered 174 and up, further exacerbating the situation, particularly when buses and trucks restart from a standstill. Morrison street has residences for the ENTIRE length of the proposed development.</p> <p>Furthermore, Morrison Street is in the catchment area for Tollcross Primary school, and this proposal brings additional risk to families and children heading to school. The immediate risk from the additional traffic (which would be in both directions) and also a long term risk to our health from the additional pollution.</p>	X		TRO/23/04 only.	<p><b>Air pollution</b> – see response(s) above</p> <p><b>Motor traffic volumes</b> – see response(s) above</p> <p><b>Statement of reasons – need for changes</b> – see response(s) above.</p> <p><b>Technical competency of objection</b></p> <p>The representation to TRO/23/04 is technically competent and noted as an objection.</p>
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		<p>The proposal itself does not contain links to the information it references such as "traffic modelling undertaken", nor are any extracts included. Thus, we do not have all the information available to us.</p> <p>The proposal conflates what seem like two separate proposals to adjust the traffic flow at Tollcross junction and the removal of the one-way restriction at Morrison Street. These are half a mile away from each other. There is no reason given as to why these two changes are in the same proposal. In order to object to a part of it, we have to object to the whole. For clarity, my objection is mainly in relation to the works at Morrison Street.</p> <p>The following paragraph comes from the "Statement of reasons" document: "<a href="https://www.edinburgh.gov.uk/downloads/file/33057/tro-23-04-statement-of-reasons">https://www.edinburgh.gov.uk/downloads/file/33057/tro-23-04-statement-of-reasons</a>":</p> <p>"Tollcross Junction, the entirety of Morrison Street and the Morrison Street-Dewar Place-Gardners' Crescent Junction are located in a sensitive City Centre location and have been identified in the Circulation Plan as areas where 'place' and sustainable modes should be prioritised, above others."</p> <p>The proposal does not include any prioritisation for sustainable modes of transport. The proposal proposes the exact opposite. It adds a lane of traffic HEADED TOWARDS the LEZ .... more pollution, more noise, and LESS room for cyclists and residents. There is NO evidence provided to show how this so-called "reason" is fulfilled by the proposal.</p> <p>The following paragraph (also an extract from the "Statement of reasons" document) has no supporting evidence either:</p>					
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		<p>"The Council declared a Climate Emergency in 2019 (which is ongoing) and transport accounts for over 25% of the City's total CO2 emissions. The works herein are considered minor in terms of all negative impacts yet are required for the Council to fulfil, in part, its statutory obligations in reducing harmful emissions via the LEZ scheme, as prescribed under Section 87(1) of the Environment Act (1995), in fulfilment of Part 1 of the Climate Change (Scotland) Act 2009 and towards achieving its net zero 2030 targets."</p> <p>The phrase ..."The works herein are considered minor in terms of all negative impacts yet"... There is no evidence provided justifying this sentence. The negative impacts are NOT minor for the residents and families.</p>				
21	<p>Air pollution</p> <p>Motor traffic volumes</p>	<p>I wish to object to the above proposal on the grounds that it will greatly increase congestion and pollution on a residential street.</p> <p>The street, Morrison Street, has the potential for considerable amenity improvement following the major developments at Haymarket. This will be less likely to be effected if the street becomes a more heavily polluted area.</p>	X			<p><b>Air pollution</b> – see response(s) above</p> <p><b>Motor traffic volumes</b> – see response(s) above</p> <p><b>Technical competency of objection</b></p> <p>The representation to TRO/23/04 is technically competent and noted as an objection.</p>



To: TRO.Consultations@edinburgh.gov.uk

## LEZ Mitigation Traffic Orders

Objection from Spokes Planning Group, May 2023

*This objection considers the proposals for RSO-23-03 TRO-23-04 TRO-23-05*

*The Council is proposing to carry out adjustments west of the Low Emission Zone. The aim of the scheme is to mitigate the assumed impacts of LEZ on motor vehicle movements:*

*[RSO/23/03](#) is the redetermining of sections from footway to carriageway and vice-versa*

*[TRO/23/04](#) is the changes in turnings, one-ways, etc*

*[TRO/23/05](#) is the changes in waiting/ loading etc*

## General comments

We welcome the [LEZ introduced by City of Edinburgh Council](#) to clean the air in the city centre, and we appreciate that mitigation measures may be needed in surrounding areas. This should aim to minimise rat-running (not to cater for it) given the majority of motor vehicles are LEZ compliant and to prioritise and encourage travel by active means.

However the proposed RSO and TROs provide more car options and are a missed opportunity as regards the issues cycle users face around Tollcross junction and Morrison Street, despite the promises for Morrison Street in the City Centre Transformation policy, and the Council's recent Major Junctions Review.

Enabling more people to walk / wheel / cycle here ties in with reducing motor vehicle movements across the city, not just the city centre, in line with council policy. Making active travel safer will actually help to reduce the need for motor vehicles here. This helps to prevent rat running by through traffic of streets that should be safe to travel actively and also prioritise / encourage modal shift to public transport.

Furthermore, encouraging increased numbers of non-LEZ-compliant polluting vehicles into Morrison Street now will also make it politically more difficult for the Council to expand the LEZ area in future.

We urge City of Edinburgh Council to therefore prioritise the redesign of Tollcross and Morrison Streets to improve safety of active travel users and not encourage more motor vehicle use. Especially given Tollcross and Haymarket were ranked second and third most dangerous junctions in the entire city in the Council's own recent [Major Junctions Review](#).

We therefore object to elements of the proposals put forward, and we urge the council to review our detailed comments below carefully.

## Detailed comments

*The following notes are based on Spokes Lothian Planning Group (Spokes PG) correspondence with CEC Officers in Jan 2023 during the initial stakeholder consultation for these draft Orders.*

1. Spokes Lothian is extremely concerned that there is no segregated cycle provision being proposed on Morrison St. The existing unsegregated (painted) central filter lanes (which remain unchanged in the proposals) are currently only used by the most confident cyclists whereas the Council wishes to grow cycle use by all categories of people.

As kerbside parking retention is prioritised in the proposals, cycles headed east along Morrison Street will be in the door swing zone at additional risk of conflict and increased likelihood of injury or fatality. This is not acceptable and not in line with the Sustainable Transport Hierarchy.

Morrison St is part of an east-west cycle route avoiding tram tracks of Shandwick Pl & Princes St and is shown as a 'main cycle route' in the Council's [Transformation policy](#). These Orders go nowhere to assist this City of Edinburgh Council (CEC) policy.

We are told that CEC has future undefined proposals that *may* improve conditions for active travel in Morrison Street. However the current LEZ mitigation proposals bake in and strengthen the status quo of motor vehicle dominance. This seems contrary to the City's 30% car km reduction target.

2. Spokes also urges Dewar Place to include a protected uphill cycle route southbound. Clearly this must be designed carefully given the sharp left at the top, and also not to make life difficult for cyclists wanting to go straight ahead into Gardners Cres. If Morrison St is planned to become bidirectional for cars Spokes considers space should be reallocated for cycle users.

3. At Tollcross Spokes considers the right turn allowance unnecessary pending the imminent wider review of the whole junction under the Lothian Road Boulevard project. Tollcross has been identified as a high priority dangerous junction for those who cycle. It is a multilane signalised junction which only the most confident road cyclists can use. There is already an alternative loop for motor vehicles that must undertake this journey via Ponton Street, Semple Stree, Morrison Street and then Lothian Road / Earl Grey Street

Spokes believe this route (with clear signage for drivers) would act as a deterrent for some motor vehicle journeys, whereas if avoiding the LEZ is facilitated then it will mean the aims of encouraging cleaner air will be lost as polluting vehicles will be present in higher numbers around the LEZ.

Spokes welcomed the information that it is estimated that only  $\pm 19$  vehicles undertake this manoeuvre daily, incl. several cycles (but with no information as to whether it includes ambulances and fire engines). What is the problem that needs this solution?

4. Spokes is also concerned an additional light phasing may mean pedestrians wait even longer to cross Brougham Place at Tollcross, where the existing banned turn would be revoked. Again we consider this proposal as not being in line with the Sustainable Transport Hierarchy.

5. CEC intends implementing the proposals soon, whereas the longer-term aspirations to improve conditions for walking/wheeling and cycles at Tollcross and Morrison Street are years away - and furthermore this added traffic will restrict active travel options at that time. The Dangerous Junctions review flagged Tollcross as the second most dangerous junction in Edinburgh and Haymarket (at the west end of Morrison St) as third worst. The present proposals do nothing to improve safety of vulnerable road users at these junctions, and the future proposals are entirely speculative.

6. Spokes welcomes the improved junction at Gardner's Crescent for pedestrians. However, we oppose the banned left turn without an exemption or alternative for cyclists (Page 204, Cycling by Design 2021). We would also strongly support early release phasing for cycles.

Finally, there are other cities in the UK with LEZs who use prominent warning signage and public information campaigns well in advance of the LEZ areas in order to reduce traffic in and around the LEZ. This, together with other Council traffic-reduction policy measures, and SatNav technology, should reduce traffic in these areas and render some of the proposals in the draft Orders redundant anyway.

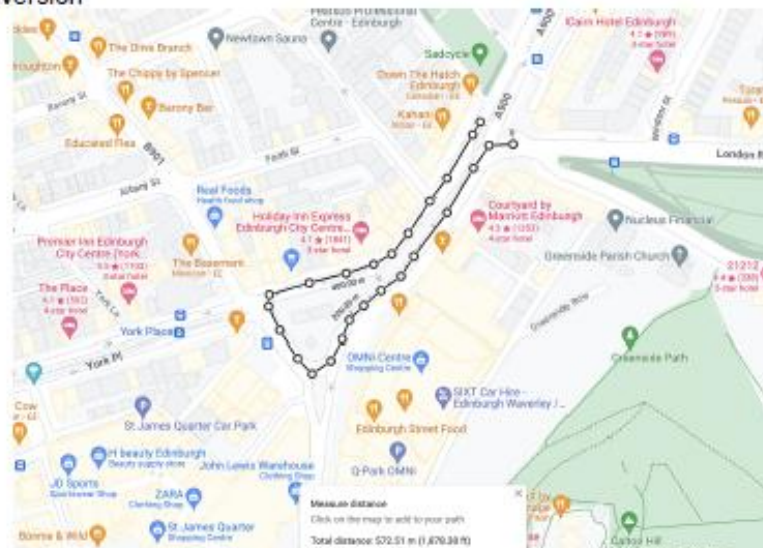
Our primary objection, however, remains that the draft Orders aim to smooth the way for additional motor traffic here, in an already busy area, including at recognised dangerous junctions; and do not create the high quality cycling facilities promised for Morrison Street in the City Centre Transformation policy – and indeed make that harder to achieve in the future.

## Additional comments

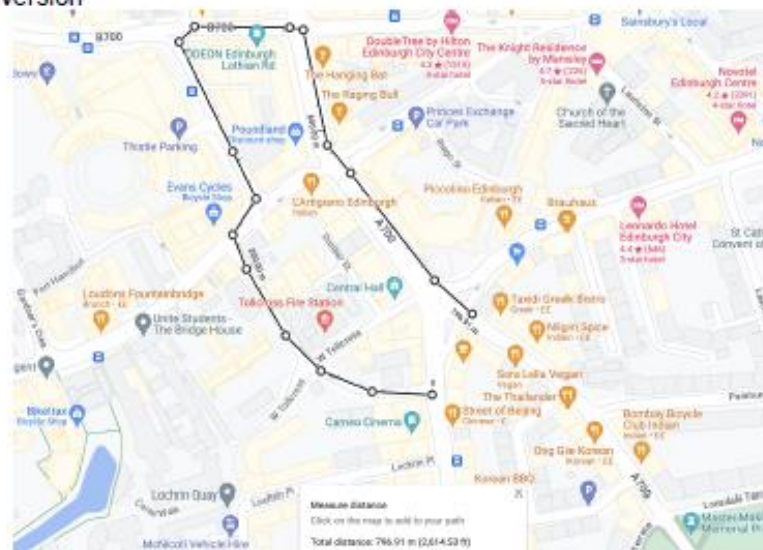
### Banned Right Turns

Spokes has compared the long-standing banned right turn at Tollcross into Brougham Place with others recently implemented by CEC.

London Road to Elm Row  
572 metre diversion



Home Street to Brougham Place  
796 metre diversion



# LEZ Mitigation Traffic Orders

Further comments from Spokes Planning Group, 26 May 2023

**RSO/23/03** - redetermining of sections from footway to carriageway and vice-versa

**TRO/23/04** - changes in turnings, one-ways, etc

**TRO/23/05** - changes in waiting/ loading etc

We're grateful for the recent meeting to discuss the mitigation measures for the Low Emission Zone.

After further consideration, Spokes now withdraws our objections to **RSO/23/03** and **TRO/23/05**. This is to enable the junction improvements at Gardner's Crescent, which provide a significantly improved pedestrian environment. However, we remain disappointed that there will be no significant improvements to cycling here, particularly at the existing and planned uphill approaches.

However we maintain our objection to **TRO/23/04**.

Spokes strongly supports the Low Emission Zone and its aims, however **the proposed changes to Morrison Street will worsen conditions for active travel, introducing further traffic and pollution to a street that is identified as a key cycle route.**

Crucially, by removing one westbound lane, the proposed measures will make future planned improvements to Morrison Street far harder, or even impossible, to deliver. Morrison Street is already identified as part of the primary cycle network in the City Mobility Plan and as a main cycle route in the City Centre Transformation plan.

We reiterate that:

- If the Council is serious about its 30% car-km reduction target, it must start designing for less motorised traffic, not more. Morrison Street has significant cycle traffic, and would have even more if it was made safer to cycle on.
- Morrison Street is a core route to Haymarket and West Edinburgh from Lothian Road, Tollcross and the Southside.
- Morrison Street, Torphichen Street, Torphichen Place and Dewar Place are all identified as part of the Primary Cycle Network in the draft City Mobility Plan, with Morrison Street also identified as a location for Place, Wheeling and Walking priority. Morrison Street is further identified as a main cycle route in the City Centre Transformation plan.
- The Circulation Plan says it should prioritise active travel over other modes.
- It is likely to be literally years before Morrison Street is made cycle-friendly (as promised), no details are known of likely facilities, and the existing Traffic Orders will make high quality cycle provision much more difficult to provide.

We urge early implementation of the following:

- Protected cycleways in both directions on Morrison Street and uphill on Dewar Place. This could be achieved initially at low cost using temporary materials.
- Early release lights for cyclists at all junctions, but particularly on the steep uphill exit from Dewar Place
- Allow cyclists to turn left into Gardner's Crescent, possibly using an Ardmillan Terrace/Gorgie Road-style cycleway.
- Provide a one-way exemption for cyclists on Grove Street.
- Remove the ban on cycling west on West Maitland Street.

Some of these changes require adjustments to traffic sequences and reallocation of road space from motor vehicles to active travel. However, they are the kind of changes the council must be willing to adopt if it is to make Edinburgh a city where cycling is a realistic choice for all - and if it is to properly implement its own policy documents referenced above.

# Appendix G – CCWEL TRO/17/91 drawing (2018)

