



Dear Traffic Orders Team,

I am writing on behalf of the New Town and Broughton Community Council to formally object to TRO/21/26A to introduce an Experimental Traffic Order to the City Centre area. In particular, we have serious concerns about the impact of the continued restrictions to Waverley Bridge.

Under this ETRO, all traffic is banned from Waverley Bridge apart from that requiring access to the businesses and station. Consequently all of the buses, including tour and airport buses, that used to use Waverley Bridge have been relocated to St Andrew's Square, Regent Road or Waterloo Place. This has added to congestion on these roads and in particular to the pavements along Regent Road and Waterloo Place with consequent adverse impacts for traffic management and road safety.

The situation has been confused by the introduction of a TTRO (TEMP/24/109) under which airport buses have temporary access to Waverley Bridge due to restrictions on St David Street for ongoing construction work at the old Jenner's building. This TTRO is valid until December 2025 but the ETRO is only valid until August 2025. Therefore a significant element of this ETRO will not be in effect as it has been superseded by the TTRO. We suggest that the ETRO should be amended and republished to reflect the actual status of Waverley Bridge so that it is clear on what basis comments are being sought.

We wish to highlight some of the consequences of the relocation of buses from Waverley Bridge to other roads in the City Centre:

1. The decision to relocate buses from Waverley Bridge was taken as part of the Spaces for People measures introduced during the pandemic. Inevitably there was little opportunity for people to comment on these urgent (but supposedly temporary) changes when they were introduced in 2020 but they have now been in place for over four years. One of the consequences of moving the buses from Waverley Bridge is that it is no longer as easy to transfer from and to the trains operating from Waverley Station. For most passengers this change does not cause significant problems but for people with mobility issues, visual impairment or indeed wheelers (including passengers with young children), the additional distance that they need to travel between the station and the nearest bus stop could have a significant impact on their ability to travel. **Has any assessment been undertaken to ensure that this change is not in breach of the Equality Act 2010 by discriminating against people by virtue of their: age and/or disability and/or sex and/or in the case of women being pregnant?**
2. Buses using Waterloo Place and Regent Road are having to use the small roundabout outside the Old Royal High School to turn around. This is causing congestion and due to some buses needing to reverse to complete the turn, additional risks to the safety of pedestrians crossing at the bottom of the road to Calton Hill. **Has a swept path analysis been performed to confirm that the use of this roundabout as a turnaround point by so many buses is safe?**

3. Additional out of town buses parking at the bus stands on Regent Road are making it difficult for passengers wanting to board east bound service buses at the St Andrews House (E) stop to see oncoming buses and for the drivers to see waiting passengers. As a consequence, passengers have been observed stepping into the road to ensure they were visible to approaching buses increasing the risk to their safety. **Have these risks been considered in making the decision to relocate the buses?**
4. Due to the narrow pavement in this section of Regent Road and the number of people waiting at this stop, it can often be difficult for pedestrians and wheelers to navigate this section of congested pavement. We are also concerned at the lack of any welfare facilities for the drivers of the out of town buses waiting at Regent Road to commence their next service. **Has any assessment been undertaken to confirm that this pavement is of adequate width given the increased footfall and have the welfare needs of drivers been considered in making the decision to relocate the buses?**
5. The additional tour buses using Waterloo Place are adding to the congestion for westbound service buses adversely impacting on the reliability of the **12** different services using the very busy Stop ZJ on Waterloo Place. The pavement at this point is also very narrow making it difficult for pedestrians and especially wheelers to navigate past the often very congested bus shelter. **Insufficient account has been taken of the impact on traffic flows and road safety of so many buses now using this short section of road with an inadequate number of bus stops.**

It is stated that the Waverley Bridge is required for pedestrians but given the continued service access, it is not really a pedestrianised area and is very underutilised. In our view, it should revert to its previous use for out of town, tour and airport buses. Given the recent news about the future of the bus station, removing buses from Waverley Bridge is not the way to go. **Clearly any plans for this road do need to provide a safe means for pedestrians (including passengers) to access the station and move from Princes Street to the Old Town. This can be achieved without closing the road to all buses and taxis.**

We therefore object to the ETRO primarily due to the consequences of removing buses from Waverley Bridge.

Regards

Mike Birch

Secretary - NTBCC