

Retaining 'Spaces for People' measures - Cockburn Association response

General Comments

The Cockburn Association welcomes this opportunity to comment on the *Spaces for People* scheme. However, as this scheme consists of many on the ground projects with directly impacts on the lives and amenity of local residents in a variety of ways. In respect of the current consultation on the *Spaces for People* scheme we are unable to comment on points of detail or on the local merits or otherwise of individual initiatives within the overall programme.

We offer the following comments as a contribution to the lively ongoing debate within the city on the merits of the programme. But we are disappointed that the current consultation does not provide an opportunity to discuss and comment on the wider transport, planning and place policy issues which are relevant to the *Spaces for People* scheme. It is to be hoped that further consultation on the *Spaces for People* scheme will allow a debate on relevant issues within this wider policy environment.

The recently approved *City Mobility Plan 2030* as well as initiatives such as the *Central Edinburgh Transformation Project*, *George Street* proposals and the *Meadows to George Street Cycleway project* All signal a shift in emphasis and desire to move away from automotive strategies into more civic-based ones. The Cockburn supports this approach in principle but will scrutinise the content of actual proposals as they are published for consultation and comment.

Better facilities to encourage walking, wheeling, and cycling are required to making Edinburgh the great walkable city that it should be. But they must be the right initiatives in the right place and be consistent with the needs and wishes of residents and local businesses.

Challenges and Issues

The *Spaces for People* was a rapid rollout scheme that benefited from huge displacements of traditional road traffic due to the Stay at Home regulations of the Scottish Government. As normal activity resumes over the coming weeks and months, competing pressures of road and civic space will result. Any assumptions of success or impact will need to be reassessed, in some cases from first principles, before any temporary schemes can be deemed workable, appropriate or relevant to the everyday experiences and needs of residents and businesses post-pandemic.

The increase in on-line retail was an establish and growing trend before the pandemic has been significantly accelerated by the lockdown. The shift from *People moving to the Shop* to the *Shop moving to the People* will continue, meaning an increase in delivery traffic through the city and all times of the day. A particular feature of this shift is the requirement for localised loading bays for delivery vehicles in all parts of the city, but particularly on residential streets. Any Street for People initiative must be able to accommodate this trend.

Design and Place Emphasis

The Cockburn argues that *Spaces for People* must prioritise making places for people. Its focus should be place led, not transport led. The introduction of safer cycling facilities is important but in many instances is a traffic management issue. An while it may be possible to reach a balance between the competing needs of pedestrians, cyclists and motorists, this will not always be the case. In addition, the specific requirements of facilitating efficient deliveries to local business and deliveries and services to residents must also be fully integrated into an acceptable, workable, permanent version of the *Spaces for People* scheme.

A wider, more inclusive urban design approach through a focused agenda of quality design inputs will yield more appropriate results in many places. In this, we also emphasise the need to enhance the DESTINATION element of local centres in order to support local businesses post-Covid, noting the important role that they have played in supporting their neighbourhoods during and before the pandemic. Such an approach will also anticipate and address the potential unintended negative consequences of local *Spaces for People* infrastructure such as creation of new local 'rat runs'.

Narrative and Discussion

Spaces for People in Edinburgh was initiated to put in place several measures that specifically try to:

- help parents/carers and children to physically distance near schools;
- help people to physically distance while using high streets, some city centre streets, and while exercising; and
- provide protected cycle lanes on main roads, so that people can consider cycling for trips that they might otherwise make by public transport.

It is the Cockburn's View that the Council has an opportunity, in terms of transport and travel, to make sure that residents and business owners can move about the city more safely and more efficiently, with a reduced impact on the local environment, than was the case before the pandemic.

However, any *Spaces for People* schemes that become permanent must:

- be acceptable to residents and businesses;
- improve the streetscape;
- be safe for all users (particularly vulnerable residents).
- improve accessibility for all users (particularly vulnerable residents).;
- be efficient and effective;
- be environmentally acceptable;
- provide for walking, cycling and public transport consistent with the Transport Hierarchy.

The *Spaces for People* projects which have already been put in place or are in the process of being put in place, across the city may be fit for purpose and relevant to the needs of residents, businesses, and local communities.

However, the restrictions on movement during the pandemic certainly present challenges and uncertainties in forming a complete picture of the needs and requirements of residents and established businesses post-pandemic.

What is certain is that all schemes which are to become permanent should only become so *if* they conform to the Transport Hierarchy. If they do not conform, they should not become permanent or should only do so after significant modification.

Emphasising the Transport Hierarchy

The **Scottish Government's Transport Hierarchy** strategy places the needs and requirements of pedestrians at the top (including the access requirements of people with disabilities), followed by cyclists, then public transport, then shared transport with private car users last. The aim of the hierarchy is to ensure that the movement needs of the most vulnerable groups are fully considered in all new transport and mobility schemes. This does not necessarily give priority to pedestrians and cyclists in every location. This will depend on local circumstances.

Anecdotal evidence seems to suggest that the current *Space for People* projects have the potential to affect hard-to-reach or vulnerable groups disproportionately and adversely, such as those with mobility issues. We note and agree with the concerns expressed by the Edinburgh Access Panel. Our own stakeholders have raised very similar concerns relating to pedestrians safely at 'floating bus stops' and in any situation where pedestrians are forced to cross a cycle lane to get to their bus or their parked car.

A particular concern is any proposed loss of parking provision for blue badge holders caused by the roll-out of cycle lanes. Of necessity, blue badge holders must be allowed to park close to their destination. This is not a question about the total number of blue badge parking bays in the city. But it is a question about having blue badge parking bays where they need to be to meet the requirements of blue badge holders. In some situations, it may not be possible to meet the competing requirements of blue badge holders and, for example, cyclists. In such circumstances the legitimate needs of blue badge holders cannot and must not be compromised.

Local businesses will also have their own unique concerns. The Council's transport teams need to engage effectively with local businesses and their representative beyond the passive and somewhat leading digital consultation portal. Information should be disseminated and presented locally in a way likely to be accessible and useful to the various local stakeholders with a substantial interest in the changes being put in place. Local businesses will only be able to survive and thrive post-pandemic if they have safe and secure access for incoming and outgoing deliveries to and from their places of businesses. At this point, it is not clear to us that this have been established in all the temporary *Spaces for People* schemes currently in place or proposed. The economic sustainability of local businesses is dependant on the

Spaces for People programme being fit for purpose in this respect. This is more than a simple decision about the number and location of loading bays, important as they are.

A related point, it the facilitation of deliveries and services to local residents. The point has already been made that the ongoing growth in online shopping has led to an increase in deliveries to residents, at all times of the day. The *Spaces for People* programme must accommodate this need and the related needs of the many service providers that are used on a regular basis by residents throughout the city.

The Need for a Place Hierarchy

Missing from the *Spaces for People* initiative is an understanding of the needs of the particular place or local neighbourhood into which the interventions are being located.

Much of central Edinburgh is covered by **Conservation Area designations**, each of which has its own Conservation Area Character Appraisal that sets out those characteristics that need to be preserved or enhanced. We acknowledge that traffic interventions are technically excluded from Conservation Area Management by Class 30 of the General Development Order (Work by the local authority) but we argue that there is a duty of care by all sections of the local authority to ensure the highest design standards in a Conservation Area.

Any interventions should reinforce the particular character and functions of that place. For example, if a street acts as a local neighbourhood centre (a parade of shops, pubs, cafes, etc), the priority is to enhance the pedestrian environment with gathering spaces to support these places as local destinations. It should be explicit that if in achieving this, the ability to insert a segregated cycleway is curtailed, that should be accepted.

Maintenance

A point which we have raised in previous consultations such as that for the **City Mobility Plan 2030** is the issue of ongoing maintenance. An example is the condition of some of the city's pre-pandemic cycling infrastructure of painted on-road cycling lanes and on-road waiting areas. In many instances, these have not been maintained although some have now been overlain by *Spaces for People* infrastructure. The Council has not yet made it clear if and how future resources will be provided to maintain permanent *Spaces for People* projects in a safe and appropriate condition to secure the needs of those walking, wheeling, and cycling. Put simply, funding appears to be available for capital works. But will funding be available to secure the adequate maintenance of completed projects in the future?

Consultations and the Consultation process

A recent **opinion piece** in the *Evening News* declared that implementation is not consultation. We agree with that sentiment. At the height of the pandemic, normal consultation requirements were set aside for the necessary infrastructure to be put in place as quickly as possible whilst the pandemic was at its peak. This meant that some residents had **controversially** little, or no notification of planned *Spaces for People* changes and only found out when the implementation works started.

Now, the Council is considering whether to keep some *Spaces for People* measures in place, either on a trial basis or more permanently. Before deciding whether to go through the legal processes necessary to keep projects in place, the Council want to hear residents' and businesses' views. The current process is an online consultation. It is not one based on the ground, in local communities, talking face-to-face with residents and local businesses. Whilst we appreciate that many schemes will be advanced under a temporary or experimental basis, it can be assumed that permanent retention is an objective.

As the pandemic restrictions ease, the Council must take the opportunity to expand and extend its consultation process to capture a full range of views from stakeholders affected by the *Spaces for People* projects. An opportunity to discuss and comment on the wider transport, planning and place policy issues which are relevant to the *Spaces for People* scheme should also be provided. The Cockburn Association would certainly strongly encourage the Council to search out and take up all further consultation opportunities as they become possible.

It is also essential that the Council recognises that the views and lived experience of stakeholders may change as pandemic restrictions are eased and the city fills up again with traffic, visitors, and events. It is a sad reality that as commercial life returns to community 'High Streets' across the city, the local streetscape of shops and businesses, the way people shop, use services and meet friends and neighbours may have all have undergone significant change. Locals may have discovered new ways of using their local streets and neighbourhoods and the *Spaces for People* initiative will need to support and facilitate local community vitality post pandemic and not hinder it.

The Council's consultation processes will need to be agile enough to capture this changing reality. Indeed, as the city moves back to 'normal' life the results of the Council's current consultation, given the unique circumstances under which it is being carried out, may come to be quite irrelevant to the reality of life in only a few months' time. And, of course, the views of residents, business, services providers and utility companies may be quite different and may need bespoke consultation processes.

Summary

We would encourage all local residents, businesses and stakeholders to participate in the **Council's current consultation**. But we believe that this should not be the end but rather the start of a more significant and locally engaging consultation exercise or series of consultations.

