

LEITH LINKS

COMMUNITY COUNCIL

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

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

About us and our area

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

Summary and recommendations

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

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

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

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

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

Our engagement

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

Overall views on the proposed LTN

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

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

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

Quality of evidence/proposals not linked to evidence

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

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

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

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

Perfect storm from multiple disjointed proposals and disruption

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

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

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

Learning lessons from elsewhere?

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

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

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

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

Quality of engagement

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

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

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

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

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

Quality of the LTN leaflet – content and accessibility

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

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

Misrepresentation of engagement events and lack of transparency and best practice

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

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

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

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

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

Conclusions

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

LLCC

9 July 2021