

DATE: 30 MARCH 2026

**STATEMENT OF CASE ON BEHALF OF THE CITY OF EDINBURGH COUNCIL IN
RELATION TO MEADOWS TO GEORGE STREET TRAFFIC REGULATION ORDER**

DPEA REFERENCES: TRO-2030-6

COUNCIL REFERENCES: TRO/21/32

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1. BACKGROUND

- 1.1 The City of Edinburgh Council (the “**Council**”) is undertaking the Meadows to George Street project (“**MGS**”) a town centre regeneration and active travel development part of the Council’s Edinburgh City Centre Transformation Strategy (the “**ECCT**”).¹ The MGS project is intended to be one of the first projects under the ECCT, and will deliver major street improvements to facilitate cycling, walking, connectivity and accessibility in Edinburgh’s Old Town and New Town.
- 1.2 The MGS project, as part of the wider ECCT plan, will enable approximately £110,000,000 of economic benefits and £310,000,000 of health and environmental benefits to the City of Edinburgh;² and will connect the centre of the city to other completed active travel networks such as the City Centre West to East Link and regeneration projects such as George Street and First New Town.
- 1.3 The MGS project will involve an extensive programme of improvements between Teviot Place in the south, through Bristo Place and Forrest Road, across George IV Bridge and the Mound and ending at Hanover Street in the north. Key features include:
- 1.3.1 the pedestrianisation of Forrest Road;
 - 1.3.2 expansion and improvement of the public space around Greyfriars Bobby;
 - 1.3.3 improved crossings between Middle Meadow Walk and Forrest Road and new crossing points on key desire lines;
 - 1.3.4 segregated cycleways on Forrest Road, George IV Bridge, the Mound, Bank Street and Hanover Street;
 - 1.3.5 bus priority improvements;
 - 1.3.6 cycle parking and cycle-safety improvements across the route;
 - 1.3.7 widening and decluttering footways at key points; and
 - 1.3.8 a Restricted Parking Zone across the core project area with specifically marked parking and loading areas, with provision for accessible parking and access.
- 1.4 To enable delivery of the MGS project the Council published a proposed The City Of Edinburgh Council (Meadows To George Street, Edinburgh) (Prohibition Of Motor Vehicles, Entry And Turning, One-Way Roads And Bus Priority Measures) (Variation No. _) Order 202_ on 19 April 2024 (the “**Order**”),³ pursuant to the Road Traffic Regulation Act 1984⁴ (the “**RTRA**”) and The Local Authorities’ Traffic Orders (Procedure) (Scotland) Regulations 1999 (the “**1999 Regulations**”).⁵
- 1.5 The Order, if confirmed by the Scottish Ministers, will enable the Council to deliver the MGS project. The MGS project will greatly improve facilities for walking, wheeling, and cycling, along with public spaces on some of Edinburgh’s most iconic city centre streets; whilst also delivering bus priority improvements.

¹ CD008

² CD008 at p 22.

³ CD001.

⁴ CD009.

⁵ CD010.

1.6 This Statement of Case (this “**Statement**”) is submitted on behalf of the Council as promoter of the Order for the purposes of the public hearing into the objections to the Order pursuant to regulation 8 of the 1999 Regulations.⁶

2. RELEVANT POLICY

2.1 Transport policy at national, regional and local level encourages and is supportive of sustainable and active travel, and improving cycling facilities. A summary of those policies is set out below.

National policy

2.2 Delivering infrastructure for active travel is a priority of the Scottish Government. The National Transport Strategy (the “**NTS**”),⁷ published in 2020, provides a strategic framework within which decisions should be made. The NTS contains the following vision for transport:⁸

“We will have a sustainable, inclusive, safe and accessible transport system, helping deliver a healthier, fairer and more prosperous Scotland for communities, businesses and visitors.”

2.3 The NTS lists priorities and associated outcomes as guide to decision-making. Those most relevant to the MGS project are set out below:⁹

2.3.1 The priority for reducing inequality will lead to development outcomes where projects will be easy and affordable for all to use.

2.3.2 The priority for taking climate action will lead to development outcomes where projects will help deliver net-zero targets; will adapt to the effects of climate change; and will promote cleaner, greener choices.

2.3.3 The priority for delivering inclusive economic growth will lead to development outcomes where projects are reliable, efficient, high quality and innovative.

2.3.4 The priority for improving health and wellbeing will lead to development outcomes where projects are safe and secure for all; enable healthy travel choices; and communities are great places to live

2.4 The NTS states that:¹⁰

“Importantly, overarching all the Policies, to address the challenges and achieve the Priorities we will embed the Sustainable Travel Hierarchy in decision making by promoting walking, wheeling, cycling, public transport and shared transport options in preference to single occupancy private car use for the movement of people.”

2.5 The NTS further highlights that:

2.5.1 people still face barriers when wanting to cycle or walk to their destination;

2.5.2 increasing reliance on cars has contributed to Scotland becoming less active as a nation. Many journeys are relatively short and could be undertaken by walking and cycling. Just over 34% of journeys under one kilometre are made by car (either as a driver or a passenger). This rises to over 50% when the journey is between one kilometre and two

⁶ CD010.

⁷ CD011.

⁸ CD011 at p 4.

⁹ CD011 at p 5.

¹⁰ CD011 at p 42.

kilometres. Changing travel behaviour to use more sustainable modes will have a significant impact on our environment, as well as our health and wellbeing;

- 2.5.3 in combatting obesity one of the most effective ways to secure the required 30 minutes of moderate activity per day is to reduce reliance on motorised transport, changing the means of everyday travel to walking and cycling. However, in 2017 there were 290,000,000 vehicle kilometres travelled on Scotland’s roads by pedal cycles. This was 6.5% lower than in 2012; and
- 2.5.4 people are more likely to walk and cycle where safe and accessible active travel infrastructure is available. By embedding the Sustainable Travel Hierarchy, Scotland’s transport system will be designed with sufficient walking and cycling options to help us become a healthier, more active and fitter nation and tackle medical problems caused by poor levels of activity. It will also reduce the adverse impact on our air quality and the risks from diseases this causes.
- 2.6 Transport Scotland’s Active Travel Framework establishes an overarching vision that “*Scotland’s communities are shaped around people, with Walking or Cycling the most popular choice for shorter everyday journeys.*”¹¹ Active travel outcomes are:¹²
- 2.6.1 increase the number of people choosing walking, cycling and wheeling in Scotland;
- 2.6.2 high quality walking, cycling and wheeling infrastructure is available to all;
- 2.6.3 walking, cycling and wheeling is safer for all;
- 2.6.4 delivery of walking, cycling and wheeling is promoted and supported by a broad range of partners; and
- 2.6.5 walking, cycling and wheeling is available to all.
- 2.7 Transport Scotland’s Cycling Framework and Delivery Plan for Active Travel in Scotland 2022-2030 (“**Cycling Framework**”)¹³ builds on the previous Cycling Action Plan (2020). It notes the top priority for realising Scotland’s active travel goals is the “*delivery of more dedicated, high quality, safe cycling infrastructure, effectively resourced, where fair access is ensured*”.¹⁴ The ambitions stated in the Cycling Framework include the prioritisation of investment in the creation of a dense, coherent network of connected cycling infrastructure in every town and city that is segregated from traffic and integrated with public transport.
- 2.8 Scottish Government’s current Climate Change Plan – 2026-2040¹⁵ sets out the Scottish Government’s proposals and policies for meeting its climate change targets. It sets out how Scotland can deliver its emissions reductions targets, of zero -emissions relative to the baseline by 2045.
- 2.9 The Scottish Government’s National Performance Framework (“**NPF**”)¹⁶ sets out a range of national level outcomes which will contribute to its overall vision and purpose. Many of these are

¹¹ CD012 at p 2.

¹² CD012 at p 2.

¹³ CD013.

¹⁴ CD013 at p 3.

¹⁵ CD014.

¹⁶ The National Performance Framework is undergoing reform at present. As of the time of drafting, public engagement is being undertaken until 9 April 2026 which will inform further drafting from this engagement draft.

relevant to travel and the walking and cycling agenda. As such, the work undertaken through the Active Travel Framework is expected to feed into the following National Outcomes:

- 2.9.1 connected: we participate freely in the civic, cultural and social life of our communities;
- 2.9.2 healthy: we live longer, healthier and more fulfilling lives;
- 2.9.3 sustainable: we live in a healthy environment, enjoy the natural environment and protect it for future generations.

Regional policy

- 2.10 The South East Scotland Transport Partnership has published a Regional Transport Strategy 2035, the most recent version of which was published in February 2023 (the “RTS”).¹⁷ Two objectives of the RTS are stated to be:¹⁸
 - 2.10.1 delivering safe active travel - enabling safe active travel in the region requires the provision of integrated and high-quality routes for walking, wheeling and cycling that join up settlements and destinations. This is essential to support the vital role walking and wheeling have to play in enabling people to make healthy living choices and assist in delivering places that are happier, more inclusive and equal, and more prosperous;
 - 2.10.2 reducing car kilometres - the Scottish Government has set out a target to reduce car kilometres in Scotland by 20% by 2030. Reducing the dominance of private cars offers significant benefits both to individuals and wider society, including improved health and wellbeing, reduced inequalities and more inclusive economic prosperity. Reducing car use will also improve our public places, making them more attractive, safer and healthier spaces in which to live, work and spend leisure time.

Local policy

- 2.11 The Council’s City Mobility Plan 2021 – 2030 (“CMP”)¹⁹ sets out the Council’s strategic approach to the sustainable, safe and effective movement of people and goods around Edinburgh up to 2030. The overarching vision is that “*Edinburgh will be connected by a safer and more inclusive net zero carbon transport system delivering a healthier, thriving, fairer and compact capital city and a higher quality of life for all residents.*”²⁰ Active travel is supported throughout the CMP, which further states:²¹

“Self-powered movement is healthy for us and our environment and adds to the life and vitality of our streets and places. It is the cleanest and most affordable way to travel.

Encouraging greater uptake in active travel is not just about strengthening connectivity and functionality in the network. It is also about improving the quality of routes and spaces so walking, wheeling and cycling is a pleasure to do.

When we design and maintain paths and routes for walkers, wheelers and cyclists, they should be fully accessible for all needs and abilities, safe, and minimise conflict between modes. This is critical if we are to strengthen people’s ability, confidence and desire to walk, wheel and cycle more.

¹⁷ CD016.

¹⁸ CD016 at Chs 7 and 15.

¹⁹ CD017.

²⁰ CD017 at p 8.

²¹ CD017 at p33.

UK and international evidence shows that when space for walking, wheeling and cycling is prioritised in high streets, local businesses benefit from increased trade. Investing in active travel therefore also helps to support our economy.”

2.12 Policy Measure MOVEMENT 15 - Cycling states that the Council will “Expand and enhance the citywide network of cycle routes to connect key destinations across the city, including increased segregated cycle infrastructure on main roads”²².

2.13 The supporting text provides that:

“Sustrans’ 2019 Edinburgh Bike Life Report states that every year, cycling prevents 251 types of serious long-term health condition, saves 14,000 tonnes of greenhouse gas emissions and creates £49.2 million in economic benefit for individuals and the city.

Our 2019 citywide survey confirmed that the most effective way to encourage more people to cycle is to provide more and better cycle lanes/paths and improved condition of cycle lanes/paths.

With 10% of our transport budget dedicated to cycling, we are already supporting more people to cycle by delivering on-street cycleways as part of the ‘QuietRoutes’ network. QuietRoutes use traffic-free paths, quiet roads or cycle paths separated from traffic.

The Active Travel Action Plan, as with walking and wheeling, sets out a package of measures to support cycling, including storage and cycle parking facilities. Our aim is to continue to enhance and expand the cycling network, with a focus on increasing provision of segregated routes on some main roads and creating a joined-up network. Involvement of communities and local businesses will be key to this process. This will support people who are willing and able to cycle, especially if they currently lack the confidence to try it.”

2.14 The CMP includes a ‘*Delivering Actions for Active Travel*’ section,²³ which details the actions that will be undertaken to deliver the active travel policies set out in the CMP help meet committed Council targets, including becoming a net zero carbon city by 2030, reducing car kilometres by 30% by 2030 and Vision Zero - where there are zero fatalities or serious injuries on Scotland’s roads - by 2050. The document highlights that cycling is very well placed to provide an effective alternative to the car in a city the size of Edinburgh.²⁴

2.14.1 Because parking at destinations is less problematic than when driving, cycling is often the fastest way of making journeys of up to about three miles (five kilometres – a 15- to 20-minute bike trip), and it can be very competitive for trips of up to five miles (eight kilometres).

2.14.2 Cycling, like driving and walking, does not rely on timetables, meaning it can be a very effective way of joining up suburban areas with disparate travel patterns. The growing availability of reliable electric bikes means that Edinburgh’s hills are less of a fundamental barrier than formerly.

2.15 All this means that there is huge growth potential for this, by far the most energy efficient, low impact, health-enhancing form of wheeled transport. In order for cycling to be an effective alternative to the car the report identifies that “*Safety concerns, particularly from motor traffic, are one of the major barriers to people choosing to cycle in Edinburgh. To overcome this, we are*

²² CD017 at p 35.

²³ CD018.

²⁴ CD018 at p 19.

looking to expand our cycle network.”²⁵ This cycle network is comprised of primary, secondary and local routes. MGS is a primary cycle route within the network, as discussed below.

- 2.16 Alongside CMP, and its ‘*Delivering Actions for Active Travel*’ section, is the Our Future Streets (OFS) framework.²⁶ This framework gives strategic direction to delivering road space reallocation across the city with particular focus on key corridors, the city centre and neighbourhoods. Its purpose is to “*support the delivery of key CMP objectives by enhancing sustainable, safe, efficient, and inclusive travel across the city. Enhancing conditions to support safe and inclusive active travel is critical to this*”. In the city centre, OFS builds on the ECCT, which set out the Council’s vision for a people-focused city centre, that is much better for people to walk, wheel and cycle around, including MGS. The Council’s Transport and Environment Committee approved (on 1 February 2024) the OFS layout for the city centre which designates the streets within MGS corridor as:
- 2.16.1 primary network for Place (secondary on Forrest Road, Bristo Place, Teviot Place, Market Street and Candlemaker Row);
 - 2.16.2 primary network for Walking;
 - 2.16.3 primary network for Cycling (secondary on Bristo Place and local on Candlemaker Row and Market Street);
 - 2.16.4 primary network for Public Transport (secondary on Candlemaker Row, not prioritised for Forrest Road or Market Street);
 - 2.16.5 local access only for General Traffic and traffic restrictions on Forrest Road, Candlemaker Row, Bank Street and Market Street.
- 2.17 In order to deliver the project as primary cycle network route, the OFS framework sets out that the corridor should have segregated cycleways and traffic restrictions as noted above.
- 2.18 The Council’s CMP Capital Investment Programme, approved at the 22 May 2025 Transport and Environment Committee confirms the Council’s proposed investment commitment to the MGS Project.²⁷

Transport policy conclusion

- 2.19 The MGS project is entirely in accordance with national, regional and local transport policy. The MGS project supports the NTS travel priorities and associated outcomes. The MGS project will provide safe, free, high-quality cycling, pedestrian and public transport infrastructure, improving the connectivity of the historic Edinburgh city centre. It will promote health and wellbeing, connectivity and economic and environmental benefits to Edinburgh’s city centre. It accords with the Sustainable Travel Hierarchy.
- 2.20 The MGS project is underpinned by the Council’s policy and strategy, including the CMP, and forms a key part of the Council’s OFS Framework and “*Delivering Actions for Active Travel*”. The ongoing delivery of the Scheme is detailed in the Council’s approved CMP Capital Investment Programme.²⁸

²⁵ CD018 at p 19.

²⁶ CD019.

²⁷ CD020.

²⁸ CD020 at Appendix 1.

Planning policy

2.21 The MGS project accords with relevant local and national planning policy.

Edinburgh City Plan 2030

- 2.22 The Edinburgh City Plan 2030 (“**City Plan**”)²⁹ was adopted on 7 November 2024 and sets out policies to guide development and land use in Edinburgh. The City Plan supports “*walking, wheeling and cycling by creating streets and public spaces for people over cars and improving and expanding sustainable public transport. City Plan 2030 aligns with and assists in the delivery of the City Mobility Plan’s commitment to make Edinburgh a city that welcomes everyone, where the streets are for people not cars, and with accessible and pleasant places to safely walk, wheel and cycle around.*”³⁰
- 2.23 The City Plan sets out key active travel proposals and seeks to develop and expand a citywide network of protected cycleways. It supports the existing network of city, town and local centres as important focal points for people who live and work in Edinburgh, providing shopping, leisure and community facilities in locations “*which can be easily accessed by walking, wheeling and cycling or public transport and helping to contribute towards 20-minute neighbourhoods*”³¹.
- 2.24 The City Plan targets Edinburgh becoming a sustainable city which supports everyone’s physical and mental wellbeing and a city where you do not need to own a car to move around. The City Plan also focuses on enhancing Edinburgh’s existing green blue infrastructure in recognition of the wide range of benefits greenspaces and watercourses offer, by providing “*attractive, welcoming active travel routes and giving natural setting to these to promote walking and cycling.*”³²
- 2.25 Part 4 of the City Plan sets out proposals to deliver the strategy and policies of the City Plan. The MGS project is safeguarded as an Active Travel Strategic Project (ATSR7).³³
- 2.26 The MGS project, with its focus on active travel and public realm improvement, accords with the City Plan strategy by connecting key parts of the city (the Meadows in the South with the commerce hub of the New Town) and being part of the ECCT. It also accords with the general development principles for good public and active transport connections and high-quality public realm and green spaces.

National Planning policy

- 2.27 The National Planning Framework 4³⁴ (“**NPF4**”) was adopted by the Scottish Ministers on 13 February 2023. NPF4 replaces both the National Planning Framework 3 and Scottish Planning Policy and will form part of the statutory development plan for the City of Edinburgh.
- 2.28 NPF4 supports the creation of sustainable, liveable and productive places. One of NPF4’s overarching spatial principles is Local Living:³⁵

“We will support local liveability and improve community health and wellbeing by ensuring people can easily access services, greenspace, learning, work and leisure locally.”

²⁹ CD021.

³⁰ CD021 at [2.98].

³¹ CD021 at [2.130].

³² CD021 at [2.57].

³³ CD021 at Table 3, p 163.

³⁴ CD022.

³⁵ CD022 at p 4 and 62 (Policy 15).

- 2.29 NPF4 Policy 13 (Sustainable Transport) encourages, promotes and facilitates developments that prioritise walking, wheeling, cycling and public transport for everyday travel and reduce the need to travel unsustainably.³⁶ Policy 13 supports proposals to improve, enhance or provide active travel infrastructure and which provide direct, easy, segregated and safe links to local facilities via walking, wheeling and cycling networks before occupation.
- 2.30 NPF4 also designates “National Developments” (“NDs”),³⁷ being significant developments of national importance that will help to deliver the Scottish Government’s spatial strategy. National developments include ND 7: Central Scotland Green Network and ND 8: National Walking, Cycling and Wheeling Network. ND 7 includes routes for active travel and/or recreation and ND8 includes New and/or upgraded routes suitable for a range of users for walking, cycling and wheeling that help create a national network that facilitates short and longer distance journeys and linkages to multi-modal hubs,³⁸ in both cases where the development would constitute a “major development” in terms of the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009.³⁹ This shows the strength of policy support for active travel schemes such as the MGS project.

Planning policy support

- 2.31 The Project accords with local and national planning policy. The City Plan strongly supports investment in active travel infrastructure and safeguards the route of the Project.

Environmental policies

- 2.32 The Project will also contribute to the City’s net zero carbon target by 2030 through improvements to walking and cycling. The ECCT and the CMP undertook appropriate environmental assessment at a strategic level in respect of the active travel improvements proposed throughout Edinburgh.

Impact on affected parties

- 2.33 The Council has carefully considered the benefits of the MGS project and the interests of the parties affected by the Order.
- 2.34 Having regard to the benefits of and policy support for the MGS project, the Council is satisfied that there is a compelling public interest case for confirmation of the Order. While there will be interference with the private rights of a number of parties, the Council considers that this is clearly outweighed by the public benefits of the MGS project.
- 2.35 In connecting with George Street and City Centre West to East Cycle Link (“CCWEL”), MGS will provide a vital missing part of the city centre cycle network and will link up the cycle route network in the east and south of the city with that in the north and west. This will deliver a step change in high quality cycle connectivity across the city for residents and visitors.

3. THE COUNCIL’S ENGAGEMENT WITH THE OBJECTORS (CONSULTATION)

Engagement prior to making the Order

- 3.1 The MGS project’s development and consultation is intrinsic to the wider ECCT strategy and has been a central component in the extensive public engagement on the ECCT, which was reported to the Council’s Transport and Environment Committee on 12 September 2019.

³⁶ CD022 at p 57.

³⁷ CD022 at p 99.

³⁸ CD022 at p 107 and 108.

³⁹ CD034.

- 3.2 Through the project’s development, multiple stages of public and stakeholder engagement have been undertaken:
- 3.3 During the development of the Community Links PLUS funding bid in 2017, the project undertook a focus group with people of varying occupations, ages and genders who frequent the area regularly travelling by different modes gathering insight into their travel choices and barriers to more walking and cycling.
- 3.4 At Royal Institute of British Architects (“**RIBA**”) design stage 1, in 2018, engagement undertaken⁴⁰ included a stakeholder workshop; a business and community representative drop-in sessions; a widely advertised online place-check tool; public engagement stalls and visitor snap survey on the proposed route; and selected stakeholder one-to-ones, including with Edinburgh Access Panel.
- 3.5 In May to July 2019, RIBA stage 2 engagement⁴¹ comprised a stakeholder workshop; a dedicated project website; an online survey with details of the MGS project’s proposed changes and visualisations; door to door business visits; public engagement stalls along the route and at the Central Library and The National Museum of Scotland which displayed concept designs and provided feedback forms; promotion via leafleting, social media postings and videos, press releases, lamppost wraps, railing banners; and engagement with the Community Councils.
- 3.6 In October/November 2019, engagement specifically for businesses was undertaken encompassing:
- 3.6.1 a Council headed letter posted to all businesses directly along the project corridor. This provided a Loading and Servicing Proforma which asked businesses for a detailed list of their loading, servicing, and waste operations on a daily basis;
- 3.6.2 three business drop in events at Augustine United Church.
- 3.7 Feedback from each of these stages of engagement was used to help inform the design’s development.
- 3.8 The Order complied with the 1999 Regulations’ requirements to allow the public to comment on any proposed Traffic Regulation Order; this ran from 19 April 2024 to 17 May 2024. During this period the project team also set up in person sessions for stakeholder organisations, including a specific session for disability groups to review the proposals and ask questions. There were also additional public and business drop-in sessions; letter drops to all businesses and addresses along the corridor. The MGS project team presented the project at the two local community council’s meetings (New Town and Broughton Community Council and Tollcross Community Council).
- 3.9 In addition to the MGS-specific engagement events noted above, further city-wide public engagement was undertaken in 2018 on ECCT, including in respect of cycleways and traffic reduction and the plans for Edinburgh’s city centre. This engagement process reflected high levels of overall support for changes to improve active travel routes and reduce traffic in the city centre.
- 3.10 Following public engagement of the ECCT, it was approved by the Council’s Transport and Environment Committee in February 2019.
- 3.11 By choosing to refer all the objections to a Public Hearing, the Council is demonstrating an open and transparent approach that provides opportunity for further, independent, scrutiny of the objections.

⁴⁰ CEC001.

⁴¹ CEC002.

Public opinion and consultation reflected in the MGS project

- 3.12 As noted above, the MGS project's designs received high levels of support across most of the changes it proposed. There were more people in favour of restricting traffic on Bank Street than those who opposed. These high levels of support for MGS were also reflected more broadly in the positive response to the engagement on ECCT.
- 3.13 In the response to the 2019 engagement, the MGS project team carefully considered all the responses received. Section 7 'Next Steps' of the 2019 report notes how the project responded to the feedback with consideration to changes in the design and where these changes also aligned with project/council policy objectives and guidance.⁴²
- 3.14 This process was continued at each stage of engagement and is reflected in the relevant section below of this Statement.
- 3.15 Examples of the design changes made due to community engagement include: disabled resident parking, access and delivery needs have been accommodated, loading windows have been altered to assist businesses, flexible footway/loading bays have been changed to standard loading bays to make the footways more legible for disabled users, more seating has been provided, and footway and cycleway widths have been improved wherever achievable.

Adequacy of consultation/engagement

- 3.16 As noted above, the project undertook engagement through a wide variety of methods and channels, so that awareness of the project, and the changes it proposes, would reach as many audiences as possible. In particular, the project team ran in person events and provided contact details so that anyone could come and ask questions if they needed to. The option for people to request translated, braille or large script versions of materials was provided.

Engagement post-making of the Order

- 3.17 Subject to approval of MGS, prior to and post construction of the scheme a communications strategy will be developed and delivered. This will ensure all interested parties and the public are kept informed about project progress, information in advance of key changes being made and advice on future operations. Specific communications and support will be offered to businesses affected prior to, during and post construction to help adapt to the changes.

4. OBJECTIONS TO THE PRINCIPLE OF THE SCHEME

General opposition to the TRO and/or the MGS

- 4.1 This Statement sets out the policy context that underpins MGS above. This policy context sets out a clear priority for sustainable transport modes, under the sustainable transport hierarchy ahead of private car use. In particular the OFS framework for the city centre clearly defines the intended transport types that should be prioritised on the MGS streets. MGS is aligned to these policies. Notwithstanding this, MGS will still permit for all key destinations, such as transport hubs, and public buildings to be accessible by private car, albeit that some of these journeys may require alternative routes.

Traffic on the road network, journey times, road safety and pollution

- 4.2 In respect of increased traffic, journey times, speed on other streets; the Council notes:

⁴² CEC002.

4.2.1 Traffic modelling for the project corridor and the wider city centre has been undertaken and concludes that:⁴³

“Option A [whose only significant change to through traffic is the introduction of MGS] has a modest impact on city centre streets and redistributed traffic can be accommodated on adjacent streets”

4.2.2 Whilst certain journeys by private car may take longer, journeys by walking, cycling and public transport will be improved along the project corridor.⁴⁴ This trade-off is aligned to national, regional and local transport policy, as set out in section 2.

4.3 In respect of air quality impacts; the Council notes:

4.3.1 Detailed air quality modelling for the project and city centre has been undertaken and in line with relevant government and professional guidance and the Air Quality Standards (Scotland) Regulations 2010. The modelling compares traffic emissions with and without MGS.⁴⁵

4.3.2 The Air Quality Assessment considered 392 sensitive receptors proximate to MGS. The assessment determined that the vast majority of these receptors would experience a negligible impact due to the MGS project, for all three pollutants considered (NO₂, PM₁₀ and PM_{2.5}). The assessment indicates that on the opening year of the MGS project:

- (a) For NO₂; 18 receptors experienced a beneficial impact due to MGS (i.e. the Scheme led to a reduction in pollutant concentrations) and 13 experienced adverse air quality effects;
- (b) Eight of these beneficially impacted receptors face moderate benefits; while only one negatively impacted receptor faces moderate negatives, though it should be noted this property already experiences exceedances of the air quality thresholds noted in the guidance and regulations.
- (c) For PM₁₀, nine receptors experienced beneficial impacts, while six experienced adverse effects; and
- (d) For PM_{2.5}, eight receptors experienced beneficial impacts and none experience any adverse impact.
- (e) No receptors experience annual mean concentrations of nitrogen dioxide or PM₁₀ that were high enough to suggest that there was any risk of non-compliance with the guidance and regulations.

4.3.3 Due to the number of moderate beneficial impacts that were predicted to occur, the overall effect of the Scheme was determined to be not significant and in line with relevant planning policy.

⁴³ CD019 at p 65.

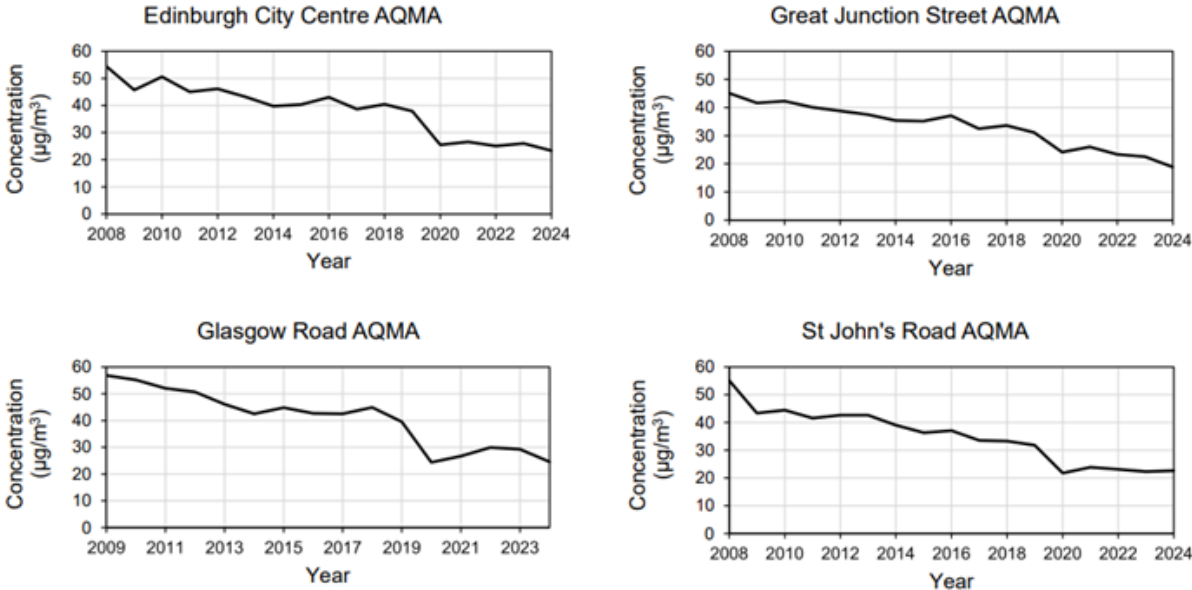
⁴⁴ CEC003.

⁴⁵ CEC004

It is worth noting that the assessment was finalised in 2023 and utilised air quality measurement data gathered in 2018. The charts below have been taken from Edinburgh City Council’s most recent Local Air Quality Management publication. They show that across the city, there is a general trend of decreasing annual mean nitrogen dioxide concentrations, which have continued in that trend since 2018. Aside from the effect of the COVID-19 Pandemic, this suggests that the Council’s existing measures to improve local air quality, alongside the natural evolution of the vehicle fleet, is helping to reduce annual mean nitrogen dioxide concentrations across the City and, in particular, within the City’s Air Quality Management Areas.

Figure 1: NO2 concentration trends

Figure A.2 – NO2 concentration trends at passive diffusion tube monitoring locations



4.4 In respect of road safety concerns; the Council notes:

4.4.1 Road Safety Audits have been undertaken for the project which raise no outstanding concerns that have not been addressed through the design process.⁴⁶ As noted in Section 2 on policy, the MGS project sits within policy and delivery plans for the whole city, including measures and projects to improve road safety. This will ensure that over time road safety across the city can improve.

4.5 Objectors specifically raised concerns about traffic and congestion issues on roads adjacent to the MGS project. Specific concerns on impacts on Lothian Road, the Bridges, Queen Street, the New Town, the Old Town, Edinburgh city centre, Melville Drive, Lauriston Place and York Place were highlighted.

4.6 As noted above, traffic increases may occur on some streets surrounding the MGS project, including streets highlighted by these objections. However, as part of the wider OFS plan for the city centre, Lothian Road, the Bridges, and many other key streets in the city centre include projects to improve sustainable transport and placemaking. Delivery of these proposals is expected to improve road safety and the overall levels of traffic, which are expected to fall in the city centre through modal shift and the prioritisation of active travel. Such increases in sustainable transport modes have been recorded in Edinburgh and elsewhere in Scotland when similar type projects have been delivered.⁴⁷

⁴⁶ CEC005, CEC006 and CEC007.

⁴⁷ CD024 and CD025.

- 4.7 Modelling has indicated that the largest traffic increases (an extra 4 vehicles a minute) will be on the west end of Queen Street/South Charlotte Street.⁴⁸
- 4.8 York Place, the New Town, Melville Street and Lauriston Place see either moderate or no increases in traffic and, as noted above, overall, all the traffic distribution changes have only modest effect and can be accommodated within the traffic network. Further to this, streets with the largest traffic increases, such as Queen Street, are designated to remain as part of the primary (or in some cases secondary) traffic network in OFS.
- 4.9 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 and place functions. This accords with OFS.
- 4.10 Modal shift being prioritised in city centres, and leading to positive transport effects has been borne out in other European cities, such as Ghent; where implementation of comparable traffic restriction plans to OFS. In Ghent there have been reductions in general traffic post implementation, with increases in sustainable transport modes. Alongside this their primary roads for general traffic continued to function effectively.⁴⁹

Appropriate use of public money

- 4.11 Similar projects to MGS have been delivered in Edinburgh and nationally and have shown to have beneficial outcomes for the local area and local people, including for health and well-being from people choosing the travel more actively, improved air quality from less people driving, creating more inclusive streets that are accessible to all by wider footways, more crossing points and dropped kerbs.⁵⁰

Modelling of transport and traffic impacts of MGS and assessment of cumulative impacts

- 4.12 As set out in the policy section of this Statement, the project has been developed in the context of the wider ECCT and OFS plans for Edinburgh's city centre and city as a whole. MGS is one project, among many, that form the structure of the changes that the ECCT/OFS plan introduces in the city centre.
- 4.13 Similarly, environmental considerations in respect of the ECCT proposals (including air quality and traffic modelling) has already been considered appropriate by the Council and approved in the wider context of ECCT and OFS.

5. EQUALITIES ISSUES

- 5.1 An Integrated Impact Assessment has been undertaken for the project.⁵¹ This assessment process is initiated at the first stage of a project and then updated at each key milestone of the project's development and shared publicly on the Council's website.
- 5.2 The assessment considers potential impacts under three overarching themes:
- 5.2.1 Equality, Health and Wellbeing and Human Rights;
 - 5.2.2 Environment and Sustainability including climate change emissions and impacts;
 - 5.2.3 Economics.

⁴⁸ CEC003.

⁴⁹ CD026.

⁵⁰ See, for instance, CD024, CD028 and CD029 and the Edinburgh Walking and Cycling Index.

⁵¹ CEC008.

- 5.3 Impacts within each of these themes are identified⁵² and mitigation measures then applied to address them.⁵³ Through this process the MGS project has been diligent in ensuring equalities issues are identified, considered and appropriately addressed.

Discriminatory effect of traffic restrictions, reduction of accessibility for older or disabled people

- 5.4 People not living on the streets within the MGS project area will still be able to receive deliveries and services. They will also be able to reach all key destinations and services along the corridor, such as Waverley Station, the museums and galleries, by private car, albeit that some of these journeys may be via alternative longer routes.
- 5.5 Access to services by bus and active travel will be significantly improved, resulting in an increase in the overall choice of safe and viable transport options. In respect to this the MGS project also highlights that disabled people are proportionately more likely to use public transport than those who are not disabled.⁵⁴ As such, as a group, disabled people may benefit proportionately more from the bus journey time improvements than non-disabled people.
- 5.6 The Council does recognise there may be some disabled people who rely solely or mainly on private cars or private hire vehicle (“PHVs”) for transport, either driving or as a passenger, for whom this would not be an advantage. However, these people would still be able to access all key services and destinations by private car or by PHV.
- 5.7 MGS is proposing to develop a comprehensive signage strategy for the wider road network; and communications campaign undertaken in advance of construction including specific outreach to accessibility groups across the city.
- 5.8 Access by taxi is maintained on all routes, as currently, with taxi ranks, pick up/drop off areas provided along the route as well as drop off permissible in areas of double yellow line restrictions.
- 5.9 Some objections have specifically raised concerns about private car access to certain sites along the corridor, particularly St Giles Cathedral and the National Galleries. Access to St Giles Cathedral from the south along George IV Bridge will remain available as is currently the case. In addition, the MGS project intends make an alteration to the current TRO to permit a right turn from Chambers Street to George IV Bridge (see relevant section below of this Statement). This will help to provide better access to George IV Bridge for those approaching from the North or East, who might previously have accessed via the Mound.
- 5.10 Access to the National Galleries will remain from the north via Hanover Street and The Mound. Access from the South is still possible, though it is acknowledged that these routes will be longer, as it requires routing around the Old Town, via either the Bridges or Lothian Road. Access by PHV is maintained from the south via through the Market Street bus gate (which is proposed to have an ETRO trial permitting PHVs).

Access to and from Waverley Station

- 5.11 Access to all entrance points at Waverley Station will be retained. However, some journeys to the station by private car may be longer. As noted above, access by public transport will be improved, which may be proportionately more beneficial to disabled users. The MGS project also plans to trial permitting PHVs through the market street bus gate, which will help maintain access for

⁵² CEC008 at section 8.

⁵³ CEC008 at section 12 and 13.

⁵⁴ CD027.

disabled and older users accessing the station by PHV. Please refer to document ‘MGS Waverley Traffic Routing’ with details on the access points and routes for traffic including taxis.⁵⁵

Blue badge parking

5.12 Blue badge holders can currently park on street within the locations listed below as a driver or passenger of a vehicle with the badge clearly displayed:

- 5.12.1 disabled persons (blue badge) parking places;
- 5.12.2 pay and display bays;
- 5.12.3 shared use bays;
- 5.12.4 single and double yellow lines (out with any loading prohibition and provided an obstruction/hazard is not caused).

5.13 On the streets affected by the TRO, the number of spaces currently available for people with blue badges to park are provided in Table 1 below.

Table 1: Existing blue badge parking along the MGS project

Existing Blue badge parking spaces									
	Hanover Street	Mound	Mound Place	North Bank Street	Bank Street	George IV Bridge	Forrest Road	Teviot Place	Bristo Place
Blue badge bays	1	0	0	0	0	0	0	0	0
P&D bays	0	0	9	0	0	0	0	0	0
Shared use bays	0	0	10	0	0	0	0	0	0
Single and Double yellows - no loading prohibition	0	0	11	0	0	0	0	0	0
Single and Double yellows - with part time loading prohibition (Monday to Friday 7.30 a.m. to 6.30 p.m.; Saturday 8.30 a.m. to 6.30 p.m.; Sunday 12.30 p.m. to 6.30 p.m.)	3	0	0	3	4	40	10	22	15

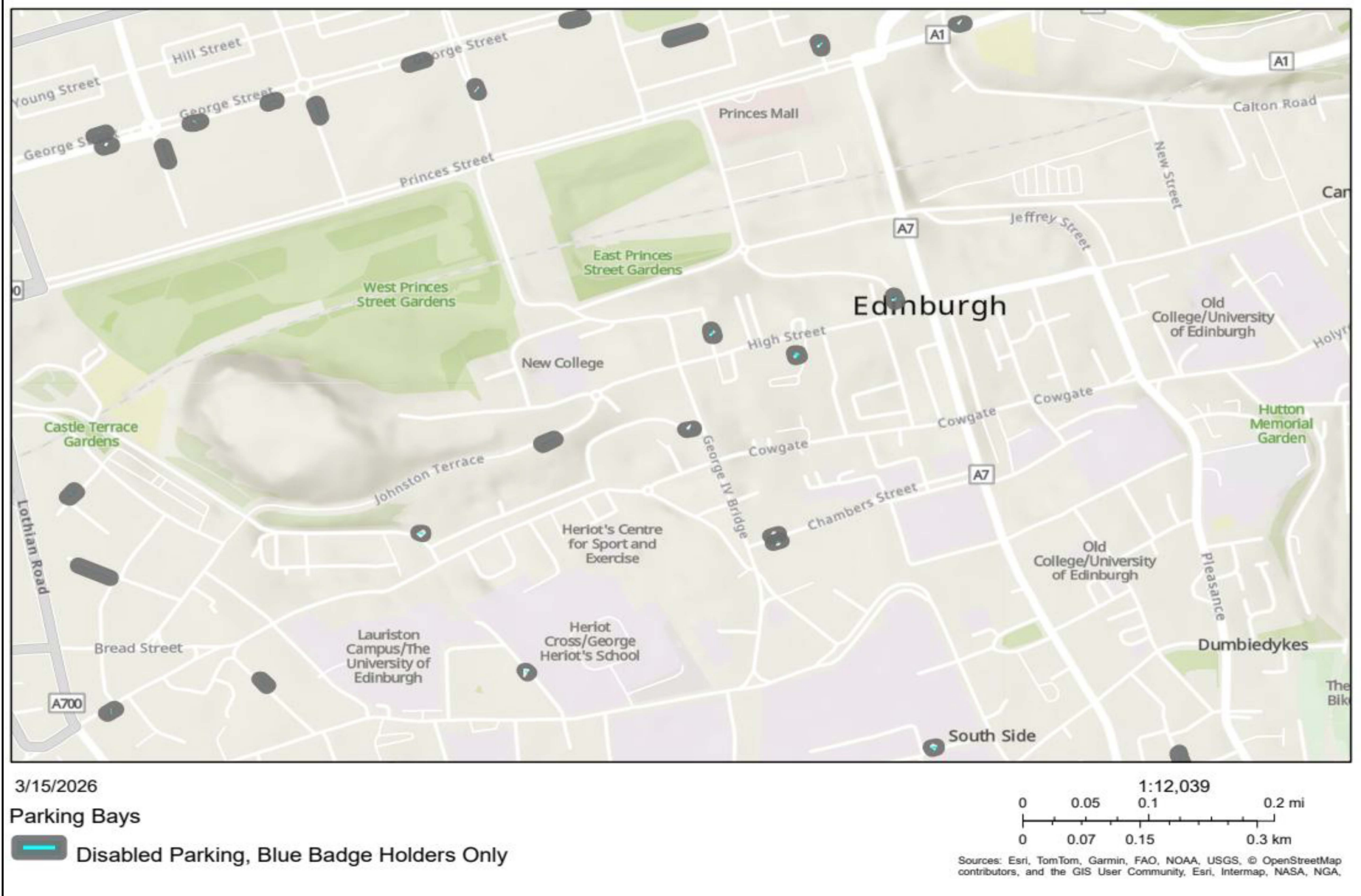
5.14 On the streets affected by the TRO, there is currently only a single blue badge space located on Hanover Street. There are part-time loading prohibitions on the majority of the single and double yellow lines associated with the bus greenways, which allow blue badges to park (off-peak)

⁵⁵ CEC009.

outside of loading hours, Monday to Friday between 6.30 pm to 7.30 am; Saturday 6.30 pm to 8 am; and Sunday 6.30 pm to 12.30 am. There is a total capacity for off-peak parking totaling 97 cars in the MGS project area. There are a further 11 spaces on Mound Place with no loading prohibitions allowing 24-hour parking for blue badges.

- 5.15 It should be noted that in the nearby surrounding streets, there are blue badge spaces on George Street, St. Giles Street, Parliament Square, Victoria Street and Chambers Street. The map below (Figure 2) shows the blue badge parking spaces across the area.

Figure 2: map of blue-badge parking spots close to the MGS project



5.16 During the design development process, the MGS project undertook detailed parking surveys to understand levels and distribution of the blue badge parking within the study area. Please refer to ‘MGS Disabled Parking Summary Note’ with details of the survey data and analysis on demand and activity on the streets affected by the TRO.⁵⁶

5.17 ***Proposed TRO blue badge parking***

5.18 The proposed TRO and designs aim to provide blue badge spaces on the streets affected where there was recorded demand. This includes new spaces on George IV Bridge (2no.) at the location of St. Augustine’s Church and on Teviot Place (1no.), as well as retaining the bay on Hanover Street.

5.19 The survey data also highlighted that the existing spaces on Victoria Street (2no.), St. Giles Street (2no.) and Chambers Street (5no.) cater for the majority of the demand in the area and these are unchanged by the proposals.

5.20 Due to the constrained road widths proposed by the scheme, and the need to maintain traffic flows for public transport journey times, there are no proposed lengths of single or double yellow lines with no/part-time loading prohibitions which would be available for blue badge parking.

Post TRO consultations

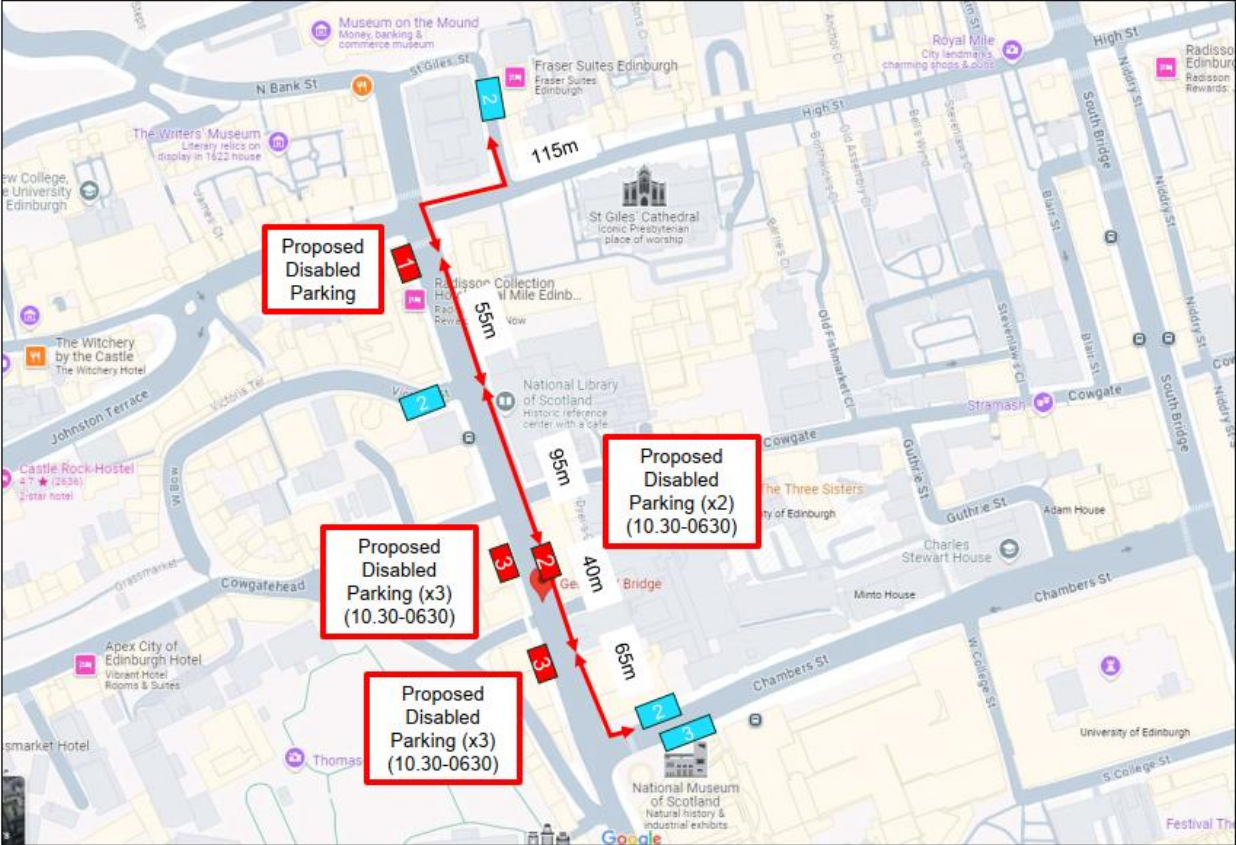
5.21 Feedback from key stakeholder organisations including the Edinburgh Access Panel, St. Giles Cathedral and St. Augustine’s Churches raised concerns regarding the reduced capacity of blue badge parking on George IV Bridge (provided by the part-time loading restrictions). The MGS project team met with each of the organisations as part of our post TRO consultations to understand their concerns. Amendments are now being proposed which will introduce seven additional blue badge parking spaces on George IV Bridge. This includes a new space at the junction with the High Street (near St Giles Cathedral) and six new spaces in the centre of the street, near Augustine’s United church. These spaces will operate from 10:30am to 06:30am.

5.22 Feedback from access groups noted that some people with blue badges have reduced mobility and this limits the distance they can walk. They raised concerns over the walking distances on George IV Bridge and the High Street area where there are many key trip attractors and churches/places of worship. With the additional spaces now being proposed, the distances between parking is shown in Figure 3 below.

5.23 Consultation with a further resident on Mound Place, who hasn’t responded to the TRO, highlighted the need for disabled parking and an amendment to the TRO is proposed to accommodate this.

⁵⁶ CEC010.

Figure 3: additional spaces proposed after engagement



Discriminatory reduction of access to services for local residents in the project area

- 5.24 Following detailed in person engagement with residents who live within the affected streets, the MGS project plans to make the following adjustments to the TRO:
 - 5.24.1 residents of Bank Street, Cockburn Street, Mound Place and Ramsay Gardens will be permitted to use private cars through the Bank Street bus gate at any time. This change has been made as these residents would otherwise be disproportionately affected by the traffic restrictions, in particular their access to zone 4 parking opportunities. As there are low numbers of residents, permitting them access will not negatively impact on bus journey times;
 - 5.24.2 residents of Forrest Road and Forrest Hill will be permitted to access Forrest Road/Hill at any time. As there are low numbers of residents, permitting them access will not significantly impact on the pedestrian cycle zone.
- 5.25 The MGS project team have also made specific adjustments for disabled residents who live on the affected streets, with creation of location specific disabled parking and permissions for services, such as care and deliveries, to be made at any times required.
- 5.26 Residents of these streets will still be able to receive deliveries within the times of the loading window. Specific deliveries of one-off items that cannot be delivered within loading windows or at loading bays can be accommodated through the council’s existing online exemptions process. This is already used for delivery of large one-off items like washing machines to locations in the city with loading restrictions, or for emergency domestic trade works such as a significant water leak.

6. IMPACTS ON BUSINESS, RESIDENTS, EMERGENCY SERVICES AND HERITAGE

Benefits to residents, the wider community and tourists

6.1 As previously noted, studies of similar types of projects in Edinburgh and the UK demonstrate the benefits that MGS will be able to provide for local people. The MGS project consultation and engagement that has been undertaken indicates high levels of support from local people and this support was also reflected in similar consultations for the ECCT strategy that MGS is a part of.

Impacts on emergency services

6.2 Emergency services were contacted as part of the project's consultation process and no concerns were raised. Access through all the restrictions is permitted for emergency services

Impacts on local businesses and employment

6.3 Studies undertaken of similar types of project in Edinburgh indicate that overall, positive effects of such projects are reasonable to expect and negative effects on business and employment are unlikely.⁵⁷ Further to this, national and international studies also indicate similar positive results of these type of street changes.⁵⁸

Impact on business and residents loading and servicing

6.4 In Edinburgh city centre, loading and servicing access is primarily managed through specific access windows, typically scheduled overnight or during early morning hours to avoid peak pedestrian and traffic times. The MGS scheme proposes to adopt a similar approach and provide synergy with nearby loading and serving times to provide consistency across the city centre. This consistency will help accommodate delivery services by providing similar access times across the area to suit journey and vehicle scheduling. Many of these existing restricted access windows have been in operation for a number of years and proven to work successfully.

6.5 Nearby pedestrian-priority streets with restricted access and loading schedules:

6.5.1 Royal Mile (High St, Cockburn St): Open for loading from 12 am to 10.30 am daily;

6.5.2 Lawnmarket (Johnston Terrace to George IV Bridge): Servicing and loading permitted between 7 pm and 10.30 am; and

6.5.3 Princes Street: Access and loading permitted between 8 pm and 7 am.

Business engagement

6.6 The proposed loading access windows and locations have been informed by a number of engagement programmes with local businesses and detailed parking and loading surveys. This evidence based approach has ensured a robust method for providing for the business needs, observed demands and consistency of approach across the city centre.

6.7 A list of the engagement activities complete in the project design development stages in 2018-19 are shown in tables below. Overall, 58% (97) of businesses along the project route provided detailed loading and servicing information and a further 41 business owners provided feedback via online surveys.

⁵⁷ CD024.

⁵⁸ CD028 and CD029.

First Stage – June to September 2018

- 6.8 In June, the project team walked the route to speak with local businesses, shared information via leaflets and the project website.
- 6.9 A business drop-in session was held in September where businesses were asked for feedback and to complete a form to specify their loading and servicing schedules.
- 6.10 The route was walked again in September to speak to any businesses we had not yet met with.

Second Stage – May to July 2019⁵⁹

- 6.11 Members of the project team walked the route again in May providing details of the next stage in the project.
- 6.12 A drop-in session for businesses and organisations was held in June. Forms about loading and servicing were again available.
- 6.13 An online survey was also launched.

Third Stage – October to November 2019

- 6.14 A letter was sent out to each business along the project route providing details of the project and included a form for businesses to provide their personal loading and servicing needs.
- 6.15 The letter also advertised three business focused drop-in events.

Loading data collection

- 6.16 The project team undertook detailed loading surveys in 2019 and 2024 to inform the TRO proposals. These loading surveys were analysed to understand:
 - 6.16.1 demand for loading on each street section;
 - 6.16.2 timing of existing loading operations.
- 6.17 Please refer to the ‘2024 Loading Survey Technical Note’ for full details.⁶⁰
- 6.18 The final proposals for loading locations (bays) and timings were informed by the business feedback, observed survey demand and consistency of access and timing across the city centre. Loading timings on George IV Bridge have been aligned with the High Street loading period. The loading times on Hanover Street have been co-ordinated to complement the emerging loading proposals on George Street.
- 6.19 In addition, the proposed bus gate times on the Mound were also aligned with the access restrictions on Princes Street to provide consistency and access for servicing during those times across the city centre.

Other kerbside activities

- 6.20 Aside from the formal loading bays contained within the TRO, there are a number of activities which are permitted within the scheme extents available to businesses and residents access including:
 - 6.20.1 It is generally permitted to drop off and set down on any of the roads and kerbsides where safe to do so;

⁵⁹ CEC002.

⁶⁰ CEC011.

- 6.20.2 advanced applications can be made for exemptions to access via the bus gates on the Mound and Market Street as well as the access restrictions on Forrest Road for events or special loading activities;
- 6.20.3 applications for dispensation can be made by residents or businesses via the Council website and are generally permitted provided they do not create a road safety hazard. A dispensation may allow for trades; delivering heavy goods; furniture or home removals; and vehicles with generators.

Post TRO engagement and amendments

Businesses

- 6.21 As part of the TRO advertisement and consultation process in April/May 2024, the MGS project team undertook targeted engagement with businesses within the scheme. This included letters and leaflets; business visits; drop-in events; and tailored business information packs.
- 6.22 During this engagement, and on receipt of formal responses and objections to the TRO, further engagement was undertaken with businesses on the following streets. As part of these discussions, there are a number of amendments being proposed (noted below in Table 2).

Table 2: business engagement and amendments to the TRO

Street	Issue and recommendations
Bank Street	<p>Issue: Bus gate access and loading too restricted and will impact operations.</p> <p>Recommendations: Amendments proposed to the position of bus gate which will allow northbound traffic access to turn right into St. Giles. This movement will permit access/egress to the loading bay on Bank Street and access to St. Giles Street where a mixture of parking and loading exist.</p> <p>The loading bay on Bank Street would be altered to provide more loading capacity and to operate from 7 p.m. to 10.30 a.m. to align with the loading periods on surrounding streets.</p> <p>Further to this 24hr loading bays have been provided on Mound Place to facilitate any additional loading/servicing requirements</p>
George IV Bridge	<p>(a) Issue: Lack of blue badge parking</p> <p>Recommendation: As noted above, additional blue badge spaces are being proposed on George IV Bridge.</p> <p>(b) Issue: Event loading/servicing</p> <p>Recommendation: Applications for dispensation for events can be made via the Council’s website and is a typical process for venues in the city centre.</p>
Bristo Place	<p>Issue: Loading operations require on-street storage of vehicles.</p> <p>Recommendation: Additional 26m loading bay added to west side of Bristo Place.</p>

Residents

- 6.23 In respect of residents affected by the MGS project, the following amendments are proposed (noted below in Table 3).

Table 3: amendments to the TRO for residents

Street	Issue and recommendations
Forrest Road	<p>Issue: Disabled resident with reduced mobility relying on taxis and private car pick up/drop off.</p> <p>Recommendation: As set out sections above the project will be providing access for the needs for this resident.</p>
North Bank Street	<p>Issue: Concerns raised over access for deliveries to property.</p> <p>Recommendation: Amendments proposed to the position of bus gate which will allow northbound traffic access to turn right into St. Giles. This movement will permit access/egress to the loading bay (noted above) on Bank Street and access to St. Giles Street where a mixture of parking and loading exist.</p>

6.24 In summary, the Council is satisfied that an evidence led approach has been applied to the loading and access proposals included in the TRO which meets the demands of the streets and provides consistency across the city centre. We have continued to engage with businesses and residents who have objected to the TRO on grounds of limiting access for loading/services and are proposing amendments to further mitigate these concerns.

Heritage context

6.25 The MGS project is located within the ‘Old and New Towns of Edinburgh’ World Heritage Sites which were inscribed in 1995. The project area encompasses parts of the Old Town Conservation Area and New Town Conservation Area. Numerous category A, B and C buildings and monuments are located along the route.

6.26 Given the sensitivity of these heritage designations the design of the MGS project has been undertaken with due regard to the Outstanding Universal Value of the World Heritage Site and the attributes which contribute to this.

Proposed works

6.27 Generally, the project does not propose any alterations to listed buildings, monuments, or the existing physical pattern or scale of streets. Therefore, the impact of the works on heritage is limited in this regard to the public realm. The only exception to this was the proposal to widen an area of the Mound. In relation to this, an alternative design is now proposed in this area to avoid the widening of the Mound and therefore to retain the existing low wall and railing which is covered by the Category A listing of the National Gallery of Scotland.

Heritage Impact Assessment

6.28 Through the design of the project, a Heritage Impact Assessment process has been followed. This identified the attributes which contribute to the Outstanding Universal Value (OUV) of the World Heritage Site and identified the possible impacts of the proposed action on these. Proposals have been developed with a consideration of the impact of proposals on key attributes of the World Heritage Site’s OUV, such as Street pattern, hierarchy and evolution, Street symmetry, alignment and proportion, Architecture, Open Space, Distinctive townscapes (Old and New Towns), Monuments, Views and Vistas, and Topography.

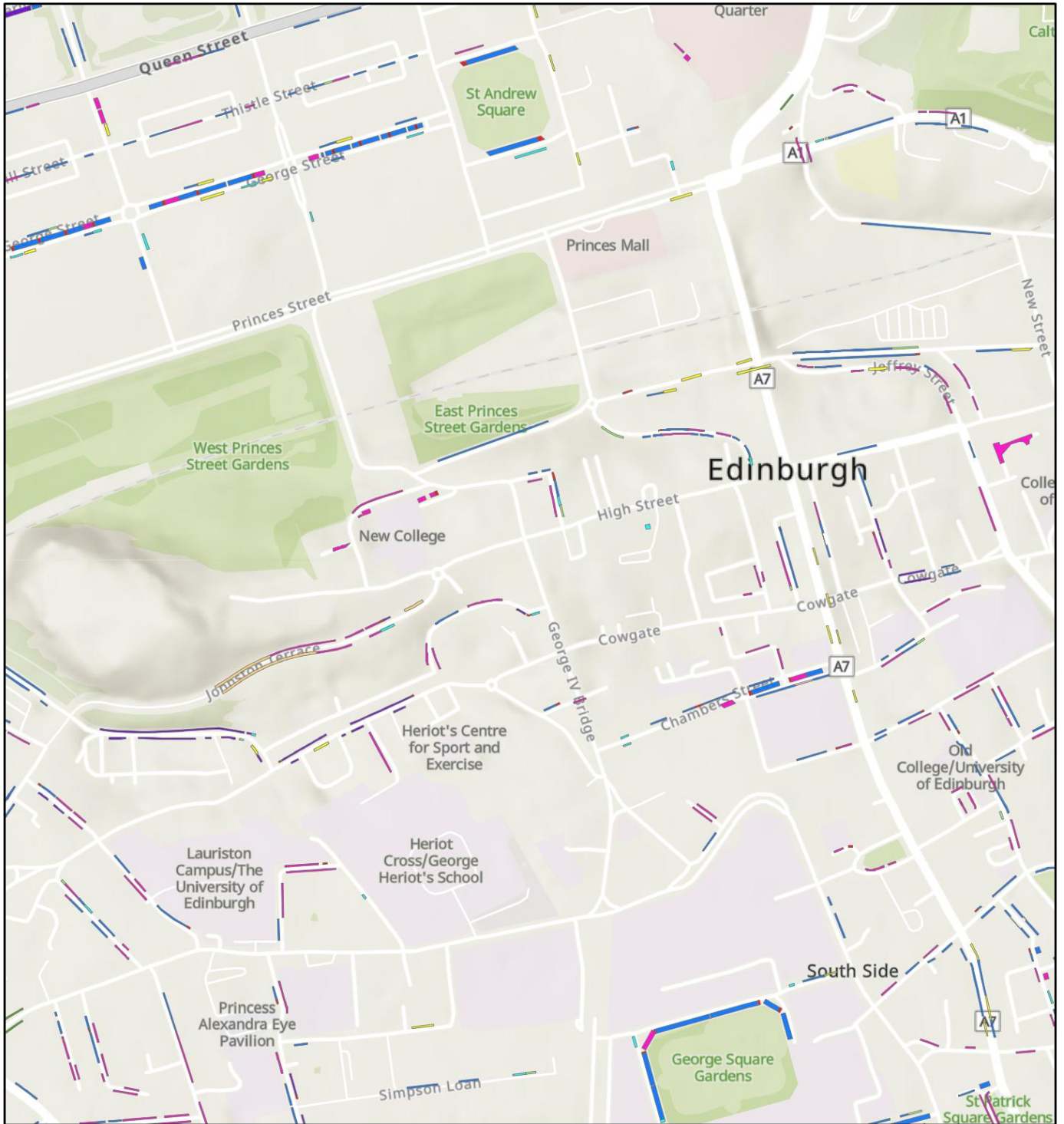
Heritage Engagement

- 6.29 Throughout the project, consultation and engagement has been undertaken with both Edinburgh World Heritage and CEC's World Heritage Site co-ordinator to ensure proposals are appropriate. This engagement has included discussion in relation to layout, materials and tree planting amongst other topics, with recommendations being incorporated within the designs.
- 6.30 Proposed amendments to the MGS project from engagement with objectors concerned with heritage include responding to flexible loading bay requests will result in amendments to the physical design of the space.

Restriction of residents' access to and through the city centre and parking.

- 6.31 As detailed in section 5 above, whilst the traffic restrictions will change how some journeys to and within the city centre will be made, all destinations and parking is still accessible. Reducing private car kilometres and trips through the city centre are core aspects of the CMP, ECCT and OFS. As such, decreasing private car trips along the MGS corridor is fully aligned to Council policy (and supported more generally by national policy).
- 6.32 Also as noted above, the MGS project proposing introducing double yellow lines in place of single yellow in multiple locations which would remove the opportunity for parking outside the times of the restrictions. However, as shown in Figure 4, there remains many parking opportunities in the local area (Pay and Display bays on George Square, Chambers Street, Grassmarket, St. Giles St, Market Street and George Street) and this parking remains free on a Sunday until 12:30pm. The prioritising of public transport and active travel ahead of private cars also aligns to Council, regional and national policy.

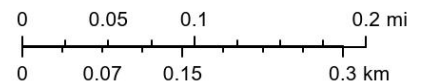
Figure 4: Parking proximate to the proposed TRO



3/27/2026

1:12,000

- | | |
|---|---|
| Parking Bays | Other Controlled Parking Bay - authorised vehicles only |
| Buses Only | Parking and/or Loading Bay on Greenway Route |
| City Car Club Vehicles Parking Only | Public Parking charged as per tariff on parking meter |
| Disabled Parking, Blue Badge Holders Only | Resident Permit Parking only |
| Loading Bay | Residents Permit or Public Parking as per tariff on parking meter |
| Motorcycle Parking Only | |



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri, Intermap, NASA, NGA, USGS

Negative impact PHV business due to the TRO

- 6.33 Consideration was given to permitting PHV through the Bank Street bus gate. However, modelling of this clearly indicates that it would have a detrimental impact on southbound bus journey times.⁶¹ The sustainable transport hierarchy, as set out in the CMP, places buses above PHV in order of priority. As such, by not permitting PHV at Bank Street, MGS is aligned to Council policy.
- 6.34 Further to this, it is noted that the Council’s Transport and Environment Committee approved maintaining the Council’s position of not permitting PHVs through bus gates pending a review of all existing and proposed bus gates to consider where it may be appropriate to allow access to both PHV and Black Taxis.⁶²
- 6.35 MGS concluded a review in line with this and, for the reasons stated above, will not permit PHVs through the Bank Street bus gate.
- 6.36 At Market Street this same process was followed and, given that permitting PHVs through this bus gate is not expected to have an impact on bus services, it is proposed to permit PHV through the bus gate on a trial basis under an Experimental Traffic Regulation Order.
- 6.37 The MGS project considered permitting PHV into Forrest Road, however given that the street is a pedestrian cycle zone it was judged that permitting PHVs into the space would significantly decrease the safety and functioning of this space for pedestrians and cyclists. It was considered that the taxi rank on Teviot Place would provide a suitable alternative pick up/drop off point for people wishing to use a PHV for accessing destinations on Forrest Road.

7. CYCLEWAY DESIGN

Suitability of the proposed cycleways

- 7.1 Edinburgh Streets Design Guidance (“**ESDG**”)⁶³ by The City of Edinburgh Council (2015) sets out the place type and movement types of streets within the catchment area of the route.
- 7.2 The streets on which the core cycle route is located are all classified as ‘Strategic’ for movement type. Strategic streets are those that have the highest significance of movement.
- 7.3 The streets on which the core cycle route is located are also all designated as primary network for Cycling under OFS, see Figure 5. Further to this, the OFS integrated network map, specifies that for the MGS route, with the exception of Forrest Road, Bristo Place and Market Street, protected cycleways should be provided.⁶⁴

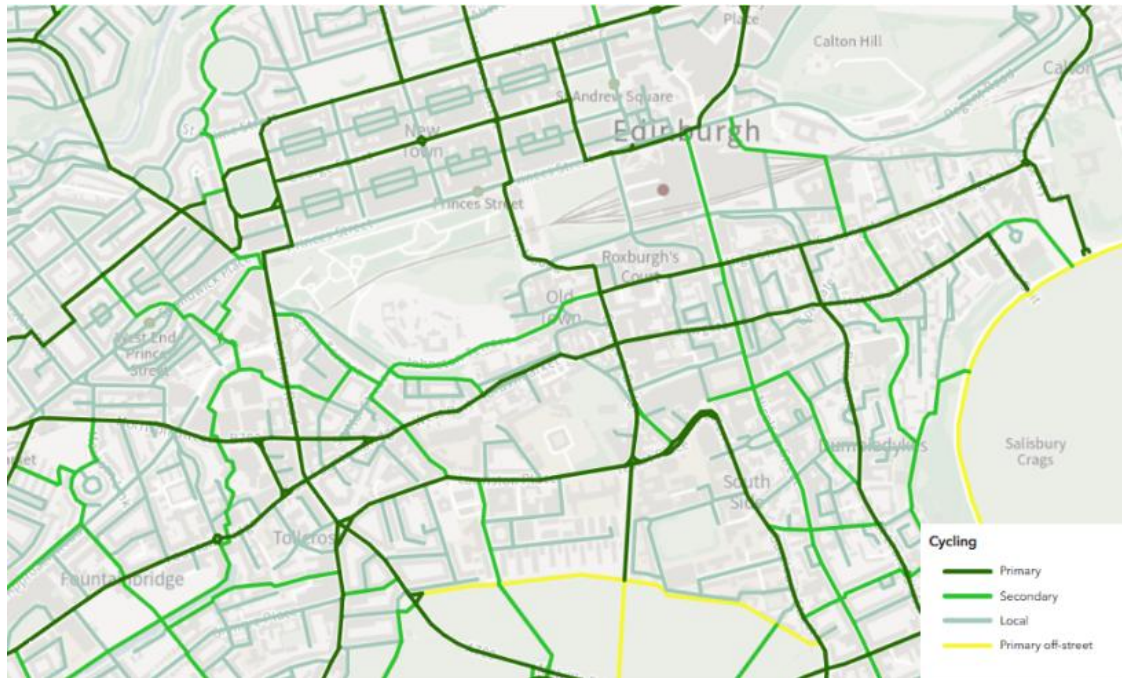
⁶¹ CEC003.

⁶² CD030.

⁶³ CD031.

⁶⁴ CD019 integrated network map.


Figure 5: OFS cycle network in Edinburgh City Centre



- 7.4 As per ESDG, the existing vehicle volumes and speeds would necessitate, for safe cycling, an intervention of ‘cycle lanes or segregation from traffic’, whether 85th percentile speeds are greater or less than 20 miles per hour.⁶⁵
- 7.5 Cycling by Design (Transport Scotland, 2021),⁶⁶ also provides a breakdown of level of intervention required by the volume of traffic and the 85th percentile speed of traffic. This is shown in Figure 6.

Figure 6: Cycling by Design intervention levels

Motor Traffic Speed (85th percentile)	Two-way traffic flow (pcu per day)	Two-way traffic flow (pcu per hour)	Mixed Traffic Street	Detached or Remote Cycle Track	Cycle Track at Carriageway Level	Stepped or Footway Level Cycle Track	Light Segregation	Cycle Lane
0 to 30 kph	0 to 2000	0 to 200	●●●	●●●	●●●	●●●	●●●	●●●
	2000 to 4000	200 to 400	●●	●●●	●●●	●●●	●●●	●●●
	4000+	400+	●	●●●	●●●	●●●	●●●	●●
30 kph to 50 kph	0 to 1000	0 to 100	●●●	●●●	●●●	●●●	●●●	●●●
	1000 to 2000	100 to 200	●●	●●●	●●●	●●●	●●●	●●
	2000 to 4000	200 to 400	●	●●●	●●●	●●●	●●●	●●
	4000+	400+	●	●●●	●●●	●●	●●	●
50 kph to 65 kph	0 to 1000	0 to 100	●●	●●●	●●	●●	●●	●●
	1000 to 2000	100 to 200	●	●●●	●●	●●	●●	●
	2000+	200+	×	●●●	●●	●●	●	●
65 kph to 80 kph	0 to 1000	0 to 100	●	●●●	●●	●●	●●	●
	1000+	100+	×	●●●	●	●	●	●
80 kph to 95 kph	0 to 1000	0 to 100	●	●●●	●	●	●	●
	1000+	100+	×	●●●	●	●	×	×
95 kph to 110 kph	All	All	×	●●●	●	●	×	×



In relation to Design Principle – Safety

●●● **High Level of Service:** Suitable for most users.

●● **Medium Level of Service:** May not be suitable for some users, particularly novice users. Designer should consider the lack of attractiveness of the facility to these users and how this can be overcome or mitigated.

● **Low Level of Service:** Not suitable for a range of users, including novice and intermediate users. Should be avoided unless the risk to these users is conveyed to the Overseeing Organisation by the designer and accepted by the Overseeing Organisation. See Section 2.4.

× **Should not be used**

⁶⁵ CD031.

⁶⁶ CD032.

- 7.6 This shows that a ‘Detached or Remote Cycle Track’ or a ‘Cycle Track at Carriageway Level’ would provide a high level of service, whether 85th percentile speeds are greater or less than 30 kilometres per hour.
- 7.7 The junction turning count surveys that were undertaken in 2018 showed that the proportion of larger vehicles on the corridor, either Light Goods Vehicles, Heavy Goods Vehicles, or Public Service Vehicles, was around 20% in the AM peak hour.⁶⁷
- 7.8 It should be noted that the measures proposed by the MGS project would likely see a reduction in traffic volumes, particularly during the proposed hours of operation of the bus gate on Bank Street and North Bank Street. The traffic modelling that has been carried out indicates that the flow along the corridor if the scheme were in place would be as shown in Table 4.⁶⁸

Table 4: traffic flow with the TRO

Street	Vehicles per Hour	
	AM peak hour (8 a.m. to 9 p.m.)	PM peak hour (4.45 p.m. to 5.45 p.m.)
Hanover Street	552	534
The Mound	552	534
North Bank Street	180	228
Bank Street	179	230
George IV Bridge	294	302

- 7.9 Table 4 demonstrates that, even if vehicle speeds were also to reduce, ESDG would still require ‘Cycle lanes or segregation from traffic’ on Hanover Street, The Mound, and George IV Bridge. Cycling by Design would still require a ‘Detached or Remote Cycle Track’ or a ‘Cycle Track at Carriageway Level’ on Hanover Street and The Mound. It should be noted that, out with the hours of operation of the bus gate, vehicle flows could be higher than the values shown in Table 4, as general traffic would be permitted to travel through the bus gate on Bank Street and North Bank Street.
- 7.10 Both ESDG and Cycling by Design state that further consideration to/preference toward protecting cycles from traffic should be given in situations where higher numbers of large vehicles are expected to be present.⁶⁹ Due to the number of bus services (including tour buses) along the route, there is a relatively high number of large vehicles likely to be present. The presence of these large vehicles makes implementation of segregated cycleways, rather than unprotected cycle lanes considerably more preferable.
- 7.11 It should be noted that the MGS route is designated as a Primary Cycling route under OFS. OFS states that the highest level of service should be provided on primary cycling routes, and that

⁶⁷ CEC003.
⁶⁸ CEC003.
⁶⁹ CD031 and CD032.

lower levels of intervention, such as use of bus lanes, cycle lanes separated by road markings, or mixed traffic streets, should be avoided wherever possible.

- 7.12 Considering all these factors, and design guidance related to them, the Council is satisfied that segregated cycleways are the most appropriate design solution.
- 7.13 Segregated cycle track widths are defined in the ESDG Factsheet C4 - Segregated cycle tracks - Hard segregation.⁷⁰ These have been reproduced below in Table 5.

Table 5: segregated cycleway widths

Widths	One-way	Two-Way
Absolute Minimum	1.50m	2.00m
Desirable	1.75m	2.50m
High Flows	2.00m +	3.00m +

- 7.14 Segregated cycle tracks also require a buffer between the cycle track and the carriageway. The required width of the buffer is also outlined in ESDG Factsheet C4 - Segregated cycle tracks - Hard segregation.⁷¹ The MGS designs meet these requirements.
- 7.15 The specification of a two-way segregated cycle track on The Mound, North Bank Street, Bank Street, and George IV Bridge was informed by a robust appraisal process that considered cycle route design objectives, pedestrian design objectives, bus services, parking and loading, and traffic operations and resilience. A two-way cycle track on the east side of the corridor was determined to be the best option, and this has been engaged upon throughout the MGS project life cycle.
- 7.16 On Hanover Street, with flow cycleways (one-way cycleways on each side of the road) have been proposed. This is because it creates a simpler junction layout for cyclists at the intersection with George Street. As George Street is the main east west cycle route through the city centre, and Meadows to George Street will be the main north south cycle route through the city centre. High numbers of cyclists are expected on both routes. As such, the simplest and most intuitive layout is preferred.
- 7.17 As the main north south cycle route into the city centre, and part of national cycle routes 1 and 75, high flows of cyclists are expected. As such, the cycleway has been designed to the standards set out in Table 5, wherever possible. In some locations, this was not achievable because of the requirement to retain existing footway widths and retain a suitably wide carriageway for buses, and so designs were provided to the desirable two-way width of 2.50m.
- 7.18 Three Stage 1 Road Safety Audits have been undertaken of the full scheme:
- 7.18.1 Stage 1 Road Safety Audit completed in July 2020 (Ref: RSA/262/S1-A);⁷²
 - 7.18.2 Stage 1 Road Safety Audit completed in December 2021 (Ref: 114421(1));⁷³ and
 - 7.18.3 Stage 1 Road Safety Audit completed September 2022 (Ref: RSA/22/003a).⁷⁴

⁷⁰ CD031.

⁷¹ CD031.

⁷² CEC005.

⁷³ CEC006.

⁷⁴ CEC007.

- 7.19 The Stage 1 Road Safety Audit completed in December 2021 was undertaken because of changes that were made to the design that warranted a re-auditing of the proposals. Any problems that the Audit Team deemed to be outstanding from the July 2020 Stage 1 Road Safety Audit were captured in the Stage 1 Road Safety Audit completed in December 2021. The third Stage 1 Road Safety Audit was undertaken in September 2022 to capture further alterations to the proposals on Hanover Street, as well as the addition of Market Street to the project. Road Safety Audit Response Reports were completed for each of the Road Safety Audits were undertaken.
- 7.20 The Stage 1 Road Safety Audit that was completed in July 2020 and the Stage 1 Road Safety Audit that was completed in December 2021 each identified only limited problems with the proposed cycle tracks, as detailed in the associated reports.⁷⁵ In response to these issues being raised, the MGS project team consider:
- 7.20.1 Cycle tracks have been designed in accordance with ESDG, with the desirable width of a two-way segregated cycle track being 2.5m or 3m where high flows are expected.⁷⁶
- 7.20.2 In respect of the width of the cycle track on Bank Street / North Bank Street:
- (a) This is a particularly constrained area. In order to provide a wider cycleway here the existing footway widths would need to be reduced which is not feasible. The carriageway cannot be narrowed any further whilst maintaining two-way traffic.
 - (b) The cycle track cannot be widened as it is a requirement that two-way traffic is retained, and in the proposed arrangement the cycle track is as wide as can be accommodated within the existing constrained street boundaries.
 - (c) The kerb upstand between cycle track and footway has been increased from 50mm to 70mm.
 - (d) The designs have been updated to provide speed control for downhill cyclists by reconfiguring the St. Giles Street junction geometry to slow cyclists on approach and through this section.
- 7.20.3 In respect of concerns about marking commencement of segregation buffers:
- (a) appropriate bollards and/or signage to be included on segregation strips to highlight their presence to road users.
 - (b) Appropriate traffic signs have been incorporated into the designs.
- 7.20.4 In respect of the lack of dropped kerbs on segregation islands at taxi and loading bays on Hanover Street:
- (a) Drop kerbs, or a raised crossing point of the cycleway, and tactile paving are provided at each interface with loading, bus, taxi and blue badge bays.
 - (b) The design on Hanover Street has been updated since the Road Safety Audits and also now include these details.
- 7.20.5 In respect of the width of the cycle track on the Mound:
- (a) Forward visibility, the provision of road markings and the requirement for speed control measures have been reviewed and incorporated in the designs.

⁷⁵ CEC005 and CEC006.

⁷⁶ CD031.

Forrest Road design

- 7.21 The design of Forrest Road required balance between pedestrian space, access for deliveries and refuse, access to Forrest Hill and provision of cycle connectivity. The street layout includes a shared cycle street whereby the carriageway width is reduced to five metres wide, this allows a 3.5-metre lane northbound which would be shared by cyclists and permitted vehicles, whilst the southbound lane is 1.5 metres wide ensuring cyclists can safely pass north bound vehicles. Both widths are in line with ESDG and Cycling By Design.⁷⁷
- 7.22 The access time for loading on the Forrest Road cycleway (between 9.30 am and 12.30 pm) has been proposed based on:
- 7.22.1 cycle trip data shows this is outside the peak volumes, which runs to 9.30 am;
 - 7.22.2 avoids higher lunchtime pedestrian footfall and nearby school traffic from, which begins 12.30 pm onwards; and
 - 7.22.3 the observed loading demand and timing.
- 7.23 The footway width is increased, and footway clutter removed, ensuring that the footways are useable for their full width allowing increased space for street activity. In addition, fully compliant tactile paving will ensure the street is safe and accessible for all and additional seating is proposed for resting places on the street.
- 7.24 Traffic access is proposed to be restricted on Forrest Road via the introduction of a prohibited entry restriction to enable the proposed controlled pedestrian zone. Access is restricted to local access only to allow:
- 7.24.1 loading between 9.30 am to 12.30 pm; and
 - 7.24.2 Access to private properties within Forrest Road or Forrest Hill and waste service vehicles at all times.
- 7.25 As covered above, the MGS project team have also made specific adjustments for disabled residents who live on Forrest Road/Hill and permissions for services, such as care and deliveries, to be made at any times required.
- 7.26 Residents will still be able to receive deliveries within the times of the loading window. Specific deliveries of one-off items that cannot be delivered within loading windows or at loading bays can be accommodated through the council's existing online exemptions process.

8. DESIGN ISSUES

Footway widening on the Mound

- 8.1 In accordance with the ESDG and MGS project objectives, the project team have aimed to achieve footway widening as far as possible in the scheme extents within the constraints available. Widening and de-cluttering of the footways on the Mound have been made to increase width and comfort (see Section 8 below for further details) at the following locations:
- 8.1.1 the foot of the Mound on eastern footway; and
 - 8.1.2 at the junction of Market Street.
- 8.2 The Mound presents a constrained road corridor within the Waverley Valley with adjacent land being steep embankments. In addition, the geometry and form of the road corridor are regarded

⁷⁷ CD031 and CD032.

as important heritage features within the city centre and viewpoints within the World Heritage Site. The railings and stone mounting along the Mound are part of the Category A listing of the National Gallery of Scotland. The Mound is therefore protected from any significant changes in geometry such as widening east or west to create more footway space.

- 8.3 The existing footway on the east of the Mound is between around 1.8m and 3m wide, with signage and street furniture reducing the effective width at various points. Street furniture including a bus stop and shelter restricts the width at the northern end, which is proposed to be improved via widening and relocation of furniture on the new separation island. This results in an improvement of pedestrian comfort rating from grade E to grade A.
- 8.4 The space required for vehicle traffic – including buses and access to Waverley Station - has been reduced to a minimum acceptable width required to safely manoeuvre on the street and at junctions. The cycleway design is a desirable 3.0 metres (excluding the intended narrowing in advance of the bus stop bypass) in width to accommodate the expected usage demands and geometry of the street (which includes a bend and gradient). The Road Safety Audits specifically recommends a wider cycleway on the Mound.⁷⁸
- 8.5 Due to these constraints, it has not been possible to provide additional footway widening on the eastern footway alongside the proposed cycleway.
- 8.6 It should also be noted that for north-south movements the Playfair Steps, located to the direct east of the Galleries, is a key pedestrian route. This connects to Princes Street Gardens and is a popular choice for pedestrians.

Need for changes to the footway

- 8.7 The ESDG suggests that the minimum footway width for a strategic high street should not be less than 2.5 metres, with the desired footway width being three metres wide. ESDG does state that it may be acceptable to reduce footway widths below the minimum widths specified where segregated cycle infrastructure is being proposed, as is the case with the MGS scheme.⁷⁹
- 8.7.1 As mentioned above, the eastern footway on The Mound is currently less than 2.0m wide. There are locations elsewhere where the current clear footway width is less than 2m due to the presence and position of street furniture, including the east side of Hanover Street, both sides of The Mound, both sides of George IV Bridge, and both sides of Forrest Road.
- 8.8 The MGS project has aimed to follow the ESDG and has maximised footway space where possible. A summary of the proposed footway widening and improvements is shown in Table 6 below:

Table 6: Summary of footway improvements

Location	Proposed Footway Improvements
Hanover Street	Effective footway widths widened by relocation of street furniture onto islands Average Pedestrian Comfort Level improved to A
The Mound (east side)	Footway widened

⁷⁸ CEC005, CEC006 and CEC007.

⁷⁹ CD031.

	<p>Effective width widened by relocation of bus stop onto island</p> <p>Additional buffer to traffic through provision of segregated cycle track</p> <p>Average Pedestrian Comfort Level improved to A / A-</p>
The Mound (west side)	Unchanged
Junction of The Mound, Market Street, and North Bank Street	Crossing of Market Street shortened by extending footways
North Bank Street (north side)	Additional buffer to traffic through provision of segregated cycle track
North Bank Street (south side)	Footway widened in the vicinity of Mound Place
Junction of North Bank Street, St Giles Street, and Bank Street	Slight narrowing of footway on north side of St Giles Street at junction, although this is mitigated by the provision of a continuous footway across the junction
Bank Street (east side)	Unchanged
Bank Street (west side)	Unchanged
Junction of Bank Street, Royal Mile, George IV Bridge, and Lawnmarket	Crossing of George IV Bridge shortened by extending footways
George IV Bridge (east side)	<p>Footway generally widened. Some localised narrowing in vicinity of junction with Forrest Road, but width still greater than 2.5m</p> <p>Effective width widened by relocation of bus shelters onto island</p> <p>Additional buffer to traffic through provision of segregated cycle track</p> <p>Average Pedestrian Comfort Level improved to A</p>
George IV Bridge (west side)	<p>Footway widened</p> <p>Average Pedestrian Comfort Level improved to A</p>
Junction of George IV Bridge and Victoria Street	Crossing shortened by extending footways
Junction of George IV Bridge and Chambers Street	Crossing shortened by extending footways
Forrest Road (east side)	Unchanged
Forrest Road (west side)	Footway widened

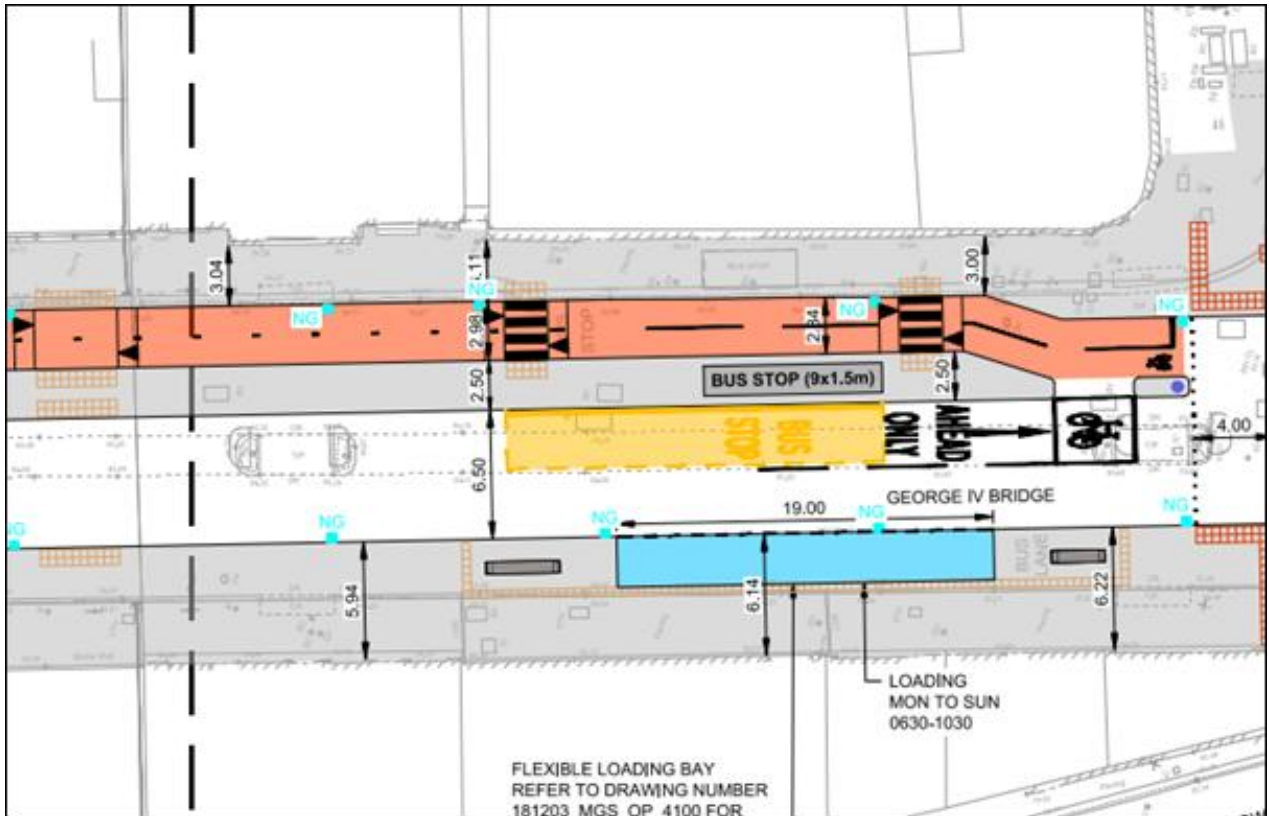
	<p>Effective width widened by relocation of street furniture</p> <p>Average Pedestrian Comfort Level improved to A+</p>
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- 8.9 It is worth noting that the few pinch points along the route are all above 2.5 metres wide, which is the minimum width recommended by ESDG for the types of streets affected by the MGS TRO.
- 8.10 Pedestrian counts were used to inform areas of high footfall and to target improvements in footway widths would be beneficial. This has been the case along George IV Bridge, for example, where higher volumes of static pedestrians were observed at bus stops and tourist attractions. Pedestrians were observed spilling out onto the road at The Elephant House and Greyfriars Bobby as the number of static pedestrians increased. Pedestrians waiting at bus stops tended to queue linearly, either sitting under the bus shelter or along the wall at the back of kerb (see Figures 7 and 8 below). The data also highlighted that the bus shelter created pinch points which, when combined with the high number of waiting pedestrians, restricted pedestrian movement the most.
- 8.11 A crucial aspect of the design was therefore to use the pedestrian data to inform decisions on suitable footway widths, especially around bus stops and tourist attractors. It was also essential to provide adequate space for all users; particular for people with mobility and visual impairments, and those pushing wheelchairs or similar. This data also influenced the decision to locate the cycle track on the east side of George IV Bridge in particular, to avoid potential conflicts with the busiest pedestrian volumes and tourist points.

Figure 7: Pedestrians blocking up the pavement and spilling into the carriageway at Greyfriars Bobby

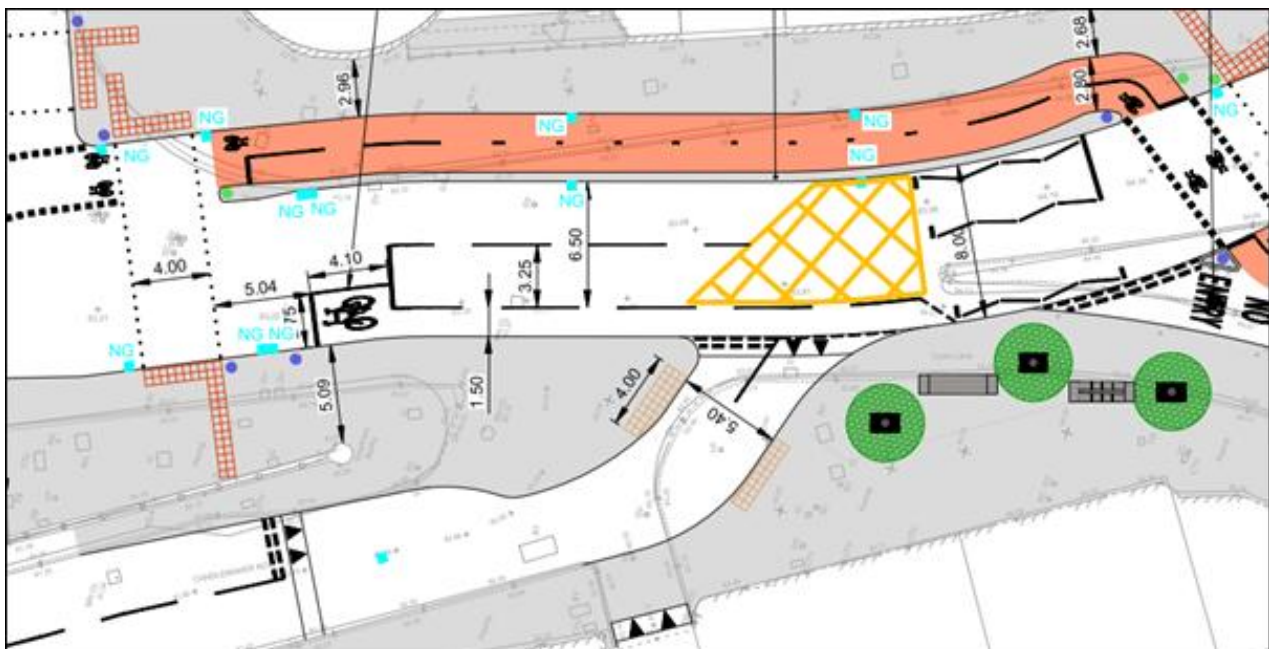


Figure 8: example of Increased space for pedestrians waiting for the bus along George IV Bridge



8.12 Areas with high footfall and static pedestrians such as Greyfriars Bobby will benefit from increased footway widths.

Figure 9: Increased footway width by Greyfriars Bobby



Footway clutter

8.13 The ESDG states that reducing street clutter is vital for ensuring pedestrian safety, independence, and accessibility, particularly for those with disabilities. The guidance recommends maintaining "Clear Walking Zones" to prevent hazards and improve orientation for visually impaired users by

removing unnecessary obstacles.⁸⁰ Cluttered footways and underutilised street furniture affects pedestrian circulation and can be visually intrusive. The placement can also impact wheelchair users and people with visual and/or mobility impairments. Within the MGS project, footway clutter has a significant impact on available footway widths.

- 8.14 On each of the MGS streets the existing street furniture impacts the quality and accessibility of the footway spaces and pedestrian routes. The proposed MGS scheme applies the principles of recommended in the ESDG by rationalising and reducing street clutter on footways and where possible locating these in coherent ‘furniture zones’ outside of the ‘clear walking zones’.
- 8.15 Bollards are situated along the edge of both footways between Chambers Street and Victoria Street. Cycle racks, bus shelters, bins, signposts and telephone boxes are also present on the corridor (see Figures 10 and 11 below). In addition, the streets are often cluttered with tables and chairs outside cafes, wheelie bins, ‘A’ -boards and other temporary signage.

Figure 10: Example of footway clutter on Forrest Road



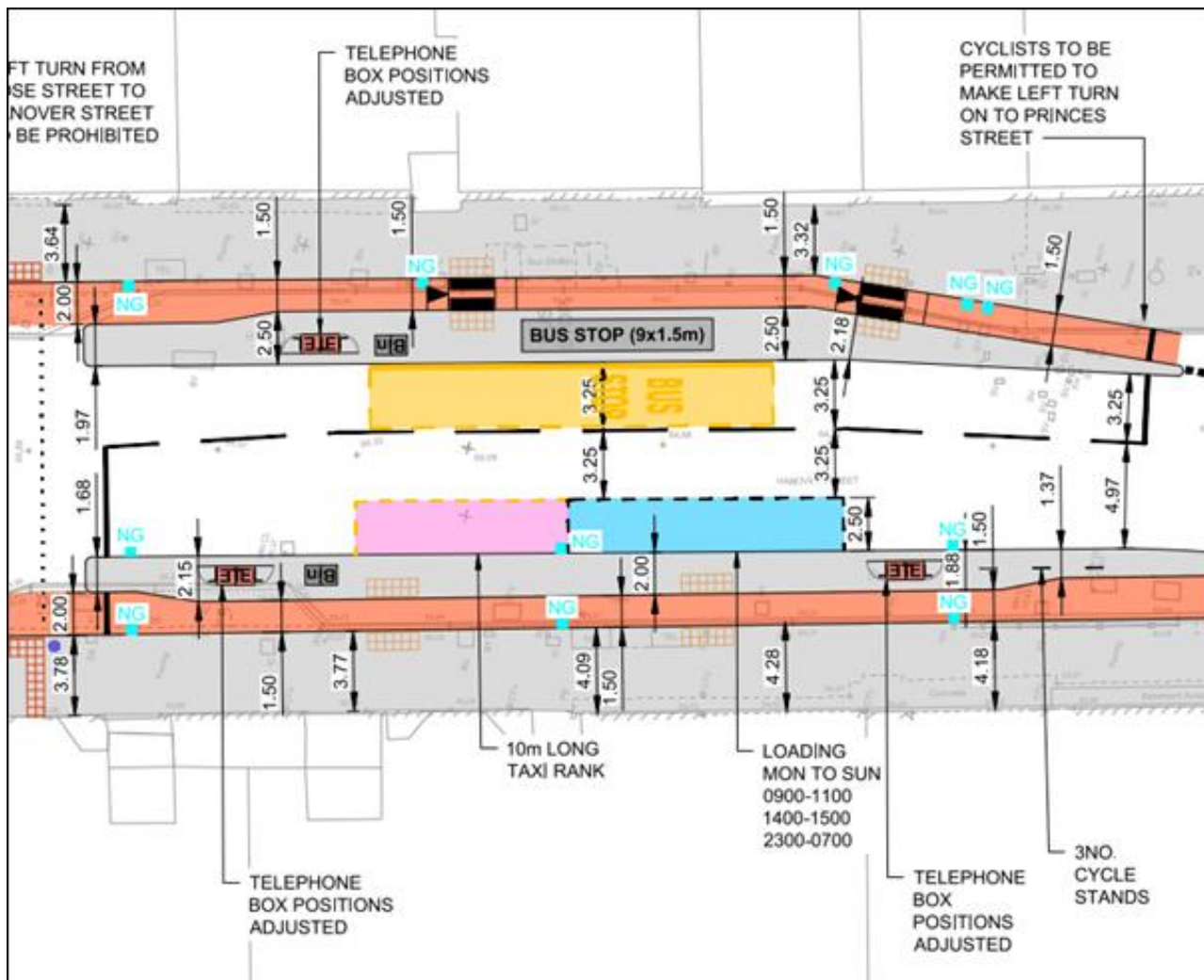
⁸⁰ CD031.

Figure 11: Example of footway clutter on Hanover Street



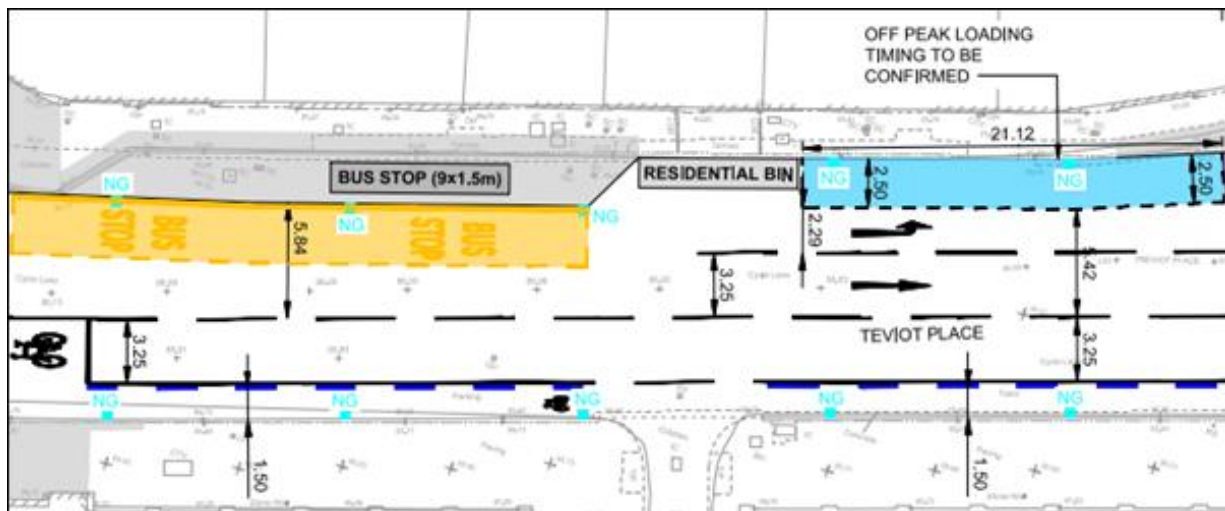
- 8.16 The cluttered streets of the corridor reduce the effective widths of the footways, creating pinch points along its length.
- 8.17 Most pinch points occur at bus stops, which further worsens crowding and pedestrian comfort. The increase in pedestrians caused by passengers alighting from buses and waiting to board cause numerous problems to arise:
- 8.17.1 poorer accessibility for wheelchair users and people with mobility issues;
 - 8.17.2 impaired movements for people with pushchairs;
 - 8.17.3 safety – pedestrians forced to walk on carriageway;
 - 8.17.4 safety – personal security;
 - 8.17.5 discomfort due to overcrowding; and
 - 8.17.6 lower walking speeds.
- 8.18 Reducing street clutter is crucial to improve pedestrian flows and increasing available space for static pedestrians. The design approach taken has been to place bus stops along a central island, so that pedestrians waiting for buses are removed from the footways. Current street furniture has also been reviewed and relocated to island areas wherever possible. This is shown on Figure 12 in Hanover Street, where cycle stands, telephone boxes, bins and bus stop shelters are moved to islands.

Figure 12: Street furniture and bus stops moved to islands



8.19 On Teviot Place, residential bins now have their designated space on the carriageway, and more space has been added in front of the Bedlam Theatre.

Figure 13: Street furniture and bus stops moved to islands



Pedestrian comfort model

- 8.20 ESDG Factsheet P2 (Promoting Pedestrian Movement and Activity: Desire Lines and Comfort) includes recommended guidance on assessing the suitability of footways for the expected volumes of pedestrian activity. It recommends the application of the Pedestrian Comfort Assessment.⁸¹
- 8.21 The aim of a pedestrian comfort assessment is to understand the pedestrian experience as people walk along a street. Therefore, different locations along a street (the site) are assessed to understand the level of comfort, and how this may change due to street furniture or changes in width, for example. In the case of the MGS project, a PCL has been calculated for each street for which pedestrian flows were available: Hanover Street; The Mound; George IV Bridge; and Forrest Road. A PCL was calculated on both sides of each street at a typical location, where width is not constrained by street furniture. Where street furniture was present, additional PCLs were calculated at these ‘pinch points’.
- 8.22 The method for determining a PCL calculates the number of pedestrians per metre of available footway per minute (ppmm). A grading table is then used to classify the comfort level as comfortable, acceptable, at risk or unacceptable. A full table summarising the PCL assessment undertaken for the MGS project is provided.⁸²
- 8.23 The PCL shows that the proposals are beneficial in improving overall pedestrian comfort, as the designs remove street furniture onto bus islands (bus shelters, bins, telephone boxes), therefore the footway width available is larger than what is currently provided. This is particularly evident in Hanover Street and George IV Bridge where comfort levels are currently rated E around bus stops, then, by moving the bus stops away from the footway, the comfort levels rise to an A.
- 8.24 A summary of the changes in pedestrian comfort is provided below, using the peak hour flows:

Street	Pinch Points		Overall Width (along the street)	
	Before	After	Before	After
Hanover Street (east)	E	A-	A-	A-
Hanover Street (west)	E	A-	A-	A-
Mound (east)	E	B	B	B
George IV Bridge (east)	E	A-	A-	A-
George IV Bridge (west)	E	B+	B+	A
Forrest Road (east)	A	A	A+	A+
Forrest Road (west)	B+	A-	A	A

** The Mound east has been taken at the northern end where changes are proposed.*

*** Assessment completed assuming loading bays are not flexible and not considered usable footway space.*

⁸¹ CD031.

⁸² CEC012

Road Safety audits

- 8.25 The Stage 1 Road Safety Audit that was completed in December 2021 identified several problems with footways.⁸³ Comments the issues identified in the road safety audits and the MGS project's potential responses are covered below:
- 8.25.1 The crossfall along the frontage of the Radisson Hotel is an existing constraint, and altering this is not within the scope of the MGs project;
 - 8.25.2 The design on Hanover Street has been updated, with dropped kerbs and tactile paving shown at the taxi and loading bays on Hanover Street;
 - 8.25.3 tactile paving arrangements have been updated to extend to, or closer to, the rear of the footways on the Mound, Market Street and Mound Place junction;
 - 8.25.4 Bank Street's proposed loading bay will formalise the existing arrangement and operations present at the location;
 - 8.25.5 Existing bollards on George IV Bridge will be removed as part of the MGS scheme.
- 8.26 One problem was raised regarding footways in the Stage 1 Road Safety Audit that was undertaken of the proposals on Hanover Street and Market Street in September 2022.⁸⁴ The identified issue, relating to vehicle overrun and the footway on Jeffrey Street at East Market Street is not within the scope of the scheme. However, it should be noted that the type of junction and the geometry of the street is being altered at this location, which may reduce the risk of left turning vehicles overrunning the footway.

Bus stop bypasses

- 8.27 The scheme proposes four bus stop bypasses within its extents at Hanover Street (2no.), the Mound and George IV Bridge. Bus stop bypasses are essential infrastructure for safe cycling where cyclists and buses share the same route. Please refer to section 7 above of this report with the rationale on the associated cycleway design.

Overview of design guidance

- 8.28 The design has applied national and local guidance on bus stop bypasses as detailed in *Cycling by Design* (Transport Scotland, 2021) and *Edinburgh Street Design Guidance* (City of Edinburgh Council).

Cycling by Design, Bus stop bypass design⁸⁵

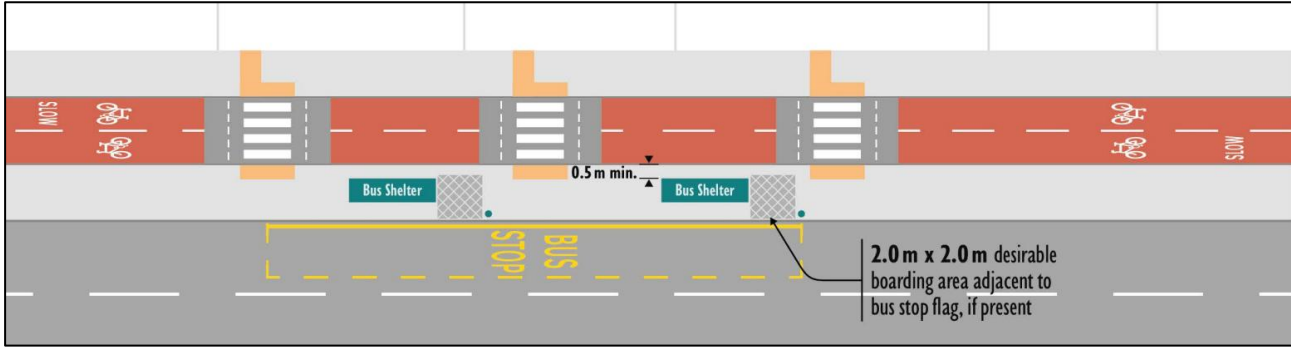
- 8.28.1 The design principles of bus stop bypasses are:
- (a) pedestrians should have priority over cycle users;
 - (b) pedestrian crossings of the cycle track should be on clear desire lines;
 - (c) the layout should encourage cycle users to slow on approach to these crossings;
 - (d) visibility between users should be achieved.
- 8.28.2 The Meadows to George Street designs are of the type 'Bus stop bypass (with continuous island)' as shown in Figure 14 below.

⁸³ CEC006.

⁸⁴ CEC007.

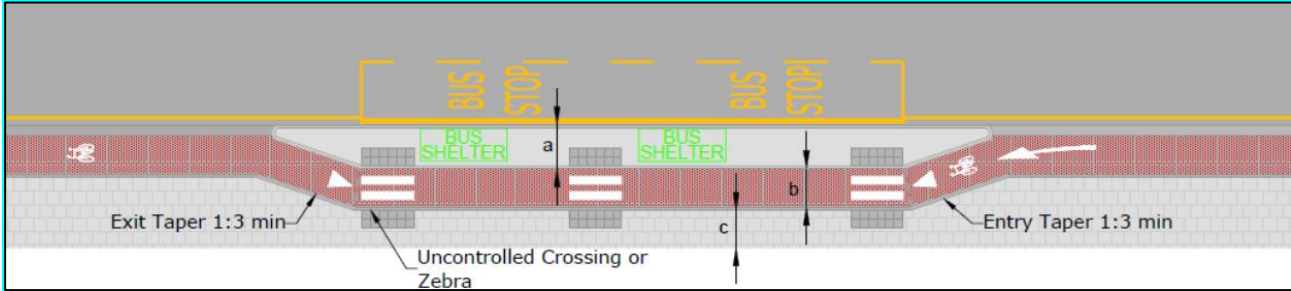
⁸⁵ CD031 at p 97.

Figure 14: Figure 3.23 of Cycling by Design



- 8.28.3 Clauses relevant to Bus Stop Bypass design and those in the Meadows to George Street project specifically are presented in clause 3.10 of Cycling by Design.⁸⁶
- 8.28.4 Edinburgh Street Design Guidance, Segregated Cycle Track factsheet - Integration with Bus Stops⁸⁷ includes details on the design of bus stop bypasses. The Meadows to George Street designs are type A.1 – Bus shelter located on island. This arrangement is shown below in Figure 15.

Figure 15 – ESDG A.1: Floating Bus Stops – Bus shelter located on island



Living Streets Research

- 8.28.5 In 2024, Living Streets published ‘*Inclusive design at bus stops with cycle tracks*’, which detailed the research that Living Streets had undertaken relating to cycle tracks that interacted with bus stops. The report included the findings of a literature review, consultation (including interviews, focus groups, and site visits), and studies of sites that Living Streets undertook. In section 8.2, the report surmises good design considerations, that⁸⁸ “good design should seek the following:
 - (a) *the use of simple designs for pedestrians that are legible and intuitive in use;*
 - (b) *careful use of levels to segregate space, whilst maximising accessibility;*
 - (c) *the use of other features that make a design simple and clear for blind and partially sighted pedestrians, and which clearly identify the bus stop location (see section below);*
 - (d) *the use of a design that creates a simple environment for cyclists, free of distracting obstacles or risks at and immediately around the bus stop;*
 - (e) *the provision of good visibility between pedestrians and cyclists;*

⁸⁶ CD032.
⁸⁷ CD031.
⁸⁸ CD033 at p 101.

- (f) *the highlighting, to cyclists, of the presence of the bus stop and any locations where pedestrians are likely to cross;*
- (g) *good design for wider accessibility e.g. in terms of appropriate pavement and island widths, lack of clutter and pinch points, and limited crossfall”*

8.28.6 A further recommendation from the research notes that attempts to reduce cycling speeds at these bus stops can act as a distraction for cyclists from observing people crossing ahead, potentially increasing conflict at bus stops rather than decreasing conflict. The research also notes speed reducing measures can cause problems for less confident cyclists or for those using adapted cycles or other wheeled mobility aids on the cycle track.

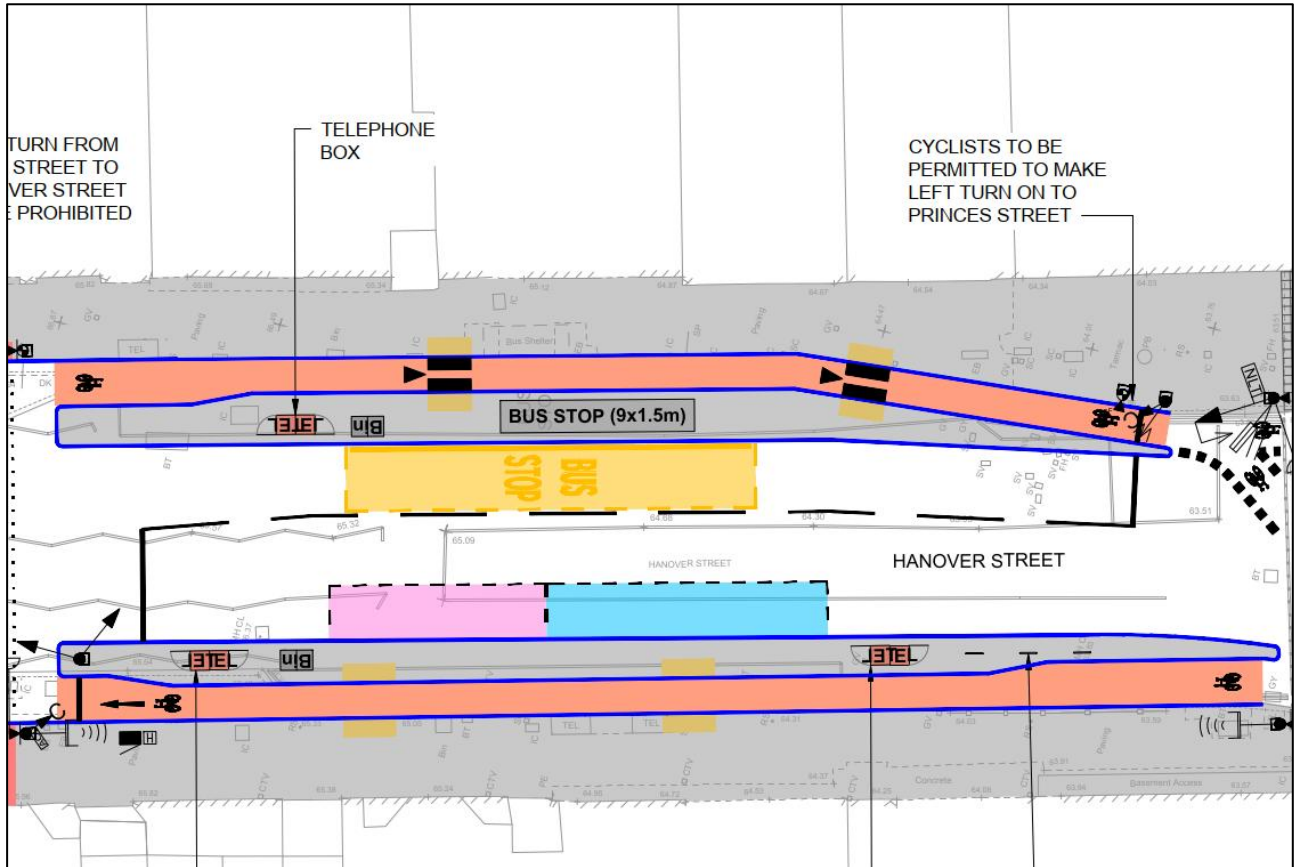
8.28.7 The research also includes possible enhancements to existing practices that could be used/trialled/investigated for more complex environments. These are listed below:

Environment	Approach	Details
All environments (including quiet-simple)	Ensuring an environment which is simple to navigate, where desirable behaviours are as likely as possible	Designs according to the key principles and minimum design quality outlined in Section 8.2 of the report (refer to details above)
Busy-complex environments	Instructing and informing cyclists	Use of signalised crossings
Moderately-busy-complex environments	Informing pedestrian – simple sound approach	Simple detector providing audible and tactile signal indicating an approaching bicycle
	Informing pedestrian – artificial intelligence approach	Camera detects presence of, movement of, or stopping of cyclists. Pedestrian informed audibly and with tactile signal
	Informing cyclists – button-operated light signals	Use of flashing light signals (or a close equivalent) to draw attention

Application of design guidance

8.29 In this section, an overview of each of bus stop bypass designs is included with a review against applicable design standards.

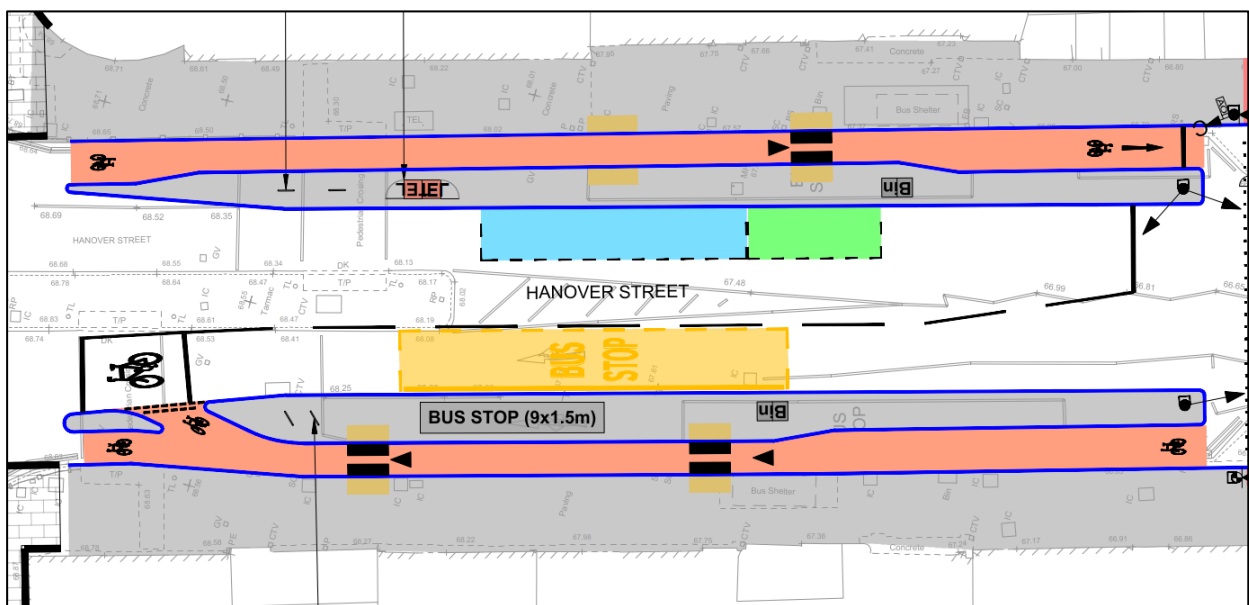
Hanover Street, southbound



Guidance		Requirement	Proposed Design
CbD	ESDG	Pedestrians should have priority over cycle users, ESGD recommends zebra crossings	Zebra crossing proposed, with footway dropping down to cycle track level and tactile paving for pedestrians.
CbD		Pedestrian crossings of the cycle track should be on clear desire lines	Zebra crossings proposed on both sides of the bus stop and shelter on the anticipated pedestrian desire lines.
CbD	ESDG	The layout should encourage cycle users to slow on approach to these crossings	Cycle track narrows from 1.75 metres to 1.5 metres on approach to and through the bypass area.
CbD	ESDG	Visibility between users should be achieved including location and design of bus shelter	Good visibility and sightlines achieved. Street clutter and furniture removal from footway will further improve this. Bus shelter design still to be agreed, however, expect a cantilever shelter with clear end panel on cycle approach.
CbD	ESDG	The width of the bus stop island should allow for the width of the shelter, plus at least 0.5 metres between the back of the shelter and the cycle track and 0.5 metres	Bus stop island 2.5 metres wide over distance of 25 metres. 0.5 metres clearance provided between shelter and cycle track, and between shelter and carriageway

Guidance	Requirement	Proposed Design
	distance from the front of the shelter to the road carriageway.	
CbD	An overall length and width of 2.0 metres should be provided at the bus boarding area to allow wheelchair users to make a 90-degree turn when boarding or alighting the bus.	>two metres length and >two metres width bus boarding area provided
CbD	The footway width should be maintained for pedestrians passing the bus stop bypass in accordance with Section 3.4.	Adjacent footway width slightly narrowed, but effective width widened through removal of street clutter and relocation of street furniture.
CbD	The cycle track should be at a lower level than the footway and the bus stop island, with a level difference of at least 60 millimetres.	Appropriate level difference provided between cycle track and footway/bus stop island
	ESDG Cycle track widths (min/desirable): one-way track (1.2 m/1.5 m); and two-way track (2.0 m/2.5 m)	Cycle track widths greater than minimum requirements.
	ESDG Cycle track taper length on approach to bypass = min 1:3	Entry taper length 1:6.3; exit taper length 1:5.7

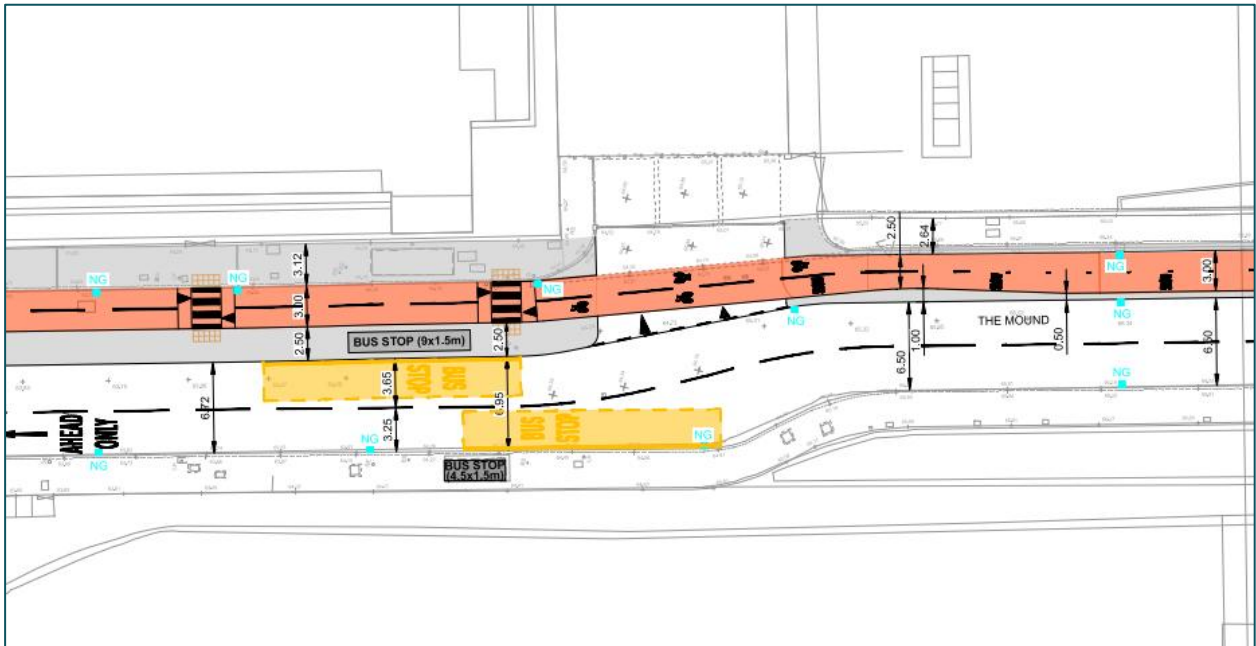
Hanover Street, northbound



Guidance		Requirement	Proposed Design
CbD	ESDG	Pedestrians should have priority over cycle users, ESDG recommends zebra crossings	Zebra crossing proposed, with footway dropping down to cycle track level and tactile paving for pedestrians.
CbD		Pedestrian crossings of the cycle track should be on clear desire lines	Zebra crossings proposed on both sides of the bus stop and shelter on the anticipated pedestrian desire lines.
CbD	ESDG	The layout should encourage cycle users to slow on approach to these crossings	Cycle track narrows from 1.75 metres to 1.5 metres on approach to and through the bypass area.
CbD	ESDG	Visibility between users should be achieved including location and design of bus shelter	Good visibility and sightlines achieved. Street clutter and furniture removal from footway will further improve this. Bus shelter design still to be agreed, however, expect a cantilever shelter with clear end panel on cycle approach.
CbD	ESDG	The width of the bus stop island should allow for the width of the shelter, plus at least 0.5 metres between the back of the shelter and the cycle track and 0.5 metres distance from the front of the shelter to the road carriageway.	Bus stop island 2.5 metres wide over distance of 23 metres. 0.5 metres clearance provided between shelter and cycle track, and between shelter and carriageway
CbD		An overall length and width of 2.0 metres should be provided at the bus boarding area to allow wheelchair users to make a 90-degree turn when boarding or alighting the bus.	>two metres length and >two metres width bus boarding area provided
CbD		The footway width should be maintained for pedestrians passing the bus stop bypass in accordance with Section 3.4.	Adjacent footway width slightly narrowed, but effective width widened through removal of street clutter and relocation of street furniture. Pedestrian comfort category XX achieved.
CbD		The cycle track should be at a lower level than the footway and the bus stop island, with a level difference of at least 60 millimetres.	Appropriate level difference provided between cycle track and footway/bus stop island

Guidance		Requirement	Proposed Design
	ESDG	Cycle track widths (min/desirable): one-way track (1.2m/1.5m); and two-way track (2.0m/2.5m)	Cycle track widths greater than minimum requirements.
	ESDG	Cycle track taper length on approach to bypass = min 1:3	Entry taper length 1:5.7

The Mound



Guidance		Requirement	Proposed Design
CbD	ESDG	Pedestrians should have priority over cycle users, ESDG recommends zebra crossings	Zebra crossing proposed, with footway dropping down to cycle track level and tactile paving for pedestrians.
CbD		Pedestrian crossings of the cycle track should be on clear desire lines	Zebra crossings proposed on both sides of the bus stop and shelter on the anticipated pedestrian desire lines.
CbD	ESDG	The layout should encourage cycle users to slow on approach to these crossings	On the northbound approach to the boarder, the cycle track is reduced to 2.5 metres and slow markings are provided.
CbD	ESDG	Visibility between users should be achieved including location and design of bus shelter	Good visibility and sightlines achieved. Street clutter and furniture removal from footway will further improve this. Bus shelter design still to be agreed, however,

Guidance		Requirement	Proposed Design
			expect a cantilever shelter with clear end panel.
CbD	ESDG	The width of the bus stop island should allow for the width of the shelter, plus at least 0.5 metres between the back of the shelter and the cycle track and 0.5 metres distance from the front of the shelter to the road carriageway.	Bus stop island 2.5 metres wide over distance of 30.8 metres. 0.5 metres clearance provided between shelter and cycle track, and between shelter and carriageway
CbD		An overall length and width of 2.0 metres should be provided at the bus boarding area to allow wheelchair users to make a 90-degree turn when boarding or alighting the bus.	>two metres length and >two metres width bus boarding area provided
CbD		The footway width should be maintained for pedestrians passing the bus stop bypass in accordance with Section 3.4.	Adjacent footway width maintained and effective width widened through removal of street clutter and relocation of street furniture. (in particular the bus shelter)
CbD		The cycle track should be at a lower level than the footway and the bus stop island, with a level difference of at least 60 millimetres.	Appropriate level difference provided between cycle track and footway/bus stop island
	ESDG	Cycle track widths (min/desirable): one-way track (1.2m/1.5m); and two-way track (2.0m/2.5m)	Cycle track widths greater than minimum requirements.
	ESDG	Cycle track taper length on approach to bypass = min 1:3	No taper, straight approach.

Gradients on the Mound

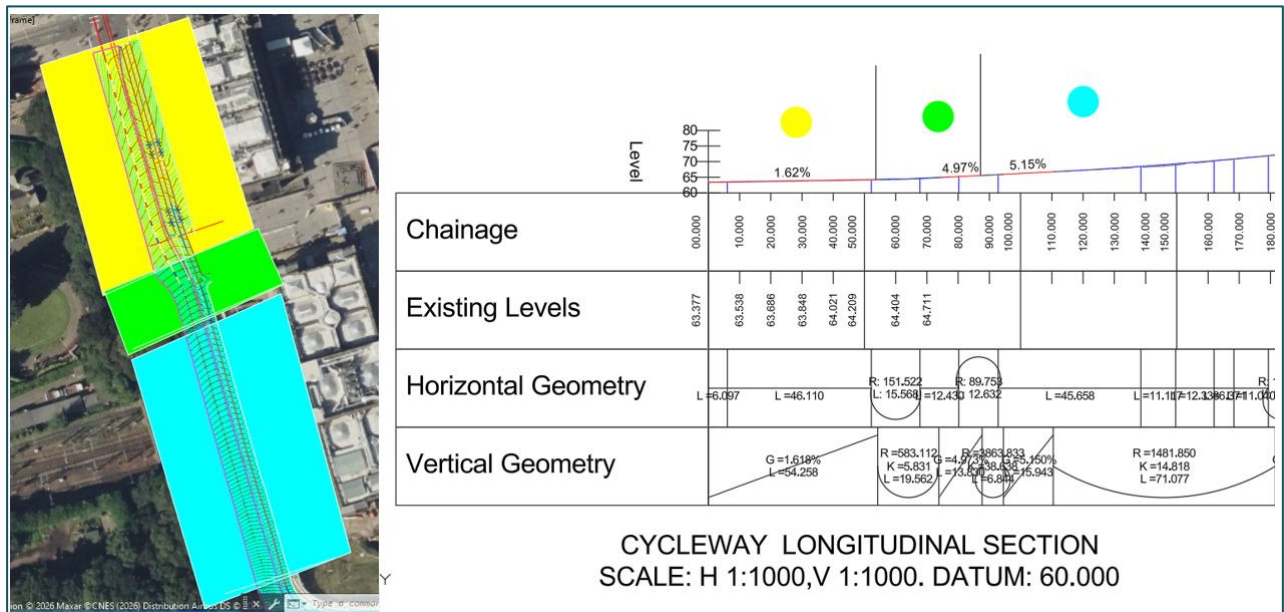
8.30 Several objectors refer to the steep gradient on the Mound and concerns over the safety and operations of this with relation to the bus stop bypass at the northern end of the Mound. Assessment of the cycle-route and its safety is discussed above. The following will discuss the safety of the cycle-route in the context of the bus stop only.

8.31 ESDG Factsheet C1 sets out the preferred gradients of cycle routes and is set out as:⁸⁹

Gradient	
3%	Preferred
5%	Desirable maximum
7%	Normal absolute maximum
>7%	For short lengths

8.32 The image below shows the gradient on the Mound, which can be noted as:

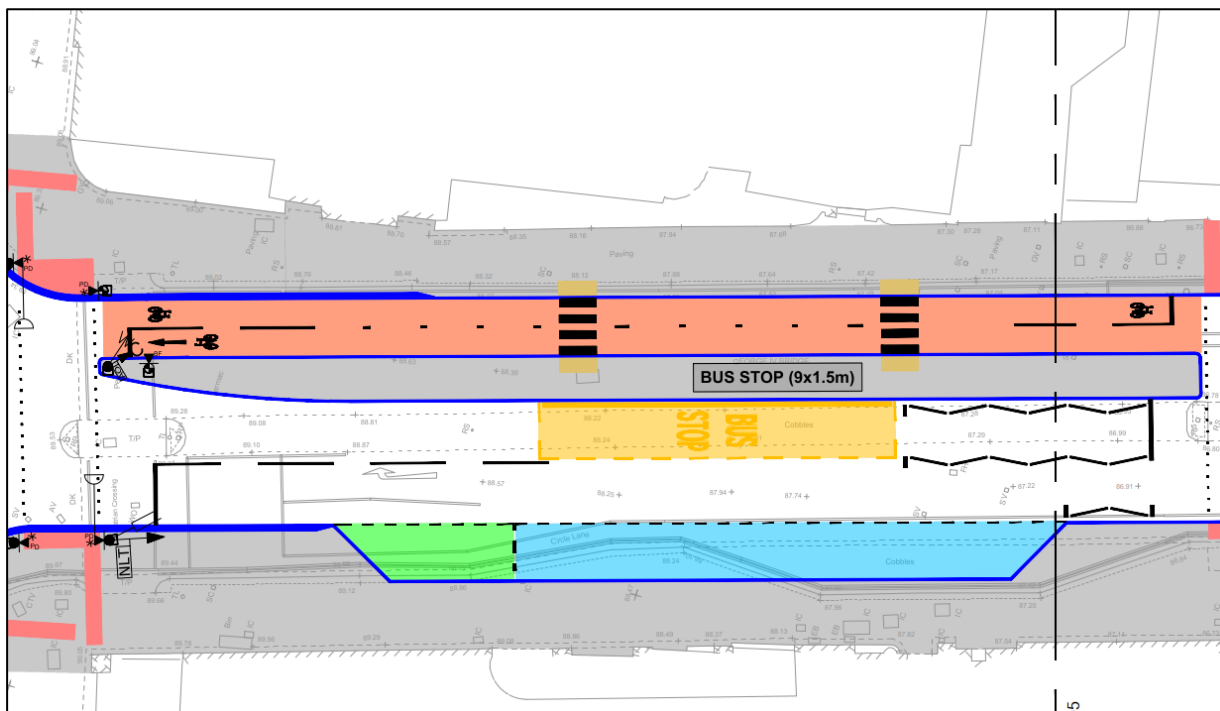
Chainage (meters length)	Average Gradient
0-55	1.62%
55-95	4.97%
95-180	5.15%



⁸⁹ CD031.

- 8.33 Considering the gradients of the Mound cycle track on approach to the bus stop bypass, it can be noted that:
- 8.33.1 the first 55 metres of northbound approach is fairly flat with 1.62% gradient which is within the preferable threshold in the ESDG;
 - 8.33.2 the approach up to 180 metres south of the bus stop bypass is from 4.97%-5.15% average gradients which sit within the Desired Maximum threshold in the ESDG;
 - 8.33.3 it can therefore be considered that on the approach to the bus stop bypasses the gradients are within recommended guidance.
- 8.34 Following feedback from stakeholder groups during the design development, the MGS project team have investigated options to mitigate cycle speeds, increasing cyclists awareness of the approaching bus bypass area and kept up to date with evolving guidance and research. The following layout and mitigations are noted:
- 8.34.1 forward visibility for cyclists approaching the bus stop bypass are clear and further enhanced with additional elevation on approach;
 - 8.34.2 the cycle track is narrowed on approach, at the junction access to the Galleries, to provide a visual narrowing to help reduce cycle speeds;
 - 8.34.3 SLOW markings are proposed on the cycle track on approach;
 - 8.34.4 following the latest Living Streets research, the design has been simplified at the bus stop bypass area and includes dropped kerbs and zebra crossings at pedestrian crossing points. This is consistent with the wider scheme;
 - 8.34.5 a full monitoring and evaluation plan will be developed to consider the operations of the bus stop bypass post construction.
 - 8.34.6 in response to the Living Streets research and recommendations for more formal pedestrian crossing points (lights) or use of cameras or detectors, the design is future-proofed with additional ducting to allow the installation of additional features in future if they are deemed to be required from the monitoring and evaluation.

George IV Bridge



Guidance		Requirement	Proposed Design
CbD	ESDG	Pedestrians should have priority over cycle users, ESDG recommends zebra crossings	Zebra crossing proposed, with footway dropping down to cycle track level and tactile paving for pedestrians.
CbD		Pedestrian crossings of the cycle track should be on clear desire lines	Zebra crossings proposed on both sides of the bus stop and shelter on the anticipated pedestrian desire lines.
CbD	ESDG	The layout should encourage cycle users to slow on approach to these crossings	Zebra crossings provided to highlight crossing areas and reduce approach speeds.
CbD	ESDG	Visibility between users should be achieved including location and design of bus shelter	Good visibility and sightlines achieved. Street clutter and furniture removal from footway will further improve this. Bus shelter design still to be agreed, however, expect a cantilever shelter with clear end panel.
CbD	ESDG	The width of the bus stop island should allow for the width of the shelter, plus at least 0.5 metres between the back of the shelter and the cycle track and 0.5 metres distance from the front of the shelter to the road carriageway.	Bus stop island 2.5 metres wide over distance of 45 metres. 0.5 metres clearance provided between shelter and cycle track, and between shelter and carriageway

Guidance		Requirement	Proposed Design
CbD		An overall length and width of 2.0 metres should be provided at the bus boarding area to allow wheelchair users to make a 90-degree turn when boarding or alighting the bus.	>two metres length and >two metres width bus boarding area provided
CbD		The footway width should be maintained for pedestrians passing the bus stop bypass in accordance with Section 3.4.	Adjacent footway width widened.
CbD		The cycle track should be at a lower level than the footway and the bus stop island, with a level difference of at least 60 millimetres.	Appropriate level difference provided between cycle track and footway/bus stop island
	ESDG	Cycle track widths (min/desirable): one-way track (1.2m/1.5m); and two-way track (2.0m/2.5m)	Cycle track widths greater than minimum requirements.
	ESDG	Cycle track taper length on approach to bypass = min 1:3	No taper, straight approach.

Road Safety Audits

8.35 Three independent Stage 1 Road Safety Audits have been undertaken of the full scheme,⁹⁰ as noted above. No problems were raised regarding the proposed bus stop bypasses in any of the Stage 1 Road Safety Audits that have been completed.

Edinburgh CCWEL bus stop bypass evaluation

8.36 Monitoring of bus stop bypasses implemented on the CCWEL project was presented to the Council’s Transport and Environment Committee January 2025.⁹¹ The monitoring demonstrated a very low level of interaction between pedestrians and cyclists at bus stop bypasses, concluding the layouts are working well and do not present a meaningful hazard or barrier to pedestrians accessing bus stops.

“4.6 For CCWEL, three Bus Stop Bypasses were introduced, and detailed monitoring of interactions between pedestrians and cyclists was undertaken at two of these (Wester Coates Road and Magdala Crescent).

4.7 Monitoring of the interactions between pedestrians and cyclists at crossings over the cycle track at bus stops found minimal interactions between the two groups and negligible evidence of conflict. Only around 1% of pedestrians crossing the cycle track to access a bus had any kind of interaction with a passing cyclist.

⁹⁰ CEC005, CEC006 and CEC007.

⁹¹ CD024.

4.8 Given the very low number of interactions between pedestrians crossing the cycleway and cyclists using the cycleway at these locations compared to the overall volume of each it is considered that they are operating well and do not present a meaningful hazard or barrier to pedestrians accessing bus stops.”

Post implementation communications and monitoring

- 8.37 To aid the safe use and operation of the bus stop bypasses the MGS project team propose to undertake a comprehensive communications campaign in advance of and post opening of MGS. This will be targeted to access groups to share information on the new infrastructure and guidance on how to approach and use these safely. It is envisaged that a wider communications campaign will also inform local residents and visitors of the new infrastructure and highlight the changes to street layout and operations.
- 8.38 In addition, the MGS project will undertake a monitoring and evaluation programme of the bus stop bypasses and their use.

Negative impact on bus services and/or access to public transport

- 8.39 Under the MGS project, Hanover Street, The Mound, Bank Street, North Bank Street, George IV Bridge, Bristo Place and Teviot Place would become a bus and cycle priority corridor. As stated in above, this is supported by local and national policy.
- 8.40 The various streets within the corridor are served by the following services:
 - 8.40.1 Hanover Street, The Mound, George IV Bridge:
 - (a) Lothian Buses services 9, 23, 27;
 - 8.40.2 Bristo Place:
 - (a) Lothian Buses services 2, 9, 12, 47, 47B;
 - (b) Midland Bluebird (McGill’s Scotland East) service 60;
 - 8.40.3 Forrest Road:
 - (a) Lothian Buses services 2, 9, 23, 27, 35, 45, N35.
- 8.41 The existing traffic operations require buses to use the gyratory system at Bristo Place, Teviot Place, and Forrest Road. Under the proposed traffic operations, buses would travel two-way on Bristo Place and Teviot Place, and no buses would use Forrest Road. Otherwise, bus routes would be unaffected.
- 8.42 Table 7 provides a summary of the existing provision of bus stops within the extents of the project:

Table 7: Existing bus stop provision

Direction	Street	Location
Northbound	Forrest Road	North of junction with Forrest Hill
	George IV Bridge	Opposite National Library of Scotland
	The Mound	Opposite access between Royal Scottish Academy and National Gallery

	Hanover Street	Between junctions with Rose Street and George Street
Southbound	Hanover Street	Between junctions with Rose Street and Princes Street
	The Mound	North of access between Royal Scottish Academy and National Gallery
	George IV Bridge	Opposite junction with Victoria Street

8.43 Table 8 provides a summary of the proposed provision of bus stops within the extents of the project:

Table 8: Proposed bus stop provision

Direction	Street	Location
Northbound	Teviot Place	East of junction with Forrest Road
	George IV Bridge	Opposite National Library of Scotland
	The Mound	Opposite access between Royal Scottish Academy and National Gallery
	Hanover Street	Between junctions with Rose Street and George Street
Southbound	Hanover Street	Between junctions with Rose Street and Princes Street
	The Mound	North of access between Royal Scottish Academy and National Gallery
	George IV Bridge	Outside Consulate General of France

8.44 As shown in Tables 7 and 8, the primary differences in bus stop provision between the existing and proposed layouts are as follows:

8.44.1 the northbound bus stop that is currently positioned on Forrest Road is relocated onto Teviot Place to suit the revised traffic operations;

8.44.2 the southbound bus stop that is currently positioned opposite the junction with Victoria Street is relocated around 35 metres northbound.

8.45 Throughout the development of the scheme the bus stop provision has been discussed and agreed with public transport operators and the Council's public transport team.

8.46 Objections and feedback were received that include reference to the removal of bus stops at Market Street and Chambers Street. It should be noted that these have been removed independently to the MGS project. As noted in Tables 7 and 8, the MGS scheme does not include the removal of any bus stops.

- 8.47 Bus gates provide priority for vehicles that are permitted to travel through them at times when other vehicles are not permitted.
- 8.48 The MGS project proposes bus gates at the following locations: Market Street (west of the junction with Jeffrey Street/East Market Street); and Bank Street/North Bank Street (between the junctions with Market Street and Lawnmarket/High Street).
- 8.49 The bus gates would permit access by buses, taxis, cycles, and authorised vehicles during the hours of operation. The bus gate on Bank Street/North Bank Street would operate between the hours of 6 am and 10 pm. The bus gate on Market Street would operate 24 hours per day.
- 8.50 At Candlemaker row the existing southbound no entry except buses and cycles is moved southward to the junction with Merchant Street and a north bound traffic restriction, except buses, cycles and taxis is introduced, with loading permitted at certain times.
- 8.51 As buses are permitted to travel through the bus gates, the bus services using the streets within the extents of the scheme would be unaffected by the proposals.
- 8.52 Clear signage is proposed to inform drivers/riders of the restrictions and the hours of operation. On Market Street, roundabouts are proposed either side of the bus gate to allow vehicles to safely turn.
- 8.53 Lothian Buses were engaged throughout the development of the designs. Feedback was provided in 2019 that informed the development of the designs. No objections to the Traffic Regulation Orders were received from Lothian Buses.
- 8.54 The City of Edinburgh Council’s Public Transport team were also engaged throughout the development of the designs.
- 8.55 As part of the Meadows to George Street project, the entire route corridor was modelled in VISSIM. This modelling was carried out in 2019 to 2020, with the report being finalised in May 2020. The primary aim of this modelling was to assess the proposed layout options for the project that were being considered at the time.
- 8.56 Following the initial modelling, additional testing has been undertaken to reflect updated design layouts. This includes different methods of traffic control on The Mound, traffic signal adjustments, and the variation of loading routes. The preferred option included signal adjustments at The Mound/Market Street and Royal Mile/George IV Bridge junctions. A comparison of the bus journey times with respect to the base model is shown in Table 9 below. This modelling indicates an overall improvement in bus journey times to delivered through the changes proposed by MGS.⁹²

Table 9: bus journey times comparison

Direction	AM		PM	
	2016 Base JT	Option 3A JT	2016 Base JT	Option 3A JT
Northbound	9.40	6.29	6.29	5.46
Southbound	5.16	6.39	6.49	6.49

⁹² CEC003.

Design of flexible loading bays

8.57 Following feedback during the TRO consultation, the project has removed the proposals of ‘flexible loading bays’ from the scheme. All loading bays now proposed to have a 70mm kerbed upstand at the rear to define the edge of the loading space and footway. This kerb height is in line with Inclusive Mobility and latest guidance.

Parking revenue for the Council

8.58 The proposed TRO includes the reduction of two Pay and Display parking spaces on Mound Place only. The project team have worked with the Council’s Parking Operations team in the development of the proposals. The proposed changes to Pay and Display bays are considered acceptable to meet the demands of the street/area and will have negligible financial impact for the Council.

9. SUPPORT FOR THE TRO

9.1 Over a third of responses to the TRO signalled support for the Project (117 of the 326 responses). As the reporter will be aware, this is a significant portion in the context of such a major change in the heart of Edinburgh.

9.2 Supporting responders highlighted and reinforced a number of important themes underpinning the Project. Key to these were comments made about provision of safe cycling infrastructure. Supporting responders noted the following:

9.2.1 The Project fills a “critical” gap in the current cycling network by providing a safe segregated north-south artery through the centre of the city. This connects the broader network between the Meadows and CCWEL; allowing those living in Tollcross, Bruntsfield, Marchmont, Sciennes and other Meadows-adjacent areas to access the wider Edinburgh network.

9.2.2 The current arrangement of both Forrest Road and George IV Bridge are described as congested with traffic and preventative of the bus system being efficient. The adjacent cycle way is narrow. Supporting responders describe the effect of this all as “deeply unpleasant”, “unsafe” and “terrifying to cycle on”. Another described the Mound and Chambers Street junction as “by far the most dangerous and stressful part of my commute”.

9.2.3 Supporting responders also note that the provision of a segregated cycling may have an enabling effect on less-confident cyclists, or those particularly vulnerable. Cycling commuters have expressed strong support for the Project, with a number of comments being made that this would encourage a change of commuting habits and remedy the issue of the city being presently “bisected with no safe route across”.

9.3 Supporting responders also highlight the importance of the proposed pedestrian improvements. Noting the pedestrian congestion of Forrest Road, Greyfriars Bobby and George IV Bridge year-round; with the issue being heightened at peak seasons. Widened footways are cited as making the areas more pleasant to walk down, especially for anyone requiring more space to walk comfortably and without feeling as an imposition, such as parents with strollers and those with mobility aids or issues.

9.4 Public Transport benefits are also highlighted by supporting responders as being a major Project benefit. The proposed bus corridor is noted as needed for making the north-south bus routes more efficient and prevent buses being delayed by car-congestion.

- 9.5 Supporters also highlight the environmental and health benefits the Project enables through changing the priorities of the centre of Edinburgh from car-focussed to pedestrian and active travel focused. Responders commented that the Project would contribute positively to climate change, greenhouse gas and air pollution policies; and facilitate healthier choices for residents.
- 9.6 A number of local businesses also cited support on economic grounds. These businesses highlighted that cyclists and pedestrians tend to be more likely to spend at business along their routes more-so than those travelling by car.
- 9.7 Supporters indicate some approval of the proposed design. Noting the Project’s use of floating bus stops have been proven effective nationally and internationally, and will provide additional comfort and safety to users of cycle and pedestrian paths. These commenters also note a balanced approach looks to have been taken by CEC, “considering the impact on all users of the space” and achieving “a balanced compromise – taking action to reduce traffic volumes while still allowing delivery and disabled access.”
- 9.8 Many of the supporting responses note that the proposed changes are welcome and should be progressed with all due haste.

10. MODIFICATIONS OR ALTERNATIVES

- 10.1 The MGS project team are proposing to recommend the following modifications to the Order, described above at the relevant sections of discussion.

Street	Proposed Modifications
Bank Street	<p>Residents of Bank Street, Cockburn Street, Mound Place and Ramsay Gardens will be permitted to use private cars through the Bank Street bus gate at any time.</p> <p>Reduction of the extent of the bus gate, now proposed to end at the northern side of St. Giles Street junction, to allow right turning vehicles to enter St. Giles Street during the bus gate operational times.</p> <p>The loading bay on Bank Street would be altered to provide more loading capacity operating from 7 p.m. to 10.30 a.m.</p>
Mound Place	<p>Removal of a section of loading restrictions on Mound Place to facilitate any additional loading/servicing requirements.</p> <p>Additional blue badge parking space provided on Mound Place.</p>
George IV Bridge	<p>A new blue badge parking space at the junction with the High Street (near St Giles Cathedral) and six new blue badge parking spaces in the centre of the street, near Augustine’s United church. These spaces will operate from 10:30am to 06:30am.</p> <p>Permitting right turn from Chambers Street to George IV Bridge northbound.</p>
Bristo Place	<p>Removal of a 26m section of loading restrictions on the west side of Bristo Place to accommodate business servicing.</p>

Forrest Road	<p>Residents of Forrest Road and Forrest Hill will be permitted to access Forrest Road/Hill at any time.</p> <p>Specific adjustments for disabled residents who live on the affected streets with access permissions for services, such as care and deliveries, to be made at any times required</p> <p>Minor repositioning of proposed loading bays by approx. 5m. to accommodate a bin hub and access controls.</p>
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10.2 The MGS project team are also considering the promotion of other measures to facilitate the following, in the interests of addressing objector concerns noted in this TRO process in respect of MGD:

Street	Proposed Modifications
Mound Place	5no. additional Residents Parking spaces provided in place of existing shared use bays (4no.); and existing waiting/loading restrictions (5m / 1no.). These are being proposed to accommodate residents concerns over local access and availability of permit zone parking spaces.
George IV Bridge	Permitting right turn from Chambers Street to George IV Bridge northbound to improve access to George IV Bridge and High Street.
Market Street	The MGS project plans to trial permitting PHVs through the Market Street bus gate, which will help maintain access for disabled and older users accessing the station by PHV.

11. WITNESSES AND REPRESENTATION

11.1 The Council will be represented by CMS Cameron McKenna Nabarro Olswang LLP.

11.2 The Council reserves the right to amend its list of proposed witnesses once the nature of the evidence to be led by other parties to the inquiry is known.

11.3 The following individuals will also represent the Council to provide the Reporter with evidence on their specialist areas:

Witness	Role	Qualifications	Topics covered
Martyn Lings	Project Director	BA(Hons), MSc, RPUD	Project
Elaine Campbell	Operations Manager – Development Management. City of Edinburgh Council	MSc (Hons) (Planning), MSc (Climate Change and Sustainability), MRTPI	Planning

Paul Matthews	Regional Director, Streets, AECOM	BEng, MILT, NEC4Reg	Project
Gareth Hodgkiss	Associate Director – Air Quality & Permitting, AECOM	BSc, MSc, MIEnvSc, MIAQM	Air Quality
Siobhan Wolverson	Associate Director, Planning, AECOM	BA(Hons) MSc MRTPI PIEMA	Planning
Alastair Haigh	Director, SLR	MA (Hons). CMLI	Heritage design
Colin Hardie	Associate Director, AECOM	MSc, CMILT	Traffic Modelling

12. DOCUMENTS

- 12.1 The Council currently intends to refer to the Core Documents and the documents listed in Appendix 1 of this Statement.
- 12.2 The Council reserves the right to submit further documents once the nature of the evidence to be led by other parties to the inquiry is known.

13. CONCLUSIONS

- 13.1 Section 122 of the RTRA requires the Council to exercise its functions in making a Traffic Regulation Order to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the road. This duty is a qualified duty in that the Council must comply with it so far as practicable, having regard to:
- 13.1.1 the desirability of securing and maintaining reasonable access to premises;
 - 13.1.2 the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
 - 13.1.3 the national air quality strategy;
 - 13.1.4 the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
 - 13.1.5 any other matters appearing to the Council to be relevant.
- 13.2 From the information set out in this submission, it is demonstrated that the Council has sought to secure the expeditious, convenient and safe movement of vehicular traffic, cyclists and pedestrians. The Council has also had regard to maintaining reasonable access to premises, the effect of the MGS project on the amenity of the area, air quality, facilitating and maintaining the passage of public transport and, among other things, the strong policy support for improving facilities for active and sustainable travel options. The Council has therefore complied with its duty under section 122 of the RTRA.

13.3 The MGS project and the Order has strong policy support at national, regional and local level, as can be seen from the discussion in this Statement.

APPENDIX 1 CORE DOCUMENTS

Core Document Reference	Document
CD001	The City Of Edinburgh Council (Meadows To George Street, Edinburgh) (Prohibition Of Motor Vehicles, Entry And Turning, One-Way Roads And Bus Priority Measures) (Variation No. _) Order 202_
CD002	MGS List of TRO Amendments to existing road network
CD003	MGS advertisement template
CD004	City of Edinburgh Council existing and proposed TRO maps
CD005	City of Edinburgh Council MGS TRO maps
CD006	Number not used
CD007	Number not used
CD008	Edinburgh City Centre Transformation Strategy
CD009	Road Traffic Regulation Act 1984
CD010	The Local Authorities' Traffic Orders (Procedure) (Scotland) Regulations 1999
CD011	National Transport Strategy 2020 - Transport Scotland
CD012	Active Travel Framework (November 2019) – Transport Scotland
CD013	Cycling Framework and Delivery Plan for Active Travel in Scotland 2022-2030 – Transport Scotland
CD014	Climate Change Plan – 2026-2040 – Scottish Government
CD015	National Performance Framework – Scottish Government
CD016	Regional Transport Strategy 2035 - The South East Scotland Transport Partnership
CD017	City Mobility Plan 2021 – 2030 (February 2024 update) – City of Edinburgh Council
CD018	City Mobility Plan 2021 – 2030 Appendix 6: Implementation Plan - Delivering Actions for Active Travel – City of Edinburgh Council
CD019	Our Future Streets: a circulation plan for Edinburgh (1 February 2004) - City of Edinburgh Council

Core Document Reference	Document
CD020	City Mobility Plan Capital Investment Programme
CD021	City Plan 2030 (November 2024) - City of Edinburgh Council
CD022	National Planning Framework 4 (February 2023)– Scottish Government
CD023	Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009
CD024	City of Edinburgh Council Transport and Environment Committee - City Centre West to East Cycle Link 12 Month Monitoring
CD025	Cycling Scotland all mode traffic surveys
CD026	Assessment of Gent’s traffic circulation plan 2017 – 2020 - Transport and Mobility Leuven
CD027	Disability and Transport 2021 – Transport Scotland
CD028	The Pedestrian Pound 3 rd Edition (November 2024) – Living Streets
CD029	Street Appeal Summary Report – Transport for London
CD030	City of Edinburgh Council Transport and Environment Committee - Bus Lanes and Bus Gates – Consideration of Permitting Access to Private Hire Vehicles (November 2025)
CD031	Edinburgh Streets Design Guidance (2015) – City of Edinburgh Council (together with factsheets).
CD032	Cycling by Design (2021) - Transport Scotland
CD033	Inclusive design at bus stops with cycle tracks (March 2024) – Living Streets
CD034	Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009

APPENDIX 2
COUNCIL DOCUMENTS

Document Reference	Document
CEC001	MGS Stage 1 Consultation Report
CEC002	MGS Stage 2 Consultation Report
CEC003	MGS Transport Modelling Report
CEC004	MGS Air Quality Report
CEC005	MGS Stage 1 Road Safety Audit (July 2020)
CEC006	MGS Stage 1 Road Safety Audit (December 2021)
CEC007	MGS Stage 1 Road Safety Audit (September 2022)
CEC008	MGS Integrated Impacts Assessment (August 2025)
CEC009	MGS Waverley Traffic Routing (March 2026)
CEC010	MGS Disabled Parking Summary Note (March 2026)
CEC011	MGS 2024 Loading Survey Technical Note
CEC012	MGS Pedestrian Comfort Survey (March 2026)