

CITY OF EDINBURGH COUNCIL
TRANSPORT AND ENVIRONMENT COMMITTEE

Item No 3

12 October 2023

DEPUTATION REQUESTS

Subject	Deputation
3.1 In relation to item 7.4 – East London Street	New Town and Broughton Community Council (verbal and written submission)
3.2 In relation to item 7.5 – Litter Bin Siting Policy	Leith Links Community Council (written submission)
3.3 In relation to item 8.2 – Speed Limits Review – 20mph	Friends of Prestonfield Primary School, Parent Council (written submission)
3.4 In relation to item 7.2 – Road Safety – Service and Delivery Plan	Sight Scotland and Sight Scotland Veterans (written submission)

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Deputation to Transport and Environment Committee meeting to be held on 12 October 2023 regarding item 7.4: East London Street

The New Town and Broughton Community Council welcomes the speed with which this matter has been brought back to Committee following the consideration of the petition in August but is concerned that the report contains incomplete and perhaps misleading information on which Councillors will be expected to make substantive decisions about the future of East London Street.

We are disappointed that the report presented to the Transport and Environment Committee does not make any recommendations to address the primary concern of the residents, namely the level of noise and vibration that is being generated by the volume of traffic passing over a poorly maintained setted road surface. This lack of recommended action appears to be based on a misinterpretation of the results of the noise survey conducted in December 2022. The attached report highlights a number of concerns with the presentation and interpretation of the data from this survey. We respectfully suggest that the concerns raised in this report are properly considered before the issue of excessive noise is dismissed.

There is also no recognition that due to the need to keep this road open while it was required as a diversion for the Trams and other road projects, there has been no significant maintenance conducted over the last three years. In section 4.7 it is stated that East London Street was only used as a diversion for "short periods". This is not correct. All westbound traffic from London Road was diverted between Leith Street and East London Street for an extended period of time while Leith Walk, Picardy Place and York Place were unavailable. No information is included in the report on the current condition of the road surface nor any details of when it was last inspected.

We welcome the decision to undertake a new traffic volume and speed survey but are disappointed there are no plans to include the results of this survey in the decision-making process about the future of this street. The data from 2019 is unlikely to properly reflect current traffic volumes and speeds and therefore it is critical that updated information is used to inform any decisions that are made about the road surface and traffic calming. Given the concerns about the use of this street by out-of-service buses, we believe that it is important to ensure that the survey is able to distinguish between HGV's and PSV's. We therefore suggest that a video survey should be conducted to complement the standard tube survey.

We are pleased that East London Street is now part of the Council's atmospheric monitoring but as the first year's data will not be available until after February 2024, it appears premature to be making decisions about this road especially given that there is a school on this road. We have received representations from parents about the level of traffic on this street and the potential impact on the health of their children. We also note that there is a wider review ongoing to look at alternative routes for buses and other traffic which will not be completed until November 2023. We suggest that this is a further reason to delay any decisions about the long-term future of this street.

Mike Birch

Transport Convenor, New Town and Broughton Community Council

10 October 2023

**Deputation to Transport and Environment Committee meeting to be held on 12 October 2023
regarding item 7.4: East London Street (Attachment 1)**

**Commentary on aspects of the East London Street report for the Transport and Environment
Committee meeting 12 October 2023**

General Comments

The report is a detailed response to the petition submitted to the Council by Ross MacCallum, and the subsequent discussion of the petition at the Transport and Environment Committee meeting of 17th August 2023. The Committee asked for the report to be completed in time for a subsequent meeting on 12th October 2023.

The original petition focused on the nighttime noise and vibration from out-of-service buses using East London Street, and the sleep disturbance that this causes to residents. Other potential issues were raised at the meeting, such as air pollution, traffic volumes, and speeding. The report has sought to address all of these issues, and as a result the core problem of nighttime noise nuisance has not received the attention it needs. Importantly, **errors in the interpretation of noise levels made in the report lead to incorrect recommendations being made.**

Comments on the interpretation of noise data

In paragraph 4.10 the report refers to the *Noise Insulation Regulations 1975* for guidance on acceptable noise levels, though it also notes that these regulations are not actually applicable in this case. The regulations define a threshold for acceptable road noise levels as being less than 1 dB above an L10(18-hour) value of 68 dB. In simple terms, **L10 (18-hour) is the average of the loudest tenth (6 minutes) of each daytime hour** between 0600 and 2400. Note that by definition the measure is not a continuous average and it *excludes nighttime noise*.

In paragraph 4.11 the report refers to a noise monitoring survey of East London Street which it says showed that daytime and nighttime noise levels were generally below 68 dB (while noting that peak noise levels were much higher) and goes on to say in paragraph 4.12 that no interventions are necessary because of this. However, the noise monitoring survey did not measure L10 (18-hour) – instead it made two different measurements: **LAeq(day) is a continuous average of daytime noise levels** between 0700 and 2300, while **LAeq(night) is a continuous average of nighttime noise levels** between 2300 and 0700. Note that this survey therefore *includes nighttime noise* measurements.

The respective definitions of L10(18-hour), LAeq(day) and LAeq(night) mean that they are not equivalent, and **cannot be compared**. L10(18-hour) concentrates only on the *loudest* moments during the sample period, while LAeq(day) and LAeq(night) are continuous averages that include *all* sound measurements and therefore they will always be lower in value than L10(18-hour) taken at the same location. Given that the values of LAeq(day) were already 66, 65 & 67 dB at the three survey locations on East London Street, it is very likely that measurements of L10(18-hour) taken at the same locations would be much higher than the 68 dB threshold used by the report, however it is impossible to be certain without further survey work. Nevertheless, **the conclusion made in paragraph 4.12 is clearly not justified by current data.**

Comments on the impact of night-time noise

The petition stresses in particular the impact that *night-time* noise is having on East London Street residents, but the report doesn't focus on this aspect. The use of a threshold measure in the report that specifically *excludes* night-time noise (see above) is a case in point.

The European Parliament passed the Environmental Noise Directive 2002 (END) in response to a previous World Health Organisation (WHO) report on the human health impacts of high levels of

environmental noise. END was implemented in Scotland by the Environmental Noise (Scotland) Regulations 2006, which remain in force. While END leaves it up to member states to set their own measures and limits for noise, the methodologies and measurements that it promotes are intended to take into account not only the absolute noise level, but also how many people are likely to be affected by it and how annoying it will be for them in different circumstances. There is a particular recognition that night-time noise has much worse adverse effects on people than daytime noise.

WHO has published updated guidance in its Environmental Noise Guidelines 2019, which **strongly recommends that night-time road noise levels are kept below a LAeq(night) value of 45 dB**. The noise measurement survey on East London Street found that values of LAeq(night) at the three measurement locations were 60, 59 and 62 dB. These values are very significantly higher than the WHO recommended maximum and so **high night-time noise levels are likely to be causing significant health impacts for East London Street residents**.

Dr Douglas Reed

8th October 2023



Written Deputation

From: Leith Links Community Council

To: City of Edinburgh Council

Transport and Environment Committee – 12 October 2023

Item 7.5 – Litter Bin Siting Policy

1. Purpose

1.1 To make representations to the Committee in relation to the proposed amendments to the Litter Bin Siting Policy.

2. Background and our experience with litter and bins locally

2.1 **Our role:** The Committee will be familiar with the role and constitution of local Community Councils to act as a voice for our local area. We do that by raising 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. Leith Links Community Council (Leith Links CC) covers an area within the Leith Ward, bounded by the red line on the map at Annex A. Although the Litter Bin siting policy is City wide it affects the Leith Links CC area.

2.2 **Local problems:** We take a close interest in the problem of litter and waste on the streets, parks and paths of our area and want to see big improvements. Our area incorporates Leith Links and the Restalrig Railway path which functions as a linear park – including a long overgrown outdoor gym - as well as an off road route. Both areas have too much litter and too few bins, especially the Railway Path along its length but especially to the rear of the Academy, where built up litter within the undergrowth is only ever cleared by volunteer effort. Lack of bins makes clearing the litter a much tougher job than it would otherwise be. This surely represents a deterioration in the local natural environment?

2.3 **Bins and behaviour :** Within discussion of a proposed new Masterplan for Leith Links we have asked for more bins within the park, particularly highlighting the enduring problem of litter around benches within the park which are further than 20m from the road. We can see little evidence that people who have, for example, sat at a bench and consumed a bottle of vodka or a takeaway lunch from the nearby Tesco superstore will carry the rubbish to the edge of the park to put in a bin. The benches are surrounded

with litter which again relies on volunteer effort to clear. If we are going to tackle litter in the city and the Leith Links CC area there need to be no excuses to littering such as 'I could not see a bin/it was too far away'. That means more bins, sometimes bigger (double) bins at the most heavily used locations, very clear signage and social marketing to bring behaviour change and there also needs to be a role for enforcement. The approach should be designed from learning about what has worked – we would question if the Councils plastic banners taped to lamp posts marketing technique is sufficient – it also frequently adds to litter within the park as these lamp post wraps break off and become wind blown.

2.4 Littering is anti social and there can be few reasonable excuses or justifications for it. We appreciate the point that more litter is associated with areas of multiple deprivation but being poor or experiencing deprivation surely does not mean you are completely unable to put your rubbish in a bin?

2.5 **Bin location makes a difference** : We have welcomed some additional bins recently placed within Leith Links especially one that came to be located by the Vanbrugh Place bus stop when the previous location against a wall almost instantly attracted public urination next to private property. Simply relocating it right by the bus stop has reduced significantly the amount of litter around that bus stop on the grass of the park. The bus stop is used by lots of school pupils and had often been surrounded by drink containers and vape wrappers – purchased up Lochend Rd but unwrapped on the walk to the bus stop - and there is now visibly less rubbish immediately around the stop since a bin was located there. Unless litter pickers operate in the Links much litter gets shredded by grass cutters and enters the environment.

2.6 **Engagement with active citizens is weak** : This additional bin/relocation only happened as a result of intervention and some effort to engage by the Community Council who are arguably in a more powerful position than individuals. But it should be easy for any citizen to inform the Council about what would improve the area, especially something as fundamental as litter and street cleansing. Too often members of the public who do litter picking, report problems and request additional bins, using the online form, are faced with admin obstacles to reporting issues or no response. On social media one can see a host of people reporting litter regularly to @edinhelp but after a while those who regularly pick litter locally give up as the Council does not seem to act on the 'data' and insight they provide or respond to requests. The LLCC is aware of one request made for a bin by another local bus stop where there is lots of rubbish in the adjacent hedge though acknowledged has not had any further response for a year. Why should the citizen keep chasing if the Council cannot be bothered to respond? **We would like to see the Council working with and acknowledging the efforts of local people and work with them to identify local solutions to littering, beyond bins to behaviour change. The Council could usefully create a network of litter**

pickers to provide data and insight to help with bin siting decisions but also to celebrate their work in a more systematic way.

2.7 Bin siting policy not ambitious because there is no strategy or targets:

Given our interest in getting more bins in the local area and Leith Links we had high hopes for the Litter Bin siting policy. But it disappoints in a number of respects relating to strategy, policy, process and results. We suggest that Cllrs ask for the policy to be further developed including in the ways set out in 'Asks' below.

- 2.4 **Partner with CCs :** Community Councils are able to help the Council engage with the public in a hyper local way. In addition to suggesting improvements in process we can help to gather evidence from the public, audit and report on what is happening on the ground and communicate change to local people – our email newsletter for example has c1,500 followers as does our X/twitter account. As the Council looks to revise the TORs for Community Councils and oversee elections in 2024 **it would be helpful to see more strategic thinking about working with Community Councils on highly local aspects of policies like 'litter bin siting' and tackling litter.**

Asks and comments

- 2.6 We note the content of the covering paper and Appendix 1 'Litter bin siting policy' and the proposed amendments. We have the following comments and asks:
- a) We **agree** that location and servicing of bins in parks, on paths and near bus stops are key areas to focus on. We also agree there needs to be signage to bins within parks – there is none in Leith Links or on the Restalrig Railway path.. However the specific **amendments to the policy at this stage are pretty marginal and seem unlikely to be sufficient to make a difference to litter.** Additionally this **policy has no success measures so how will the Council know that any objectives are being achieved?**
 - b) We **suggest** that to fill the strategic gap Cllrs ask Officers to **develop a clear litter reduction strategy with measurable goals and results, and operational targets.** The strategy should set out the Council's theory of behaviour change and show clearly what interventions, in addition to positioning and emptying litter bins, the Council will make to ensure those bins are used. It may be the work being done currently by Scotland is Beautiful to develop behaviour change interventions would help but, as highlighted at the end of this deputation, there is already considerable learning from Councils in other parts of the UK that Edinburgh could usefully look at for ideas on public communications including local signage as well as bin siting policy.
<https://www.keepsotlandbeautiful.org/news/2023/september/key-stakeholders-meet-in-edinburgh-to-discuss-litter-strategy-action-plan/>

- c) **We are disappointed that there is no change proposed at this point to siting bins within 20m of a road.** We understand that it is undesirable for large bin lorries to drive on park paths, especially during the daytime. However the discussion of this constraint in 4.5 and 4.6 suggests that the model needs to change to provide a better service. The paper contains no proposals for how litter more than 20m from a road but within a public park or path the Council has responsibility to manage will be cleared, ever. If there is reliance on volunteer effort how is this to be engaged consistently? Perhaps the model needs to change. Bins in parks and on paths could be serviced with quad bikes or small tractor type vehicles with trailers swapping out the inner bins with clean ones and delivering the full bins to the side of the road for removal or emptying and return. The service seems to be being designed around the vehicles rather than rethinking the vehicles in light of the need to service bins off road. Whilst approving the modest amendments to the bin siting policy proposed **Cllrs should press Officers to look at all options to achieve bin servicing at a distance further than 20m from a road.** Distance from a bin is a key excuse for littering as behaviour change surveys by Councils in England have found. If the 20m rule is to remain then Cllrs must ask officers how and by whom they expect litter to be cleared from all areas in parks and on paths.
- d) The **Edinburgh litter reduction strategy should include standards for cleanliness of street bins – including absence of graffiti.** Dirty graffiti covered bins gives the strong impression the Council just does not care about what Edinburgh's streets look like or how it's service infrastructure is maintained. Post pandemic there may even be some people who won't use bins they consider have dirty surfaces creating an excuse to litter. Cleanliness and condition of bins can clearly be assessed by staff servicing the bins but if there are no standards how do they know what is unacceptable? **Condition and cleanliness could also be measured through regular visual audits, perhaps undertaken by local CCs or volunteers or by the council setting up monitoring arrangements with text-based surveys of residents in particular areas.**
- e) Additionally **there should be a simpler way for residents to request additional bins or larger bins and report broken or dirty bins.** If the Council no longer wants people to use @edinhelp to do this – many reports these days are asked to complete web forms involving numerous clicks and screens - there should be a simple to use app, rather than the multi-layered multi web form interface the Council has now. A litter and flytipping reporting app that people can use easily on their phones – or just a social media account – could be at the heart of a much more engaging way of involving the public in a campaign to tackle litter on our streets. There are plenty of report-it apps around that the Council could use instead of CEC cumbersome and clunky web form where matters raised also seem to disappear.

- f) Much has been made in the media of this Litter Bin Siting policy being a data led approach with the implication of modernity and strategic change. But there is nothing in the paper before Cllrs to show how the smart bin sensors are being used now, how reliable the kit is, whether it is working 100% of the time in all the bins, how many current bins are smart, what the current data shows and importantly what action is taken in response to smart bins reporting to base that they are full and at what frequency the data is monitored – is it live operational data to improve service delivery today or after the event data to peruse at leisure? **Cllrs should ask for more information about the smart bin data reporting and seek assurances on how it is actually being used to deliver better services which reduce litter on a daily basis.**
- g) **Smart bin data only exists for locations where there are smart bins – so how does ‘data’ about littered locations without bins get into this ‘data led’ approach?** The litter bin siting policy should use a wider range of data from social media reports and requests made for bins (which do not appear to be categorised as complaints) as well as the other data listed. Insight from Community Councils should also be a source of data – if not why not?
- h) The Litter Bin Siting policy says that litter bins will not be located near to communal bins. This fails to realise that often communal bins are across the road from, eg, parks and are also not accessible for anyone in a wheelchair to use do the height of the opening and the need to lift the lid. Cllrs should not accept this proposition as an acceptable accessible substitution. Indeed many of Edinburghs street bins are also inaccessible for some users. **We suggest this aspect of the policy is revised to refer to accessibility considerations and Cllrs should be clear that a communal bin is not as accessible as a street bin and is not an acceptable inclusive substitute, especially when to use it involves crossing a road.**
- i) **The Litter Bin Siting policy should be amended to include a process to consult and notify the local community council where it is proposed to remove a litter bin because of persistent vandalism or arson.**
- j) There is nothing in the paper about whether or how litter bins will be relocated where there has been a change affecting its use, most notably when bus stops are relocated, or taken out of service for a long time. **Cllrs should expect the policy to set out how bin siting joins up with bus stop siting changes. If a bin has been sited specifically to serve a bus stop it should move when the bus stop is moved.**

Conclusions

We want to see less litter on our streets and in our parks. We welcome more and new bins in our area and would especially welcome more bins in Leith Links, by every bench in the park would be our suggestion, by every bus stop as this is a busy urban area with shops, restaurants and several schools as well as leisure visitors to the park and along the Restalrig railway path, which has a dearth of bins and much litter in the undergrowth.

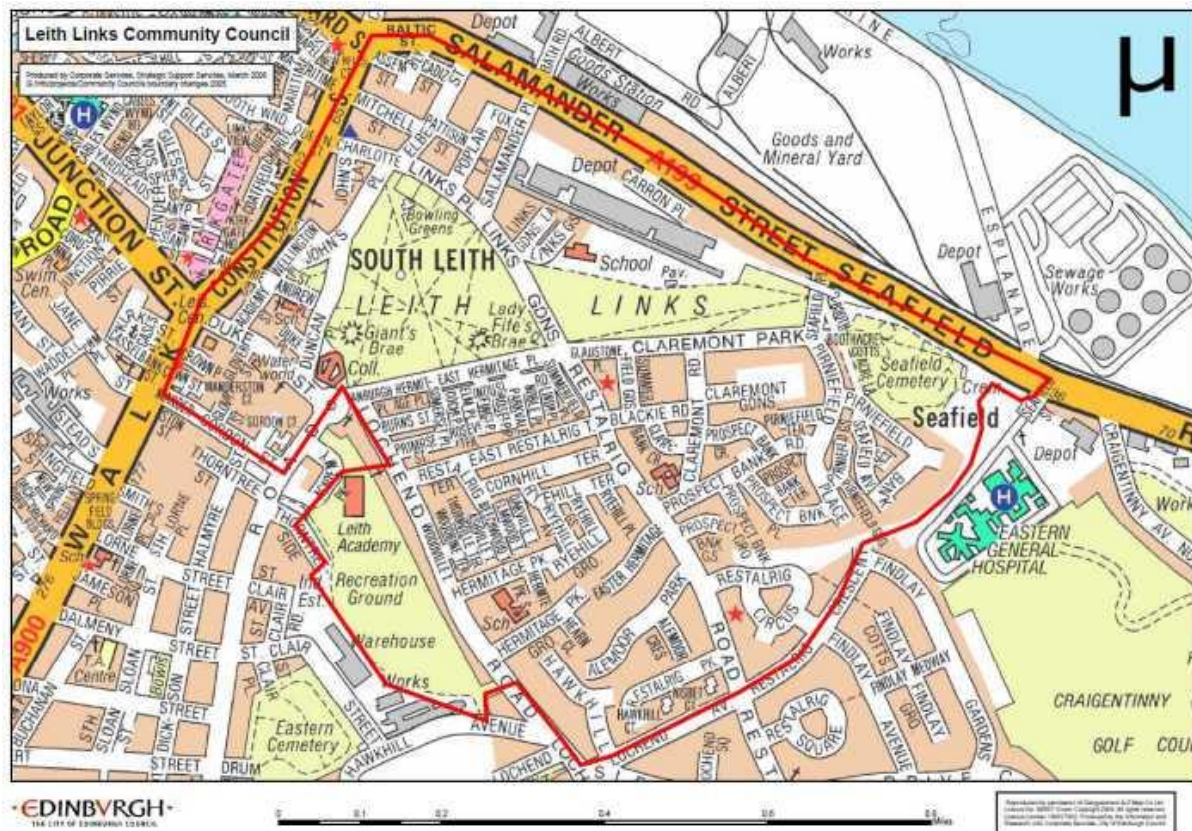
We do not think the Litter bin siting policy on its own is sufficiently transformative to tackle litter in our area and it maybe because it lacks a clear and ambitious strategy with measurable goals. We ask that CC's are built into the engagement process on decisions about bin locations in their area - ideally looking at the whole area of each CC, and any wider strategy aimed at reducing litter. We also suggest that performance measures include measures of the quality of bin infrastructure in place – i.e. that it is free of graffiti and is in a good condition. It should be much simpler for the public to report and request issues than it is now and all and any data from the public and CCs should form part of the data sources listed in the litter bin siting policy.

More broadly, CEC's communications with the public relating to littering and fly tipping – including behaviour change could be playing a much more significant role in managing waste and rubbish in Edinburgh. There seems to be almost no focus in this paper on how to change public behaviour – though there is much learning from elsewhere which we hope the Council will draw on. A few links are provided in Annex A.

Leith Links Community Council

10 October 2023

Annex A – Leith Links Community Council area



A few links to litter/waste behaviour change communications resources/examples

[Using communications to promote behaviour change | Zero Waste Scotland](#)

[Reducing littering | Local Government Association](#)

[Eliminating fly tipping | Local Government Association](#)

[Improving Hampshire's recycling using behavioural insights | Local Government Association](#)

['My Council / Report it' digital app | Local Government Association](#)

'The impact of behaviour change on residents' climate change related behaviour can be shown by the example of littering in the New Forest's coastal areas which had increased during the first months of the COVID-19 outbreak. **New Forest District Council worked on the LGA Behavioural Insights Programme** to support the development of a new insight-led approach to tackling this issue, which proved highly successful. The intervention, which used novel messaging and imagery on advertising trailers at three sites and dispensed rubbish bags, reduced litter by 10.8 tonnes over a one month period (a reduction of 29 per cent), saving an estimated £10,000 in waste collection costs.'



10 October 2023

Dear Edinburgh Council – Transport Committee

Transport Committee meeting – Thursday 12 October 2023 - 8.2 Speed Limits Review 20 mph – Peffermill Road – Written Deputation request

We are writing to raise our concerns on behalf of the parents and local community with the road and traffic around Prestonfield Primary school.

We specifically have concerns with Peffermill Road and would like this shared as a written deputation with the transport committee in advance of the meeting due to be held on Thursday 12 October 2023 to discuss the speed limits review – section 8.2.

As we all know evidence shows walking more (and using cars less) is beneficial for children's physical and mental health, builds connected communities and friendly neighbourhoods, and improves air quality by reducing traffic congestion. But, where we live, walking to school isn't a safe or simple option for many families especially on the Peffermill Road.

The main problem on Peffermill Road is the speed which cars drive along the road during school drop off and pick up times and how cars park on the pavement on Peffermill Road or near the traffic islands and pedestrian crossing. All these things make walking to school unsafe.

There have been at least 3 incidents over the past few months where cars have been damaged outside the school in a collision with a parked vehicle. These incidents have been brought to Edinburgh Council road safety team's attention by the school headteacher.

Separately our school crossing patrol who helps children to cross the road safely on Peffermill Road has been receiving verbal abuse from drivers when they have ignored the red light at the pedestrian crossing, driving at speed or when they have been asked why they have parked their car up on the pavement or near a traffic island on Peffermill Road.

We have been made aware of the consultation results which will be discussed at the transport committee's meeting on Thursday 12 October 2023. We are extremely disappointed in the responses as we do not feel it represents the Prestonfield

community's views on road safety or indeed the safety of the local children walking to and from the school.

If the parents of Prestonfield Primary School had known about the consultation, there would have been many more respondents in favour support of 20 mph on Peffermill Road and the introduction of other measures including double yellow lines and keep clear markings on the road.

We urgently need the Edinburgh Council transport committee and road safety team to make the route safer by

- issuing a Traffic Regulation Order to reduce the speed of cars to 20 mph at least as a minimum at school drop off and pick up times.

More generally, we need Edinburgh Council transport committee and road safety team to improve local walking routes around the school by:

- Creating safe road crossings at the front and back of the school
- Stopping pavement parking – introduce double yellow lines on both sides of Peffermill road outside the school.
- Introduce “keep clear” yellow road markings outside the school nursery gate entrance on Peffermill Road.

We urgently ask the transport committee to consider our concerns before making a final decision on the speed limits review for Peffermill Road/Prestonfield Primary school

Yours sincerely,

Tracey McFarlane and Lindsey King
Co-Chairs – Friends of Prestonfield Primary School, Parent Council

friendsofprestonfield@gmail.com

Deputation to the Transport and Environment Committee about Item 7.2 - Road Safety – Service and Delivery Plan Update for 2023/24

Sight Scotland and Sight Scotland Veterans

At Sight Scotland and Sight Scotland Veterans, Scotland's largest sight loss charity, we believe that roads need to be safe and accessible for all. Putting people with visual impairment at the centre of decision-making is essential for ensuring streets meet the needs of blind and partially sighted people. Key issues to consider at pedestrian crossings are: ensuring there are audible signals to signify traffic has stopped, as well as including revolving cones under wait boxes – these are used when a person can't see the red/green man or hear audible signals. Staggered crossings are hazardous and confusing for people with visual impairment. Tactile paving is essential to ensure someone can determine where the pavement ends, and the road begins.

Kind regards,

Fiona

Fiona McDonald (she/her)
Campaigns and Communications Assistant

Sight Scotland and Sight Scotland Veterans
2A Robertson Avenue
Edinburgh
EH11 1PZ

Switchboard: 0131 229 1456
Ext: 2028