

LEITH LINKS COMMUNITY COUNCIL

Leith Connections

A response to consultation questions from Leith Links Community Council

5 March 2021

1. Introduction

This response from Leith Links Community Council to the consultation on new cycle route / Low Traffic Neighbourhood is submitted in order to 'give a voice' to local residents, in addition to responses that they may have made as individuals via the online consultation forms (which the CC has encouraged everybody to do).

It summarises points made by community councillors and members of the local community. These have been collated from internal discussions amongst Community Councillors and from a public meeting attended by a wider range of members of the local community.

The public meeting was held online on Monday 1st March, and included a presentation and answers to questions, from Miles Wilkinson and Martyn Lings of City of Edinburgh Council. 43 people attended this meeting – 2 elected Councillors for Leith Ward, 9 Leith Links Community Councillors, and 32 members of the public – local residents, and including 2 visitors from Leith Harbour & Newhaven Community Council.

The Community Council itself does not have a fixed 'for' or 'against' view. We see this as a highly complex issue which needs much more time and a much more nuanced approach, if it is to be resolved fairly and satisfactorily. While we can appreciate many positives in the aspirations of the schemes, we can also see many unresolved issues and potential problems. (And that division is also reflected in the comments made by others during our consultation). We think the designs are incomplete and not yet fully thought through. We are happy to hear that comments will be taken on board and designs refined over the next three months and we would like to see council staff down here, actually walking and driving these streets, so they can see and experience for themselves, and listen to locals 'on the ground', rather than this being a 'paper exercise'. We think that the proposal to implement on an experimental basis as early as September this year is unreasonable – rushed and premature.

Cycle route apart, why not wait until the tramworks are finished and the tram is running (or is closer to starting running), before making huge further changes to the area in the form of the Low Traffic Neighbourhood? Travel patterns are likely to change following Covid, anyway, and will change further, locally, once the tram is in service.

This is a very difficult time indeed, in Leith. We are already suffering from delays and congestion caused by tramworks, road works, road closures, diversions, a poorly functioning new traffic junction, plus reduced public transport due to Covid, and bus diversions. Edinburgh City Council is now proposing multiple new traffic schemes for our area - this planned new cycle route, an entire low traffic neighbourhood, making Spaces for People permanent, controlled parking zones, revised public space management plans..... These are presented separately as if they were completely distinct events. But when you aggregate all the various effects of each scheme, on top of the effects of previous / existing problems, it adds up to a very major impact on local residents. We are not convinced that these cumulative and interlinking effects of all the different schemes on residents is being properly recognised.

Comments made by residents include:

- *Is this really the right time to make these enormous experimental interventions on an area already suffering from such huge disruption?*
- *Why now, why so fast? The new Local Development Plan has been put off till summer, everyone's lives are more or less on hold, due to the pandemic, the economy is tanking with many businesses teetering on the edge of a cliff, and they want to introduce these huge changes in what will seem like a blink of the eye, apparently with less opportunity for scrutiny than a single controversial planning application would receive from the council's committee system.*
- *Should we not wait until there is sufficient public transport infrastructure and network to offset the massive inconvenience that these proposals appear likely to cause if introduced in the autumn, as is suggested?*

- *Are they talking to each other in a meaningful way and looking at the same maps? What do the computer models reckon? And can you trust them? (They trusted traffic modelling for the roundabout at the foot of Easter Road, and look at what a disaster that is.)*

2. Quality of the Consultation

The online consultation form was criticised by many on multiple grounds.

It was from an outside body, apparently, rather than using the Edinburgh City Council Consultation Hub, but collected personal data which may, arguably be in breach of GDPR?

It allowed users to go back, and to save, but did not do what the Consultation Hub does - that is, email out a pdf of the completed response once submitted. That's annoying, especially as we are now used to the Consultation Hub and expect such a service. But more importantly, if not intending to feedback to users, why did it ask for users' name address, email address and what will the authors do with that data?

The form was created in an all-too familiar format consisting of 'leading' questions, rather than neutral questions. As such it is not really ethical research. It can also lead to suspicion and mistrust on the part of respondents.

- *The problem is they simply do not listen to our views. We are ignored and like other things we don't want in this city it will get pushed through.*

The form actually consisted of two separate 'surveys' on linked but separate topics, which is definitely not good research practice.

The initial consultation period was unacceptably short; 10 – 28 February, and even when extended to 5th March (only on request) gave respondents just 4 weeks to respond, also making it difficult for a body like a Community Council to do its job - that is, to share information and consult local residents.

- *The council spends years slowly mulling on these major changes, hires consultants and experts etc, fannies about a bit and then springs them on communities, giving them hardly any time at all to respond.*

The online format meant that the most vulnerable local residents, arguably those most likely to be affected by changes to the roads around their homes, might not find it easy to respond. The leaflet gave a phone number and postal address for receiving a paper copy of the consultation, but the very short timescale made that an impractical option, especially since some residents report receiving the leaflet after the initial deadline date of 28th February.

- *How much effort has been made to contact residents within the LTN who may not have access to computers, online information etc?*

Many local residents also reported that they had not received leaflets at their homes. Some reported that the people delivering leaflets had dumped a pile at the foot of the stair rather than delivering through letter boxes.

3. Issues and Concerns

There was considerable scepticism and general concern that the agenda was pre-set, that the data had been selected to suit the case, and that consultation was taking place on proposals that were incomplete (e.g. what about the end section, from Dock Street/ Commercial Street to OT??). It was a bit confusing to be talking about two things at once – the cycle route and the LTN.

Equality and Accessibility

Concerns were expressed about equality and disability impacts and the importance of carrying out an assessment on these.

- *Not everyone 1) can afford or 2) is physically able to use a bike or 3) can walk long distances.*
- *It's not just about people who are blind or in wheelchairs, we have an ageing population who need access to public transport within 200 or 300metres of their home, and from/between key locations within the area.*
- *Every car route that is closed off and every parking space removed makes life more difficult and more restricted for people with mobility problems.*

Some felt that some of **accessibility issues** could be improved with some basic maintenance by the Council in the surrounding area (footway resurfacing, dropped kerbs etc.) Others felt that this was not so, e.g. improving pavement surfaces not sufficient if they are not wide enough for wheelchairs.

Everybody agreed that there was (1) a need for **reduction of street clutter** and (2) a **need for much improved signage** at all stages of the route, both for drivers and cyclists but also to guide visitors to the heritage areas of The Shore.

Proposed Cycle Route

There was no dissent about the need for a segregated cycle route, that the Tram Team had apparently forgotten/ omitted from their designs. We would like to know who is paying for this – hopefully the Tram Team and / or Sustrans, and NOT the ordinary Council Tax payer?

There was discussion/division about the preferred route. Is Henderson Street / Sandport Bridge really the best / only route?

Constitution Street would be the obvious and most direct route for cyclists. People were shocked to hear that the top (south) end of Constitution Street will be so narrow (because of tram stop) that it will be impossible for there to be a cycle lane.

Cyclists, like everyone else, are likely to follow 'desire lines' and hence many may choose to ignore the new cycle route and cycle down Constitution Street anyway. Will this be made 'illegal'?

Why is it assumed that cyclists all just want to go to Ocean Terminal?

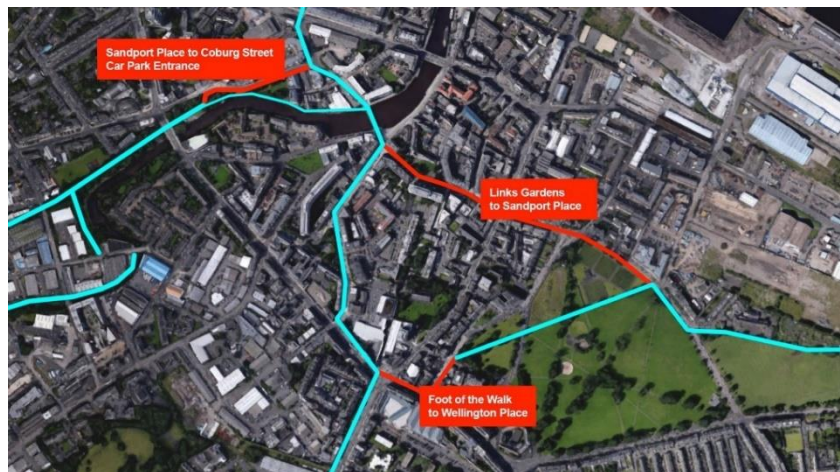
The Shore area is generally where leisure walkers / cyclists / tourists want to be. It has always been held up as a 'poster street' for 'café culture'. Why not make the Shore the traffic free pedestrian and cycle route, and send the buses over Sandport Bridge to Commercial Street (with a bus stop half way along, so people can alight and cut through Sandport Way to Custom House etc)? This would also save the fabric of the cobbled road from the ravages of heavy traffic that currently cause damage, and would leave safe space for public seating and allow the cafes and bars to create pleasant outdoor eating/drinking on The Shore.

and / or

At least 50 % of cyclists reaching the bottom of the Walk will not want to go to Ocean Terminal but will want to turn right and go east (towards Leith Links and the cycle path onwards to Portobello etc.) but the cycle route leads them away in the opposite direction. Where are they supposed to go? Should there be an additional cycle path from the Foot of the Walk to Academy Street, to let cyclists filter down into the Links area? Or another cycle route (spur) from Henderson Street through Lidl carpark and Kirkgate / Coatfield Lane to the northern end of Constitution Street, from where cyclists could access Leith Links and pick up the cycle path to Portobello?

Missing Links

There are other obvious missed opportunities where there should be cycle paths to connect to existing routes. These (the red routes) have been well summarised on a graphic created by local resident Gordon Carmichael (map used with his permission). They are arguably equally - if not more - important than the proposed route to Ocean Terminal.



Strong feelings were expressed about the **importance of clear physical separation of cycle lanes** from both pedestrian and car lanes to ensure compliance and safety for all. Parking in the new cycle lane must not be physically possible (or people WILL park in it!)

Is there joined-up thinking on cycle infrastructure across the city?

- *Cycle hire EDI seems to be collapsing - bike racks broken and any bikes all over the pavement - needs addressing.*

Road Closures along the cycle route

Making Henderson Street essentially a dead end will cause congestion and safety issues as traffic will go down there then have to do a U turn to get out again. We **don't see the need to close off Parliament Street at the Henderson Street end**; leaving it open would create a loop that would let traffic exit back on to Great Junction Street via Cables Wynd (and vice versa).

Enforcement, Education and Security

The need for education and enforcement was frequently mentioned – once a cycle lane is introduced, will there be better education of cyclists?

Will there be enforcement to prevent cyclists from endangering pedestrians by cycling on the pavements, as many do at present?

The need for education and good public communication was underlined – one resident made it clear that they did not actually understand what a cycle lane was, by asking if people in wheelchairs and mobility scooters should use it.

The law needs to be clarified and enforced as regards eScooters. These are illegal currently and yet as we all know, there are many people using them in Leith already, apparently with complete impunity. They ride them on pavements, cycle lanes and on the road. Are they to become legal? Will they be allowed in cycle lanes?

Comments made included:

- *Are we going to address bike theft (which is massive in Edinburgh / Leith) along with all this? People aren't going to cycle and leave their bikes on the street until it is much safer to do so.*
- *One option to reduce bike theft would be to create secure bike storage, which is definitely needed, and on a wider scale than indicated by these plans.*
- *Perhaps trying more to engage people with cycling and providing cycling guidance for adherence to rules and regulations, and learn how to share public spaces safely. Classes for adults re-learning to cycle in a safe environment could be a welcome option.*
- *Are Cycling training and proficiency tests going to be compulsory?*

LTN

The proposed LTN caused much more concern and disagreement, with many questions raised - and left unanswered - by the planners. We would argue that this needs much more work, especially as regards the northern and eastern sections of the area, e.g. from the Shore north and eastwards to Seafield.

- *I understand the need to reduce car use generally and improve connectivity for walkers and wheelers, but such enormous change should surely not be foisted on this part of the city without giving much more notice and showing much more joined-up thinking in relation to other schemes in prospect for the area – namely Spaces for People initiatives, CPZ, the tram, all of which are intrinsically linked.*
- *How much consultation is being done within the LTN – I'd like them to share all the research data, impact assessment material, etc, and demonstrate detailed knowledge of how the area functions at a granular level, with multiple site visits, showing that they have co-ordinated their thinking with all the other key players in the mix, tram team, bus companies, Transport Scotland, Forth Ports, and all the rest.*
- *I'd want to ask what the consequences and knock-on effects of the LTN proposals will be – for those who live, work and trade in the area, those visiting the area, and those wanting to pass through. And indeed what the domino effects will be on the areas surrounding the LTN.*

Car ownership and use, increased traffic and congestion

- *If car ownership is already comparatively low in Leith, why not focus on car reduction in other areas and on instead improving bus connections for an area that is obviously more reliant on buses?*
- *If there are 50% Leithers who don't have a car, then 50% do have a car. Both should be considered.*
- *The figure of 50% car ownership may be out of date in the light of the volume of high-cost additional residential properties being built in very large numbers both within and on the fringes of the LTN area. Realistically we may be looking at increasing traffic volume.*

There were many concerns about increased **traffic pressure and congestion** caused by blocking off so many roads:

- *Where will all the traffic go? Some of it may "evaporate", as the council hopes, but much of it won't and how will that work?*
- *Closing the Shore and Sandport Place will cause a huge amount of congestion on Bernard / Commercial Street around the Shore area.*

- *The two main arterial routes – Salamander/Baltic/Bernard and Claremont /East/Hermitage/Duke/Gt Junction St – are already overloaded and congested at a time of much reduced traffic in the pandemic lockdown. If and when the traffic volumes go up again, plus road closure at Henderson St, Dock Street, The Shore etc. - where will it all go?*
- *The main east-west routes will be Gt Junction St and Commercial St. Salamander St already has unacceptably high emissions and poor air quality, due to heavy traffic to and from the working docks. These plans will greatly increase the traffic and levels of emissions on these roads. How does the Council propose to reduce them? (And why is the Council permitting developers to build hundreds of new homes along the route of this pollution?)*
- *Salamander Street already has high level of pollution which dropped dramatically last March when lock down started. As traffic gradually increases again, it will go up again.*
- *A lot of the traffic along Salamander/ Bernard/Commercial Street (and currently, up the Shore) - is heavy industrial and commercial vehicles - large vans and trucks, including construction vehicles– and this will increase as building increases along towards Granton. If they can't use the Shore or Sandport Place, these could be displaced on to Claremont / Hermitage which is a residential area beside a park, and North / Great Junction Street which is already under great traffic pressure.*
- *What studies have / will be done to model what it would be like for car-using residents and businesses within the LTN – getting into the Bermuda Triangle (as residents now call it), getting out of it (and onto roads potentially in gridlock), moving around within it and navigating its outskirts (where the congestion could get really bad).*

Public Transport

Both of these proposed schemes will be dependent on excellent public transport to underpin them, particularly in poorer weather.

- *No new traffic schemes should make bus transport / service more difficult or less attractive. Does this scheme actually promote use of public transport, as it claims? No, it doesn't – unless you count simply removing other forms of transport to constitute 'promotion'.*

The tram system so far has undermined what was a very good public transport system in this area. People east of the Shore along to the Links have lost two key bus services, the 16 and the 12. Literally thousands of new residents are moving into the area as extensive high-density residential developments increase on the fringes of the Links and along Salamander Street.

How do you support an ageing population who are not wheelchair users but can't walk long distances and are dependent on buses? This needs to be considered in more detail and ensured alongside these schemes. We'd want to see **input from Lothian Buses** as an early and integral part of the planning and design of these schemes.

- *The floating bus stops planned for Great Junction Street and Henderson Street are a source of great concern – there are felt by many to be potentially dangerous for both pedestrians and cyclists. There is a moratorium on new floating bus stops, which would be contravened by an experimental implementation of this plan in autumn 2021.*
- *Relocating the northbound bus stop on Henderson Street will be inconvenient for bus users wishing to access the FoodBank, community facilities at South Leith church halls, and the Kirkgate shopping centre.*
- *The distance from someone's home or workplace to access public transport is supposed to be not more than 300 metres (Bus Friendly Design Guide, Planning Committee, 2005, paras 2.3-2.6) Edinburgh Street Design Guidance (2019) talks of 400 metres between bus stops (but NB this has NOT been agreed or adopted by T & E as policy!) The proposed schemes will probably not meet these standards, for certain area within the proposed LTN.*
- *The traffic congestion caused on the roads peripheral to the LTN (Salamander/ Bernard /Commercial Street, and Claremont Park / Hermitage Place/Duke Street /Great & North Junction Street) is likely to cause delays to bus services using those routes.*

Employment

The planners claim that the scheme will 'improve access to employment'. But we were unable to discern how this claim is justifiable??

Businesses

The planners claim that the effect on local businesses will be positive – but it's hard to see how that claim / conclusion can be evidenced. Yes, more visitors / patrons may come on foot or by bike and spend money, but equally a lot may decide not to bother, if they can't park nearby, and will just choose go elsewhere instead.

The after-effects of Covid-19 and extended lockdowns (not to mention tramworks) mean that many businesses may close down anyway, so it is too early to say what the picture will look like by the end of this year.

Most of the businesses in the area are pubs, cafes and restaurants, and the difficulties that they are going to face to get supplies delivered (e.g. beer barrels unloading on the Shore) may lead to more closures. There are many upmarket restaurants in this area and they are by no means all patronised exclusively by locals. These 'destination' businesses, such as Fishers, Shore Bar, Ship on the Shore, Wisharts, Borough, etc. need the custom of people who drive from other parts of the city. How will it look for them as they emerge from lockdown and try to resume trading, to find that they are stranded within an area that is 'no go' for customers' cars?

Comments made include:

- *Will the LTN turn this into a Special Uneconomic Zone, hollowed out of its traditional businesses and long-established traders?*
- *How much effort has been made to engage with traders and small businesses within the proposed LTN – the mechanics and repair shops, and the Michelin-starred restaurants, pubs and cafes that are part of the much-vaunted night-time economy of Leith?*

Access and Parking

Many concerns were expressed about access to the area for residents (and visitors, but residents are felt to be more of a priority). For many residents within the area, closing Henderson Street, the Shore, Coburg Street, Dock Street and Sandport Place leaves a question mark over how they will be able to enter and leave their own homes by car, e.g., at Coal Hill, or Coburg Street. They could face an extended diversion and greatly increase journey time, which would add to emissions and congestion on nearby roads.

There was also concern about a severe lack of parking spaces, due to removal of spaces along the cycle route, and potentially within the LTN. It was felt that a very careful review of parking needs to be incorporated into this scheme. Council officers appeared completely unable to answer the simple question 'But where will people park?' While there may be reduced car use progressively, over the years, and thus gradual 'traffic evaporation', that does not answer the immediate problem of people who own cars and need to use them and may not, with this scheme, be able to park them anywhere near where they live. A controlled parking zone, likely to be introduced, will not solve this problem.

We suggest therefore that

- a) Closing off streets like Parliament street, that add much needed parking spaces, be reconsidered.
- b) Coburg Street should remain open at the Ferry Road end, albeit as a dead end, for access only, and offer some parking.
- c) Consideration be given to creating new 'pocket' car park(s) around the fringes of the LTN, for example along Salamander Street.

Car parking should also be offered in the form of a Park and Ride to the east of the area, to accommodate commuters from East Lothian who intend to take the tram from Leith into the city. (The 'Ride' in this case could take people to a tram stop in Leith rather than into the city centre.)

There was also extreme concern felt about the lack of places for delivery vans to park. And we all know that the number of these has gone up massively since the start of the pandemic due to online shopping; this pattern is unlikely to reverse significantly. Currently, short term delivery drivers tend to just park on the pavement and run to make each delivery – but this is not compatible with a so called 'safe' neighbourhood / play streets etc. Longer term vans such as workmen, Council staff (e.g., service vehicles), removal vans etc. will quickly fill and 'block' the few loading bays allocated within this plan.

Comments made included:

- *This plan appears to compromise/reduce parking spaces for residents, which is already very limited.*
- *A lot of parking will be lost in Constitution St, Henderson St, Dock St etc. Where will existing residents park if they don't have the private parking that some of the new developments have? We have about 100 flats on our street and 7 on-street parking places, so we have to park in the surrounding streets - but that's where parking is going to be removed. Why should we be forced to sell our cars, or move house? Some of us can cycle, but not all. And in good weather but not all weathers. It's crazy.*
- *It's already hard to find parking at the Shore for residents, without removing more spaces. Number plate recognition technology would enable residents to park. (can it be true that this is legal in England but not in Scotland?)*

4. Other Suggestions/Ideas

- *An increase in the numbers of car club cars would be useful.*
- *A lot of possible solutions exist, but not at the right scale: e.g., the City Car Club and bike hire. Giving residents free Car Club memberships, bike hire memberships, cycle training, etc might encourage people to give them a shot.*
- *Public transport in Leith is excellent but what is needed is scaling up and incentivising, such as free / cheap bus passes, free membership of the Car Club etc.*
- *Where is the green space in these proposals? We want to see trees (proper street trees not just weedy trees in pots)*
- *Public seating is needed for older people*
- *More litter bins, less close to the edge of the Water of Leith, and emptied more regularly, to avoid pollution of the water.*

5. Positive views

There were numerous positive views expressed.

These comments supported the schemes on various points, agreeing with the suggestion that they c/would;

- be more equitable
- encourage cycling/walking,
- reduce car use
- by reducing through traffic, make the area safer
- improve air quality inside the area due to reduced emissions
- help address the climate emergency and generally improve the environment.
- offer opportunities for more community use of public space

Some comments made:

- *The areas where schemes like this have been implemented are much nicer and more pleasant to spend time - and where people tend to get together and spend time, they also spend money, so actually better for local business too.*
- *I'm delighted with the plans. Fewer cars the better. I live on Coburg Street and I can't wait for this to be introduced and to stop cars using it as a short cut.*
- *I'm a car owner but I'm all for the LTN and cycle lane. It will make the area much nicer. People are far too wedded to their cars*

6. Conclusion

The importance was recognised, of looking at ALL current plans and developments, including the proposed CPZ and the trams, and considering them and their impact on local residents and businesses , as an integrated whole not as separate, independent parts.

Some comments made:

- *I support the general direction here, but it's essential to get the details right*
- *It doesn't seem very sensible not to consider the implications of the CPZ in the context of these other two consultations (i.e. Spaces for People and this one). They all have a bearing on each other. Or perhaps we shouldn't be embarking on three distinct traffic management projects simultaneously...*
- *It would be better policy making to join all these things up frankly...*
