

New Town and Broughton Community Council Response to retaining Spaces for People Measures Consultation

Executive Summary

As noted below, the New Town and Broughton Community Council (NTBCC) considers the consultation to be deeply flawed. The inclusion of questions about measures not yet implemented is highly questionable. Until there has been an opportunity to evaluate the success or otherwise of any particular measures, it is impossible to make any valid judgment on whether they should be retained or removed. Many of the questions group cycling and walking together but the needs of these two groups are quite different making it impossible to properly judge the merits of specific measures for each of these groups. The survey is designed to encourage simple yes/no answers to questions about whether measures should be retained and does too little to obtain any insight into the consequences both favourable and otherwise from the implementation of the measures. The Commonplace Mapping tool would have been a far more effective means of obtaining genuine and considered feedback on the various measures that have been introduced. This lack of qualitative feedback will hamper any decision making by Council officials and Councillors. Edinburgh Council and its citizens deserve better than this hastily prepared and poorly designed survey.

With regard to the specific schemes already implemented in our area:

- We are in favour of continuing with the changes to **The Mound** and **Princes Street East** with some provisos.
- We are opposed to the measures on **Waverley Bridge** and **London Road** being retained and indeed believe that they should be removed before the end of the current TTRO's.
- We do not agree that any of the measures yet to be introduced in our area including those to **Broughton Street, Broughton Roundabout, Bellevue, Rodney Street or Canonmills** should be considered for retention until there has been an opportunity to better assess their effectiveness.
- We are also very concerned about the impact on traffic in our area of the planned changes to **South Bridge** and would urge that implementation is delayed until the consequences of the planned restrictions to vehicular traffic can be better understood.

General Comments

1. Despite the deadline for submissions being delayed to 5 April, it still appears that the whole process is being rushed. We do not agree with consulting on the retention of measures that have not been implemented yet. Until stakeholders including the public and local businesses have had an opportunity to evaluate the success or otherwise of any particular measures, it is impossible for them to make any valid judgment on whether they should be retained or removed. It is suggested that the results on any planned measures are discounted and that a new consultation, if required, is held after the measures have been in place for at least six months. This would allow counts of the number of pedestrians and cyclists using these temporary measures to be taken to support or otherwise their retention.
2. There are three separate but almost identical surveys (for the Public, Businesses and Stakeholders) with the main difference being the number of words that the respondents can submit as comments. As a result, many of the questions do not make sense for someone completing the survey on behalf of a business or stakeholder group. There are clearly issues that will affect businesses and wider stakeholder groups that the survey is not able to capture. It is therefore difficult to understand how the results of such a survey will be used for any future decision-making.

3. Many of the questions group cycling and walking together. The needs of these two groups are quite different and as such it will be impossible to properly assess the significance of the answers and thus draw any conclusions about the merits or otherwise of specific measures for each of these groups. There are also no specific questions about the needs of those using public transport. The implementation of segregated cycle lanes has introduced new hazards for bus users at bus stops. Asking questions about the experience of bus users would have been useful in better understanding these hazards and in identifying suitable mitigation measures.
4. The questionnaire requires simple yes/no answers about which schemes should be retained or removed with limited opportunity to comment on the specifics of particular measures. It is unlikely that the responses will provide a valid basis for understanding which specific elements of the schemes are working or not. There is no requirement for adding comments and therefore someone completing the survey may vote in favour or against a series of measures in an area but 100% agreement or otherwise with a particular scheme should not be inferred. There should have been greater emphasis on understanding why the responses were for removal or retention. For example the closure of Waverley Bridge has required the buses that normally terminated there to be relocated mostly to St Andrews Square or Regent Road. In neither location are there any facilities for buses to wait until commencing their return journeys. The pavement on Regent Road where the buses stop is very narrow and it is impossible to social distance without stepping on to the carriageway creating new hazards for pedestrians.
5. The survey encourages all or none responses, which may therefore overwhelm any more specific responses. Given that the survey is covering the whole of Edinburgh it is inevitable that awareness of the various measures will not be uniform among respondents. The views of a community most directly by specific measures may be swamped by the responses of others. The Commonplace Mapping tool that was used to establish where many of the measures were required would have been a better tool to gain feedback on which schemes were working or not.
6. There is nowhere in the survey to record general points on the various measures including for example the conservation/heritage arguments, the continued presence of street clutter, the additional hazards associated with pavements which include sections partly at a lower road level, the lack of progress on increasing pedestrian priority at crossings. Our comments on each of these issues is shown below:
 - a. Heritage Issues - we understand that given the emergency nature of many of the measures especially those introduced in the first period of the pandemic that it was not possible to ensure that the measures met requirements for such infrastructure changes to satisfy the normal expectations for a World Heritage Site but this can no longer be used as an excuse to perpetuate the sub-standard designs that have been implemented in many areas across Edinburgh. Any continuation beyond the current period of the TTRO's should be subject to full heritage assessment.
 - b. Street Clutter – the result of many of the measures introduced across the City has been to increase the level of street clutter that is not only unsightly but creates additional hazards particularly for pedestrians. Any extension of the current measures should be accompanied by a campaign to reduce the level of street clutter to improve the public realm. This again would have been a good use of the Commonplace Mapping tool to help identify any surplus street clutter.
 - c. Pavement Hazards – the extension of pavements into the carriageway with wands to separate that space from the main carriageway or even no separation apart from road markings from adjacent cycle paths results in significant additional hazards for pedestrians due the changing

levels and proximity with other road users. Where such pavement widening is retained it must be achieved with a single level of pavement of properly maintained paving and drop down kerbs at any road junctions. Cyclists and pedestrians should not be expected to share space. Any cycle lanes that are retained should be fully segregated from any pedestrian areas and of sufficient width to ensure proper separation.

- d. **Pedestrian Crossings** – there are many examples within our own area and also highlighted by Living Streets across Edinburgh of crossings at traffic lights where the time that pedestrians are expected to wait before crossing is too high and the time allowed for them to cross is too short. This does not reflect the stated priorities of the Council or the Sustainable Travel Hierarchy that should put greater emphasis on pedestrian movement. Again the Commonplace Mapping tool could have been used to great advantage to identify specific problem areas. Given that changing the timing on traffic lights would not incur any significant financial cost, the problems already identified by Living Streets and others should be addressed now rather than wait for the completion of this review.

Existing Schemes

There are a number of schemes within our area and we have focussed our feedback on these measures.

1. **Princes Street East** - this scheme places bus gates at the east end of Princes Street and on South St David's Street, which operate during the daytime to restrict unauthorised vehicles from entering this part of Princes Street. It was initially proposed that the pavement on the south side of this section of Princes Street (between North Bridge and Waverley Bridge) would be widened but this did not happen (despite the Council's own website stating that it has). There is also clearly an issue with compliance as many non-authorised vehicles are still entering Princes Street, which will require improved signage and more effective enforcement. We are in favour of this measure but the original plans for pavement widening should proceed, as it is very congested in this area due to the station entrance and a number of bus stops.
2. **Waverley Bridge** – we considered that the closure of this road was unnecessary when first proposed, as the pavements were already very wide. Closure of this road to the many buses that terminated here has resulted in their relocation to St Andrews Square and Regent Road. In the latter case as many as eight buses at a time are waiting here before starting their return journeys blocking parking bays and creating additional hazards for pedestrians walking to and from Princes Street. We are against this measure being made permanent and indeed believe that it should be removed as soon as possible.
3. **The Mound** – we are in favour of the segregated cycle lanes being retained but on the understanding that by creating a permanent north south segregated cycle route from the city centre that North Bridge should not have any restrictions imposed on vehicular traffic so that there remains a north south vehicular route on the east side of the City for private and commercial vehicles. This route is critical for the effective management of traffic on this side of the City, which may be expected to increase once the St James Quarter reopens later this year. There are no obvious diversion routes for traffic that would otherwise use North and South Bridge. We are in particular concerned that any restriction to traffic on this corridor will increase the volume of traffic using the roads around Holyrood Park that is such an important areas for exercise for many residents in this part of Edinburgh. Also given that there will remain a number of bus services using the Mound the safety of bus stops needs further consideration.

4. **London Road** – we were against the introduction of a fragmented section of segregated cycle path for westbound cyclists only along the south side of this road from Easter Road to Leith Walk, as it would encourage cyclists into an area where the construction activities for the Tram work would be most active over the next 18 months. We are also concerned that until the Tram works are complete there will not be any connection to the existing cycle network on Leith Walk around Picardy Place. Based on our observations most cyclists are avoiding using this section of cycle path as the road surface is poorly maintained close to the kerbs where the cycle path is located and there is a frequent need to leave the lane to negotiate the bus stops along the route. We proposed that an alternative route should be implemented along Regent Road to better connect with current and planned cycle infrastructure and this remains our view. We are against this measure being made permanent and unless the current deficiencies are addressed it should be removed immediately. We would welcome discussions on creating an alternative cycle route along Regent Road.

Planned Schemes

There are a number of planned schemes within our area and we have focussed our feedback on these schemes but the proposed scheme for South Bridge has the potential to cause significant disruption to traffic flows in our part of the City and this is included below.

1. **Broughton Street** - the lack of any measures at the top of Broughton Street is a major deficiency of the planned scheme as is the lack of any traffic calming or improved pedestrian crossings. We have made our views clear on the small section of cycle path and the movement of the loading bays to the side streets. For all these reasons we are opposed to the measures being retained with the exception of the pavement build out at Barony Street. Indeed we would like to see further pavement build outs at junctions along Broughton Street to increase pedestrian space and slow traffic turning into these side streets.
2. **Broughton Roundabout** – we do not know what will be eventually approved for this junction but apart from the widening of the pavements none of the proposed measures address the key issues identified by the Commonplace Mapping. We are against these measures being made permanent but that we are strongly in support of a radical improvement to this junction that prioritises the needs of pedestrians and cyclists. This should be part of a review of all of the streets leading to and from this roundabout and in particular East London Street.
3. **Bellevue/Rodney Street/Canonmills** – while it is too early to make any decisions about the measures on this route, we would be in agreement with replacing the planned TTRO with an Experimental TRO to allow further evaluation of the measures to be made.
4. **South Bridge** - this measure will introduce a bus gate restricting traffic entering South/North Bridge and effectively closing off this side of the City centre to private and commercial traffic during daytime. Traffic will therefore need to find diversions around this blockage, which will mean increased traffic congestion on small side streets and increased traffic through Holyrood Park neither of which is desirable. As with the other planned measures it is too soon to make any decisions about whether the intended measures are retained permanently but for the reasons stated we are opposed to this measure being retained and indeed would prefer to see the plans for a bus gate cancelled.