



Additional Comments by New Town and Broughton Community Council (NTBCC) based on review of the CEC Statement of Case regarding Meadows to George Street Traffic Order (TRO/21/32)

Introduction

The Statement of Case (Statement) in relation to the Meadows to George Street Traffic Regulation Order (TRO/21/32) prepared for the City of Edinburgh Council by CMS Cameron McKenna Nabarro Olswang LLP is 64 pages long and contains numerous links to external documents. It is beyond the resources of a community council to comment in detail on every aspect of the Statement. Our review has been further hampered by the fact that many of the external documents referenced in the Statement are not in the public domain. The additional comments made below focus on the points made in our original objection, a copy of which is attached for your reference, concerning the adverse impact of the proposed changes on the people living and businesses operating in our community.

Hanover Street

The specific point raised in our objection regarding introduction of two one-way cycle lanes on this busy pedestrian street is not adequately addressed in the Statement. Given the decision earlier in 2026 to reassess the George Street redevelopment project as part of a wider city centre review, the argument in favour of one-way cycle lanes is even more questionable. As noted, a single two-way cycle lane on one side of Hanover Street would reduce cyclist interactions with pedestrians especially at the bus stops along this route. It should also be noted that there are currently no legal restrictions on the speed that cyclists can travel on cycle paths or the need for them to comply with the marked direction of a cycle path. In effect every cycle path is two-way whatever the marking shown. This situation creates additional hazards for pedestrians especially those needing to cross cycle paths at bus stops. It is noted that the Council now intends to relocate some of the existing pavement clutter on to the islands provided for bus stops. This would create additional hazards for cyclists and anyone using the bus stop as it would reduce visibility for both pedestrians and cyclists.

As noted in our objection, the lack of any means for vehicles to turn around in Hanover Street is clearly a deficiency from a traffic management and road safety perspective. Although the Statement (7.18) references the Road Safety Audits (RSA) that have been undertaken, these audits are not in the public domain and thus it is not possible to determine whether the RSA addressed this point.

The reduction of bus stops from this road will inevitably mean that buses will be more likely to be queuing to allow passengers to disembark and board. This will result in additional congestion and delays to traffic using Hanover Street, in particular the buses. No information is provided in the Statement regarding the traffic modelling of this change nor the future impact on bus journey times as the number of buses increase to meet the forecast additional demand as people are encouraged to switch from private cars to public transport.

The Mound

The Statement has selectively quoted from various national and local guidance, introduced previously unreported data from 2018 and referenced an unpublished Pedestrian Comfort Survey conducted in March 2026 to justify the proposal for a segregated cycle lane. It ignores the requirement, however, that pedestrians should in accordance with the Sustainable Travel Hierarchy be prioritised. The proposed cycle

track can only be accommodated by squeezing pedestrians including bus users and those with impaired vision or mobility into too small a space. It has been widely reported that the pavements on The Mound are frequently so crowded that people are straying on to the road. The lack of any response by the Council in these proposals to this issue is a significant deficiency that needs to be addressed before any scheme proceeds. As noted earlier, moving street clutter on to the bus stop islands is not a suitable substitute for ensuring that there is adequate space for pedestrians.

Bank Street

With regard to the displacement of traffic as a result of the introduction of a bus gate on Bank Street, although reference is made to some traffic modelling having been undertaken the Statement provides no detail on the assumptions used in this modelling. In paragraph 4.2.1, it is stated that there is only “modest impact on city centre streets and redistributed traffic can be accommodated on adjacent streets. This conclusion appears to be based purely on the direct impact of the measures introduced by this TRO rather than the cumulative impact of the various initiatives to restrict traffic in the city centre. We also do not know the geographical extent of the modelling or what is meant by “accommodated”. Residents and businesses on those adjacent streets deserve greater clarity about the impact of the planned traffic restrictions.

Also, the Statement (4.2.2) states that journeys made by private cars will take longer but there is no consideration of the impact on commercial traffic and the businesses operating in the city centre. The Statement (4.7), states that the number of vehicles using Queen Street/ South Charlotte Street will increase by 4 vehicles per minute. This equates to nearly 6,000 vehicles a day depending on how the number has been calculated. This is an already busy junction and with plans to reduce the number of lanes on South Charlotte Street this increase in vehicles will inevitably result in more congestion and atmospheric pollution.

The Statement does not address the impact of other schemes, including that proposed for the Bridges corridor. As a result, the concerns raised in our objection about the future closure of the Bridges Corridor to most traffic have not been addressed. Without a clear understanding of the cumulative impact of the planned changes to all city centre streets, it is impossible to evaluate the impact of this specific scheme on future accessibility and journey times.

We note that changes have been proposed to the location of the bus gate on Bank Street which address our concern about the need for non-authorised traffic to turnaround in a very confined space. We have raised the same concerns as noted earlier about Hanover Street which have not been addressed.

Finally, we are surprised to read in the Statement (4.9) that *‘It is the view of officers that it is more appropriate to have some traffic increases on these streets than retaining high levels of traffic on streets which are designated as primary network for walking cycling, cycling and place functions.* We would have expected that such an important decision would be based on more than the “view of officers”. The proposed approach is just transferring a problem rather than resolving the underlying issues of high levels of traffic in Edinburgh.

Forrest Road

The specific points raised by this element of our objection are not addressed in the CEC Statement of Reasons. We note that further changes have been made to increase access for residents and local businesses. While we believe that these changes are necessary, they further undermine the argument presented in the Statement about the changes in Forrest Road producing an attractive pedestrianised area. We specifically question whether the Road Safety Audits conducted so far have properly addressed the risks associated with this increasingly shared space.

Use of Regulated Parking Zones

While this element of our objection is addressed in the Statement, it does **not** provide a satisfactory justification or mitigation for the removal of so many spaces (with single and double lines) that can be currently used by disabled drivers. While the small increase in designated disabled spaces is welcome, this number is insignificant compared to the number of spaces which will be lost. The number of blue badges issued continues to increase and this proposal will have a growing adverse impact on this protected group.

Floating Bus Stops

The Statement seeks to justify the inclusion of floating bus stops along the route of the Meadows to George Street project. The Statement fails to recognise that all of the guidance states that they should only be installed where there is adequate space. The September 2024 Guide Dogs document 'Designing for Inclusion' called for a moratorium on the use of floating bus stops until further evidence showed that they can be implemented safely. These concerns are ignored in the Statement.

Certainly, at some of the proposed floating bus stops there is inadequate space to allow their installation without a significant adverse impact on pedestrians. In particular, the width of the pavement on the east side of The Mound is below that recommended for such a busy pedestrian area. The Statement states that wherever possible a minimum pavement width is being maintained but the present plans do not comply with the intent of the Sustainable Travel Hierarchy or the stated aims of the Meadows to George Street project. The Project should be prioritising pavement widths and only once those requirements have been met seeking to increase the allocation of space to other forms of transport.

Equality Impact Assessment

The Statement (5.1) references the Integrated Impact Assessment that has been undertaken but this does not meet the need to demonstrate that the proposed project complies with the Equality Act and the specific points raised by our objection. While it is accepted that disabled people may benefit (5.5) proportionately more from improvements in bus journey times it must also mean that they will be disproportionately adversely impacted by the negative consequences of some of the decisions regarding the design of bus stops.

New Town and Broughton Community Council

15 May 2026