

NTBCC Objection regarding Meadows to George Street Traffic Orders (RSO/21/08 and TRO/21/32)

The New Town and Broughton Community Council (NTBCC) has considered the above traffic orders and wishes to object to them for the following reasons:

1. Hanover Street

It is proposed to introduce two one-way cycle lanes on either side of this street between George Street and Princes Street. It was stated that the use of two one-way cycle lanes was to align with the design of George Street but at a George Street and First New Town project briefing last year we were told that the design of Hanover Street had been set by the Meadows to George Street Project. Given the stated intent to introduce consistency in the design of public realm, it would appear that a two way cycle path would reduce pedestrian/cyclist interactions, remove the need for floating bus stops on one side of the street and allow more space to be retained/created for pedestrians.

Given that in the plans there is no route for south bound vehicles (other than buses, taxis, cycles and other traffic wanting to access Market Street) beyond Princes Street, Hanover Street is essentially a dead end for most traffic and therefore the need for traffic to turn around would seem to be an important but overlooked consideration. With the narrowing of the carriageway this will become much more difficult especially for larger commercial vehicles raising serious traffic management and road safety considerations. It is also proposed to reduce the number of bus stops on the street which given the number of services that are using this road will be a counterproductive measure in that it will increase congestion around bus stops.

2. The Mound

The introduction of a two way cycle path on the east side of this street reduces the available space for a wider pavement thus disadvantaging pedestrians and introducing additional hazards due to the addition of a floating bus stop at the bottom of a long downhill section for north bound cyclists. The travel hierarchy would require that more rather than less space is provided to pedestrians. The cycle path has been designed without any measures to reduce the speed of cyclists thus increasing the risk for pedestrians in an already congested area. Given the expected increase in the number of buses serving this route as more people move from private cars to public transport, this level of pedestrian movement should be expected to increase. The current design does not allow for such an increase. The need for a segregated cycle path is not justified. If

the plans to eliminate most traffic on this street are approved, the volume of vehicles will be reduced to a level where, according to Transport Scotland's Cycling by Design 2021, a Mixed Traffic Street, Light Segregation or a Cycle Lane would all be suitable. Likewise, the Scottish Government policy document 'Designing Streets' states that: 'Cyclists should generally be accommodated on the carriageway. Only where traffic volumes and speeds are high should the need for a cycle lane be considered.' We do not consider that there has been such a justification provided which would outweigh the detrimental impact of the proposals on pedestrians.

3. **Bank Street**

The introduction of a bus gate for the period between 6.00am and 10.00pm will remove this route as a means for most traffic to travel north/south within the City Centre. This will result in the displacement of traffic on to other routes. The stated primary diversion routes are Lothian Road and North Bridge but there will inevitably be other roads that will see increased traffic as a result of this change. It is not clear that these consequences have been effectively modelled to understand the consequences for cars and commercial vehicles of this change. As a result we do not have a clear understanding of the areas in which there will be increased congestion and thus atmospheric pollution.

There are plans now in place to restrict traffic on the Bridges Corridor which are not considered in these proposals. It is stated that north bound traffic that would have used George IV Bridge/Bank Street/The Mound to access the north of the city centre will now use Chambers Street. There is, however, no onward route for such traffic if South Bridge is closed to regular traffic and, even without such changes, it would only add to the existing levels of congestion on this street.

Although access to Waverley Station and George IV Bridge has been maintained, there is no reasonable means for such traffic to turn around when the bus gate is in operation. Particularly at Bank Street with the proposed additional restrictions at St Giles Street, traffic will be required to undertake a three point turn on a sharp bend in order to avoid contravening the bus gate restrictions. This introduces significant road safety and traffic management issues. It is stated that this measure is required to reduce traffic wanting to cross the City Centre but fails to recognise that the majority of the traffic is not going across the City Centre but is operating within two parts of the City Centre which are linked by already very limited routes and would be further adversely impacted by these and other planned changes. The result of these

restrictions will be to increase congestion and journey times for individuals and businesses in this area.

4. Forrest Road

The planned pedestrianisation of this street will result in two way traffic being moved to the adjacent Bristo Place and Teviot Place including the many buses that serve this road. The term pedestrianisation is a misnomer as continued vehicular access is being maintained to local businesses and residents. There are also exemptions for loading operations for part of the day. Consequently the images presented of a tree lined pedestrian boulevard are misleading. As a result of closing this road to one way traffic, the displaced traffic will need to negotiate the sharp turns at Teviot/Bristo Place which will now become a two way junction thus increasing the potential for road safety and congestion. While there is a desire to link George IV Bridge with the Meadows as part of an upgrade to National Cycle Route 75, this can be achieved without the complete closure of this important public transport route. It should be entirely possible to introduce a two way cycle path on the east side of Forrest Road to link the planned cycle path on George IV Bridge with the existing Meadows Walk cycle path. Again the traffic hierarchy would indicate that both pedestrians and bus users should be prioritised at this location.

5. Use of Regulated Parking Zones

The project seeks to remove double and single yellow lines from much of the route and instead establish a regulated parking zone in which all parking, waiting and loading is restricted to designated bays. The consequence of this change is that disabled drivers would only be able to park in spaces designated for that purpose. Currently there is an exemption in place that allows them to park on single and some double yellow lines, recognising the specific needs of this group of motorists. Although there is a small increase in designated spaces proposed this does not match the significant increase in blue badge exemptions that have been granted over recent years. Further thought needs to be given to whether the restricted parking zone is the correct approach given its potential adverse impact on a protected group.

6. Floating Bus Stops

As noted, floating bus stops introduce additional hazards for pedestrians and in particular those with impaired vision or mobility. The Council appears to be disregarding those risks as they are being proposed along the route irrespective of the forecast traffic volumes on each road. Cycling by Design sets out some clear recommendations about the design of cycle paths and floating bus stops. Adequate space, clear visibility and control of cyclist speed are considered essential to

minimise risks to pedestrians. Apart from the use of uncontrolled pedestrian crossings across the cycle path at bus stops, the current design does not adequately address these issues and in particular the need to control speed of cyclists. It is stated in the guidance that “bus stop bypasses on steep downhill gradients should be avoided...” It is difficult to match this with the plans for the bus stop at the bottom of The Mound. While floating bus stops may be appropriate in some cases where the speed and volume of traffic is high, they introduce additional hazards for pedestrians which need to be justified and mitigated before proceeding with their introduction on this and other Council projects.

7. Equality Impact Assessment

There is a legal requirement for local authorities to demonstrate that any road scheme promotes equality of opportunity for disabled people. Given the points raised previously about pavement widths, floating bus stops and loss of disabled parking, it is unclear how these proposals will meet this requirement. There needs to be a clear and explicit demonstration that the project is in compliance with the requirements of the Equality Act.