

## Edinburgh Tram - Traffic Regulation Orders

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### Transport, Infrastructure and Environment Committee

21 September 2010

#### 1 Purpose of report

- 1.1 On 9 February 2010 this Committee considered a report on the Statutory Consultation on the Traffic Regulation Orders (TROs) required for the Edinburgh Tram Network (ETN) and approved the recommendation to continue the Statutory Process. The Orders (designated TRO1) have been advertised and this report records objections and comments which have been received, notes the responses to those and the recommended actions to address them, and recommends that the Orders be made as advertised.

#### 2 Summary

- 2.1 The Director of City Development published the Traffic Regulation Orders (TRO1) on 22 February 2010 and the majority of the objections/comments received focus on two issues, i.e. the banning of the right-turn from London Road into Blenheim Place and the impact of the general traffic restriction on Shandwick Place.
- 2.2 This report recommends that the London Road/Blenheim Place restriction should be accepted but not implemented until such time as a trial of the junction, with the right-turn permitted, has evidenced that there is a need for the ban. In the interim there will be a further review of the design to establish whether the junction can be configured in such a way as to retain the right turn. The ban on a right turn will only be implemented if the further design review fails to come up with an effective solution and there is evidence from observation of the junction that problems with vehicle tailbacks are being experienced. This is discussed in more detail in paragraphs 3.21 to 3.23 below, in Item 1.1 in Appendix 1 and in Section 5 in Appendix 2.
- 2.3 The report also recommends that the ban on general vehicular traffic on Shandwick Place is retained and that workshops should be set up to take forward measures to address the wider-area impact of the Shandwick Place restriction. The workshops would look to agree objectives and potential actions with the local communities for consideration by this Committee in the future. This is discussed in more detail in paragraphs 3.24 to 3.40 below, in Item 2.1 in Appendix 1 and in Sections 14 and 18 in Appendix 2.

- 2.4 The report also makes recommendations as to how a number of other concerns should be addressed. Again these are discussed in detail in the report and in the accompanying Appendices.

### **3 Main Report**

#### **Background**

- 3.1 In February 2008 the Scottish Government published an amendment to The Local Authorities' Traffic Orders (Procedure) (Scotland) Regulations 1999 to take account of situations where traffic measures are to be made "in connection with matters already authorised by a Private Act of Parliament." The amendment recognised the need to improve the statutory procedure to allow authorities to manage the promotion of TROs more effectively and more efficiently in such special circumstances. This amendment removed the requirement to hold a mandatory public hearing of objections, in specified circumstances, but did not remove the right to hold a discretionary hearing.
- 3.2 The Director of City Development reported to the Transport, Infrastructure and Environment Committee on 22 September 2009 on proposals for a three-stage process for promotion of the tram TRO, taking account of the amended Regulations.
- 3.3 In the first stage it was proposed that Orders (designated TRO1) relating to the on-street sections of tram should be promoted, that comments and objections should be considered and noted and that the Orders should be made, as published. It was noted that this would ensure that Orders, TRO1, are in place to allow tram to operate and the road network to be managed. It was also noted that the existing Orders on the tram route would be revoked and replaced by the TRO1 Orders.
- 3.4 The second stage would then involve refinement of TRO1 — taking into account comments and objections received at the TRO1 consultation stage — and promotion of variation Orders (designated TRO2), if appropriate. Therefore the variation Orders (TRO2) would respond to issues raised during the TRO1 statutory process, as appropriate.
- 3.5 The third stage would involve promoting any necessary changes identified during the tram commissioning period and promoting a third Order (designated TRO3).
- 3.6 It was also noted that Orders relating to wider-area issues and changes along or adjacent to off-street sections of tram would be brought forward separately and would be reported to Committee at the appropriate time.
- 3.7 The Transport, Infrastructure and Environment Committee accepted this strategy as being both a pragmatic and a fair solution to a complex and challenging process.

### Timing of the Orders

- 3.8 Obtaining consent for any major project is a complex process. The usual approach is to start with some form of 'approval in principle'. The promoter of the project then has the comfort of knowing that the project is acceptable in principle before undertaking the cost of working up a detailed design. However, it means that the person or body giving the 'approval in principle' does not have all of the detail available when they make their initial decision. Nevertheless, this approach is common practice. It has long been accepted that it would be unreasonable to expect developers, whether in the public or private sector, to spend significant amounts of money working up detailed proposals before they know whether or not the project is acceptable in principle.
- 3.9 A similar approach was followed for the ETN. The tram Bills, which were lodged with the Scottish Parliament in 2004, were supported by the required information specified in the Standing Orders dealing with the private Bill process, including the Scottish Transport Appraisal Guidance (STAG) Report (which set out an indicative alignment based on a specimen design) and the Preliminary Financial Case, to allow MSPs to consider the project.
- 3.10 A STAG appraisal is a comprehensive process and the promoter of any scheme is required to consider and satisfy Government objectives in terms of environment, safety, economy, integration and accessibility. However, the substantive detailed design work was not undertaken until after the Acts were passed in 2006 and this staged approach was recognised and accepted by the Parliamentary Committee considering the Edinburgh Tram (Line One) Bill:
- "The Committee recognised that much of the detailed design of the tram project has yet to be developed and may indeed only be known after the Parliament has completed its consideration of the Bill (should the Bill become an Act)."*
- 3.11 For instance, the details of various matters which required the prior approval of the Planning Authority, such as the design of the tram stops and the design and location of the building fixings, were not available during the parliamentary stage.
- 3.12 Likewise, the detailed design for the traffic management measures was not available during the parliamentary stage. Again this was recognised and accepted by the Parliamentary Committee considering the Edinburgh Tram (Line One) Bill. The traffic management measures could only be designed after completion of the detailed design for the tram infrastructure and the road layout. Hence it is only now that the proposed detailed traffic management measures for the Orders are available.

### TRO1 Public Deposit

- 3.13 The TRO1 Orders — stage one of the TRO strategy — were advertised on 22 February 2010. A public exhibition ran concurrently with the 28-day public deposit period and the documents were made available at local libraries and on the internet. *(It should be noted that, where possible, the published Orders reflected comments received during extensive consultations which culminated in a series of public exhibitions which were undertaken at five local venues along the tram route in October/November 2008.)*
- 3.14 A total of 420 objectors lodged objections and comments during the public deposit period with a further 11 submissions arriving after the closing date of 21 March 2010, all of which are considered in this report.
- 3.15 The author of each letter and e-mail has been given an identification number and their objections and/or comments are summarised in Appendices 1 and 2. Appendix 1 identifies the key concerns raised while Appendix 2 comprises a comprehensive record of all issues raised, with responses and a recommended course of action.
- 3.16 It is important to note that many of the comments and concerns raised are not TRO matters. For example a number of correspondents question the need for a tram system, while others question some of the design decisions which have been taken in the development of the scheme. As such, these comments and concerns are not material to the TRO process and Members are not required to take account of them in taking a decision on the making of the Orders (TRO1).
- 3.17 Notwithstanding that, and in the interests of completeness, these non-TRO issues have also been logged in Appendix 2 along with a response and recommendation, where appropriate.
- 3.18 Some of the correspondents have also taken the opportunity to make suggestions, some of which again are not material to the making of the Orders. Again in the interests of completeness these are summarised in Appendix 3.

### Objections/Comments Summary

- 3.19 The majority of the objections/comments received focus on two issues but a number of other concerns have also been identified, as shown in Table 1 below:

	Issue	Objections received during the 28 day period	Objections received after deadline
1	Blenheim Place – banned turns	241	7
2	Shandwick Place – closure to general traffic	145	2
3	Picardy Place	9	-
4	Leith Walk	5	-
5	Forth Ports	1	-
6	Cycling	3	-
7	Other	16	2
	<b>Total</b>	<b>420</b>	<b>11</b>

**Table 1 – Objection Issues**

- 3.20 The issues and proposed actions are outlined below but are summarised in greater detail in Appendix 1.

#### **Blenheim Place**

- 3.21 The proposal to ban the right-turn into Blenheim Place from London Road, which was introduced on operational and safety grounds to accommodate the ETN infrastructure and to allow the tram to operate in accordance with its approved business case, generated 248 letters of objection.
- 3.22 *It is recommended that the Orders be made as advertised but before the banned turn measure comes into force it is further recommended that:*
- a) *a design review be undertaken to establish if a practical and safe alternative can be developed which preserves the right turn with minimal impact on tram operations;*
  - b) *if an approved alternative design is feasible the necessary TRO2 variation Order will be promoted and be subject of further consultation. The outcome of this consultation would be reported back to the Transport, Infrastructure and Environment Committee to allow members to decide whether to retain the banned turn in TRO1 (as made) or to make the Variation Order, which would remove the banned turn from TRO1 and prevent the ban coming into force; and*
  - c) *in the event that construction commences before the process is completed the junction be constructed without the physical measures which effect the banned turn (that part of the TRO1 Order would not be implemented) and the junction be trialled under that scenario.*
- 3.23 This approach means that there will be a further report to the Transport, Infrastructure and Environment Committee before the banned turn might come into force and it will ensure that the “no banned turn” design is tested and trialled to inform the Committee's decision on whether or not to vary TRO1. Also as there is documentary evidence of support for the proposed banning of the right-turn (to reduce the amount of intrusive through-traffic) this will also ensure that those members of the community who support the ban will have an opportunity to state their views before a final decision is taken by Committee.

#### **Shandwick Place**

- 3.24 The proposal to restrict general traffic usage on Shandwick Place, which was introduced on operational and safety grounds to accommodate the ETN infrastructure and to allow the tram to operate in accordance with its approved business case, generated two groups of objection;
- a) 2 objectors raised concerns about the impact on the local business and retail sector caused by the restriction on access to Stafford Street; and
  - b) 147 letters of objection or notes of concern raised concerns about the impact of diverted traffic on parts of the surrounding road network.

- 3.25 When developing the business case one of the assessment criteria was the running time of the tram. Figures were based upon 2008 costings over a 60 year period. Output from the traffic model in Appendix 4 indicates that tram delay due to the opening of Shandwick Place to general traffic in the morning peak period could be approximately 8 minutes in a westbound direction. The economic impact of just the morning peak delay would reduce the business case by some £42.5 million over the 60 year period and would significantly impact on the operation of the tram.
- 3.26 In light of this, it is recommended that a design review be undertaken with regard to the Stafford Street access issues to establish if a Canning Street to Stafford Street routing option can be provided safely and with minimal impact on the tram operations.
- 3.27 The restriction on general through-traffic on Shandwick Place, however, is critical to the operation of the tram. Other design options were considered but an alternative working solution could not be identified. Appendix 4 demonstrates the additional delays which would be incurred by both tram and bus services should general traffic be permitted to use Shandwick Place. There would also be additional delay and queuing on Princes Street, Lothian Road and South Charlotte Street approaches.
- 3.28 That said, a number of other related actions are also being pursued by the Council, including the 20mph zoning of the Coates area, the ongoing city centre Air Quality Action Plan including potential Low Emissions Zoning, and the introduction of a Puffin crossing on Great Stuart Street.
- 3.29 The Council will also continue to monitor air quality at the monitoring site which had previously been established on Great Stuart Street at the request of residents and although twelve month's data should be considered, for the purposes of this report the Council has undertaken calibration and analysis of the July to December 2009 data. This analysis shows that nitrogen dioxide levels are within accepted EU limits for this 6 month period; the recorded average figure of 49.2µg/m<sup>3</sup> when corrected in line with government guidance gives 33µg/m<sup>3</sup>, i.e. below the 40µg/m<sup>3</sup> annual limit set by the EU.
- 3.30 The air quality monitoring will be reviewed when further validated data has been collected.
- 3.31 In addition, following discussions with representatives of the Moray Feu who have raised concerns that emissions accumulate in roadside basements, the Council has received advice from Edinburgh University Atmospheric Chemistry Department who have confirmed that it is unlikely that nitrogen dioxide levels would build up to unacceptable levels in basement areas based on the levels that the Council has collected at the kerbside. Notwithstanding this, Council officials have agreed to explore the best methodology to undertake monitoring in basement areas adjacent to the road.

- 3.32 The Moray Feu residents, who were concerned about the impact of the Shandwick Place restriction, undertook their own analysis of air quality data which they collected themselves and of raw data provided to them by the Council from a monitoring site which had previously been established on Great Stuart Street at the request of residents.
- 3.33 With regard to their interpretation of the Council's air quality data the Council note that it is not possible to draw conclusions from short-term data but that it takes at least a year's data to establish compliance or otherwise with national air quality targets. The Moray Feu do not acknowledge this fact in their presentation of the data. Not only that but the figures cited are "raw" and have not therefore had the appropriate corrections applied to them. So any conclusion arrived at by the Moray Feu on the basis of the Council's short-term, raw data is unreliable. This is discussed in greater detail under Item 14.7 in Appendix 2.
- 3.34 With regard to the data collected on behalf of the Moray Feu the Council also have a number of concerns. The equipment used by the Moray Feu to monitor air quality is not type approved and the stringent calibration and quality control requirements which the Council must comply with when gathering such data have not been adhered to. There are similar concerns with the noise data. So again the Council would assert that any conclusions arrived at by the Moray Feu on the basis of this data are unreliable.
- 3.35 Notwithstanding this, it is acknowledged that the restriction on general traffic entering Shandwick Place will impact on some communities in the wider-area, not least by diverting traffic to the surrounding road network. A number of actions are proposed which will look to mitigate that impact.
- 3.36 *It is recommended that workshops be set up to engage objectors, or their representatives, and the local Community Councils in discussions of all of the issues which have been raised. Objectors have made a number of suggestions in relation to the Shandwick Place restriction (these are summarised in Appendix 3) and these could form the basis of the opening discussions. The workshops should look to agree objectives and determine a programme of potential actions to be considered by the Transport, Infrastructure and Environment Committee at a future date. A separate report titled 'Edinburgh Tram – Traffic Regulation Order: TRO1 Review' to this Committee considers this in greater detail.*
- 3.37 Any actions agreed by the Transport, Infrastructure and Environment Committee would then feed into future works programmes.
- 3.38 In anticipation of TRO1, and with particular regard to concerns raised by objectors about sleep disturbance, the Council previously sought to promote a night-time HGV ban on the Randolph Crescent, Great Stuart Street, Ainslie Place and St Colme Street route. This was reported to the Transport, Infrastructure and Environment Committee on 5 May 2009 at which time it was recorded that there are a number of issues with such a proposal and the matter was not pursued. In the opinion of officers that position has not changed and HGV bans on a street-by-street basis cannot be recommended.

- 3.39 The impact of freight traffic is a city-wide concern and needs to be addressed in those broader terms. The Council therefore intend to engage with the freight industry to investigate options for a strategy which will seek to minimise freight movements and intrusion within the city. The Local Transport Strategy identifies a number of aims, objectives and policies in this context and the Transport 2030 Vision, which was approved by Transport, Infrastructure and Environment Committee on 9 February 2010 and which aims to establish a clear, long-term vision, will help to guide that work.
- 3.40 *It is recommended that TRO1 should be made as advertised, noting the above actions.*

#### **Picardy Place**

- 3.41 A number of issues were raised by objectors. They relate to:
- a) servicing requirements for the St James Centre redevelopment;
  - b) the adverse impact on the streetscape and the impact on access to St Mary's Cathedral;
  - c) the removal of loading and disabled parking provision on the Antigua Street frontage;
  - d) the adequacy of the loading provision on Picardy Place.

*Appendix 1 gives a full response but it is recommended that no further action be taken as a result of these objections and that the Orders should be made as advertised.*

#### **Leith Walk**

- 3.42 Three issues have been raised by objectors. They relate to:
- a) the proposals failing to respect existing rights of access and materially affecting the use and enjoyment of the developed property at the Shrubhill House site;
  - b) the loss of parking/loading facilities in the vicinity of *The Bed Shop*; and
  - c) banned right turns along the route of the tram.

*Appendix 1 gives a full response but it is recommended that no further action be taken as a result of these objections and that the Orders should be made as advertised.*

#### **Forth Ports**

- 3.43 Forth Ports have raised two objections:
- to the waiting and loading restrictions on Old Port Road; and
  - to the "bus only" restriction at the cruise liner terminal access.

Appendix 1 gives a full response but it is recommended that no further action be taken with regard to Old Port Road and that the terminal access should be referred to a design review.

*It is recommended that the Orders should be made as advertised, noting the above actions.*

### **Cycling**

- 3.44 Objections have been raised to a number of cycle-related issues. In their letter of objection Spokes acknowledge that many of these issues are being considered under a cycling review, to which they and the Cycle Touring Club (CTC) have been party, but state that they must maintain their objection until the outcome of the review is confirmed.

A comprehensive cycling review has been undertaken to identify facilities, particularly wider-area alternative routes, which might be introduced. It is proposed that non-standard features be trialled (at The Mound) and, if successful, these can then be utilised elsewhere. Any required modification to the traffic regulations identified by that process would then be promoted under the relevant future Orders.

It should also be noted that the Council is currently working on an *Active Travel Action Plan* and that this will be reported to Transport, Infrastructure and Environment Committee on 21 September 2010. This will set out a series of actions aimed at increasing the amount of walking and cycling in the city. It will have a particular focus on working toward the *Charter of Brussels* target of 15% of journeys to be made by bicycle in 2020.

### **Other objections**

- 3.45 A number of other objections have been raised. They relate to:
- a) the banned right-turn from Queen Street eastbound into North St David Street southbound;
  - b) the proposed build-out of the north footway on Princes Street (opposite Waverley Bridge);
  - c) the loss of dedicated disabled parking provision on Frederick Street;
  - d) the pedestrian link between Haymarket Station and the Exchange area via their development site;
  - e) the banning of private vehicles from Princes Street (westbound at night), Shandwick Place, Constitution Street, St Andrew Square, West Maitland Street and the road outside Ocean Terminal;
  - f) the principle of priority being given to tram over all other vehicles;
  - g) the principle of priority being given to trams, buses, taxis and cycles over private vehicles;

- h) a number of banned turns including Palmerston Place into West Maitland Street, The Mound into Princes Street and banned right turns from Leith Walk;
- i) the reduction of parking places;
- j) *"inadequate loading provision between Jameson Place and Lorne Street, because of the length of kerbside taken up with bus stop bays";* and
- k) consultation for the Orders being inadequate.

*Appendix 1 gives a full response but it is recommended that no further action be taken as a result of these objections and that the Orders should be made as advertised.*

- 3.46 An objection has been raised to the banned right turn from Balfour Street into Leith Walk.

*It is recommended that no immediate action be taken as a result of this objection and that the Orders be made as advertised.*

*It is further recommended that a review and consultation be undertaken following implementation of the tram project to establish if any further action is required at that time.*

- 3.47 An objection has been raised to the proposal to re-route traffic through Manor Place and Palmerston Place.

This is, in effect, an objection to the Shandwick Place restrictions, so the answer in paragraphs 3.25 to 3.37 above applies.

- 3.48 An objector has noted that in making Orders the roads authority is required to have regard to Sections 3 and 122 of the Road Traffic Act 1984.

*It is considered that TRO1 has been processed in accordance with the requirements of the 1984 Act and it is recommended that a statement to that effect be incorporated in the TRO1 Orders, as required by the Road Traffic Act 1984. Members should refer to Item 7.14 in Appendix 1 for a full statement on these legal requirements.*

- 3.49 An objector has requested the opportunity for deputations to Council Committee and also an impartial Public Hearing. The matters of receiving deputations and the holding of a public hearing are for Members to consider as part of this process.

- 3.50 Two other matters have been raised:

- a) that there is *"insufficient information provided to ascertain the impact on pedestrians."*; and

- b) with regard to the “*noise and vibration caused by tram at the junction of York Place and North St Andrew Street.*”

These are not TRO matters but the appendices give a full response to them.

#### **Phased Implementation Implications**

- 3.51 Should phased implementation of the tram project be required a review of TRO1 would need to be undertaken to reconcile the terms of the Orders with the actual conditions on-street. Where a mismatch was identified this might require elements of TRO1 to be revoked or promotion of a separate Variation Orders. This would be reported to Committee at the appropriate time.

#### **Programme for Making and Varying TRO Orders**

- 3.52 As a consequence of the delays to the construction programme and the possibility of phased implementation it may be necessary to vary dates for implementation of TRO1 on a section by section basis. In practice this will require implementation dates for parts of the Orders to be amended from time to time.
- 3.53 Consequently, it is recommended that the Committee agree to delegate powers to the Director of City Development to vary the operational dates of each and every measure, so as to align with the completion of works dates in the tram construction programme.
- 3.54 Appendix 5 details the process for making and varying Traffic Regulation Orders for TRO1.

### **4 Financial Implications**

- 4.1 The costs for TRO1 will be contained within the tram budget.
- 4.2 A provisional sum has been identified for the wider-area measures works in the tram budget. This will be reassessed when the full scope and potential costs emerge from the review process and workshops, and this will be reported to Committee at the appropriate time.

### **5 Environmental Impact**

- 5.1 A number of environmental issues have been raised by objectors and these are dealt with in the report and appendices.

### **6 Equalities**

- 6.1 There are no adverse equalities impacts arising from this report.

### **7 Conclusions**

- 7.1 Of the 431 objections received, 92% of them relate to just two issues; the impact of the proposed banned right-turn into Blenheim Place, and the wider-area impact of the Shandwick Place general traffic restriction.

- 7.2 It is notable that no objections were lodged by premises on Shandwick Place or Princes Street and there were only three objections relating to Leith Walk. It is considered that this reflects the extensive consultation which was undertaken and the adjustments to the draft proposals which were made, where possible, as a result of that informal consultation.
- 7.3 Actions have been identified to address a number of the concerns raised by objectors.
- 7.4 The Moray Feu undertook data collection and analysis which the Council have concluded is unreliable. The Council, meanwhile, analysed short-term data and established that for the six-month period up to December 2009 nitrogen dioxide levels are below the annual limit set by the EU. Notwithstanding this and recognising the concerns raised by objectors about the wider-area impact of the Shandwick Place measures, it is noted that monitoring will continue and it is recommended that workshops be set up to engage with the local communities to investigate and consider potential mitigation measures. A further and separate report that expands on the structure of the workshops is also presented to this Committee.
- 7.5 A number of issues have also been identified where it is considered that no further action is either possible or required.
- 7.6 It is considered that the agreed TRO Strategy is still the correct way to proceed and that TRO1 should be made as advertised.

## **8 Recommendations**

- 8.1 It is recommended that the Committee:
- a) note the responses to the issues raised by objectors and make TRO1 as advertised; and approve the recommendations incorporated within this report.
  - b) note and agree the actions which have been identified to address a number of the issues raised by objectors, as noted in Appendices 1, 2 & 3.
  - c) note that one of the recommendations incorporated within this report includes the set up of workshops to engage with the local communities to investigate and consider potential mitigation measures in relation to the required Shandwick Place restriction. A further and separate report that expands on the structure of the workshops is also presented to this Committee.
  - d) It is recommended that the Committee agree to delegate powers to the Director of City Development to vary the operational dates of each and every measure, so as to align with the completion of works dates in the tram construction programme.

**Dave Anderson**  
Director of City Development

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Appendices	<ol style="list-style-type: none"> <li>1 A schedule of the main issues raised by objectors, with responses and recommended actions.</li> <li>2 A schedule of all issues raised by objectors, with responses and recommended actions.</li> <li>3 A schedule of suggestions made by objectors.</li> <li>4 A note on the proposed general traffic ban in Shandwick Place</li> <li>5 Process for Making and Varying Traffic Regulation Orders for TRO1</li> </ol>
Contact/tel/Email	Alan Bowen, 0131 623 8804, <a href="mailto:alan.bowen@edinburgh.gov.uk">alan.bowen@edinburgh.gov.uk</a>
Wards affected	All wards
Single Outcome Agreement	<p>Supports National Outcome 10 – ‘We live in well-designed, sustainable places where we are able to access the amenities and services we need’.</p> <p>Supports National Outcome 15 – ‘Our public services are high quality, continually improving, efficient and responsive to people’s needs’.</p>
Background Papers	<ol style="list-style-type: none"> <li>1 Objection letters</li> <li>2 Technical Note 127986: <i>Shandwick Place modelling report</i></li> </ol>

APPENDIX 1

A schedule of the main issues raised by objectors, with responses and recommended actions.

BLENHEIM PLACE			
	ISSUE	RESPONSE	ACTION
1.1	The proposal to ban the right-turn into Blenheim Place from London Road generated 248 letters of objection. Key concerns were the implications that the proposal has for access and the required traffic re-routing, the isolation and marginalisation of the community, and potential reduced security and safety.	<p>This measure was introduced on operational and safety grounds to accommodate the Edinburgh Tram Network infrastructure, and to allow the tram to operate in accordance with its approved business case.</p> <p>However, in light of the strength of opinion opposing the measure it is recommended that a design review be undertaken to establish if a practical and safe alternative can be developed which preserves the right-turn with minimal impact on the tram operations.</p> <p>If an approved alternative design is feasible, the necessary TRO2 variation order will be promoted. There may be objections to the proposal; indeed this may be a likely scenario as there is documentary evidence that there is also support for the proposed banning of the right-turn (to reduce the amount of intrusive through-traffic).</p> <p>It would be the intention to undertake this design review and take any new proposal through the necessary statutory consultation process prior to construction work starting. However, in the event that construction commences before that process is completed it is recommended that the junction be constructed without the physical measures which effect the banned turn (that part of the TRO1 Order would not be implemented), and that the junction be trialed under that scenario.</p>	<p>Review design and promote TRO2 if appropriate.</p> <p>Undertake trial allowing right-turn, pending outcome of above review.</p>

SHANDWICK PLACE			
2.1	<p>The proposal to restrict general traffic usage on Shandwick Place generated two groups of objection;</p> <ul style="list-style-type: none"> <li>• 2 objectors raised concerns about the impact on the local business and retail sector caused by the restriction on access to Stafford Street; and</li> <li>• 146 letters of objection or notes of concern raised concerns about the impact of diverted traffic on the surrounding road network.</li> </ul>	<p>To accommodate the Edinburgh Tram Network infrastructure and to allow the tram to operate in accordance with its approved business case, the designers found it necessary to restrict access on Shandwick Place during tram operational times to trams, buses, taxis and cycles only; key issues the designers had to contend with were overall reduction in road capacity and consequential road safety concerns. (This is discussed in greater depth in Appendix 4 and the background paper to this report).</p> <p>On road safety grounds there is also a general design presumption against uncontrolled (i.e. without traffic signal control) right-turn manoeuvres across tram tracks.</p> <p>Recognising the impact these design features have on access, the TRO proposals have been drafted to permit all traffic to access the section of Shandwick Place, from Canning Street to Rutland Place/Princes Street, in both directions from 20.00 to 07.00 (i.e. outwith peak bus operational times) for loading purposes only. Alternative access to Stafford Street is also available via Coates Crescent (left into Shandwick Place from the east end of Coates Crescent and left again into Stafford Street).</p> <p>Noting the Stafford Street access objections the recommendation is to review the design and consider if a Canning Street to Stafford Street routing option can be provided safely and with minimal impact on the tram operations. If an approved alternative design can be identified, the necessary TRO2 variation order will be promoted.</p>	<p>Review design of Canning Street and Stafford Street junctions and promote TRO2 if appropriate.</p>

		<p>The predominant concern is the impact the restrictions on Shandwick Place will have on areas north of the tram route, i.e. West End crescents, Moray Feu, etc. The objections are itemised in Appendix 2 but the Moray Feu Residents Association submission — which concentrates on the route between Queensferry Street and Queen Street, via Randolph Crescent, Great Stuart Street, Ainslie Place and St Colme Street — encompasses the bulk of the objectors' concerns.</p> <p>In their submission the Moray Feu Residents Association object on the grounds of the impact on residents' health from increased noise (particular reference is made to sleep disturbance caused by HGVs), vibration and air pollution which the scheme will generate. By way of making their case they draw on air quality data which they have obtained from the Council and on air quality and noise data which they have collected using their own equipment.</p> <p>Appendix 2 includes a full discussion of their submission but the conclusion Council officials have reached is that there are concerns with both the Association's interpretation of Council-sourced data and with the data they have collected themselves.</p> <p>With regard to their interpretation of the Council's air quality data the key concern is that it is not possible to draw conclusions from short-term data but that it takes at least a year's data to establish compliance or otherwise with national air quality targets. The Moray Feu do not acknowledge this fact in their presentation of the data. Not only that but the figures cited are "raw" and have not therefore had the appropriate corrections applied to them. So officials hold the view that any conclusion arrived at by the Moray Feu on the basis of the Council's short-term, raw data is unreliable.</p>	
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	<p>With regard to the data collected by the Moray Feu, Council officials have a number of concerns. It is noted that the equipment used by the Moray Feu to monitor air quality is not type-approved and that the stringent calibration and quality control requirements which the Council must comply with when gathering such data have not been adhered to. There are similar concerns with the noise data. So again officials would assert that any conclusions arrived at by the Moray Feu on the basis of these data are unreliable.</p> <p>Notwithstanding the above, and recognising the concerns raised by objectors about the wider-area impact of the Shandwick Place measures, it is recommended that workshops be set up to engage with the local communities to investigate and consider potential mitigation measures.</p> <p>The Council has now completed their calibration and analysis of the July to December 2009 data and found that nitrogen dioxide levels are within accepted EU limits for this 6 month period; the recorded average figure of <math>49.2\mu\text{g}/\text{m}^3</math> when corrected in line with government guidance gives <math>33\mu\text{g}/\text{m}^3</math>, i.e. below the <math>40\mu\text{g}/\text{m}^3</math> annual limit set by the EU.</p> <p>The Council has also received advice from air quality experts at Edinburgh University Atmospheric Chemistry Department, who have advised that it is unlikely that nitrogen dioxide levels would build up to unacceptable levels in basement areas based on the levels that the Council has collected at the kerbside.</p>	<p>Engage with local communities to investigate mitigation options.</p>
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		<p>The Council will continue to monitor air quality at the site which has now been established on Great Stuart Street and the situation will be reviewed when sufficient validated data has been collected. Also, following discussions with representatives of the Moray Feu, officials have agreed to investigate the possibility of monitoring air quality in basement areas adjacent to the road. However, it should be noted that while the Noise and Statutory Nuisance Act 1993 makes noise in the street a statutory nuisance, traffic noise is excluded so local authorities are not required to monitor traffic generated noise.</p> <p>In response to a motion raised by Councillors Mowat and Dundas at the Transport, Infrastructure and Environment Committee on 10 February 2009, TRO1 includes a proposal to remove the general traffic eastbound ban on Hope Street, by way of helping distribute east-west traffic through the west end area of the city. This was reported to the Transport, Infrastructure and Environment Committee on 5 May 2009 at which time it was noted that the proposal could generate objections, particularly in terms of the environmental impact on Charlotte Square. No objections have been lodged, so this measure would be introduced as part of TRO1 if made.</p> <p>In anticipation of the TRO, and with particular regard to concerns about sleep disturbance, the Council previously sought to promote a night-time HGV ban on the Randolph Crescent, Great Stuart Street, Ainslie Place and St Colme Street route. This was reported to the Transport Infrastructure and Environment Committee on 5 May 2009 at which time it was recorded that there are a number of issues with such a proposal and the matter was not pursued.</p>	<p>Continue to monitor air quality and review.</p> <p>Note the re-opening of Hope Street eastbound to general traffic to help distribute east-west traffic.</p>
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	<p>That position has not changed and HGV bans on a street-by-street basis cannot be recommended. The impact of freight traffic is a city-wide concern and needs to be addressed in those broader terms. The Council therefore intend to engage with the industry to investigate options for a strategy which will seek to minimise freight movements and intrusion within the city. The Local Transport Strategy identifies a number of aims, objectives and policies in this context and the Transport 2030 Vision, which was approved by Transport, Infrastructure and Environment Committee on 9 February 2010 and which aims to establish a clear, long-term vision, will help to guide that work.</p> <p>It should be noted that public consultation has been undertaken regarding the potential 20mph zoning of the area bounded by Magdala Crescent, Douglas Crescent, Palmerston Place, West Maitland Street and Haymarket Terrace (<i>the latter three streets are not included in the zone</i>). The Transport, Infrastructure and Environment Committee considered a report on this on 27 July 2010 at which time a decision was taken to proceed with the scheme at the earliest opportunity, subject to consultation with the Scottish Government to permit possible variations to the layout.</p> <p>The <i>Air Quality Update</i> report to the Transport, Infrastructure and Environment Committee on 24 November 2009 noted progress with the actions identified in the Council's Air Quality Action Plan 2008-2010, particularly the voluntary emissions reduction partnerships with the bus and freight sectors operating in the City. At that Committee officials were instructed to consult on the feasibility and implications of establishing a Low Emissions Zone in the city.</p>	<p>Note the ongoing initiatives being pursued in partnership with public transport and freight sectors.</p> <p>Note the 20mph zoning proposals being pursued for the Coates area.</p> <p>Note the Low Emissions Zone initiative being investigated.</p>
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		The <i>Pedestrian Crossing Prioritisation Process – New Priority List</i> report to the Transport, Infrastructure and Environment Committee on 9 February 2009 identified a Puffin crossing on Great Stuart Street at its junction with Ainslie Place as the number one priority site in the city centre. The report noted that consultation would be undertaken with Neighbourhood Partnerships.	Note the potential pedestrian crossing on Great Stuart Street.
<b>PICARDY PLACE</b>			
<b>3.1</b>	Henderson Global Investors (HGI) and the John Lewis Partnership have objected on the grounds that the proposals do not take cognisance of servicing requirements for the St James Centre redevelopment. They also note a general concern about the impact on city centre traffic access, referring particularly to the Shandwick Place general traffic ban.	The response notes that the TRO1 measures do not prejudice any re-development but also confirms that design modifications for the Picardy Place gyratory and the York Place/Elder Street junction, which meet future requirements, have been instructed and that these will be brought forward in due course. Any refinements to the Orders coming out of that design review will be required to undergo the statutory consultation process for the promotion of the necessary TRO2 variation order.	No action
<b>3.2</b>	St Mary's Cathedral object on the grounds of the adverse impact on the streetscape, not least the proposed location of the bus stop. They also object to the impact on access to the cathedral.	The response notes that the proposed footway is over 8 metres wide, access has been maintained both in front of the cathedral and on Little King Street and that the bus stop is at a key tram/bus interchange location. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.	No action
<b>3.3</b>	Businesses on Antigua Street have objected to the removal of loading and disabled parking provision on the Antigua Street frontage.	The response notes that the design requires the removal of kerbside loading and parking provision at this key junction but notes that suitable alternative loading has been provided on the side streets and that blue badge holders can also park in the side streets, i.e. in the Controlled Parking Zone areas. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.	No action

3.4	Reid Furniture have objected on that grounds that the length of the off-peak loading provision on Picardy Place is inadequate to allow them to service their business. They acknowledge that alternative loading facilities have been provided (on Union Street and on Leith Walk) but contend that this is of little practical use to their operations.	The design, and therefore the Order, reflects the competing demands for kerbside space on the Picardy Place frontage at this key transport interchange, i.e. bus stops, pedestrian crossings, loading, junction capacity issues. The proposals represent a balance in meeting the needs of all users. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.	No action
<b>LEITH WALK</b>			
4.1	The Unite Group plc, who are developing the site of the former Shrubhill House, have objected on the grounds that the TRO proposals fail to respect existing rights of access and would materially affect the use and enjoyment of the developed property.	The response notes that the TRO1 measures take account of the consented planning application and access requirements and do not prejudice any future development. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised, noting that should a future planning application be approved which required different access arrangements a variation order could be promoted to comply with that consent.	No action
4.2	Although generally supportive of the tram project the owner of <i>The Bed Shop</i> objects to the loss of parking and loading facilities.	The response notes the view that suitable alternative loading and parking has been provided, and recommends that no further action be taken as a result of this objection and that the Order be made as advertised.	No action
4.3	An objection has been lodged against banned right turns along the route of the tram in general ( <i>this is not to be confused with the specific objections to the Blenheim Place banned turn, noted above</i> ).	The response notes that banned right turns along the route of the tram are only introduced where the design requires it for operational and/or safety reasons. The response also notes that alternative routings, including U-turn facilities, are provided. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.	No action

FORTH PORTS			
5.1	Forth Ports object to the waiting and loading restrictions on Old Port Road and to the "bus only" restriction at the cruise liner terminal access.	The response notes that on-street parking cannot be accommodated on Old Port Road as the general traffic lane is adjacent to a succession of tram only areas and any vehicles waiting there would obstruct general traffic as a consequence. The response concludes that no action is possible on Old Port Road but recommends that the restriction at the cruise liner terminal access be referred to a design review. Any relaxation identified by that process would then be promoted, as appropriate, in TRO2.	No action on Old Port Road. Review terminal access and promote TRO2, as necessary.
CYCLING			
6.1	Objections have been raised to a number of cycle-related issues. In their letter of objection Spokes acknowledge that many of these issues are being considered under a cycling review, to which they and the Cycle Touring Club (CTC) have been party, but state that they must continue their objection until the outcome of the review is confirmed.	<p>The response notes that a comprehensive cycling review has been undertaken to identify facilities, particularly wider-area alternative routes, which might be introduced. It is also noted that it is proposed that non-standard features be trialled (at The Mound) and, if successful, these can then be utilised elsewhere. Any required modification to the traffic regulations identified by that process would then be promoted under the relevant future order.</p> <p>It should also be noted that the Council is currently working on an <i>Active Travel Action Plan</i> and that this will be reported to Transport, Infrastructure and Environment Committee on 21 September 2010. This will set out a series of actions aimed at increasing the amount of walking and cycling in the city. It will have a particular focus on working toward the <i>Charter of Brussels</i> target of 15% of city trips by bicycle in 2020.</p>	Note ongoing actions

OTHER OBJECTIONS			
7.1	An objection has been raised to the banned right-turn from Queen Street eastbound into North St David Street southbound.	The response notes that two straight-ahead lanes are required on Queen Street eastbound for capacity reasons and that there is insufficient space to provide a third (dedicated) right-turn lane. Also the South St David Street - Princes Street - Waverly Bridge complex of junctions could not cope with additional traffic from Queen Street which a right-turn facility at Queen Street would generate. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.	No action
7.2	An objection has been raised to the proposed build-out of the north footway on Princes Street (opposite Waverley Bridge).	The response notes that the Road Safety Auditor raised concerns with an initial design with regard to tram turning left (into South St Andrew Street) across the proposed eastbound nearside lane. The solution was to remove the potential conflict by removing the nearside lane. This then presented an opportunity to widen the footway and shorten the pedestrian crossing width. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.	No action
7.3	An objection has been raised regarding the loss of dedicated disabled parking provision on Frederick Street.	The response notes that the disabled bays south of the Rose Street junction will be relocated north of Rose Street and that Blue Badge holders will be able to park, off peak, on parts of the section of Frederick Street south of Rose Street. The response also notes that dedicated disabled bays and the Blue Badge scheme are just two of a whole range of measures targeted at serving disabled people and all of which need to be considered in any proposals; other measures include concessionary travel support (buses), the Taxicard scheme, and the Dial-a-Ride and Dial-a-Bus schemes. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised	No action

<b>7.4</b>	A "holding objection" has been raised by Tiger Developments pending further discussions regarding the pedestrian link between Haymarket Station and the Exchange area via their development site. They refer specifically to the Dalry Road crossing.	The response confirms that discussions will continue with the developer but notes that the proposal for the Dalry Road crossing, particularly the island size, has been designed to cater for the volumes of pedestrians to and from Haymarket Station. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.	No action
<b>7.5</b>	An objection has been raised to the banning of private vehicles from Princes Street (westbound at night), Shandwick Place, Constitution Street, St Andrew Square, West Maitland Street and the road outside Ocean Terminal.	The response confirms that all of the cited general traffic bans are required for operational and/or safety reasons. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.	No action
<b>7.6</b>	An objection has been raised to the principle of priority being given to tram over all other vehicles.	The response notes that paragraph 58(4) of the Tram Acts makes provision for tram to be given priority over other means of transport. The principle of giving priority to sustainable transport modes, where practicable, is also a cornerstone of the City of Edinburgh Council's Local Transport Strategy. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.	No action
<b>7.7</b>	An objection has been raised to the principle of priority being given to trams, buses, taxis and cycles over private vehicles.	The response notes that paragraph 58(4) of the Tram Acts makes provision for tram to be given priority over other means of transport. The principle of giving priority to sustainable transport modes, where practicable, is also a cornerstone of the City of Edinburgh Council's Local Transport Strategy. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.	No action
<b>7.8</b>	An objection has been raised to a number of banned turns including Palmerston Place into West Maitland Street, The Mound into Princes Street and banned right turns from Leith Walk.	The response confirms that all of the cited banned turns are required for operational and/or safety reasons. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.	No action

7.9	An objection has been raised to the reduction of parking places.	The response acknowledges that the scheme requires the removal of some parking (the east side of St Andrew Square, for example) but parking (and loading) has been retained, where possible, or alternative provision has been made, again where possible. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.	No action
7.10	An objection has been raised to the banned right turn from Balfour Street into Leith Walk.	The response notes that banned right turns are only introduced where the design requires it for operational and/or safety reasons; the key issue at this location is the Balfour Street tram stop. Alternative routings, including U-turn facilities, are provided. It is recommended that no immediate action be taken as a result of this objection and that the Order be made as advertised. It is recommended that a review and consultation be undertaken following implementation of the tram project to establish if any further action is required.	Review post implementation of tram.
7.11	An objection has been raised to the proposal to re-route traffic through Manor Place and Palmerston Place.	This is, in effect, an objection to the Shandwick Place restrictions, so the response in Issue 2.1 above applies.	As per 2.1 above.
7.12	An objection has been raised on the grounds that there is <i>"inadequate loading provision between Jameson Place and Lorne Street, because of the length of kerbside taken up with bus stop bays."</i>	The response notes that the provision of loading and parking on Leith Walk was subject to extensive consultation and consequent refinement. There is limited kerb space in which to meet all the diverse and often conflicting demands and the design is considered to be the best balance in meeting that challenge. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.	No action
7.13	An objection has been raised on the grounds that consultation for the Orders was inadequate.	The response notes that it is considered that not only was the due process followed, but the Council did more than statute requires, by way of publicity, exhibitions, etc. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.	No action

7.14	<p>An objector has noted that in making an order the roads authority is required to take cognisance of Sections 3 and 122 of the Road Traffic Act 1984.</p>	<p><b>Dis-applying Section 3 (1) of the Road Traffic Act 1984</b></p> <p>Section 3 (1) of the Road Traffic Regulation Act 1984 provides that an order shall not be made which would have the effect of preventing, for more than 8 hours in any period of 24 hours, access for vehicles of any class to any premises situated on or adjacent to a road. However, Section 3 (2) of that Act goes on to enable the authority to state that the Section 3 (1) restriction shall not have effect (in relation to vehicles) in specified circumstances.</p> <p>Those circumstances are:</p> <ul style="list-style-type: none"> <li>• To avoid danger to persons or other traffic using the road to which the order relates, or to any other road; or</li> <li>• To prevent the likelihood of any such danger arising; or</li> <li>• To prevent damage to the road or any buildings on it or near it; or</li> <li>• To facilitate the passage of vehicular traffic on the road; or</li> <li>• To preserve or improve the amenities of an area by prohibiting or restricting the use of the road, or roads in that area, of heavy commercial vehicles.</li> </ul> <p>If the authority is satisfied that Section 3 (1) should not apply for one or more of those reasons, a statement to that effect must be included in the order.</p> <p>As the proposed TRO has the effect of preventing, for more than 8 hours in any period of 24 hours, access for vehicles of any class to any premises situated on the undernoted roads, consideration therefore has to be given as to whether or not the provisions of Section 3 (1) of the Road Traffic Regulation Act 1984 shall not have effect in this case in order to facilitate the passage of vehicular traffic on these roads. The affected roads are:</p>	<p>Incorporate required statement in the TRO1 order.</p>
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		<ul style="list-style-type: none"> <li>• Canning Street (Shandwick Place – Rutland Square)</li> <li>• Shandwick Place</li> <li>• Princes Street (South Charlotte Street – South St David Street)</li> <li>• South St Andrew Street (Princes Street – Meuse Lane)</li> <li>• North St Andrew Street (York Place – North St Andrew Lane)</li> <li>• Constitution Street (Great Junction Street – Laurie Street)</li> <li>• Ocean Drive (at Ocean Terminal)</li> <li>• Un-named road previously described as Old Port Road (at new road section)</li> </ul> <p><b>Applying Section 122 of the Road Traffic Act 1984</b></p> <p>Section 122 of the Road Traffic Act 1984 imposes a duty on the Council 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 road, having regard to the following matters:</p> <ul style="list-style-type: none"> <li>• The desirability of securing and maintaining reasonable access to premises;</li> <li>• The effect on the amenities of any locality affected and 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 road runs;</li> <li>• The national air quality strategy;</li> <li>• 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</li> </ul>	
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		<ul style="list-style-type: none"> <li>Any other matters appearing to the authority to be relevant.</li> </ul> <p>These factors are to be taken into account by a promoter when developing an Order and although they may have competing demands, each one must be considered and each must be weighted as the promoter thinks appropriate in the particular case. In this case, the operation of the tram network in accordance with the objectives of its approved business case is a relevant matter and it is considered appropriate to attach more weight to securing the operation of the tram, given the significant public investment in the project to date and its prior endorsement by the Scottish Parliament.</p> <p>It is also considered that the scale of consultation at both the local/interest group level and the general public level, coupled with the very thorough Technical and Planning Prior Approvals process which the project design and consequently the TRO proposals were subject to, has fulfilled these requirements and that TRO1 has been developed in the spirit of the Road Traffic Act 1984.</p> <p>That being the case, it is recommended that a statement to that effect be incorporated in the TRO1 order, as required by the Road Traffic Act 1984.</p>	
7.15	An objector has requested the opportunity for deputations to Council Committee and also an impartial Public Hearing.	The matters of receiving deputations and the holding of a public hearing are for Members to consider as part of this process.	Members to consider this
7.16	An objection has been raised on the grounds that there is <i>"insufficient information provided to ascertain the impact on pedestrians."</i>	This is not a TRO matter but the response notes that the extensive Technical and Planning Prior Approvals process which the project design and consequently the TRO proposals were subject to has ensured that pedestrian-related issues have been given due consideration.	No action

7.17	An objection has been raised over concern about the <i>"noise and vibration caused by tram at the junction of York Place and North St Andrew Street."</i>	This is not a TRO matter but the response notes that the design of both tram units and track minimise noise and vibration impact.	No action
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## **APPENDIX 2**

A schedule of all issues raised by objectors, with responses and recommended actions.

The issues have been ordered geographically in line with the TRO Relevant Maps, starting with Leith Docks and ending at Haymarket. The last two categories relate to Wider Area issues (outwith the TRO1 area) and to General issues that are not specific to one particular location.

For ease of reference, the reference number provided to each objector is noted against the relevant issue(s) below.

### **1. Leith Docks**

- 1.1 – PD331
- 1.2 – PD331
- 1.3 – PD331
- 1.4 – PD331

### **2. Constitution Street**

- 2.1 – PD242, PD353
- 2.2 – PD242, PD353

### **3. Leith Walk**

- 3.1 – PD351
- 3.2 – PD394

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- 3.3 – PD396
- 3.4 – PD183
- 3.5 – PD394
- 3.6 – PD242, PD353
- 3.7 – PD242
- 3.8 – PD242
- 3.9 – PD242
- 3.10 – PD394
- 3.11 – PD419
- 3.12 – PD394
- 3.13 – PD394
- 3.14 – PD394
- 3.15 – PD394
- 3.16 – PD394
- 3.17 – PD367, PD368

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**4. Antigua Street**

- 4.1 – PD289
- 4.2 – PD243, PD290, PD291
- 4.3 - PD243, PD290, PD291
- 4.4 - PD243, PD290, PD291
- 4,5 – PD243, PD290, PD291

**5. Blenheim Place**

- 5.1 – PD038, PD046
- 5.2 – PD017, PD022, PD102, PD142, PD429
- 5.3 – PD001, PD002, PD003, PD004, PD005, PD006, PD007, PD008, PD009, PD010, PD011, PD012, PD013, PD014, PD019, PD020, PD021, PD023, PD024, PD027, PD028, PD029, PD030, PD031, PD032, PD033, PD034, PD035, PD036, PD037, PD039, PD042, PD043, PD045, PD047, PD048, PD049, PD050, PD051, PD052, PD053, PD054, PD055, PD056, PD057, PD058, PD059, PD060, PD061, PD062, PD063, PD064, PD065, PD066, PD067, PD068, PD069, PD071, PD072, PD073, PD074, PD075, PD076, PD077, PD078, PD079, PD080, PD081, PD082, PD083, PD084, PD085, PD086, PD087, PD088, PD089, PD090, PD091, PD092, PD093, PD094, PD095, PD096, PD097, PD098, PD099, PD100, PD101, PD103, PD104, PD105, PD106, PD107, PD109, PD110, PD111, PD112, PD113, PD114, PD115, PD116, PD119, PD120, PD121, PD122, PD124, PD125, PD126, PD127, PD128, PD129, PD130, PD131, PD132, PD133, PD134, PD135, PD136, PD137, PD138, PD139, PD140, PD141, PD143, PD144, PD145, PD146, PD147, PD148, PD149, PD150, PD151, PD152, PD153, PD154, PD155, PD156, PD157, PD158, PD159, PD160, PD161, PD162, PD163, PD164, PD165, PD166, PD167, PD175, PD176, PD177, PD178, PD179, PD187, PD189, PD190, PD191, PD192, PD193, PD194, PD195, PD196, PD197, PD198, PD199, PD200, PD201, PD202, PD203, PD210, PD214, PD215, PD216, PD217, PD218, PD237, PD239, PD240, PD241, PD258, PD259, PD260, PD261, PD262, PD263, PD264, PD265, PD266, PD267, PD268, PD269,

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PD270, PD271, PD272, PD273, PD274, PD275, PD279, PD280, PD281, PD282, PD283, PD284, PD285, PD287, PD308, PD327, PD328, PD329, PD330, PD333, PD335, PD336, PD337, PD350, PD355, PD356, PD370, PD371, PD372, PD373, PD374, PD375, PD376, PD377, PD378, PD379, PD380, PD390, PD397, PD398, PD400, PD401, PD420, PD421, PD422, PD425, PD426, PD427, PD428, PD431, PD433, PD434, PD435

- 5.4 – PD125, PD282
- 5.5 – PD242, PD353
- 5.6 – PD001, PD003, PD004, PD005, PD006, PD007, PD008, PD009, PD010, PD012, PD014, PD019, PD020, PD021, PD022, PD023, PD024, PD027, PD028, PD030, PD032, PD033, PD034, PD035, PD036, PD038, PD039, PD042, PD045, PD046, PD047, PD048, PD049, PD050, PD051, PD052, PD053, PD054, PD055, PD056, PD057, PD058, PD059, PD060, PD061, PD062, PD063, PD064, PD065, PD067, PD068, PD069, PD071, PD072, PD073, PD074, PD075, PD076, PD077, PD078, PD079, PD080, PD082, PD083, PD084, PD085, PD086, PD088, PD089, PD090, PD091, PD092, PD093, PD094, PD095, PD096, PD097, PD099, PD100, PD101, PD104, PD105, PD106, PD107, PD109, PD110, PD112, PD113, PD114, PD115, PD116, PD119, PD120, PD121, PD124, PD125, PD126, PD127, PD128, PD129, PD130, PD131, PD132, PD133, PD134, PD135, PD136, PD137, PD138, PD139, PD140, PD141, PD142, PD143, PD144, PD146, PD147, PD148, PD149, PD150, PD151, PD152, PD153, PD154, PD155, PD156, PD159, PD160, PD161, PD162, PD163, PD164, PD165, PD166, PD167, PD175, PD176, PD177, PD178, PD179, PD187, PD189, PD190, PD192, PD193, PD194, PD195, PD196, PD197, PD198, PD199, PD200, PD201, PD202, PD203, PD210, PD214, PD215, PD216, PD217, PD218, PD237, PD239, PD240, PD241, PD258, PD259, PD260, PD261, PD262, PD263, PD264, PD265, PD266, PD267, PD268, PD269, PD270, PD271, PD272, PD273, PD274, PD275, PD279, PD280, PD281, PD282, PD283, PD284, PD285, PD287, PD308, PD327, PD328, PD329, PD330, PD350, PD354, PD355, PD356, PD370, PD371, PD377, PD379, PD380, PD390, PD397, PD398, PD400, PD401, PD420, PD421, PD422, PD427, PD428, PD429, PD431, PD433, PD434, PD435
- 5.7 – PD004, PD007, PD008, PD032, PD035, PD037, PD046, PD048, PD053, PD054, PD057, PD060, PD061, PD064, PD066, PD067, PD072, PD081, PD088, PD096, PD102, PD104, PD112, PD113, PD114, PD116, PD119, PD127, PD130, PD131, PD158, PD193, PD197, PD199, PD240, PD259, PD273, PD274, PD282, PD308, PD335, PD355, PD373, PD375, PD376, PD379, PD390, PD398, PD401, PD420, PD422, PD425, PD426, PD428, PD435

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- 5.8 – PD014, PD031, PD033, PD050, PD066, PD068, PD069, PD071, PD076, PD077, PD092, PD094, PD124, PD134, PD137, PD140, PD147, PD156, PD189, PD201, PD215, PD264, PD270, PD273, PD275, PD279, PD287, PD374, PD378, PD380, PD390, PD428, PD433
- 5.9 - PD005, PD006, PD007, PD013, PD014, PD019, PD021, PD023, PD024, PD027, PD028, PD030, PD031, PD033, PD034, PD035, PD038, PD047, PD049, PD052, PD056, PD057, PD058, PD062, PD063, PD064, PD065, PD066, PD067, PD068, PD069, PD072, PD073, PD074, PD076, PD077, PD078, PD081, PD082, PD083, PD084, PD085, PD087, PD090, PD091, PD092, PD094, PD095, PD096, PD097, PD099, PD101, PD105, PD106, PD107, PD109, PD110, PD112, PD113, PD114, PD115, PD116, PD119, PD120, PD121, PD122, PD124, PD125, PD126, PD127, PD128, PD129, PD131, PD132, PD133, PD135, PD136, PD137, PD139, PD140, PD141, PD143, PD149, PD153, PD155, PD156, PD160, PD161, PD162, PD164, PD165, PD167, PD175, PD176, PD177, PD178, PD179, PD187, PD189, PD193, PD194, PD198, PD201, PD202, PD203, PD214, PD215, PD216, PD217, PD218, PD237, PD239, PD240, PD258, PD260, PD261, PD263, PD264, PD266, PD273, PD283, PD284, PD287, PD308, PD327, PD328, PD329, PD335, PD336, PD337, PD355, PD370, PD371, PD376, PD377, PD379, PD380, PD390, PD398, PD400, PD420, PD421, PD422, PD427, PD428, PD429, PD431, PD433, PD434, PD435
- 5.10 – PD031, PD050, PD066, PD068, PD085, PD092, PD113, PD114, PD115, PD126, PD140, PD144, PD146, PD147, PD148, PD151, PD152, PD153, PD154, PD156, PD157, PD158, PD159, PD161, PD191, PD192, PD218, PD264, PD270, PD272, PD275, PD308, PD329, PD380, PD390, PD428
- 5.11 – PD011, PD017, PD024, PD027, PD028, PD029, PD031, PD036, PD037, PD038, PD039, PD046, PD047, PD048, PD050, PD051, PD052, PD055, PD058, PD063, PD066, PD068, PD075, PD076, PD077, PD078, PD085, PD087, PD088, PD092, PD093, PD098, PD102, PD103, PD104, PD109, PD111, PD114, PD115, PD116, PD121, PD124, PD128, PD130, PD131, PD136, PD138, PD140, PD141, PD143, PD144, PD147, PD150, PD153, PD154, PD156, PD158, PD160, PD161, PD162, PD163, PD166, PD178, PD179, PD193, PD194, PD195, PD198, PD199, PD201, PD210, PD214, PD215, PD216, PD258, PD262, PD264, PD265, PD266, PD267, PD268, PD270, PD272, PD274, PD275, PD282, PD283, PD287, PD308, PD328, PD329, PD370, PD380, PD390, PD420, PD425, PD428
- 5.12 – PD390
- 5.13 – PD043

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- 5.14 – PD187
- 5.15 – PD354
- 5.16 – PD332

**6. Picardy Place**

- 6.1 – PD213, PD286
- 6.2 - PD213, PD286
- 6.3 - PD213, PD286
- 6.4 – PD367, PD368
- 6.5 – PD391, PD392, PD393
- 6.6 – PD391, PD392, PD393
- 6.7 – PD354, PD356, PD399
- 6.8 – PD380
- 6.9 – PD394
- 6.10 – PD174
- 6.11 - PD391, PD392, PD393

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- 6.12 - PD391, PD392, PD393

#### **7. York Place**

- 7.1 – PD380
- 7.2 – PD367, PD368
- 7.3 – PD070, PD209
- 7.4 – PD219
- 7.5 – PD219

#### **8. Queen Street**

- 8.1 – PD328, PD354, PD356
- 8.2 – PD380, PD399

#### **9. Frederick Street**

- 9.1 – PD123

#### **10. Princes Street**

- 10.1 – PD354, PD356, PD399
- 10.2 – PD380

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- 10.3 – PD242, PD353
- 10.4 – PD242, PD353
- 10.5 – PD380

**11. Lothian Road**

- 11.1 – PD380

**12. Queensferry Street**

- 12.1 – PD347,
- 12.2 – PD235

**13. West End**

- 13.1 – PD242, PD353
- 13.2 – PD353
- 13.3 – PD235

**14. Shandwick Place**

- 14.1 – PD380
- 14.2 – PD235

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- 14.3 – PD235
- 14.4 – PD212, PD288
- 14.5 – PD235
- 14.6 – PD235
- 14.7 – PD040, PD041, PD044, PD070, PD108, PD117, PD118, PD168, PD169, PD170, PD172, PD181, PD182, PD184, PD185, PD186, PD188, PD204, PD205, PD206, PD207, PD208, PD209, PD211, PD220, PD221, PD222, PD224, PD225, PD226, PD227, PD228, PD229, PD230, PD231, PD232, PD233, PD234, PD236, PD238, PD244, PD245, PD246, PD247, PD248, PD249, PD251, PD252, PD253, PD254, PD255, PD256, PD257, PD276, PD277, PD278, PD292, PD293, PD294, PD295, PD296, PD297, PD298, PD299, PD300, PD301, PD302, PD303, PD304, PD305, PD306, PD307, PD309, PD310, PD311, PD312, PD313, PD314, PD315, PD316, PD317, PD318, PD319, PD320, PD321, PD322, PD323, PD324, PD325, PD326, PD334, PD338, PD339, PD340, PD341, PD342, PD343, PD346, PD347, PD348, PD349, PD352, PD357, PD358, PD359, PD360, PD361, PD362, PD363, PD364, PD365, PD381, PD382, PD383, PD384, PD385, PD386, PD387, PD388, PD389, PD402, PD403, PD404, PD405, PD406, PD407, PD408, PD409, PD410, PD411, PD413, PD414, PD415, PD416, PD417, PD418, PD423, PD424, PD436
- 14.8 – PD040, PD041, PD044, PD070, PD108, PD117, PD118, PD168, PD169, PD170, PD172, PD181, PD182, PD184, PD185, PD186, PD188, PD204, PD205, PD206, PD207, PD208, PD209, PD211, PD220, PD221, PD222, PD224, PD225, PD226, PD227, PD228, PD229, PD230, PD231, PD232, PD233, PD234, PD236, PD238, PD244, PD245, PD246, PD247, PD248, PD249, PD251, PD252, PD253, PD254, PD255, PD256, PD257, PD276, PD277, PD278, PD292, PD293, PD294, PD295, PD296, PD297, PD298, PD299, PD300, PD301, PD302, PD303, PD304, PD305, PD306, PD307, PD309, PD310, PD311, PD312, PD313, PD314, PD315, PD316, PD317, PD318, PD319, PD320, PD321, PD322, PD323, PD324, PD325, PD326, PD334, PD338, PD339, PD340, PD341, PD342, PD343, PD346, PD347, PD348, PD349, PD352, PD357, PD358, PD359, PD360, PD361, PD362, PD363, PD364, PD365, PD381, PD382, PD383, PD384, PD385, PD386, PD387, PD388, PD389, PD402, PD403, PD404, PD405, PD406, PD407, PD408, PD409, PD410, PD411, PD413, PD414, PD415, PD416, PD417, PD418, PD423, PD424, PD436
- 14.9 – PD235

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- 14.10 – PD235
- 14.11 – PD235
- 14.12 – PD288, PD418

**15. West Maitland Street**

- 15.1 – PD242, PD353
- 15.2 – PD242, PD353

**16. Palmerston Place**

- 16.1 – PD235

**17. Haymarket**

- 17.1 – PD242, PD353
- 17.2 – PD369

**18. Wider Area**

- 18.1 – PD380, PD345, PD412
- 18.2 – PD380, PD381, PD382
- 18.3 – PD345, PD346

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- 18.4 – PD040, PD041, PD044, PD070, PD108, PD117, PD118, PD168, PD169, PD170, PD172, PD181, PD182, PD184, PD185, PD186, PD188, PD204, PD205, PD206, PD207, PD208, PD209, PD211, PD220, PD221, PD222, PD224, PD225, PD226, PD227, PD228, PD229, PD230, PD231, PD232, PD233, PD234, PD236, PD238, PD244, PD245, PD246, PD247, PD248, PD249, PD251, PD252, PD253, PD254, PD255, PD256, PD257, PD276, PD277, PD278, PD292, PD293, PD294, PD295, PD296, PD297, PD298, PD299, PD300, PD301, PD302, PD303, PD304, PD305, PD306, PD307, PD309, PD310, PD311, PD312, PD313, PD314, PD315, PD316, PD317, PD318, PD319, PD320, PD321, PD322, PD323, PD324, PD325, PD326, PD334, PD338, PD339, PD340, PD341, PD342, PD343, PD346, PD347, PD348, PD349, PD352, PD357, PD358, PD359, PD360, PD361, PD362, PD363, PD364, PD365, PD381, PD382, PD383, PD384, PD385, PD386, PD387, PD388, PD389, PD402, PD403, PD404, PD405, PD406, PD407, PD408, PD409, PD410, PD411, PD413, PD414, PD415, PD416, PD417, PD418, PD423, PD424, PD436
- 18.5 – PD040, PD041, PD044, PD070, PD108, PD117, PD118, PD168, PD169, PD170, PD172, PD181, PD182, PD184, PD185, PD186, PD188, PD204, PD205, PD206, PD207, PD208, PD209, PD211, PD220, PD221, PD222, PD224, PD225, PD226, PD227, PD228, PD229, PD230, PD231, PD232, PD233, PD234, PD236, PD238, PD244, PD245, PD246, PD247, PD248, PD249, PD251, PD252, PD253, PD254, PD255, PD256, PD257, PD276, PD277, PD278, PD292, PD293, PD294, PD295, PD296, PD297, PD298, PD299, PD300, PD301, PD302, PD303, PD304, PD305, PD306, PD307, PD309, PD310, PD311, PD312, PD313, PD314, PD315, PD316, PD317, PD318, PD319, PD320, PD321, PD322, PD323, PD324, PD325, PD326, PD334, PD338, PD339, PD340, PD341, PD342, PD343, PD346, PD347, PD348, PD349, PD352, PD357, PD358, PD359, PD360, PD361, PD362, PD363, PD364, PD365, PD381, PD382, PD383, PD384, PD385, PD386, PD387, PD388, PD389, PD402, PD403, PD404, PD405, PD406, PD407, PD408, PD409, PD410, PD411, PD413, PD414, PD415, PD416, PD417, PD418, PD423, PD424, PD436
- 18.6 – PD322
- 18.7 – PD288
- 18.8 – PD387
- 18.9 – PD295
- 18.10 – PD171, PD172, PD348, PD349

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- 18.11 – PD417
- 18.12 – PD416
- 18.13 – PD383
- 18.14 – PD370
- 18.15 – PD382
- 18.16 – PD228, PD298, PD382
- 18.17 – PD402
- 18.18 – PD225, PD254
- 18.19 – PD254
- 18.20 – PD319
- 18.21 - PD360
- 18.22 – PD186
- 18.23 – PD315
- 18.24 – PD307
- 18.25 – PD300

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- 18.26 – PD173, PD181, PD206, PD223, PD232, PD233, PD236, PD246, PD252, PD297, PD311, PD312, PD338, PD339, PD362, PD363, PD364, PD406
- 18.27 – PD345
- 18.28 – PD367, PD368
- 18.29 – PD383
- 18.30 – PD070
- 18.31 – PD235
- 18.32 – PD418
- 18.33 – PD418
- 18.34 – PD418
- 18.35 – PD418
- 18.36 – PD418
- 18.37 – PD250
- 18.38 – PD352
- 18.39 – PD352
- 18.40 - PD211, PD307, PD309, PD310

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- 18.41 – PD278, PD381, PD382

#### **19. General**

- 19.1 – PD188, PD295, PD366, PD387
- 19.2 – PD188, PD307, PD309,
- 19.3 – PD188
- 19.4 – PD207
- 19.5 – PD419
- 19.6 – PD395
- 19.7 – PD395
- 19.8 – PD188
- 19.9 – PD394
- 19.10 – PD394
- 19.11 – PD394
- 19.12 – PD288
- 19.13 – PD424

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- 19.14 – PD288
- 19.15 – PD188
- 19.16 – PD231, PD395
- 19.17 – PD394
- 19.18 – PD394
- 19.19 – PD235
- 19.20 – PD430
- 19.21 – PD310
- 19.22 – PD184, PD205, PD224, PD226, PD234, PD238, PD248, PD254, PD255, PD277, PD297, PD300, PD301, PD302, PD304, PD306, PD322, PD323, PD324, PD338, PD342, PD343, PD346, PD357, PD358, PD359, PD362, PD386, PD402, PD403, PD414, PD436
- 19.23 – PD395
- 19.24 – PD188
- 19.25 – PD395
- 19.26 – PD432
- 19.27 – PD430

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- 19.28 – PD385
- 19.29 – PD384
- 19.30 – PD212
- 19.31 – PD361

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## 1. Leith Docks

### 1.1 Loading

ISSUE	RESPONSE
From the junction of Lindsay Road through to the access to the cruise liner terminal we object to the proposed no waiting/no loading restrictions. These proposed restrictions will impact significantly on the ability to provide coach tours from the existing cruise liner terminal. We therefore require the Orders to make provision for coach parking along the length of kerb highlighted green below to enable the significant number of coaches serving visiting cruise liners to be maintained.	The provision for parking/loading on-street adjacent the pick-up point and next to the tram only area is not viable and could not be accommodated, as this would obstruct access traffic along this road, as general traffic is not permitted to drive over tram only areas

### 1.2 Access

ISSUE	RESPONSE
At the access to the existing cruise liner terminal we object to the proposed restrictions which limit vehicle access to buses only and the restriction on waiting at the location shown in green on the plan below.  When the Port of Leith hosts cruise ships on a 'turn around basis' passengers leave from and return to the port. The average passenger profile means public transport has a limited use (due to age and mobility) for the majority of passengers embarking on cruise holidays from Edinburgh. As the majority of passengers are dropped off by	On-street parking cannot be accommodated on Old Port Road as the general traffic lane is adjacent to a succession of tram only areas and any vehicles waiting there would obstruct general traffic as a consequence.  No action is possible on Old Port Road but it is recommended that the restriction at the cruise liner terminal access be referred to a design review. Any relaxation identified by that process would then be

private car or taxi, the restrictions proposed by the Orders are unrealistic. We therefore require the Orders to make provision for access to the Cruise Liner Terminal area by all vehicles, incorporating a drop off facility for taxis and private cars along with the bus stop arrangement as currently shown. The bus stop will primarily function as a coach drop off as tours return to vessels at the end of each day.	promoted, as appropriate, in TRO2.
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### 1.3 Statutory Process

ISSUE	RESPONSE
We would welcome the opportunity to formally present our objections to the Council should this be necessary.	<p>Parties wishing to make a deputation to a Council committee must make this request in writing to the Council.</p> <p>The matter of receiving deputations is for Members to consider as part of this process.</p>

### 1.4 Other Issues

ISSUE	RESPONSE
It also should be noted that the area affected by the proposed Orders is outwith the Limit of Deviation as defined by the original Tram Bill and the physical works themselves yet to be the subject of a planning approval or landowner approval.	The Council has powers to promote TROs outwith the tram Limits of Deviation. Any other appropriate consents which are required will also be obtained.

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## 2. Constitution Street

### 2.1 Cycling

ISSUE	RESPONSE
<p>From Duke St, Leith Walk and Gt Junction St into Constitution St and from Constitution Street north east of junction with Laurie Street into Constitution St. If cyclists are banned from this section of Constitution St, the alternative routes available via Academy St or Henderson St are both less direct and are of a construction and surfacing unsuitable for cycling making it dangerous. We have suggested allowing cycling in the pedestrianised area of Newkirkgate and were this to be allowed would withdraw our objection.</p>	<p>Under these proposals it is not possible within the design to accommodate cyclists in this section of Constitution Street because of the restricted road space and the proximity of the tram stops.</p> <p>A comprehensive cycling review has been undertaken to identify facilities, particularly wider-area alternative routes, which might be introduced. It is also noted that it is proposed that non-standard features be trialled (at The Mound) and, if successful, these can then be utilised elsewhere. Any required modification to the traffic regulations identified by that process would then be promoted under the relevant future order.</p> <p>It should also be noted that the Council is currently working on an <i>Active Travel Action Plan</i> and that this will be reported to Transport, Infrastructure and Environment Committee on 21 September 2010. This will set out a series of actions aimed at increasing the amount of walking and cycling in the city. It will have a particular focus on working toward the <i>Charter of Brussels</i> target of 15% of journeys to be made by bicycle in 2020.</p>

## 2.2 Cycling

ISSUE	RESPONSE
<p>From Constitution Street north east of junction with Laurie Street into Constitution St. If cyclists are banned from this section of Constitution St, the alternative routes available via Academy St or Henderson St are both less direct and are of a construction and surfacing unsuitable for cycling making it dangerous. We have suggested allowing cycling in the pedestrianised area of Newkirkgate and were this to be allowed would withdraw our objection</p>	<p>Under these proposals it is not possible within the design to accommodate cyclists in this section of Constitution Street because of the restricted road space and the proximity of the tram stops.</p> <p>A comprehensive cycling review has been undertaken to identify facilities, particularly wider-area alternative routes, which might be introduced. It is also noted that it is proposed that non-standard features be trialled (at The Mound) and, if successful, these can then be utilised elsewhere. Any required modification to the traffic regulations identified by that process would then be promoted under the relevant future order.</p> <p>It should also be noted that the Council is currently working on an <i>Active Travel Action Plan</i> and that this will be reported to Transport, Infrastructure and Environment Committee on 21 September 2010. This will set out a series of actions aimed at increasing the amount of walking and cycling in the city. It will have a particular focus on working toward the <i>Charter of Brussels</i> target of 15% of journeys to be made by bicycle in 2020.</p>

### 3. Leith Walk

#### 3.1 Parking/Loading

ISSUE	RESPONSE
<p>Despite being provided with plans over three years ago which clearly showed a loss of only two of our parking spaces, we were then presented with new plans which were at odds entirely with the previous ones. We are now losing all of our parking and most of our loading and unloading provision as well. I had the same issues when the Council implemented Greenways many years ago where I attended meetings at McDonald Road library and was told that provision for loading and unloading would be given, something which they didn't fulfil. I was forced into leasing a unit around the corner in Jane Street at great expense in order to be able to take stock in.</p> <p>However this is a much bigger and more damaging issue as the potential to attract customers is being taken away. My business has suffered irreparably already as a result of work which has gone on for much longer than was anticipated and I fear for the long term future of a business which has thrived and flourished for 30 of its 32 years.</p>	<p>The provision of loading and parking on Leith Walk was subject to extensive consultation and consequent refinement; the proposed parking/loading regime on Leith Walk reflects the balance of comments received at the public exhibitions held in 2008 and subsequently resulted in a 50% increase in loading and 35% increase in regulated parking.</p> <p>There is limited kerb space in which to meet all the diverse and often conflicting demands and the design is considered to be the best balance in meeting that challenge.</p> <p>It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.</p>

### 3.2 Parking/Loading

ISSUE	RESPONSE
<p>BUS STOPS: Between James Place and Lorne Street, the bus stop should be shorted to allow for more loading space. The reduction on buses should enable a re-design of bus-stops in the area to accommodate the new level of traffic and all user groups including elderly and fragile people.</p> <p>The separate northbound bus stops before and after Pilrig Street (only the No 11 stops at the first stop) should be simplified, freeing up road space where the stop shortly after Pilrig Street currently stands.</p>	<p>A bus stop review has been done, in conjunction with the Council and the bus companies for the proposed services once Edinburgh Tram Network (ETN) is operational and the bus stops shown on these maps are the result of this separate process. The bus bay length provision is consistent with current minimum requirements as laid out in the national guidelines. Consequently it is not possible to provide more loading facilities at this location.</p>

### 3.3 Access

ISSUE	RESPONSE
<p>I object to the "no right turn" proposal from Balfour Street to Leith Walk.</p> <p>This is the most significant proposal anywhere along the length of Leith Walk for city-bound vehicular traffic.</p> <p>If this is required by the office of the Rail Regulations then, to maintain right turn opportunity the Balfour Street/Leith Walk junction should be signal controlled.</p> <p>I understand that the platform is at the head of Balfour Street anyway</p>	<p>On road safety grounds there is a general design presumption against uncontrolled, i.e. without traffic signal control) right-turn manoeuvres across tram tracks. In the particular case of Balfour Street a left turn in and out is required because of the tram stop on Leith Walk adjacent to the Balfour Street junction. This is the only viable location for the tram stop within this vicinity that meets the safety and operational requirements of the Edinburgh Tram Network (ETN). There are alternative opportunities for city bound traffic to turn left out of Balfour Street and either to make a U-turn at the Springfield Street signal junction or to turn left at Jane Street and head towards Bonnington</p>

<p>which compounds the irrationality of this proposal. It should be moved N.E.</p> <p>Without modifications there are implications for Cambridge Avenue being opened at the Pilrig Street junction which when Cambridge Avenue is stopped up at Balfour Street has implications for liveability on this narrow street. The consequences have not been fully explored in the TRO.</p>	<p>Road.</p> <p>Under these proposals there is no provision for opening up Cambridge Avenue at Pilrig Street. The Council is committed to monitoring the on street impact of ETN once it goes operational and any necessary modifications to access within this area that have been affected by ETN could be considered at this time.</p>
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### 3.4 Access

ISSUE	RESPONSE
<p>The grounds for objection are that the proposed highway alterations fail to respect Unite's existing rights of access to the public highway and would therefore materially prejudice their use and enjoyment of the property. The works envisaged will entirely preclude access / egress being taken from Leith Walk to the northern part of the site with the result that the redevelopment options for the site would be significantly reduced. The effect of this will be to render the property very less marketable which will in turn greatly increase the level of compensation I anticipate being instructed to pursue. Further, the proposed highway alterations do not correctly acknowledge the recent planning consent for potential redevelopment of the site (06/05371/FUL), or the pending planning application for alternative redevelopment, both of which envisage a new access point from Leith Walk at the southern end of the site in accordance with the master plan for the area.</p>	<p>The design and proposed measures within TRO 1 are consistent with the planning permission (06/05371/FUL) which provides for the necessary access to and from the site. However if the developer proposes to modify the site access then the modification could be considered under a separate TRO.</p> <p>There are no statutory provisions for compensation as a result of TROs.</p>

There are alternative solutions which would be acceptable to all parties, but as these have not been shown on the Order, my client's only option is to formally object.	
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### 3.5 Cycling

ISSUE	RESPONSE
We strongly object to the notion that all cycle traffic should divert to Easter Road. ("Alternative cycle routes will be signed.")	Cyclists will still be permitted to use Leith Walk, however, the Council have undertaken an independent "Edinburgh Tram Cycle Integration Study" and this study recommended that alternative cycle routes should be developed for cyclists that may want to avoid the Tram Route. Two routes parallel to Leith Walk are being developed, one to the east and the other to the west. These routes would be signed and cyclists would have the option of using these routes as an alternative to Leith Walk.

### 3.6 Cycling

ISSUE	RESPONSE
<p>Banned turns for cyclists:-</p> <p>From Brunswick St right into Leith Walk; Brunswick St at present provides a lightly trafficked alternative for cyclists travelling from London Rd to Leith Walk;</p>	In the approved road design these junctions are not signalised. There is also a central reserve at these locations and a gap would need to be created for cyclists. This central reserve is 1.5 meters wide which is not wide enough to provide a safe haven for cyclists who would need to cross four lanes, including two sets of tram tracks. For these reasons a cycle exemption could not be promoted.

From Albert St right into Leith Walk; Lorne St right into Leith Walk; Stead's Place right into Leith Walk.	
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### 3.7 Cycling

ISSUE	RESPONSE
Banned turns for cyclists from Balfour St right into Leith Walk	The Balfour Street tram stop is located across the junction; therefore a right turn would not be feasible at this location.

### 3.8 Cycling

ISSUE	RESPONSE
Banned turns for cyclists from Iona St right into Leith Walk	With the proposed signalling arrangements, all vehicles are banned from turning right from this junction. For this manoeuvre to be permitted a gap would need to be created in the central reserve, the tram and bus only lane removed and the signal staging would need to be amended. This would increase delays for all traffic at this junction and for these reasons it is not recommended.

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### 3.9 Cycling

ISSUE	RESPONSE
All these bans significantly increase distances for cyclists to travel and the alternative routes involving a left turn and u-turn are equally as dangerous for the crossing of tram tracks.	The alternative routes where u-turns are permitted are all at signalised junctions, where the phasing permits this manoeuvre.

### 3.10 Cycling

ISSUE	RESPONSE
We regret that the recommendation made by the Dutch consultant Hans van der Stok are not reflected in the present TRO; in particular, space gained by abandoning the central reservation would allow improved cyclist provision.	<p>Cycle lanes could only have been provided if kerbside parking/loading was removed, regardless of the situation with the central reserve. In the context of Leith Walk, and the need to accommodate the business, retail and public demand for parking and loading facilities, this was never a viable option.</p> <p>The central reservation is required because it has street furniture located on it that includes traffic signal poles and the supports for the Tram's overhead power lines. The traffic signal equipment also requires to be located in the central reservation at this location so there is no real benefit in relocating the Overhead Line Equipment poles to the footway.</p>

### 3.11 Statutory Process

ISSUE	RESPONSE
<p>The City Council seeks to introduce traffic regulation orders under the 1984 Act but quoting the business case of the ETN as being paramount. The ETN is backed by various pieces of private legislation but the traffic orders have impacts that could not have been anticipated at the time that the legislation was passed - in particular in relation to this area, the closure of Leith Walk to through traffic.</p> <p>The City Council then claims that to have such changes considered at an independent hearing would be perverse given the level of support provided to the project by the Scottish Parliament and the Scottish Government - even though neither of those bodies were aware of the Council's traffic intentions when they supported the project.</p> <p>I am not a lawyer but I suggest that the specific duties and restrictions placed upon the City Council by the 1984 Act are what control the Council's actions in respect to any TRO - not a business case that has been overtaken by events or more accurately non-events.</p> <p>As I'm sure you are aware, the duties of local traffic authorities are in s122 of the 1984 Act. Sub-section (2) (b) is my concern. Nowhere in the TRO is this duty considered in respect of any of the adjoining streets that will be affected by the traffic diverted by the TRO. Clearly the City Council are in breach of this statutory duty.</p> <p>The City Council should fully review the affect on the amenity of the residents in the streets between and including Easter Road and</p>	<p>Leith Walk is not closed to through-traffic.</p> <p>Paragraphs 2.7 – 2.13 of the Statement of case explain the timing of these Orders in relation to the Edinburgh Tram Network (ETN) and the parliamentary process. In particular, those paragraphs explain why it was not possible to include the TROs in the draft Parliamentary Bills. This is discussed in the main report.</p> <p>Given the legal decisions taken by the Scottish Parliament, the Scottish Government and the Council to approve and to fund the construction and operation of the ETN, the purpose of these TROs is to manage the remaining road space in accordance with the relevant statutory duties including Section 122 of the Road Traffic Regulation Act 1984.</p> <p>Section 122 of the Road Traffic Act 1984 imposes a duty on the Council 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 road, having regard to the following matters:</p> <ul style="list-style-type: none"> <li>• The desirability of securing and maintaining reasonable access to premises;</li> <li>• The effect on the amenities of any locality affected and the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities</li> </ul>

<p>Broughton / Bonnington Road not only of the traffic diverted by the TRO but also the likely growth in traffic from development in the area that is planned to be attracted by the trams. Some turns included in the TRO such as into Dalmeny Street should be removed completely.</p> <p>A TRO to address these affects on amenity should be published before the objections to this TRO/09/60 are determined and objections then heard independently.</p>	<p>of the areas through which the road runs;</p> <ul style="list-style-type: none"><li>• The national air quality strategy;</li><li>• 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</li><li>• Any other matters appearing to the authority to be relevant.</li></ul> <p>These factors are to be taken into account by a promoter when developing an Order and although they may have competing demands, each one must be considered and each must be weighted as the promoter thinks appropriate in the particular case. In this case, the operation of the tram network in accordance with the objectives of its approved business case is a relevant matter and it is considered appropriate to attach more weight to securing the operation of the tram, given the significant public investment in the project to date and its prior endorsement by the Scottish Parliament.</p> <p>It is also considered that the scale of consultation at both the local/interest group level and the general public level, coupled with the very thorough Technical and Planning Prior Approvals process which the project design and consequently the TRO proposals were subject to, has fulfilled these requirements and that TRO1 has been developed in the spirit of the Road Traffic Act 1984.</p>
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### 3.12 Other Issues

ISSUE	RESPONSE
The TRO drawings indicate where there will be no right turns, no U-turns, no loading and no parking, but there has been no guidance given on how these rulings will be enforced, or what alternatives are available to local businesses in the area. At the majority of junctions, no U-turn is indicated. Less confident drivers could find having to find alternatives quite challenging.	Moving traffic offences will be enforced by the Police and stationary offences will be enforced by Parking Attendants on behalf of the Council in the normal manner.

### 3.13 Other Issues

ISSUE	RESPONSE
<p>We write to comment on the above TRO and to formally object to its provisions between the bottom of Leith Walk and London Road.</p> <p>We consider that it is essential that the recently published guidelines 'Designing Streets: A Policy Statement for Scotland' are taken into consideration giving emphasis on placemaking and preventing the dominance of motorised vehicles over all other street users. We note with disappointment that this document is not included in the Statement of Case (The Edinburgh Tram Network / Traffic Regulation Orders / Supporting Documents), despite the fact that a draft version has been available since January 2009.</p>	<p>Although the comments relating to "Place Making" are not part of the TRO process, they have been reflected in the road design and are consistent with the Edinburgh Standards for Streets. The Council has proposals to upgrade the footway along Leith Walk, which would also be consistent with the Edinburgh Standards for Streets.</p>

### 3.14 Other Issues

ISSUE	RESPONSE
<p>We emphatically do not want Leith Walk to be another Lothian Road, where traffic dominates by surging uninterrupted and priority is given to “motorised movement” before pedestrians and cyclists and where many independent shops have disappeared. In Lothian Road the pavements are not pedestrian-friendly due to the immediate proximity of moving traffic as there is no buffer, such as parked cars or a cycle lane. For this reason, we would want to see more time-limited parking on Leith Walk, which would also help local businesses.</p>	<p>Once the Edinburgh Tram Network (ETN) is operational the net volume of traffic on much of Leith Walk is predicted to reduce so there is no relevant comparison with Lothian Road. The volume of traffic on Leith Walk is predicted to fall by more than 800 vehicles, in both directions, in the two hour am peak period and by more than 600 vehicles, in both directions, in the two hour pm peak period.</p> <p>The provision of loading and parking on Leith Walk was subject to extensive consultation and consequent refinement; the proposed parking/loading regime on Leith Walk reflects the balance of comments received at the public exhibitions held in 2008 and subsequently resulted in a 50% increase in loading and 35% increase in regulated parking</p> <p>There is limited kerb space in which to meet all the diverse and often conflicting demands and the design is considered to be the best balance in meeting that challenge.</p> <p>It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.</p>

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### 3.15 Other Issues

ISSUE	RESPONSE
<p>There seem to be very few properly anchored bins indicated in the drawings.</p> <p>WASTE DISPOSAL SYSTEM: the council needs to design a waste disposal system that does not further reduce pedestrian space. We object to all pavement narrowing measures which will not simultaneously move residential and business bins to roadside bays.</p> <p>The TRO drawings do not show current residential bins in Smith Place and both sides of Balfour Street: Communal bins on or just off Leith Walk should be spaced at reasonable intervals.</p> <p>To allow a properly joint-up, integrated TRO/public realm design, the Council should first produce a new waste disposal system, including communal businesses bins; bin lorries operating before the trams start running; improved storage infrastructure; and possibly more frequent waste pickup from residential and business premises.</p>	<p>The provision of bins has been considered within the design of the Edinburgh Tram Network (ETN) and these proposals take this into account.</p>

### 3.16 Other Issues

ISSUE	RESPONSE
<p>PILRIG STREET: In order to protect pedestrians and promote walking in Leith Walk as an enjoyable shopping and walking experience and to</p>	<p>One of the criteria of the tram design process has been to ensure necessary pedestrian facilities are provided. Additionally</p>

<p>protect the setting of the landmark listed church building, the pavement on Pilrig Street in front of the church should not be reduced. Instead, left turns for heavy vehicles (which would encroach on the reserved tram road space) at this junction should be permanently restricted or controlled by traffic signals linked to approaching trams.</p>	<p>the Council is planning to renew the footways on Leith Walk and this will improve the ambience for pedestrians. The design requires dedicated road space, for tram and bus at this location, so as to meet the Edinburgh Tram Network (ETN) business case with regard to run time. As a result of this to enable traffic to turn left out of Pilrig Street into Leith Walk, without encroaching into the “tram and bus only” lane, it is a design requirement to provide the necessary swept path for the safe passage of large vehicles. Consequently the footway at this corner has been realigned accordingly.</p>
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### 3.17 Other Issues

ISSUE	RESPONSE
<p>HGI are also concerned to ensure that good access is maintained to the St James Centre from the south via Leith Street and from the north via Leith Walk. John Lewis Partnership have a warehouse located off Bonnington Road and rely on deliveries and access via Leith Walk. Any increase in journey times and/or diversion of traffic from Leith Walk to Bonnington Road could affect the reliability of these deliveries. Some confirmation of the measures being put in place to maintain the flow of traffic along Leith Walk and Bonnington Road would be helpful at this stage.</p>	<p>There is nothing contained within TRO1 proposals that should significantly affect the reliability of access between St James Centre and Bonnington Road. Some re-routing may be required to optimise journey times.</p>

## 4. Antigua Street

### 4.1 Parking/Loading

ISSUE	RESPONSE
I object to the above proposed Order on the grounds of the lack of provision of parking/loading facilities on the section of Antigua Street which both residents and businesses require.	The removal of the loading bays on Antigua Street is required to accommodate the revised junction layout and tram tracks. Alternative loading and parking bays are provided as part of this TRO on Union Street and Gayfield Square. In addition it has not been possible to provide dedicated disabled parking bays at this location due to complexity of the junction layout. Blue Badge holders may park without limit at the parking bay on Union Place as well as using the parking bays in Union Street and Gayfield Square.

### 4.2 Parking/Loading

ISSUE	RESPONSE
The Proposed road layout does away completely with the parking bays, the disabled parking and loading bays and the taxi rank along the length of Antigua Street. There is to be no parking loading or stopping on this length of road at all. There is to be a loading bay provided in Union Street and also another one in Gayfield Square. However these are a significant distance from our client's property. There are no dedicated disabled parking spaces at all. On the opposite side of the road the Taxi rank is to be retained as is the loading Bay and an additional loading bay is to be created just to the South West of Greenside Lane.	The removal of the loading bays on Antigua Street is required to accommodate the revised junction layout and tram tracks. Alternative loading and parking bays are provided as part of this TRO on Union Street and Gayfield Square. In addition it has not been possible to provide dedicated disabled parking bays at this location due to complexity of the junction layout. Blue Badge holders may park without limit at the parking bay on Union Place as well as using the parking bays in Union Street and Gayfield Square.

### 4.3 Parking/Loading

ISSUE	RESPONSE
<p>The businesses on Antigua Street have been told that they are losing their loading bays so as to allow extra lanes at the London Road junction. The shops and restaurants on Leith Walk and Antigua Street have all experienced first hand the chaos with deliveries, taxis dropping off and picking up customers, the elderly and disabled being made to walk up or down hill for up to around 200m to reach their destination, whereupon stating that they would go elsewhere from then on because the inconvenience was too great. This loss of business cannot be permitted.</p> <p>We already pay exorbitant levels for our rates and services because we are at the top of Leith Walk as opposed to further down the Street which benefits from reduced rates.</p>	<p>The removal of the loading bays on Antigua Street is required to accommodate the revised junction layout and tram tracks. Alternative loading and parking bays are provided as part of this TRO on Union Street and Gayfield Square. In addition it has not been possible to provide dedicated disabled parking bays at this location due to complexity of the junction layout. Blue Badge holders may park without limit at the parking bay on Union Place as well as using the parking bays in Union Street and Gayfield Square.</p>

### 4.4 Parking/Loading

ISSUE	RESPONSE
<p>The current proposal provides no dedicated disabled parking. We believe this is contrary to the Disabled parking act 2009. The current proposal to provide two parking bays (non dedicated) for Disabled people outside 22 Union Place is insufficient to provide</p>	<p>The removal of the loading bays on Antigua Street is required to accommodate the revised junction layout and tram tracks. Alternative loading and parking bays are provided as part of this TRO on Union Street and Gayfield Square. In addition it has not been possible to provide dedicated disabled parking bays at this location due to</p>

<p>for customers in the area. They are also too far away from our client's business premises to be of any use. The proposal to provide loading bays around the corner in Union Street and also on Gayfield Square means these will be located some considerable distance from our client's premises and this will result in members of staff having to leave the premises in order to help with deliveries. This distance creates a double handling situation and also means that additional staff will need to be employed as the loading bay is out of sight of the premises as well making the process more cumbersome and inefficient.</p>	<p>complexity of the junction layout. Blue Badge holders may park without limit at the parking bay on Union Place as well as using the parking bays in Union Street and Gayfield Square.</p> <p>Various disability groups have been involved during the course of the design and development of the tram route and vehicles. These groups have been working together with the Council and Edinburgh Trams to realise the best possible outcome for disabled people and to advise on how this mode of transport and associated infrastructure can accommodate all users.</p> <p>There are greater pressures being placed on a limited amount of kerb space. The design process for the TRO has attempted to maximise access, together with the amount and distribution of parking and loading, whilst ensuring that the safety of road users is paramount and the operation of the tram is not compromised. Under the TRO the total number of disabled bays in the city centre area will remain the same.</p>
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#### 4.5 Parking/Loading

ISSUE	RESPONSE
<p>The proposed layout does not include any facilities to park, load, or unload outside the shops and premises in Antigua Street, which has one of the broadest pavements on the route of the trams. We have been told the reason for no parking facilities whatsoever is that three lanes plus a tram line, i.e. 4 in total is planned; two lanes accessing London Road on the right and the other one proceeding down Leith walk. The planners have stated that the reason all parking facilities</p>	<p>The removal of the loading bays on Antigua Street is required to accommodate the revised junction layout and tram tracks. Alternative loading and parking bays are provided as part of this TRO on Union Street and Gayfield Square. In addition it has not been possible to provide dedicated disabled parking bays at this location due to complexity of the junction layout. Blue Badge holders may park without limit at the parking bay on Union Place as well as using the</p>

<p>have been removed outside the entire length of Antigua Street is to avoid a build up of traffic creating congestion as far back as York Place. We were under the impression that the trams would provide an alternative choice of public transport which would consequently lessen private car use and therefore ease congestion. Most of the other routes throughout town have only one or two lanes at most.</p>	<p>parking bays in Union Street and Gayfield Square.</p> <p>Comprehensive and detailed traffic modelling was undertaken to establish the required junction layout, including the lane configuration. The number of lanes at a junction is largely dictated by the peak-hour volume of traffic through the junction and the amount of “stacking space” required to accommodate traffic awaiting a green light.</p> <p>The volume of traffic on the northbound approach to the London Road junction which wishes to turn right into London Road means that two lanes are required, while the volume of traffic wishing to proceed north into Leith Walk means that a dedicated (nearside) straight-ahead lane is also required.</p> <p>There are also geometric restraints associated with the road design which must be factored in, e.g. the swept paths of large vehicles making turning manoeuvres, space for traffic and pedestrian islands, clearances between traffic and street furniture, etc. The tram tracks, meanwhile, have particular vertical and horizontal constraints associated with them and these need to be combined with those of the roads design.</p> <p>It is a delicate balance at any junction on the city’s road network, but it is particularly so at such a busy junction. Any delay at this junction, as a result of insufficient stacking space, for example, would very quickly knock-on to other junctions in the city centre road network</p>
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## 5. Blenheim Place

### 5.1 Access

ISSUE	RESPONSE
I would like to strongly object to the proposed permanent closure of the above exit from Royal Terrace For those of us, who unfortunately, have to make a considerable number of car trips each day for school runs, etc, the closure of this exit adds a good 15 minutes on to each journey.	Under these proposals there is no change to the existing arrangement for the egress of traffic at this junction. The left turn into London Road is still available to all traffic.

### 5.2 Access

ISSUE	RESPONSE
I am writing with my strong objection regarding the closure of Blenheim Place which I believe is proposed in the Tram Traffic Regulation Orders (TRO/09/60A&B). We wish for Blenheim Place to remain open to traffic both ways (in and out) and for traffic to be able to make left and right turns to and from Blenheim Place from and to London Road in the interests of residents in the Terraces.	Ingress and egress at the junction of Blenheim Place with London Road is still available under these proposals through the provision of a left turn into and left turn out of Blenheim Place. There is no current provision for a right turn exit from Blenheim Place into London Road eastbound and these proposals maintain that position. The right turn ban from London Road in and out of Blenheim Place is a necessary part of the road design to ensure that the Edinburgh Tram Network (ETN) can operate safely and in accordance with the Council's approved business case for ETN.

### 5.3 Access

ISSUE	RESPONSE
<p>Current proposals intend restricting eastbound access to Blenheim Place. Blenheim Place-leading into Royal Terrace - is comparatively straight and has a gentle sloping approach to the Terraces. It is a wide street and has pavement on both sides which is well lit and has buildings (mainly residential) on one side. It leads directly onto the Terraces, passing the Church and the eastern entrance onto Calton Hill, and is easy to find from London Road/Leith Walk and is easy to navigate. It is both appropriate and adequate as the primary access route to the Terraces.</p> <p>By contrast, the route proposed as the main entrance to the Terraces is Carlton Terrace Brae. It is a narrow, windy road which is steep and has a sloping camber. There is only pavement on one side, which is onto open gardens and completely blocked from view for most of its length, while the other side of the street abuts a large wall which forms the boundary to Regent Gardens. It is dark and quiet. Entrance to the Brae is from the difficult junction at Abbeymount. The Brae then joins Carlton Terrace by way of a T junction, with restricted visibility to the left on entry.</p> <p>Abbeymount junction is the entrance point to Carlton Terrace Brae. It is a five road junction with traffic signals. It is compromised from every approach. Travelling north/south traffic meets on the brow of a hill, which is very difficult in wet conditions and particularly in winter when car lights dazzle. The low winter sunlight adds to the hazards at this junction when approaching from the north side of the city. Drivers</p>	<p>The right turn ban from London Road in and out of Blenheim Place is a necessary part of the road design to ensure that the Edinburgh Tram Network (ETN) can operate safely and in accordance with the Council's approved business case for ETN. It is still possible to turn left into and out of Blenheim Place at its junction with London Road.</p> <p>There are a number of alternatives to making the right turn into Blenheim Place from London Road however these will depend on particular journeys.</p> <p>The swept path for the left turn from London Road into Blenheim Place, shows large vehicles can safely make this manoeuvre.</p> <p>Under these proposals there are no changes to the alternative accesses referred to as they did not form part of the remit for ETN TRO1.</p> <p>However, in light of the strength of opinion opposing the measure it is recommended that a design review be undertaken to establish if a practical and safe alternative can be developed which preserves the right-turn with minimal impact on the tram operations.</p> <p>If an approved alternative design is feasible, the necessary TRO2 variation order will be promoted. There may be objections to the proposal; indeed this may be a likely scenario as there is documentary evidence that there is also support for the proposed banning of the</p>

<p>wishing to access the Brae from the north have to perform a U-turn against two sets of oncoming traffic. Travelling north/east/west there is a double option to turning left/right with no clear method of indicating proposed manoeuvre. There are currently no filters or dedicated road markings. However it is difficult to see how either would seriously enhance safety, particularly as the Highway Code contains no designated signage to deal with such a junction.</p> <p>Under the proposals the only other access will be a left turn from London Road into Blenheim Place. This would be approached from the east. This is the very traffic which already accesses the Terraces from Carlton Terrace Brae. Therefore, realistically virtually ALL traffic to the Terraces will be using the highly compromised (and dangerous) Abbeymount Junction.</p> <p>With over 270 residential properties there is inevitably a reasonable level of ongoing traffic movement. This encompasses not only domestic day to day journeys, but all the service and delivery traffic associated with the upkeep of families and properties. We understand in fact that any development with over 200 dwellings should have more than one access, to insure against the risk of one access being closed for any reason. This was forcefully highlighted for residents of the terraces over New Year this year when Carlton Terrace Brae was closed by the police for three days because of ice and snow. Although this scenario may not be repeated in the near future, it was a timely reminder that any number of factors could close the road. The proposals put forward provide no viable alternative should it be required.</p> <p>The hotels and businesses in the Terraces obviously add to the level</p>	<p>right-turn (to reduce the amount of intrusive through-traffic).</p> <p>It would be the intention to undertake this design review and take any new proposal through the necessary statutory consultation process prior to construction work starting. However, in the event that construction commences before that process is completed it is recommended that the junction be constructed without the physical measures which effect the banned turn (that part of the TRO1 Order would not be implemented), and that the junction be trialled under that scenario.</p>
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<p>of traffic. The seven hotels in Royal Terrace, with over 200 bedrooms between them, generate a significant amount of delivery and service vehicles and rely upon access by heavy goods vehicles (HGVs) and coaches. These large vehicles will be forced to use Carlton Terrace Brae, which is difficult because of the U-turn. If for any reason the Brae is closed, larger vehicles cannot make the left turn in at Blenheim Place, so effectively there would be NO access to the Terraces for them. This is an unacceptable situation for such businesses.</p> <p>Daily life of the church is seriously affected by the proposed restricted access. Weddings and funerals often involve large vehicles, and traffic which is unfamiliar with the Terraces. The access routes planned are difficult to find and to navigate. This also impacts long term on community life of the church, particularly the groups involving children, as parents find the church inaccessible</p>	
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#### 5.4 Statutory Process

ISSUE	RESPONSE
<p>I found it quite difficult to get information on these road changes and how to object to them. You have not publicised them very widely.</p>	<p>This TRO consultation process was carried out in accordance with statutory requirements and indeed tie Ltd held public exhibitions on the draft TRO proposals in October/November 2008. The regulations stipulate a 21 day period for the Public Deposit period on such Orders, however, the Council extended this period to 28 days for these Orders and also held a manned exhibition throughout this period at the City Chambers as well as making the relevant information available online.</p>

## 5.5 Cycling

ISSUE	RESPONSE
Banned turn from London Rd right into Blenheim Place; if this manoeuvre is banned it will be almost impossible for cyclists to reach Royal Terrace without a very long diversion.	<p>The right turn ban from London Road in and out of Blenheim Place is a necessary part of the road design to ensure that the Edinburgh Tram Network (ETN) can operate safely and in accordance with the Council's approved business case for ETN.</p> <p>However, in light of the strength of opinion opposing the measure it is recommended that a design review be undertaken to establish if a practical and safe alternative can be developed which preserves the right-turn with minimal impact on the tram operations.</p> <p>If an approved alternative design is feasible, the necessary TRO2 variation order will be promoted. There may be objections to the proposal; indeed this may be a likely scenario as there is documentary evidence that there is also support for the proposed banning of the right-turn (to reduce the amount of intrusive through-traffic).</p> <p>It would be the intention to undertake this design review and take any new proposal through the necessary statutory consultation process prior to construction work starting. However, in the event that construction commences before that process is completed it is recommended that the junction be constructed without the physical measures which effect the banned turn (that part of the TRO1 Order would not be implemented), and that the junction be trialled under that scenario.</p>

## 5.6 Other Issues

ISSUE	RESPONSE
<p>Banning the right turn from London Road into Blenheim Place means that traffic currently using this access has to find alternative routes.</p> <p>London Road/Easter Road/Carlton Terrace Brae - This is the most obvious route for traffic that finds the right turn into Blenheim Place blocked. However, the right turn from London Road into Easter Road is very difficult because only two or three cars can turn at each traffic light signal change. This becomes a source of irritation to drivers waiting in long queues along London Road. The right turn from the top of Easter Road into Carlton Terrace Brae is a five-road junction and is extremely difficult. It is also almost a 180 degree U-turn to get into the Brae. This is very difficult for large vehicles.</p> <p>Leith Street/Waterloo Place/Regent Road/Carlton Terrace Brae - In order to evade the difficult junction of London Road and Easter Road, traffic can travel south on Leith Street, left into Waterloo Place and Regent Road and then left up into Carlton Terrace Brae into the Terraces. However, the Leith Street Place junction becomes jammed with traffic, particularly at rush hour. Also, it is not easy for luxury buses and HGVs to make the sharp left turn into Waterloo Place.</p> <p>Leith Street/Calton Road/Abbeyhill Terrace Brae - This route turns left off Leith Street before the heavily trafficked Waterloo Place junction and, in theory, could be a quicker route than the previous one at rush hour. However, the roads are only suitable for light traffic.</p>	<p>There are a number of alternatives to making the right turn into Blenheim Place from London Road however these will depend on particular journeys.</p> <p>Under these proposals there are no changes to the alternative accesses referred to as they did not form part of the remit for the Edinburgh Tram Network (ETN) TRO1.</p> <p>The swept path for the left turn from London Road into Blenheim Place, shows large vehicles can safely make this manoeuvre.</p> <p>Emergency services have been consulted, as a statutory consultee, and have no objection to the right turn restriction: in an emergency they could make the right turn manoeuvre.</p> <p>However, in light of the strength of opinion opposing the measure it is recommended that a design review be undertaken to establish if a practical and safe alternative can be developed which preserves the right-turn with minimal impact on the tram operations.</p> <p>If an approved alternative design is feasible, the necessary TRO2 variation order will be promoted. There may be objections to the proposal; indeed this may be a likely scenario as there is documentary evidence that there is also support for the proposed banning of the right-turn (to reduce the amount of intrusive through-traffic).</p>

All three alternative routes involve a considerable increase in journey times compared to the existing arrangements. Journey times can increase up to five fold depending on routes. Increases in distance and journey means associated delays and increases in costs for suppliers etc. Taxi fares, at current rates, increase by between £4 and £6 on average. This is a completely disproportionate burden for residents and businesses of the Terraces.

In an undated brief by the Council and tie Ltd., it was suggested that traffic coming from the west along London Road should turn left into Hillside Crescent. Vehicles should then turn right across London Road to come back in a westerly direction and use the left-in turn into Blenheim Place. We think this is a potentially dangerous manoeuvre at rush hour when all four lanes in London Road are packed. It is also very difficult for large vehicles to turn left into Blenheim Place.

During discussions between tie Ltd. and the Residents Association (RRCTA) on 20/10/09 at 20 Regent Terrace, a further route for traffic approaching the Terraces from the west was proposed. This involves travelling east on Queen Street, turning right into Hanover Street (TL), left into George Street (TL), left into St. Andrews Square (TL), north and east side of square (TL), South St. Andrews Street (TL), Princes Street (TL), Waterloo Place (TL), Regent Road (TL), Car Terrace Brae into the Terraces. This involves going through eight sets of TL (traffic lights), a polluting and frustrating alternative.

It would be the intention to undertake this design review and take any new proposal through the necessary statutory consultation process prior to construction work starting. However, in the event that construction commences before that process is completed it is recommended that the junction be constructed without the physical measures which effect the banned turn (that part of the TRO1 Order would not be implemented), and that the junction be trialled under that scenario.

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### 5.7 Other Issues

ISSUE	RESPONSE
The longer routes detailed above and the consequently increased journey times have a significant impact environmentally. Assuming about 800 vehicles per day use the Blenheim Place entry at present, in future this will mean an extra 420,000 vehicle kilometres per year or 90 tonnes extra of carbon dioxide emissions per year. To which must be added increased nitrous oxide, hydrocarbon and particulate emissions. Meanwhile, the Edinburgh Council leaflet "Edinburgh Trams Traffic Regulation Order" states that the new tram system is environmentally friendly. Also, the Edinburgh Council Carbon Management Programme aims to have a vast reduction in carbon dioxide emissions. What they are proposing for Blenheim Place is hardly according to their remit.	<p>Appropriate re-routing will have a minimal impact on any additional emissions and may result in less through traffic on Blenheim Place.</p> <p>Notwithstanding this, see Item 5.5 above and note that a design review is to be undertaken.</p>

### 5.8 Other Issues

ISSUE	RESPONSE
Hotels and businesses in the Terraces are gravely concerned about the proposal to close the right turn in to Blenheim Place from London Road. This junction was temporarily closed from June 2008 until November 2009 for considerable periods of time, including the busy summer season. Hotel business in terms of rates and occupancy was affected during this time. The prospect of a permanent closure of the	<p>Ingress and egress at the junction of Blenheim Place with London Road is still available under these proposals through the provision of a left turn into and left turn out of Blenheim Place.</p> <p>The swept path for the left turn from London Road into Blenheim Place, shows large vehicles can safely make this manoeuvre.</p>

<p>right turn is without doubt alarming.</p> <p>The Royal Terrace Hotel, the largest in Royal Terrace, was bought almost seven years ago by the present owners, Prima Group, because of the uniqueness of the area. In the due diligence process, no mention was made of the possibility of restricted access. They have undertaken major refurbishment and the hotel employs a large number of local staff, thereby benefiting the local economy. The hotel pays a considerable amount in VAT and council tax payments as well as to its employees on the payroll. This hotel organises tours and groups as well as having individual guests to stay. Visitors complained about the difficulty they had in reaching the hotel - getting lost, coach drivers being unable to deliver and collect passengers, deliveries and refuse collection being affected. There is also the deep concern of possible delays in the case of an accident or emergency.</p> <p>The alternative route at Carlton Terrace Brae is a difficult access point particularly for coaches and delivery vehicles. This proposal, to cut the access off from the city will most definitely damage businesses.</p> <p>Smaller hotels, some of which have been operating for almost 30 years, experience similar problems with the viability of their business being brought into question. As well as hotels, there are a number of other businesses on the Terraces that are very concerned and whose businesses are likely to suffer if the proposed ban on the right turn into Blenheim Place goes ahead. These include apartment hotels, short term lets, the Bank of New York Mellon (which employs 250 people), a Michelin-starred restaurant, the Dofos pet shop and the Scottish Chamber Orchestra.</p>	<p>Emergency services have been consulted, as a statutory consultee, and have no objection to the right turn restriction and in an emergency they could make the right turn manoeuvre.</p> <p>There are a number of alternatives to making the right turn into Blenheim Place from London Road however these will depend on particular journeys.</p> <p>Under these proposals there are no changes to the alternative accesses referred to as they did not form part of the remit for the Edinburgh Tram Network (ETN) TRO1.</p> <p>Notwithstanding this, see Item 5.5 above and note that a design review is to be undertaken.</p>
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## 5.9 Other Issues

ISSUE	RESPONSE
<p>During the preparatory stages of the tram track laying in Leith Walk, the Blenheim Place entrance was closed off for most of the period between June 2008 and November 2009. This temporary closure enabled residents to see just what an impact a permanent closure would have on our Terraces.</p> <p>Residents are considerably alarmed at the safety implications of taking away the right turn into the Terraces at Blenheim Place. Having only one main access point at Carlton Terrace Brae is extremely unsafe as was demonstrated at New Year when the Brae had to be closed by police because of treacherous weather conditions. Other reasons for the Brae to be cut off could be by civil demonstrations, football crowds or if a large vehicle breaks down or has an accident.</p> <p>In view of safety concerns about this Brae, in January 1998, it was converted to a one-way street up the slope from Abbeymount into the Terraces, i.e. westwards. Residents objected to restricted access and the Brae reverted to two-way traffic in June 1998.</p> <p>The proposed reduction in incoming traffic from London Road has a very significant impact on traffic movement along the terraces. Royal Terrace effectively becomes a one-way street. Vehicles travel faster and often overtake. This is a well-reported consequence of a one-way system and one of the reasons that Edinburgh Council do not</p>	<p>The temporary complete closure under the TTRO regulation is not part of these proposals for the TRO, where the only change to the existing junction arrangements is the ban on the right turn into Blenheim Place from London Road. Ingress and egress at the junction of Blenheim Place with London Road is still available under these proposals through the provision of a left turn into and left turn out of Blenheim Place.</p> <p>Under these proposals Royal Terrace will remain as a two-way street as left turn traffic from London Road will still continue to use the revised Blenheim Place junction.</p> <p>The issue of speeding on Royal Terrace is not a matter for consideration under these Edinburgh Tram Network (ETN) related Orders.</p> <p>Emergency services have been consulted, as a statutory consultee, and have no objection to the right turn restriction and in an emergency they could make the right turn manoeuvre.</p> <p>Notwithstanding this, see Item 5.5 above and note that a design review is to be undertaken.</p>

recommend this option as a method of traffic calming. Traffic calming is an issue in the Terraces.

Pedestrian safety is also compromised. One of the benefits of traffic is its effectiveness as a monitor for safety. Reduced traffic numbers means that the area is more isolated. Royal Terrace is also sided on the north by large public gardens, so passing traffic plays an important role in protection. During the temporary closure period, residents felt unsafe walking these long streets. The Police reported to residents of Royal Terrace who had been burgled that reduced traffic leads to increased crime.

Unfortunately there is a recorded incident of just this risk. A young lady living in the Terraces was assaulted in the summer of 2009 when Blenheim Place was closed. To avoid the extra taxi fare incurred because of the increased journey, she had walked the last 200 yards home and was attacked.

Historically, there has been and still is an active sex industry in the Royal Terrace gardens. Although the gardens have recently been opened up and improved, the dim lighting and the lack of through traffic encourages rather than discourages this activity.

Residents need to feel secure and safe in the heart of the city. The extended routes and the hazardous junction which becomes the main entry point to the Terraces means that access becomes fundamentally risky. It must also impact on the ability of emergency vehicles to reach the properties quickly

### 5.10 Other Issues

ISSUE	RESPONSE
<p>Greenside Church at 1b Royal Terrace was founded in 1839 and, as well as being a place of worship, is a vital service to the community.</p> <p>The church has suffered huge inconvenience and frustration while Blenheim Place was temporarily closed for the best part of 2008 and 2009. The proposal to cut off Blenheim Place permanently is truly alarming. Greenside Church is a burgh church and most parishioners come by car from far and wide, not many of the congregation live locally. There is therefore a perception that the church is difficult to get to. Funerals and weddings are difficult to arrange and people get lost. With no through traffic, the street becomes quieter and more dangerous. The church faces the prospect of a slow and enforced decline in local life. Many in the congregation are elderly and need to take a taxi to get to church. The extra fare is often prohibitive.</p> <p>In addition to church services, a large number of people use the church premises for community activities of various kinds. For example, the Leith Scouts meet regularly on Monday evenings and the Rainbows, Brownies and Guides on Friday evenings. The After School Club meets every weekday for several hours. Parents complain that the church is much harder to reach when they come to pick up their children.</p> <p>Another example of church activity is the New Life Christian Fellowship that meets at Greenside Church regularly. Indian dancing classes are held twice a week and the St. Andrew Ambulance</p>	<p>The temporary complete closure under the TTRO regulation is not part of these proposals for the TRO, where the only change to the existing junction arrangements is the ban on the right turn into Blenheim Place from London Road. Ingress and egress at the junction of Blenheim Place with London Road is still available under these proposals through the provision of a left turn into and left turn out of Blenheim Place.</p> <p>Notwithstanding this, see Item 5.5 above and note that a design review is to be undertaken.</p>

<p>Services meet once a week. Asian Concern for Christians of different ethnic backgrounds and denominations is also based at Greenside. During the Edinburgh Festival, Greenside Church is used for Fringe productions. Greenside Church is also a member of the Care Shelter and provides hot meals and a bed for the night to homeless people two or three times a year. All these activities depend on easy access to and from the church in order to carry on.</p>	
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#### 5.11 Other Issues

ISSUE	RESPONSE
<p>The proposed road closure and the problematic and restricted access make the Terraces difficult to reach. People are put off visiting, particularly ad hoc "dropping in". This compounds a feeling of isolation as well as the physical isolation that road closure brings.</p> <p>One of the great benefits of city centre living is a sense of connectedness. The community within the Terraces has been and is traditionally linked to Leith and Broughton. The 'New Town and Broughton Community Council' represents us. Road closure effectively removes us from these local communities. Inevitably, as traffic reroutes, new shopping and service patterns emerge. Local shops and businesses will suffer. Visitors and tourists will find it difficult to access the streets, and in the long term isolation is liable to turn into neglect. The Terraces will be, quite literally, "off the map".</p>	<p>The temporary complete closure under the TTRO regulation is not part of these proposals for the TRO, where the only change to the existing junction arrangements is the ban on the right turn into Blenheim Place from London Road. Ingress and egress at the junction of Blenheim Place with London Road is still available under these proposals through the provision of a left turn into and left turn out of Blenheim Place.</p> <p>Notwithstanding this, see Item 5.5 above and note that a design review is to be undertaken.</p>

### 5.12 Other Issues

ISSUE	RESPONSE
<p>There are various technical reasons why the design of the Blenheim Place junction was flawed. These are shown in the report No. 20454 dated March 2010 prepared for the Steering Group by Goodson Cole Transportation entitled "Report on Proposed Changes at Blenheim/London Road Junction" submitted with this report to the Council during the TRO objection period.</p> <p>Edinburgh Council design teams were mistakenly informed that road closure was considered an attractive option for residents of the Terraces. Therefore this option was followed through into the proposed plan. Edinburgh Council themselves did not undertake any review of opinion.</p>	<p>The proposed design is compliant with the Design Manual for Roads and Bridges and has met with the Road Safety Audit requirements.</p> <p>The temporary complete closure under the TTRO regulation is not part of these proposals for the TRO, where the only change to the existing junction arrangements is the ban on the right turn into Blenheim Place from London Road. Ingress and egress at the junction of Blenheim Place with London Road is still available under these proposals through the provision of a left turn into and left turn out of Blenheim Place.</p> <p>Notwithstanding this, see Item 5.5 above and note that a design review is to be undertaken.</p>

### 5.13 Other Issues

ISSUE	RESPONSE
<p>I am also convinced however adjusted the existing pedestrian crossing in London Road is a very valuable feature for all those involved in the London Road Scene near the future lights.</p>	<p>The pedestrian crossing facilities are to be moved to the junction at Leith Walk so that it will be on the primary desire line for pedestrians. It is not possible to have two pedestrian crossings within such a close proximity of each other, therefore the existing pedestrian crossing will be removed.</p>

#### 5.14 Other Issues

ISSUE	RESPONSE
<p>The current right turn arrangement from London Road works well. There is never a tail back to the roundabout and there is still room for two lanes of traffic to go past on the left. I do not see why that should not continue to be the case. If for some reason that is impossible however, it would be preferable to move the two bus stops down towards Hillside Crescent rather than shut off the right turn in to Blenheim Place. That would of course have the additional advantage of solving the long term problem of ant-social behaviour at these bus stops in the evening.</p>	<p>The bus stop arrangement on London Road provides a key link for East Lothian Bus services. There are no current proposals to review the location of these bus stops.</p> <p>Notwithstanding this, see Item 5.5 above and note that a design review is to be undertaken.</p>

#### 5.15 Other Issues

ISSUE	RESPONSE
<p>The Association does not propose commenting, at this stage, on the proposal to ban the right hand turn into Blenheim Place. Residents have differing, and evolving, views as to whether or not the loss of amenity outweighs the reduction in traffic volumes on Royal Terrace.</p> <p>We have therefore encouraged residents to respond to you directly on this topic.</p>	<p>Following discussions with local groups we are aware of the differing views held and note your comments.</p>

### 5.16 Other Issues

ISSUE	RESPONSE
<p>An extensive survey was carried out by the resident's association of Regent, Royal and Carlton Terraces association with regard to the traffic around the Calton Hill Area. It was considered by over 80% of respondents (over 40%) of all residents, that some form of traffic calming was necessary. A subsequent safety assessment was carried out by the Lothian &amp; Borders Police, they concluded that on the grounds of the potential hazard to residents and visitors' safety, that the junction at the Blenheim Place end of Royal Terrace should be limited in a way that removed at least one direction of (mainly rat run) traffic along the terraces.</p> <p>Although there has been a petition to campaign to keep this junction fully open it is signed by a number of bodies and people not living directly on the terraces and has sought to exclude people known to have an opposing or even slightly different view. It has been disingenuous in that it has asked signatories whether they want the junction fully closed and have not put forward the true position of a partial closure leading to some minor inconvenience but rather than total loss of amenity of the junction.</p> <p>I would ask on behalf of the residents actually living on the terraces and in particular those on Royal Terrace that tie adheres to their draft plan for the junction and support the recommendation of the police and the wishes of the residents.</p>	<p>Your comment supporting the proposals for the changes to the London Road/Blenheim Place junction is noted.</p>

21 September 2010

## 6. Picardy Place

### 6.1 Loading

ISSUE	RESPONSE
<p>The basis of our objection concerns the proposed area where off-peak loading is permitted on Picardy Place adjacent to Reid's premises. The correspondence enclosed with this letter of objection provides a background to the provision of the aforementioned off-peak loading area, and particular attention should be paid to Section 5 of the enclosed Delegated Decision Report of 20 October 2008, which alludes to the provision of an off-peak loading area which is to be approximately 15m in length.</p> <p>The nearest available loading bay to Reid and the other businesses operating and servicing from Picardy Place has been provided on Leith Walk approximately 120m from the Reid store entrance. Servicing from this location is highly impractical and would, in our opinion, pose serious health and safety risks to both the delivery staff and to members of the general public as it would mean that heavy goods, such as items of furniture, would have to be transported from the loading bay up the hill onto Picardy Place via the footway.</p> <p>The proposed loading bay on Union Place is just 15m in length. Many articulated delivery vehicles exceed 15m in length and would be unable to park within the limits of the loading bay. This would mean that many delivery vehicles would be unable to load and unload safely from this loading bay.</p>	<p>Picardy Place Prior Approval 08/03723/PA</p> <p>Following representations to the above the plans have been revised and area of off-peak loading will now be provided east of the proposed pedestrian crossing east of the Broughton Street Junction.</p> <p>The proposed TRO provides for a 10m length of kerbside loading on Picardy Place where loading is permitted between 6:30pm and 7:30am. This has been provided in response to representations previously received and the precise location and length of the loading bay has been determined by a number of constraints, including the need to provide for traffic circulation, bus stops, pedestrian crossings and loading whilst allowing the tram to run in accordance with its approved business case. The current design seeks to provide a solution which balances the needs of all users.</p> <p>In addition a dedicated 17m loading bay has been provided close by on Union Place.</p>

<p>There are a number of commercial premises located on Picardy Place, including the Reid store, which require deliveries at least once a day. The loading bay on Union Place is intended to be used not only to service these premises but also to service the premises located on nearby Union Place. In view of the inadequate size of the proposed loading bay and the number of premises requiring daily deliveries we do not think that the proposed servicing arrangements will be sufficient to meet demand and could result in vehicles being unable to load/unload causing traffic congestion and disruption to the operation of the businesses in the locale.</p>	
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## 6.2 Loading

ISSUE	RESPONSE
<p>In order to remedy this, and allow Reid to withdraw their objection to the proposed TRO's, we would request that a minor amendment to the TRO layout such that an articulated vehicle of 16m. in length may be accommodated within the off-peak loading area on Picardy Place.</p>	<p>The design, and therefore the Order, reflects the competing demands for kerbside space on the Picardy Place frontage at this key transport interchange, i.e. bus stops, pedestrian crossings, loading, junction capacity issues. The proposals represent a balance in meeting the needs of all users. It is recommended that no further action be taken as a result of this objection and that the Order be made as advertised.</p>

### 6.3 Loading

ISSUE	RESPONSE
Further to the points raised in the Waterman Boreham letter of objection our clients wish to stress that it is vital to the viability of the retail unit at 8 Picardy Place, that it has adequate arrangements for loading and servicing. The nature and scale of the retail unit at 8 Picardy Place is such that it needs to be accessible to articulated vehicles. The points raised in the letter from Waterman Boreham clearly express the need for a loading and servicing area of adequate length for the retail units along Picardy Place.	<p>The proposed TRO provides for a 10m length of kerbside loading on Picardy Place where loading is permitted between 6:30pm and 7:30am. This has been provided in response to representations previously received and the precise location and length of the loading bay has been determined by a number of constraints, including the need to provide for traffic circulation, bus stops, pedestrian crossings and loading whilst allowing the tram to run in accordance with its approved business case. The current design seeks to provide a solution which balances the needs of all users.</p> <p>In addition a dedicated 17m loading bay has been provided close by on Union Place.</p>

### 6.4 Access

ISSUE	RESPONSE
<p>It is noted from the TRO plans that it is proposed to remove the existing Picardy Place roundabout and replace it with a signalised one way gyratory system. HGI and their advisors have been intimately involved in the design of the Picardy Place junction to ensure that the final layout serves the tram, the redevelopment of the St James Centre and the development of the Picardy Place Island site.</p> <p>There are a number of key differences between the TRO plans and</p>	<p>The Developer has as yet not gained detailed planning permission for their proposal which is at an early stage of design and development. However, any further access requirements approved by the Roads Authority for this new development could be dealt with by appropriate variations to the TRO 1 order, for approval by Council.</p>

<p>the final agreed layout as follows:</p> <ul style="list-style-type: none"> <li>- TRO1 shows Little King Street as one way outbound as it currently operates. The final agreed layout will see Little King Street operate one way inbound with amendments to the junction geometry to accommodate the straight ahead movement from the gyratory, a left turn from Leith Street and (possibly) the occasional vehicle needing to exit Little King Street.</li> <li>- TRO1 shows different lane markings on the exit from the gyratory southbound on to Leith Street</li> </ul> <p>Whilst we appreciate that the TRO1 layouts need to be able to accommodate the current access arrangements serving the St James Centre, HGI need confirmation that the layouts as presented can be modified to accommodate the revised access arrangements associated with the redevelopment of the St James Centre and the Picardy Place Island site. These may include 2-way access on Little King Street</p>	
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## 6.5 Access

ISSUE	RESPONSE
<p>It is not entirely clear to our clients from the Statement of Case and the associated drawings what provision will be made for access to the Cathedral if the TRO comes into effect. The closing of one end of Cathedral Lane and the removal of vehicular access from the area immediately at the foot of the Cathedral steps are a concern. Our</p>	<p>Under these Orders, vehicular access to the Cathedral is provided by a loading bay in Little King Street and a loading area is also provided at the lay-by, immediately adjacent to the front of the Cathedral.</p>

clients seek an assurance from the Council that there will be no detrimental impact on the ability of those involved in Weddings, Funerals and other Services to gain the necessary access to the Cathedral as and when required. Our clients remind the Council that the Cathedral is open 365 days of the year.	
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## 6.6 Road Layout

ISSUE	RESPONSE
<p>At present, the pedestrian area at the foot of the Cathedral steps enjoys a protected setting from the main traffic route around the Picardy Place roundabout. The proposed TRO shows that three main lanes of busy traffic would run closely along the front of the Cathedral. We understand that the distance from the foot of the Cathedral steps to the proposed new carriageway kerb will be a distance of only 8.2m.</p> <p>Our clients would urge the Council to consider again whether that distance can be extended and the three lanes of traffic moved further away from the Cathedral steps.</p>	<p>The road design in this area is very complex. Within this confined area the road design has to accommodate traffic circulation, bus stops and loading whilst allowing the Edinburgh Tram Network (ETN) to run in accordance with its approved business case. The current design solution balances the needs of public transport, pedestrians, cyclists and general traffic, while maintaining vehicular access to the Cathedral. The design has sought to maximise the footway space in front of the Cathedral steps.</p>

## 6.7 Road Layout

ISSUE	RESPONSE
<p>We object to the proposed configuration at Picardy Place where the addition of many sets of traffic lights and a two-way tram stop, will add significantly to virtually all road journeys (including bus passengers) across the signalised junctions.</p> <p>At a meeting with the officials on February 3rd, it became evident that alternatives for siting the tram stop outside the gyratory system have never been considered. We do not believe it would significantly impact 'patronage' of the tram if the stop were split.</p> <p>The east-bound stop could remain in Picardy Place and the west-bound stop could be relocated to York Place or Elm Row. This would reduce the number of priority traffic light changes triggered by trams and improve journey times for all other road users.</p> <p>Relocating the west-bound portion of the tram stop could also improve the interchange for passengers transferring from buses to tram to travel west.</p> <p>Other options for improving travel times for road users must also be considered - the current proposals are unacceptable and inequitable, especially out of peak hours when travel times will lengthen significantly.</p>	<p>The tram stop at Picardy Place provides an interchange between tram and bus at this strategically important location and provides direct pedestrian access to all local facilities. The reconfiguration of Picardy Place is an outcome of a complex and interdependent design process, which must comply with a number of criteria including the Edinburgh Tram Network (ETN) business case, as well as meeting the Council's transport and planning policies. This design has been reviewed through a "charette process", including consideration of traffic demand, pedestrian access, amenity and development matters, all of which impacted on the revised design. This process included engagement with stakeholders at three key stages of the design development and at the TRO public exhibition (November 2008). The final roads design was then completed and the orders proposed.</p>

## 6.8 Road Layout

ISSUE	RESPONSE
The new layout of Picardy Place gives rise to considerable concern. The CEC/tie traffic modelling has shown increases in almost all journey times, particularly at peak times. Whilst the NTBCC accept that the tram may have some unavoidable negative impact on other transport modes, it is thought that a more optimal solution may be possible. One suggestion is that the road space (a critical item) within the new Picardy Place gyratory could be maximised by placing the Westbound tram stop on York Place. The Eastbound tram stop would remain at the N side of Picardy Place, with the tram-stop 'platform' being part of the pavement. The NTBCC would like to meet with CEC/tie to help arrive at a better solution than that which is presently on offer.	The tram stop at Picardy Place provides an interchange between tram and bus at this strategically important location and provides direct pedestrian access to all local facilities. The reconfiguration of Picardy Place is an outcome of a complex and interdependent design process, which must comply with a number of criteria including the Edinburgh Tram Network (ETN) business case, as well as meeting the Council's transport and planning policies. This design has been reviewed through a "charette process", including consideration of traffic demand, pedestrian access, amenity and development matters, all of which impacted on the revised design. This process included engagement with stakeholders at three key stages of the design development and at the TRO public exhibition (November 2008). The final roads design was then completed and the orders proposed.

## 6.9 Cycling

ISSUE	RESPONSE
Routing for cyclists at Picardy Place and on Leith Street is severely compromised and the current design will effectively discourage safe cycling in these locations.	Alternative routes for cyclists to avoid these junctions will be signed, however, if cyclists choose to negotiate these junctions, cycle lanes and advance stop lines have been provided where possible within the design.

## 6.10 Cycling

ISSUE	RESPONSE
<p>Picardy Place</p> <p>The planned TRO pays almost no attention to the needs of cyclists attempting to travel west from Broughton Street and Leith Walk. The only minor improvement is the installation of multiple traffic lights at the big roundabout which will slow traffic down.</p> <p>The pre-tram situation at Broughton Street was so dangerous that I did not attempt it; but instead dismounted and used the pedestrian crossings. Leith Walk was little better; but here I just had to take my chance with the traffic. From Broughton Street I could use Albany Street and Dublin Street; but this is very steep.</p> <p>Perhaps a westbound route could be set up via Union Street and Forth Street. The cobbled surface would have to be improved. The crossings at the top of Broughton Street could be altered to be more suitable for cyclists.</p>	<p>During the design of the Edinburgh Tram Network (ETN), cycle facilities alongside the tram route have been provided where road space has permitted it.</p> <p>It is recognised however, that some cyclists do find junctions such as Picardy Place challenging to negotiate and would prefer to use alternative routes. Following early discussions with local cycling organisations, tie Ltd and the Council commissioned an independent study (Edinburgh Tram Integration Study) to identify how cycle facilities will integrate with the ETN and to identify alternative routes for cyclists not on the tram line.</p> <p>The cycling facilities that have been integrated with the ETN at Picardy Place include advance cycle stop lines. The recommended alternative route for cyclists from Broughton Street avoiding Picardy Place would be via Dublin Street, which integrates with the Sustrans national cycle route. As part of the ETN, a new toucan crossing at the end of Dublin Street will allow cyclists to cross Queen Street into the segregated cycleway on North St Andrew Street and then there is the option of continuing along George Street or Princes Street.</p>

### 6.11 Statutory Process

ISSUE	RESPONSE
<p>Although the proposed TRO1 will have a major impact on the environment, aspect and selling of St Mary's RC Cathedral, (which is the principal Church of the Archdiocese), our clients were only made aware of the public deposit period by a third party late last week.</p> <p>Our clients are surprised and disappointed not to have received any notification of this process from the City of Edinburgh Council. Our clients consider that they should have been included in the list of Community Bodies and Organisations found at Appendix 5 of the ETN Statement of Case. Our clients seek an assurance that they will receive notification from the Council of any future consultation about TRO1 or any changes to it or any future TRO which will impact on the Cathedral.</p>	<p>The TRO notification process was carried out in accordance with statutory requirements and extensive consultation was undertaken previously; one of a series of public exhibitions in October 2008 was held in the Cathedral's hall on Little King Street. There was also prior discussion with representatives of St Mary's Cathedral and those discussions informed the final draft of the TRO.</p>

### 6.12 Other Issues

ISSUE	RESPONSE
<p>Our clients also understand that the proposed TRO includes a bus stop and lay-by at the foot of the Cathedral steps. Our clients do not understand why there is the need for a further bus stop at this location. The area is already well served by bus stops in Leith Street and York Place. In addition the provision of a permanent bus stop and lay-by at the foot of the Cathedral steps would adversely affect the view and selling of the Cathedral. It will inevitably encourage groups to</p>	<p>Consistent with the strategic objectives for bus and tram integration, this bus stop is located, in the lay-by, so that it is adjacent to the tram stop and also directly linked to the pedestrian crossings. Additionally, part of this lay-by provides vehicular access facilities to the Cathedral for events. Any buses that are laying over at a bus stop are required by Road Traffic Act 1984, section 98, to switch their engines off. The bus stop and shelter formed part of the design and was subject to</p>

<p>congregate outside the Cathedral which could be disruptive of Services taking place inside. There is also the potential for buses to idle in the lay-by to fit timetable demands.</p> <p>Our clients would urge the Council not to include the proposed bus stop/lay-by in the final version of the TRO.</p>	<p>planning permission through the Prior Approval process, details of which are available on the Council's Planning Portal under the application reference 08/03723/PA.</p>
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## 7. York Place

### 7.1 Access

ISSUE	RESPONSE
<p>York Place (plan 00015) Appears that there is a bus lane Westbound that (effectively) blocks all other traffic exiting Picardy Place. Suspect this has been left in from present-day plan? We note that both the Police and Lothian Buses have queried this, and that Sunday parking restrictions will be introduced via a later TRO.</p>	<p>All existing orders are revoked under this order, hence the existing bus lane will be removed and be replaced with a new bus lane (shown in purple) thus providing an unrestricted westbound lane for all vehicles.</p>

### 7.2 Access

ISSUE	RESPONSE
<p>Elder Street will remain the principal access for the car parks serving the St James Centre and therefore it is very important that good access is maintained. Considerable discussion has therefore taken place with the City of Edinburgh Council, TfE and the bus operators on</p>	<p>All existing orders are revoked under this order, hence the existing bus lane will be removed and replaced with the eastbound bus lane (shown in purple).</p>

<p>the best solution for the Elder Street junction. The agreed layout is attached to this letter and it is clear that this is not reflected in the TRO plans.</p> <p>The key differences are:</p> <ul style="list-style-type: none"> <li>- The eastbound bus lane on York Place is still shown on the TRO plans;</li> <li>- The right turn and tram are shown to share the same lane in an eastbound direction</li> </ul> <p>It is understood that the second series of traffic regulation orders (TRO2) will pick up on these changes for Elder Street and this will be a key requirement for HGI and JLP in removing their holding objection to TRO1.</p>	<p>The TRO1 measures do not prejudice any re-development. Design modifications for the Picardy Place gyratory and the York Place/Elder Street junction, to meet future requirements, have been instructed and these will be brought forward in due course. Any refinements to the Orders coming out of that design review will be required to undergo the statutory consultation process for the promotion of the necessary TRO2 variation order.</p>
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### 7.3 Access

ISSUE	RESPONSE
<p>Proposals to route traffic down Dundas Street and along Abercrombie Place are equally damaging and York Place must, like Shandwick Place be utilised for traffic.</p>	<p>TRO1 contains no proposal to close York Place to general traffic.</p>

21 September 2010

#### 7.4 Other Issues

ISSUE	RESPONSE
Could you please reassure me that you are using the most up-to-date technology on the corner of York Place into St Andrews Square to try to stop any vibration by the trams as they turn this bend? Similarly that the foundations of these two hundred year old buildings are not going to be compromised.	This issue is not relevant to the TRO process, however the design has made provision for minimising vibration from tram vehicles at this location.

#### 7.5 Other Issues

ISSUE	RESPONSE
I would like an artist's impression of what York Place is going to look like once the trams are in place. The New Town could have been avoided altogether (Princes Street being the exception).	The artist impression was provided to this objector when she attended the Exhibition in the Council Chambers.

### 8. Queen Street

#### 8.1 Access

ISSUE	RESPONSE
The banning of the right turn from Queen Street into North St David's Street. This is the only other viable route back to the Regent & Carlton & Royal Terraces from the north and west of the city and the	The right turn ban from Queen Street into North St David Street has been proposed because this junction has a high demand eastbound traffic; hence the road layout with two-lanes to accommodate public

proposed deviation will add significantly to the length of the journey.	transport, taxis and cyclist while the other lane is for general traffic. Additionally traffic modelling shows that if this right turn was opened up then the additional traffic would cause excessive delays at the South St. David Street/Princes Street/Waverley Bridge/South St Andrew Street junctions. The provision of a right turn option would reduce the overall capacity of the junction at this critical location on the road network. Alternative routes are available for traffic heading south at Queen Street/Hanover Street and at Picardy Place.
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## 8.2 Access

ISSUE	RESPONSE
The prohibition on right turns from Queen Street (Eastbound) into North St David Street is not understood. Surely this is a useful/essential route to access Waverley Station and the Bridges for traffic from the West End and Stockbridge? This prohibition may be related to pavement widening on Princes Street between S St David Street and S St Andrews St. This widening seems to be unnecessary and reducing road capacity.	The right turn ban from Queen Street into North St David Street has been proposed because this junction has a high demand eastbound traffic; hence the road layout with two-lanes to accommodate public transport, taxis and cyclist while the other lane is for general traffic. Additionally traffic modelling shows that if this right turn was opened up then the additional traffic would cause excessive delays at the South St. David Street/Princes Street/Waverley Bridge/South St Andrew Street junctions. The provision of a right turn option would reduce the overall capacity of the junction at this critical location on the road network. Alternative routes are available for traffic heading south at Queen Street/Hanover Street and at Picardy Place. The Road Safety Auditor raised concerns with an initial design, with regard to tram turning left (into South St Andrew Street) across the proposed eastbound nearside lane. The design solution was to remove the potential conflict by removing the nearside lane. This then presented an opportunity to widen the footway and shorten the pedestrian crossing width.

## 9. Frederick Street

### 9.1 Parking

ISSUE	RESPONSE
<p>The Council assured that following Tram Works on Princes Street, Disabled Parking would be returned. Together, where possible, town layouts i.e. The end of Frederick Street was closed off at the South with a turning circle there. Disabled Parking Bays were on the S. End next to Princes Street, plus shared bays with loading sections. Taxis were across on the west, all below Rose Street.</p> <p>This is the only access now available for the disabled motorist to use a few amenities on Princes Street, so of the utmost importance.</p> <p>The proposed temporary buses unable to enter the Shandwick Place tram works were formerly re-routed down Queensferry and Melville not Frederick Street (this will necessitate dangerous and illegal U-turns for vans etc). There is work on the corner of Frasers but that could be left for when Shandwick Place complete 2011. Also the Western Approach could bring buses into Haymarket as was done before from Princes Street.</p>	<p>The re-opening of Frederick Street has been necessary to accommodate bus movements as a result of changes to the Mound/Hanover Street/Princes Street junction layout. As a result disabled spaces have had to be moved just north on the same side of Frederick Street, between Rose Street and George Street. This change has created the opportunity to provide an increase in the number of disabled parking spaces.</p>

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## 10. Princes Street

### 10.1 Access

ISSUE	RESPONSE
We object to the proposal to build out the pavement on Princes St, in front of Top Shop/Top Man. This proposal removes one lane of traffic travelling east from St Andrew's Square and will create congestion and add to journey times.	The Road Safety Auditor raised concerns with an initial design, with regard to tram turning left (into South St Andrew Street) across the proposed eastbound nearside lane. The design solution was to remove the potential conflict by removing the nearside lane. This then presented an opportunity to widen the footway and shorten the pedestrian crossing width.

### 10.2 Access

ISSUE	RESPONSE
The narrowing of Princes St at the South Charlotte St junction (and elsewhere) seems to be causing traffic problems elsewhere. Is this necessary or can it be reversed under the TRO process? We note that the Police have commented on this.	Under these proposals the exiting deflection island at this junction is to be removed. As a safety measure to avoid general traffic travelling eastbound on Princes Street making the banned straight ahead manoeuvre, provision has been made to close the access to the inside lane by building out the footway on the east side of the junction. This has the additional benefit of making this crossing more pedestrian friendly and consequently maximise the efficiency of this junction.

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### 10.3 Cycling

ISSUE	RESPONSE
Banned turn from Princes St into South St Andrew St and vice versa: there would appear to be no reason why cyclists could not use this route and it would provide a traffic free route into that of St Andrew Square similar to that provided by North St Andrew St where cyclists are allowed and indeed a cycle facility provided	<p>On the section of South St Andrew Street from Princes Street to Meuse Lane all traffic is prohibited except trams. This is required to allow tram to turn safely into and out of Princes Street. The restricted road width of this junction combined with heavy pedestrian numbers precludes the provision of access for cyclists. Cyclists travelling southbound are permitted to enter the section of South St Andrew Street from St Andrew Square to Meuse Lane which provides access to South St David Street and then Princes Street.</p> <p>The route available for cyclists travelling northbound would be via South St David Street and advance cycle stop lines are proposed at these signalised junctions.</p>

### 10.4 Cycling

ISSUE	RESPONSE
Banned turn from the Mound left into Princes St; we understand a track facility is to be provided here.	<p>Under these proposals the staging of the traffic signals would not allow cyclists to turn left from The Mound as during this stage a pedestrian green man phase would be operating on Princes Street. Consequently to permit the left turn manoeuvre would require an alternative and additional signal stage. This would result in a reduction in the overall capacity of this junction.</p> <p>Notwithstanding this, it is proposed that a non-standard cross-footway</p>

	feature be trialled at this location and, if successful, this can then be utilised elsewhere. Any required modification to the traffic regulations identified by that process will be promoted under the relevant future order.
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## 10.5 Other Issues

ISSUE	RESPONSE
The NTBCC would press strongly for an additional tram stop near the West End junction.	The provision of an additional tram stop near Castle Street has been taken into account within the tram design. At the time of the Edinburgh Tram Network (ETN) opening it is not anticipated that this will be required according to the approved business case. However should additional tram stop capacity be required in the future this could potentially be accommodated.

## 11. Lothian Road

### 11.1 Access

ISSUE	RESPONSE
It appears that there is to be no left turn at all from Lothian Road into Shandwick Place - not even for buses/taxis. Why?	No left turn has been provided from Lothian Road to Shandwick Place on the basis of the approved design. This is because the capacity of this junction cannot accommodate this demand nor can Shandwick Place, accommodate this additional traffic loading, while meeting other demands including the operation requirements of tram to meet the approved Edinburgh Tram Network (ETN) business case.

## 12. Queensferry Street

### 12.1 Access

ISSUE	RESPONSE
I would be most grateful if you could tell me when you will re-open the entrance of Queensferry Street into Shandwick Place, and when Shandwick Place will be cleared to private and commercial traffic.	There are no proposals to re-open Queensferry Street into Shandwick Place for general traffic. All traffic will be permitted to access the city centre via Shandwick Place during the evening (from 20.00 to 07.00) for loading purposes only. The proposed restriction on Shandwick Place is required because of the space required to accommodate the Shandwick Place tram stop, which results in a reduced road capacity in this street. In line with transport policy priority has been given to pedestrians, cyclists and public transport over general traffic.

### 12.2 Other issues

ISSUE	RESPONSE
No clarity on continued presence of bus stops Loss of Taxi rank	There are no changes proposed to taxi ranks or bus stops on Queensferry Street, therefore they are not shown on the TRO drawings.

### 13. West End

#### 13.1 Cycling

ISSUE	RESPONSE
<p>Banned turns:-</p> <p>From Princes St/Rutland Place right into Lothian Rd</p> <p>Lothian Rd left into Shandwick Place Rutland Place</p> <p>Canning St right into Shandwick Place</p> <p>Shandwick Place right into Stafford St</p> <p>These objections all concern the route for cyclists from Shandwick Place at the West End of the New Town to Lothian Rd and vice versa. Lothian Road leads to a 2 way cycle facility in Kings' Stables Rd and the whole route thus forms an important and well used link between the West End and the Old Town and Southside.</p> <p>The banning of these turns would remove the route and cause severe difficulties for cyclists. If the left turn ban from Lothian Rd is banned the alternative route would be over Rutland St, Rutland Square and Canning St, but these cyclists would be banned turning right out of Canning St and so could not enter Stafford St.</p> <p>The banning of the turn into Stafford St means that cyclists cannot easily reach the West End area from Lothian Rd. Although not</p>	<p>Under these Edinburgh Tram Network (ETN) proposals, for safety and operational reasons, there is a right turn ban for all traffic travelling eastbound from Princes Street/Rutland Place into Lothian Road at the West End Junction. This would equally apply if only cyclists were made exempt from this ban.</p> <p>Under these proposals the staging of the traffic signals would not allow cyclists to turn left from Lothian Road as during this stage a pedestrian green man phase would be operating on Shandwick Place. Consequently to permit the left turn manoeuvre would require an alternative and additional signal stage. This would result in a reduction in the overall capacity of this junction.</p> <p>There is a design assumption that there will be no uncontrolled right turn manoeuvres over the tram tracks and alternative access to Stafford Street is available via Coates Crescent</p> <p>Under these ETN proposals, for safety and operational reasons, there is a right turn ban for traffic travelling westbound on Shandwick Place into Stafford Street. This would equally apply if only cyclists were made exempt from this ban.</p> <p>Cyclists travelling southbound in Queensferry Street can travel to King's Stables Road via Hope Street, Charlotte Square, South</p>

specifically banned cyclists will presumably not be able to travel from Lothian Rd into Queensferry St and vice versa, which would otherwise provide a route into Melville St to the West End.	Charlotte Street, Princes Street and Lothian Road or alternatively if approaching from the west via Dewar Place/Canning Street Lane/Western Approach Road/Lothian Road.
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### 13.2 Cycling

ISSUE	RESPONSE
The banning of the left turn from Shandwick Place into Queensferry Street will cause hardship to cyclists	This is an existing ban, so there is no change under this Order. Under these Edinburgh Tram Network (ETN) proposals, for safety and operational reasons, there is a left turn ban for traffic travelling eastbound on Shandwick Place into Queensferry Street. The current proposal permits pedestrians to cross at Queensferry Street, between Princes Street and Shandwick Place at the same time as traffic travelling eastbound into Princes Street from Shandwick Place. Consequently to permit the left turn manoeuvre would require an alternative and additional signal phase for pedestrians only. This would result in a significant reduction in the overall capacity of this junction and consequently cause extensive queuing and therefore ETN would not meet its approved Business Case.

### 13.3 General

ISSUE	RESPONSE
<p>Overview of Concerns</p> <ul style="list-style-type: none"> <li>- This traffic management scheme isolates the streets in the West End from main routes</li> <li>- If the West End is your destination you will find it very difficult to drive direct to any of those streets. The degree of inaccessibility from key locations such as the south side of the city is a major issue for West End businesses</li> <li>- There is a level of impermeability in the plan that makes the West End of Edinburgh city centre a very unfriendly place to visit in a private vehicle</li> <li>- Loss of on street parking space</li> <li>- Continuation of the CETM agenda to remove private vehicles from the city centre area is disastrous for the city.</li> </ul> <p>The West End, and our 'Village' brand, is one of element of a wider retail and leisure offer in our city. The concentration of independents, boutique shopping, and the bars, cafes and restaurants in the West End help Edinburgh differentiate from other destinations.</p> <p>We strongly believe that elements of the proposed scheme will have a</p>	<p>The overview concern appears to centre on the case of accessibility to the west end area in particular and the city centre in general. The overall effect of TRO1 is to accommodate the operation of The Edinburgh Tram Network (ETN), as explained in the Statement of Case. It must be borne in mind that the road capacity within the city is not being increased. The ETN will use some of that fixed road capacity and TRO1 will manage the remaining capacity to accommodate all other road users. The Council's approved TRO strategy recognises that future adjustments may be desirable and those adjustments will be brought forward in TRO2 and TRO3.</p> <p>There is a proposed limited number of lost permit holder parking spaces at Atholl Crescent (9) and Manor Place (2) On Rosebery Crescent the proposal is to reduce regulated public parking spaces (5).</p> <p>Following a series of public exhibitions in October/November 2008, and as a result of concerns raised by businesses at the time, a modification to the proposals was incorporated which allowed traffic to gain access to Stafford Street via Coates Crescent.</p> <p>Notwithstanding this, it is recommended that a design review be undertaken to consider if a Canning Street to Stafford Street routing option can also be provided safely and with minimal impact on the tram operations. If an approved alternative design can be identified, the necessary TRO2 variation order will be required to undergo the</p>

<p>detrimental effect on this area and will without doubt lead to the closure of businesses and damage to many others.</p> <p>There is a very clear danger that any benefits that the tram stop will bring to the area will be outweighed by the damage caused by alterations to access for all other forms of transport.</p>	<p>statutory consultation process.</p>
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## 14. Shandwick Place

### 14.1 Access

ISSUE	RESPONSE
<p>The closure of Shandwick Place to all traffic is seen as a problem. The NTBCC request that CEC/tie reconsider this in light of the inconvenience to residents and businesses, and the impact of diverted traffic in residential areas.</p>	<p>The proposed restrictions on Shandwick Place are a consequence of the road design to accommodate the Edinburgh Tram Network (ETN). On road safety and limited capacity grounds it has been necessary to restrict access on Shandwick Place to tram, buses, taxis and cyclists only. All traffic will be permitted to access the section of Shandwick Place, from Canning Street to Rutland Place/Princes Street, in both directions from 20.00 to 07.00 for loading purposes only, with additional provision of a 24 hour loading bay at the corner of Shandwick Place/Stafford Street.</p> <p>The issue is discussed in detail in the main report , in item 2.1 in Appendix 1 and Appendix 4.</p>

## 14.2 Access

ISSUE	RESPONSE
Lack of clarity on map for turning across Shandwick Place from Crescents — can a private vehicle do this?	It is proposed that Coates Crescent and Atholl Crescent will be one way, eastbound and westbound respectively. General traffic exiting the east end of Coates Crescent is permitted to turn left onto Shandwick Place and then must turn left into Stafford Street, or cross over Shandwick Place into Atholl Crescent. However, all traffic exiting from the west end of Atholl Crescent must proceed west along West Maitland Street.

## 14.3 Access

ISSUE	RESPONSE
<p>Canning Street:- Closure to private vehicle traffic is severely disruptive to business.</p> <p>Lack of right turn from Canning Street into Stafford Street is severely disruptive to business</p> <p>Need to retain private vehicle access into Stafford Street from Canning Street.</p>	<p>There is a design assumption that there will be no uncontrolled right turn manoeuvres over the tram tracks and alternative access to Stafford Street is available via Coates Crescent.</p> <p>The capacity and new layout of this junction precludes access by general traffic.</p> <p>Notwithstanding this, it is recommended that a design review be undertaken to consider if a Canning Street to Stafford Street routing option can also be provided safely and with minimal impact on the tram operations. If an approved alternative design can be identified, the necessary TRO2 variation order will be required to undergo the statutory consultation process.</p>

#### 14.4 Access

ISSUE	RESPONSE
Object to the Traffic Regulation Orders proposed for Shandwick Place and Atholl Crescent. Particular objection is made to the proposals barring private motor traffic from these areas.	The proposal is to restrict general traffic from Shandwick Place, except for the eastbound access from Coates Crescent to Stafford Street and Atholl Crescent. These measures are necessary primarily on safety and road capacity grounds and also takes into consideration the impact of the tram stop within Shandwick Place. These restrictions are necessary to allow the Edinburgh Tram Network (ETN) to operate in accordance with its approved business case.

#### 14.5 Parking/Loading

ISSUE	RESPONSE
Stafford Street:- Loading Bay is unacceptable to businesses in that location  Loss of on street parking bays not acceptable	The provision of the new loading bay is necessary to provide facilities adjacent to properties on Shandwick Place, because Shandwick Place will be closed to HGVs and LGVs from 7 am through to 8pm; hence this provision is proposed to permit reasonable access for loading. Further, according to Council parking surveys, there is typically pay parking availability on Melville Street, which is adjacent to Stafford Street.

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#### 14.6 Parking

ISSUE	RESPONSE
Object to the loss of parking bays on the Crescents	There is no change in the parking provision for Coates Crescent, while the only proposed change in Atholl Crescent is the removal of 8 permit holder parking spaces at the western end and the loss of 1 public parking bay at the eastern end of this crescent.

#### 14.7 Environment

ISSUE	RESPONSE
<p>I write to object to the proposals contained in Traffic Regulation Order 1 (TRO1) and in particular, the proposal that Shandwick Place remains closed to private and commercial vehicles. The resulting displacement of traffic through the residential areas of the West End and Moray Feu is unacceptable for a number of reasons:</p> <p>1. levels of noise pollution and traffic pollution - my understanding is that levels of noise and traffic pollution created by the current displacement of traffic resulting from the Temporary Traffic Regulation Order (TTRO) already breach legal limits - is this correct? Please provide details of:</p> <p>a. CEC investigations into the impact to date on levels of noise and traffic pollution of the displacement of traffic through the West End and Moray Feu caused by the TTRO;</p>	<p>In response to the submission from the Moray Feu the Council make the following comments:</p> <p><b>Air quality data.</b></p> <p>Monthly monitoring using passive diffusion tubes (pdt) was established on Great Stuart Street in July 2009 for the pollutant nitrogen dioxide. This was at the request of Councillor Mowat on behalf of local residents due to their concerns regarding the potential impact on air quality of traffic increases arising from temporary diversions set up to facilitate tram utility diversion works.</p> <p>This is standard practice inasmuch as the Council consider any such representations and respond accordingly; in recent times the Council have introduced monitoring sites at two locations — Queensferry Road/Barnton roundabout and Whitehouse Road — where similar,</p>

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<p>b. CEC's plans for ongoing monitoring of levels of pollution in the area and the remedial actions it will take should these levels be exceeded; and</p> <p>c. on what basis CEC is satisfied that the increased levels of pollution caused by a permanent closure of Shandwick Place will not result in a breach of legal limits.</p> <p>2. potential damage to property - please provide details of:</p> <p>a. CEC investigations into potential damage to local properties from the displacement of traffic through the West End and Moray Feu, and how CEC intends to mitigate against risk of any such damage; and</p> <p>b. CEC's duty of care to local property owners in the event of damage to property, and the extent of CEC's potential liability for the same.</p> <p>3. heritage - the New Town, of which Moray Feu is part, currently enjoys World Heritage status. Please provide details of CEC's discussions with UNESCO regarding the effect of displacement of traffic through the New Town on such status.</p>	<p>traffic-related, concerns have been raised.</p> <p>Interim updates of the monitoring results for Great Stuart Street were provided on 01.10.2010 to Councillor Mowat and to Councillor Beckett on 06.11.2010. Although the three months of kerbside raw data for July, August and September met with the annual average standard it was stated at the time that <b>a full year of monthly data was required in order to ascertain compliance with the UK National Air Quality Standards.</b></p> <p>Raw annual passive diffusion tube data requires to be corrected in keeping with government guidance due to the overestimated concentrations of nitrogen dioxide associated with this method of monitoring. Nitrogen dioxide concentrations rapidly decrease with distance from source; for example, the concentrations at the kerb edge are much higher than at the building façade. Therefore, a distance correction factor also requires to be applied in order to assess relevant exposure (at the building façade).</p> <p>The data for the month of December was very high in comparison to previous monthly concentrations. Measurements in December were more than double the average concentration from July to November. The Council are not aware of any significant change in traffic patterns or traffic volumes over that period which might explain the data peak.</p> <p>Data gathered from the Council's real time automated sites in December also showed large increases, including the urban background monitoring station at St Leonard's, which recorded a concentration of 48µg/m<sup>3</sup>. This site is set back from the road and therefore not influenced by local traffic sources. The increase during</p>
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December (as shown in Table 1) is more likely to be caused by atmospheric conditions. Concentrations over winter months are generally higher compared with data gathered during the summer.

The locations of the real time monitoring units (which the residents used in the comparison study) are kerb, urban background and a combination of roadside locations, which are varying distances from the kerb edge. The only site, which is a kerbside equivalent, is St John's Road. Although, it is inappropriate to make a direct comparison of 'raw monthly' passive diffusion tube data with real-time monitoring, the monthly values for Great Stuart Street are much lower when compared with St John's Road, apart from the month of December, as shown in Table1 below.

Therefore, it is incorrect to claim that Great Stuart Street is the most polluted street in Edinburgh based on December's monitoring data.

**Table 1**

SITE	Jul	Aug	Sept	Oct	Nov	Dec
St John's Road	51	58	63	71	74	100
Gt Stuart Street (pdt)	34	34	40	49	46	93

The unit, which has been used by the residents to monitor nitrogen dioxide, is known as a MOTES system. An electrochemical sensor

	<p>device is the component used to detect nitrogen dioxide concentrations. This methodology is still in the early stages of development with respect to how it compares with real time data gathered from government approved monitoring equipment. According to information supplied from Newcastle University, the electrochemical sensor for detecting nitrogen dioxide also measures the gas ozone and therefore there is cross sensitivity.</p> <p>The nitrogen dioxide sensor within the MOTES unit is calibrated once prior to installation. Air quality monitoring in the UK is subject to stringent government requirements regarding the calibration methodology undertaken on site, quality assurance and quality control procedures for data handling.</p> <p>Data gathered by the residents indicates that concentrations at Randolph Crescent are often higher in the evening and at night compared with measurements obtained during the day for the month of February (Figure 3). It is not unusual to have higher concentrations at night in the cold winter months. The monitoring data gathered from St Leonard's Air Quality Monitoring Station (Urban Background location) is also high in the evenings and at night during February. On 13 February, the average nitrogen dioxide concentration at St Leonard's between the hours of 7:00 and 18:00 was <math>57\mu\text{g}/\text{m}^3</math> and between the hours of 19:00 and 24:00 was <math>78\mu\text{g}/\text{m}^3</math>. The reason for higher levels in the evening and at night is most likely attributed to colder air movements creating atmospheric inversions and use of domestic space heating.</p> <p>The residents have assumed that the higher concentrations of nitrogen dioxide at night in Randolph Crescent are possibly caused by</p>
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	<p>heavy goods vehicles (HGVs). To support this assumption, evidence with respect to volume of traffic and vehicle class type would need to be gathered and compared with real time nitrogen dioxide data over the same period.</p> <p>The Council has now completed their calibration and analysis of the July to December 2009 data and found that nitrogen dioxide levels are within accepted EU limits for this 6 month period; the recorded average figure of <math>49.2\mu\text{g}/\text{m}^3</math> when corrected in line with government guidance gives <math>33\mu\text{g}/\text{m}^3</math>, i.e. below the <math>40\mu\text{g}/\text{m}^3</math> annual limit set by the EU.</p> <p>The Council has also received advice from Edinburgh University Atmospheric Chemistry Department, who have advised that it is unlikely that nitrogen dioxide levels would build up to unacceptable levels in basement areas based on the levels that the Council has collected at the kerbside.</p> <p><b><u>Noise &amp; Vibration Issues</u></b></p> <p>Details of the methodology employed for measuring the road traffic noise are not available so it is difficult to comment on the appropriateness of the data.</p> <p>Generally, noise measurements are undertaken in conjunction with International Standards Organisation guidance and the relevant British Standard (BS) equivalents, for example BS 7445 - <i>Description and Measurement of Environmental Noise</i>. An important aspect of carrying out noise monitoring is to ensure the accuracy of the monitoring equipment, which usually means calibrations should be carried out</p>
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	<p>before and after each measurement. Lord Moray's Feuars contacted Services for Communities on two occasions to carry out calibrations (with the Council's equipment). This indicates that calibration of the equipment may be insufficient to provide reliable data.</p> <p>The data provided in the letter of 17<sup>th</sup> March 2010 shows averaging of maximum and minimum levels. It is not possible to determine scientific interpretation of this method of analysis.</p> <p>Road traffic noise is normally expressed as <math>LA_{10}</math> 18hrs, which is the arithmetic average of the 18 hourly <math>LA_{10}</math> 1h values from 06.00 to 24.00 hours. (<math>LA_{10}</math> represents the weighted level of noise exceeded for 10% of the measurement period.)</p> <p>The document, <i>The Calculation of Road Traffic Noise (CoRTN)</i>, which was issued by the Department of Transport in 1988, describes the procedures for calculating noise from road traffic. These procedures are necessary to enable entitlement under the Noise Insulation Regulations to be determined, but they also provide guidance appropriate to the calculation of traffic noise for more general applications and should be used where noise impact assessments are carried out.</p> <p>There is some reference in the letter to noise levels during the day, evening and night, however it is normal practice to provide an 18hr figure as specified above. The European Directive for noise mapping specifies noise as <math>L_{den}</math>, ('den' representing day, evening and night) however the calculation of this is complex and used for the purpose of strategic planning rather than for individual cases.</p>
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	<p><b><u>Conclusion</u></b></p> <p>The Council note the surveys which have been undertaken in Great Stuart Street on behalf of the Moray Feu Residents Association and the interpretation which has been put on Council-sourced data and note a number of concerns with both pieces of work.</p> <p>With regard to their interpretation of the Council's air quality data the key concern is that it is not possible to draw conclusions from short-term data but it takes at least a year's data to establish compliance or otherwise with national air quality targets. The Moray Feu do not acknowledge this fact in their presentation of the data. Not only that but the figures cited are "raw" and have not therefore had the appropriate corrections applied to them. <b>So any conclusion arrived at by the Moray Feu on the basis of the Council's short-term, raw data is unreliable.</b></p> <p>With regard to the data collected on behalf of the Moray Feu the Council have a number of concerns. It is noted that the equipment used by the Moray Feu to monitor air quality is not type approved and that the stringent calibration and quality control requirements which the Council must comply with when gathering such data have not been adhered to. There are similar concerns with the noise data. <b>So again the Council would assert that any conclusions arrived at by the Moray Feu on the basis of this data are unreliable.</b></p> <p>Notwithstanding the above, and recognising the concerns raised by objectors about the wider-area impact of the Shandwick Place</p>
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	<p>measures, it is recommended that workshops be set up to engage with the local communities to investigate and consider potential mitigation measures.</p> <p>The Council is not responsible for the maintenance of private properties adjacent to the road, unless damage is linked to actual road works nearby. This does not apply to an increase in traffic, so any deterioration experienced to date is a matter for individual owners.</p> <p>UNESCO have corresponded with the Council on the matter and have been advised that it is the Council's view that the scheme "...does not impact on the outstanding universal value (OUV) of the site but it is understood that care needs to be taken to ensure that any traffic management measures and the accompanying infrastructure are in line with the Council's adopted Edinburgh Standard for Streets that recognises the significance of the world heritage site and the need for sensitivity within it".</p> <p>UNESCO have also been advised that "the Council recognise the need to set targets for traffic reduction, particularly in the city centre: the Council's Local Transport Strategy 2007-2012 discusses this in detail. The introduction of a tram system which runs from east to west through the breadth of the world heritage site will help by providing a modern, fast and efficient mechanism for moving large numbers of people around the city".</p>
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#### 14.8 Environment

ISSUE	RESPONSE
<p>We object to TRO/09/60A because of the compelling evidence that there is likely to be a direct impact on the health of residents from the increased noise, vibration and air pollution - none of which have yet been adequately measured, modelled and assessed by The City of Edinburgh Council or tie.</p> <p>We are confident that the potential impact on health is so serious that Shandwick Place should be immediately re-opened to take pressure off these residential streets and not closed until an adequate assessment of the impact of the TRO/09/60A on health has been carried out.</p>	<p>Air and noise quality issues are discussed in detail in Item 14.7 above.</p>

#### 14.9 Other Issues

ISSUE	RESPONSE
<p>Loss of crossing point at westerly extremity of Shandwick Place (LaPiana)</p>	<p>While it is proposed to remove this crossing it is proposed to replace it with a nearby alternative crossing at the eastern end of the Shandwick Place tram stop and also an uncontrolled crossing halfway between Canning Street and Rutland Place.</p>

#### 14.10 Other Issues

ISSUE	RESPONSE
Move of bus stops on the Crescents not clarified — where have they gone?	There is a redistribution of bus stops in this area, with some of the buses allocated to the existing stops on Shandwick Place, adjacent to the shops, while a new stop is proposed to be provided on Shandwick Place at its junction with Atholl Crescent Lane.

#### 14.11 Other Issues

ISSUE	RESPONSE
Canning Street:-  Proposed Taxi rank is poorly positioned and of little practical use.	The location of this taxi rank has emerged through the consultation process.

#### 14.12 Other Issues

ISSUE	RESPONSE
We also object to the proposed treatment of the garden area between Coates and Atholl Crescents. The proposal to fell the trees is strongly disapproved; the trees should be preserved and the railings replaced.	Due to the limited available road space in Shandwick Place it has been necessary to relocate the footways adjacent to the proposed tram stop into the gardens of these crescents. The removal of trees is not a TRO issue however any trees that require to be felled have followed the required planning process for approval.

## 15. West Maitland Street

### 15.1 Cycling

ISSUE	RESPONSE
Banned turn from Palmerston Place left into West Maitland St/Coates Place. There appears to be no reason why this manoeuvre should not be permitted for cyclists and indeed there would probably be a bus exemption if any buses were to use this route.	Under these proposals the staging of the traffic signals would not allow cyclists to turn left from Palmerston Place as during this stage a pedestrian green man phase would be operating on Coates Place, however cyclists would be able to turn left from the next junction at Manor Place.

### 15.2 Cycling

ISSUE	RESPONSE
Banned turn from West Maitland St right into Manor Place; if cyclists are not granted exemption they will have to travel much further if going from Shandwick Place towards Palmerston Place area.	<p>General traffic is restricted to the nearside westbound lane for safety and operational reasons and it is not practical to provide a right turn facility across the offside (trams and buses only) lane.</p> <p>An alternative right turn for cyclists travelling westbound would be to turn right into Hope Street from Princes Street at the West End junction.</p>

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## 16. Palmerston Place

### 16.1 Access

ISSUE	RESPONSE
Lack of clarity of traffic management north of Palmerston Place — this appears to be the only access point into the West End for traffic travelling from the South side of the city	There are no proposed changes on Palmerston Place, except at its junction with West Maitland Street. However, once the Edinburgh Tram Network (ETN) becomes operational the Council will monitor the traffic impact and consider any appropriate changes should this be required.

## 17. Haymarket

### 17.1 Cycling

ISSUE	RESPONSE
Banned turn from Dalry Rd left into Clifton Terrace / Haymarket. This manoeuvre has cycle exemption at present although no cycle facility is provided. If exemption is not given, cyclists will have a long detour via a gyratory system.	These proposals do not change the existing cycling arrangements at this junction.

## 17.2 Other Issues

ISSUE	RESPONSE
<p>We represent Tiger Developments in relation to the redevelopment of the former Morrison Street Goods Yard site. On behalf of our clients, we wish to lodge a holding objection to the Traffic Regulation Orders and look forward to discussing our client's concerns further with you.</p> <p>In particular we would ask you to note that we are currently engaging with The City of Edinburgh Council, in the preparation of a new masterplan for the former Morrison Street Goods Yard site. We understand that the tram will run on-street through the Haymarket junction and then move off-street to the tram stop located on a new Haymarket viaduct to the west of the railway station, adjacent to the railway station car park.</p> <p>We are designing a new masterplan, in accordance with the Council's 'Haymarket Development Framework' which forms supplementary planning guidance in relation to any decisions on planning applications within the wider Haymarket area. The Statement of Case for the Traffic Regulation Orders (February 2010), acknowledges in Appendix 2, Part 1.9, the high peak pedestrian flows to and from Haymarket Station. Reference is also made to improved pedestrian facilities to be provided at the Haymarket junction to better accommodate the peak flows, with for example a staggered crossing on the Dalry Road part of this junction. It is indeed this particular pedestrian crossing that we have concerns about in terms of linking pedestrians between Haymarket Station, through our client's site and beyond towards the</p>	<p>The proposed TRO1 meets the necessary requirements to operate the Edinburgh Tram Network (ETN). If further measures are necessary to accommodate development a separate, subsequent TRO could be promoted on behalf of the developer. It should be noted that TRO1 improves pedestrian facilities, including increased capacity at the pedestrian crossing at Dalry Road.</p>

Exchange area.	
We would be pleased to discuss our concerns further with you in order that we can agree a more satisfactory link between Haymarket Station, our client's site and beyond.	

## 18. Wider Area

### 18.1 Other Issues

ISSUE	RESPONSE
<p>The NTBCC Transport Committee, along with some of the local residents' associations, have been examining the preliminary tranche 1 Tram TROs. The NTBCC position is that we cannot support all aspects of Tranche 1 as we do not yet know the compensatory provisions that may be on the Tranche 2 TRO.</p> <p>The best example, and our key concern, is the way in which the Moray Feus are being used as a through traffic route for Northbound traffic at the West End of Princes Street. The arrangements at Hope Street and Charlotte Square outlined in Tranche 1 imply that all traffic from Queen Street and Lothian Road to Queensferry Street will be routed via the Moray Feus. This is not acceptable to the NTBCC and goes against our understanding that the present routing via the Feus was a temporary arrangement for the train construction phase only.</p> <p>There is no traffic permitted from Lothian Road to Queensferry Street, and no left turn to Shandwick Place. This implies that the Moray Feus</p>	<p>City centre traffic volumes indicate a steady increase year on year. Following the introduction of the Edinburgh Tram Network (ETN) there will be a redistribution of general traffic on an area wide basis. This will include the route, in both directions, through the Moray Feus from Randolph Crescent to St Colme Street. This consequence of the ETN was reported to the Transport, Infrastructure and Environment Committee in Easter 2009. At that time the Council approved the eastbound opening of Hope Street to all traffic.</p> <p>The objection asserts that all traffic will be routed through the Moray Feus from Lothian Road to the north west. The traffic model indicates that traffic heading north west distributes to a number of streets including the Western Approach Road and St Colme Street. It should be noted that the current relaxation of the banned left turn from North Charlotte Street to St Colme Street is a temporary measure and the ban will be reinstated once works are completed and the ETN is operational, and this is reflected in the modelling.</p>

will be used as a permanent route from Lothian Road to the NW. This is not acceptable and is believed to have been allowed only as a temporary measure during utility/construction works. More information is needed on all permanent diversion routes. It is noted that the Lothian Road - Queensferry Street ban is not mentioned in the TRO Explanatory Note of 11 Nov 2009 The NTBCC do note that signage is being considered for Lothian Road, to send Northbound traffic via the West Approach Road and Manor Place (and we note that the Police have commented on this also).	
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## 18.2 Other Issues

ISSUE	RESPONSE
The NTBCC expect that the no-left-turn from North Charlotte Street into St Colme Street will be reinstated at Tranche 2.	The reinstatement of the left turn from North Charlotte Street into St Colme Street does not form part of the Edinburgh Tram Network (ETN) TRO proposals. The relaxation of the banned manoeuvre operates under a temporary Traffic Regulation Order (TTRO) which has been implemented to accommodate the tram works (both the utility and infrastructure works) and the banned turn will be reinstated when the temporary Order is lifted.

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### 18.3 Other Issues

ISSUE	RESPONSE
<p>Neither the current TRO nor the proposed TRO make any attempt to minimise the likely increase in E/W traffic flows along mainly residential streets in the New Town and the West End.</p> <p>The problem in the two worst-affected streets, Ainslie Place and Great Stuart Street, is likely to be needlessly exacerbated by the decision to close the South end of Queensferry Street to general traffic. This means that the shortest routes for N/S traffic between the Dean Bridge and Tollcross will also lie along Ainslie Place and Great Stuart Street.</p>	<p>The intention of these proposals is to continue to facilitate local access. It is not proposed to re-route traffic, rather traffic will find alternative routes both within the city centre as well as the wider city road network.</p> <p>The proposed Edinburgh Tram Network (ETN) TRO1 will permit southbound traffic to be routed via Queensferry Street/Hope Street/Charlotte Square and South Charlotte Street and onwards to Lothian Road and Tollcross, as an alternative to using Great Stuart Street and Ainslie Place. Consequently eastbound traffic on Queensferry Street can access Queen Street via Hope Street/Charlotte Square and North Charlotte Street.</p>

### 18.4 Other Issues

ISSUE	RESPONSE
<p>I write to object to the proposals contained in Traffic Regulation Order 1 (TRO1) and in particular, the proposal that Shandwick Place remains closed to private and commercial vehicles. The resulting displacement of traffic through the residential areas of the West End and Moray Feu is unacceptable for a number of reasons:</p>	<p>Air and noise quality issues are discussed in detail in Item 14.7 above.</p>

1. levels of noise pollution and traffic pollution - my understanding is that levels of noise and traffic pollution created by the current displacement of traffic resulting from the Temporary Traffic Regulation Order (TTRO) already breach legal limits - is this correct? Please provide details of:

- a. CEC investigations into the impact to date on levels of noise and traffic pollution of the displacement of traffic through the West End and Moray Feu caused by the TTRO;
- b. CEC's plans for ongoing monitoring of levels of pollution in the area and the remedial actions it will take should these levels be exceeded; and
- c. on what basis CEC is satisfied that the increased levels of pollution caused by a permanent closure of Shandwick Place will not result in a breach of legal limits.

2. potential damage to property - please provide details of:

- a. CEC investigations into potential damage to local properties from the displacement of traffic through the West End and Moray Feu, and how CEC intends to mitigate against risk of any such damage; and
- b. CEC's duty of care to local property owners in the event of damage to property, and the extent of CEC's potential liability for the same.

3. heritage - the New Town, of which Moray Feu is part, currently enjoys World Heritage status. Please provide details of CEC's discussions with UNESCO regarding the effect of displacement of traffic through the New Town on such status.

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### 18.5 Other Issues

ISSUE	RESPONSE
<p>We object to TRO/09/60A because of the compelling evidence that there is likely to be a direct impact on the health of residents from the increased noise, vibration and air pollution - none of which have yet been adequately measured, modelled and assessed by The City of Edinburgh Council or tie.</p> <p>We are confident that the potential impact on health is so serious that Shandwick Place should be immediately re-opened to take pressure off these residential streets and not closed until an adequate assessment of the impact of the TRO/09/60A on health has been carried out.</p>	<p>Air and noise quality issues are discussed in detail in Item 14.7 above.</p>

### 18.6 Other Issues

ISSUE	RESPONSE
<p>Undertake a Health Impact Assessment of the proposed TRO and the impact of the introduction of the Trams on residents living in the West End / Moray Feuars area of the City. This HIA to be carried out by NHS Lothian Public Health Department and its findings and recommendations be publicly available.</p>	<p>A Health Impact Assessment is not required under the TRO legislation.</p>

### 18.7 Other Issues

ISSUE	RESPONSE
<p>Another objection arises out of the actual conditions experienced during the currency of the temporary Orders, which turned a number of side streets into main thoroughfares. Shandwick Place and the central highway between Atholl and Coates Crescent were always intended as main thoroughfares and fulfil that function well. While we believe in the permeability and use of side streets to facilitate traffic movements around the city, their main function is for local access and it is an abuse to permanently divert into them principal lines of traffic which would otherwise use main arteries such as Shandwick Place.</p> <p>Whilst applauding the overall intentions of the Council's transport strategy, in which the Tram project plays such a large part, I write as someone who lives and works in central Edinburgh to object to the proposal to close city centre streets in general, and Shandwick Place in particular, to private and commercial vehicles.</p>	<p>To accommodate the Edinburgh Tram Network (ETN) infrastructure and to allow the tram to operate in accordance with its approved business case, the designers found it necessary to restrict access on Shandwick Place during tram operational times to trams, buses, taxis and cycles only; key issues the designers had to contend with were overall reduction in road capacity and consequential road safety concerns. (This is discussed in greater depth in the background papers to this report).</p>

### 18.8 Other Issues

ISSUE	RESPONSE
<p>There is clearly a balance to be struck in order to allow trams to operate effectively, but, as the TRO information leaflet says, "the challenge is not unique to Edinburgh". In the context of cities with tram networks, the proposed frequency of our tram services is unusually</p>	<p>The frequency of trams is consistent with the approved Business Case. It is intended to commence operations in Shandwick Place with twelve trams per hour in each direction.</p> <p>Recognising the impact these design features have on access, the</p>

<p>low.</p> <p>It has been shown during the construction period that the knock-on effects of displacing traffic from Shandwick Place are devastating to the commercial effectiveness and residential amenity of the city centre. It is important that these "temporary" problems, which residents and businesses have borne with great fortitude, do not become permanent.</p> <p>There are proven means of giving on-street priority to public transport - the traffic lights controlling traffic at bus priority lanes represent just one local example - and this is especially easy to achieve when the frequency of service is so low.</p>	<p>TRO proposals have been drafted to permit all traffic to access the section of Shandwick Place, from Canning Street to Rutland Place/Princes Street, in both directions from 20.00 to 07.00 (i.e. outwith peak bus operational times) for loading purposes only. Alternative access to Stafford Street is also available via Coates Crescent (left into Shandwick Place from the east end of Coates Crescent and left again into Stafford Street).</p> <p>The signalisation of both tram and general traffic has been integrated while providing the necessary priority to the Edinburgh Tram Network (ETN) so that it complies with the requirements for run-times as set out in the approved Business Case.</p>
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## 18.9 Other Issues

ISSUE	RESPONSE
<p>Having looked at the documentation on your website, we do not see a clear analysis of how the proposals will impact adjacent areas, many of which are residential. Our specific concern is the proposal for Shandwick Place; no details are readily provided to illustrate where the displaced traffic will go.</p> <p>We note in your Edinburgh Tram TRO leaflet your comments that</p> <p>1. 'everything possible has been done to balance the needs of all road users'; we feel that the impact of the trams should also be balanced with the needs of local residents. Your website does not easily show</p>	<p>TRO1 primarily relates to moving and stationary measures along the tram route between Haymarket and Newhaven. Where it has been identified that there could be impacts on adjacent areas these are being considered separately by the Council. Following the Edinburgh Tram Network (ETN) becoming operational the Council will monitor the situation and if appropriate bring forward modifications.</p> <p>The issues are discussed in detail in Item 2.1 in Appendix 1 and Item 14.7 above.</p> <p>The key benefit of an integrated public transport system is that more</p>

<p>where the needs of local residents have been considered.</p> <p>2. 'a benefit of trams is less congestion - less pollution &amp; noise'; we feel that this is not a valid comment if it results in 'more congestion - more pollution &amp; noise' in adjacent areas, particularly residential ones.</p> <p>We do not feel from your website that we were able to easily find information that addresses these issues; this is a major failing for a public consultation process.</p>	<p>people will use it to access the city as public transport has a greater capacity to carry people than private cars. The ETN business case, 1.34, states that there is typically a 10% modal shift from car to tram. This will potentially result in fewer emissions. So the potential exists for the new integrated public transport to carry the same number of people using more public transport and fewer private cars. This will result in fewer emissions and less congestion. This is particularly relevant to the air quality management area in the city centre, through which the ETN is routed.</p> <p>The ETN Traffic Modelling Report (January 2010) formed part of the background information provided for the Public Deposit stage for these proposals. Section 8 and the Appendix of this document sets out the predicted traffic flows in the city centre road network, on and adjacent to the tram route, during the am and pm peak periods with ETN operational.</p> <p>The comments on documentation are noted. However, the TRO statutory requirements have been met.</p>
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#### 18.10 Other Issues

ISSUE	RESPONSE
<p>As a result of traffic planning by CEC, Great Stuart Street is set to become, or may indeed already be, the most polluted street in Edinburgh. If it is to be effectively re-classified by CEC as the primary traffic route between Queensferry Street and Queen Street, then it will be expected to carry even more traffic according to the expected</p>	<p>The issues are discussed in detail in Item 2.1 in Appendix 1 and Item 14.7 above.</p> <p>Randolph Crescent, Great Stuart Street, Ainslie Place and St Colme Street are local distributor roads within the city's road network</p>

<p>growth in traffic up to 2011, and significantly thereafter if the second Forth crossing is built and TRO/09/76 is used to provide more parking spaces for the travelling public within Edinburgh.</p> <p>We contend that this established residential area does not have the capacity to take this traffic under any scenario, and that far from being the 'success' described by tie, the experiment of diverting all general traffic down Randolph Crescent and Great Stuart Street has simply demonstrated that displacing traffic from commercial thoroughfares to narrow residential street is unsafe for all concerned.</p>	<p>providing access to the city centre for the travelling public. This will continue to be the case but there are no plans to change the classification of this route at the present time.</p> <p>It should be noted that in the event that a section of a road, which is a designated main route, has restricted access, then the alternative route may be signed with the designation of the original route shown in brackets. This provides the travelling public with clear direction round the local traffic management scheme. In that context this route has historically been signposted eastbound as a route to the A1 and westbound as a route to the A90.</p>
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#### 18.11 Other Issues

ISSUE	RESPONSE
<p>The west section of Great Stuart Street now carries much of the traffic between North-East Edinburgh and the A70, A71, A8 and A90, which includes significant use by heavy goods vehicles at night (along with Randolph Crescent, Ainslie Place and St Colme Street).</p>	<p>The design is based on the premise that it is primarily local traffic accessing the city centre that will be using these streets.</p> <p>Randolph Crescent, Great Stuart Street, Ainslie Place and St Colme Street are local distributor roads within the city's road network providing access to the city centre for the travelling public. This will continue to be the case as there are no plans to change the classification of this route at the present time.</p> <p>Under these proposals all traffic will be permitted to access both Princes Street and Shandwick Place in both directions from 20.00 to 07.00 for loading purposes only.</p>

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### 18.12 Other Issues

ISSUE	RESPONSE
<p>Concern over the likelihood of even higher levels of pollution than those being experienced now and CEC's failure to monitor these adequately.</p> <p>The greatly increased level of air pollutions obvious to anyone parking a car for a few hours in Randolph Crescent. Imagine the effect this heavy particle pollution is having on the health of the youngest and oldest in our community. CEC should be monitoring these levels adequately.</p>	<p>The issues are discussed in detail in Item 2.1 in Appendix 1 and Item 14.7 above.</p> <p>There is no evidence that the air quality exceeds the NO2 annual average. Recent local reading did not form a sample that could be compared with long term data. The Council has increased the monitoring in this area and depending on the outcome will take what ever action is appropriate.</p>

### 18.13 Other Issues

ISSUE	RESPONSE
<p>The traffic flows generate significant pollution. We can frequently smell exhaust fumes inside the ground floor room of our flat which looks out onto Randolph Crescent. The Council's own measurements show that nitrogen dioxide levels in Great Stuart Street significantly exceed the levels recorded in other streets in Edinburgh which have a largely commercial use. The levels experienced by residents are well in excess of the levels stipulated by EU and Scottish legal standards.</p>	<p>The issues are discussed in detail in Item 2.1 in Appendix 1 and Item 14.7 above.</p> <p>There is no evidence that the air quality exceeds the NO2 annual average. Recent local reading did not form a sample that could be compared with long term data. The Council has increased the monitoring in this area and depending on the outcome will take what ever action is appropriate.</p>

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#### 18.14 Other Issues

ISSUE	RESPONSE
I also harbour great concerns over the proposal to re-route traffic through Manor Place and Palmerston Place, Residents of the West End crescents and the area around Great Stuart Street have already suffered a great deal as a result of re-routed traffic and the proposals will be of great detriment to the quality of life of local residents. No consideration seems to have been taken of the fact that the roads were not built to cope with the level of traffic and the resulting increase in noise and air pollution in residential areas serves no benefit to those who live in the City Centre.	The intention of these proposals is to continue to facilitate local access. It is not proposed to re-route traffic, rather traffic will find alternative routes both within the city centre as well as the wider city road network.

#### 18.15 Other Issues

ISSUE	RESPONSE
Residents in the Moray Feu are prevented from taking measures to minimise the invasive noise levels by City of Edinburgh Council policy which prevents World Heritage protected properties from having crown glass replaced, sash windows replaced with double glazing or the installation of noise dampening glass.	Any restriction on alterations to windows is under Listed Building or Conservation Area legislation. World Heritage status does not result in any additional controls. In terms of the current Council Guideline on Window Replacement, sealed unit double glazing is allowed in conservation areas and Category C(S) listed buildings. The only current restriction on the installation of sealed units is in Category 'A' and 'B' listed buildings. However, this restriction is subject to a current review which recommends that slim profile glazing (with a space between the 2 sheets of glass of less than 6mm) is acceptable on Category 'A' and 'B' listed building. The only restriction in terms of the review is in the very limited number of cases where original historic

	<p>glass remains.</p> <p>It should also be noted that sealed unit double glazing is not an effective means of providing sound attenuation. An air gap of a minimum 100mm is recommended to provide a good standard of sound attenuation. This can be achieved by installing secondary double glazing. There are no restrictions on secondary double glazing for listed buildings.</p>
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#### 18.16 Other Issues

ISSUE	RESPONSE
<p>The total volumes of traffic and the speed at which they travel has left Moray Feu residents, particularly older people and young families, facing considerable difficulties crossing the roads within their own neighbourhood. Sporadic suspension of entire swathes of resident parking places has caused real difficulties for those with mobility difficulties covered by the Disability Discrimination Act but not sufficient for a blue badge.</p>	<p>The comments relate to the temporary orders that were required to support the tram works and there is no intention to suspend residents parking under these proposals.</p>

### 18.17 Other Issues

ISSUE	RESPONSE
At a consultative meeting in 2008 a senior representative of TIE when asked about the impact of displaced traffic on adjoining streets stated "It is not the responsibility of TIE to consider the impact of trams on additional traffic through residential areas". It may not be TIE's responsibility it is most certainly the responsibility of you, the elected representatives of the citizens of this wonderful city!	The TRO1 proposals cover the traffic management measures required along the Edinburgh Tram Network (ETN) route. The Council acknowledges that these measures will have wider area impacts and consequently have committed to carrying out monitoring of these areas once ETN is operational and take appropriate action where necessary.

### 18.18 Other Issues

ISSUE	RESPONSE
The vehicle and road geometry of the crescents, from Randolph Crescent through to Queen Street are not suitable, nor safe for the current capacity, far less increased; there is only one pedestrian crossing, narrow pavements sharp road edges not suitable for large vehicle manoeuvres. If a new road were to be designed for the new capacity, it would and could, particularly for safety reasons, never look like the Great Stuart Street and Ainslie Place layouts.	<p>The TRO1 proposals cover the traffic management measures required along the Edinburgh Tram Network (ETN) route. The Council acknowledges that these measures will have wider area impacts and consequently have committed to carrying out monitoring of these areas once ETN is operational and take appropriate action where necessary.</p> <p>Item 2.1 in Appendix 1 notes a number of initiatives which are being undertaken to address these general concerns.</p>

### 18.19 Other Issues

ISSUE	RESPONSE
As a major part of the World Heritage Site, serious modification of road surface, pavement lines and street furniture/signage cannot be tolerated. The effective change of use from suburban residential use to 'Trunk Road' must surely require consent from Historic Scotland as it will materially affect the settings of the listed buildings.	Historic Scotland and Edinburgh World Heritage participated in the various stages of the tram design and their views were taken into account when developing the Roads Design for the Edinburgh Tram Network (ETN) from which TRO1 has evolved and also took into account the guidance set out in Edinburgh Standards for Streets and the Tram Design Manual.

### 18.20 Other Issues

ISSUE	RESPONSE
I pay for two parking permits enabling my family to park in permit parking bays that are positioned in front of my house. Residents have referred to parking on this stretch of road as a "leap of faith". As a result of the continuous flow of traffic from Queen Street and North Charlotte Street, it is extremely difficult to stop, and reverse in to the parking space, and equally difficult to alight the vehicle whilst ensuring that your door is not detached by a passing truck. The alternative is to park on the other side of Ainslie Place and risk the treacherous crossing.	<p>The TRO1 proposals cover the traffic management measures required along the ETN route.</p> <p>The main report recommends that workshops be set up to engage with the local communities to investigate and consider the issues which have been raised through this consultation process.</p>

### 18.21 Other Issues

ISSUE	RESPONSE
Our primary concern in this connection relates to safety. Drivers travelling east to west, in particular, simply do not observe the mini-roundabout at the junction between Great Stuart Street and Ainslie Place. It is only a matter of time before a serious accident occurs there. There is also no proper place for pedestrians to cross.	<p>The mini-roundabout at the junction between Great Stuart Street and Ainslie Place does not form part of the proposals.</p> <p>The main report recommends that workshops be set up to to engage with the local communities to investigate and consider the issues which have been raised through this consultation process.</p>

### 18.22 Other Issues

ISSUE	RESPONSE
<p>Ten year ago I had the good fortune to buy a small flat, for my retirement, in Great Stuart Street. The location had a series of advantages for me in my dotage; close to the shops, cafes and the like, buses and the station; pleasant public and private gardens; above all the area was relatively quiet with an acceptable levels of traffic and hence noise and pollution. Socially it is a family area with married couples, children and dogs: all things I miss now that my three children and six grand children have to live in the South.</p> <p>A couple of years later, I attended a series of open sessions at the Council Chambers on the new traffic proposals. This was about the sensible idea of improving "inclusion" for those living away from the centre of the City who are dependant on public transport. In the final report, the Rapportateur support this socially justifiable proposal but</p>	<p>These comments are not relevant to the TRO process. However it is noted that the Council did review the traffic situation at this location and Hope Street is to be re-opened to all traffic one-way eastbound under these proposals to help distribute traffic in this area.</p> <p>The main report recommends that workshops be set up to to engage with the local communities to investigate and consider the issues which have been raised through this consultation process.</p>

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also recommended that there be no increase in traffic flows through the Moray Feu. At the meetings that I attended there was no mention made of trams or the possible resultant flows of traffic. The outcome of the report confirmed to me that the area of my chosen home would retain its family friendly environment.	
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### 18.23 Other Issues

ISSUE	RESPONSE
Last summer, in St Colme Street, we were plagued by an infestation of sewage flies that officers from the Council Health and safety considered to be potentially caused by increased pressure and disturbance to the underlying sewage system.	This comment is not relevant to the TRO process. However, the comments are noted

### 18.24 Other Issues

ISSUE	RESPONSE
As a transportation engineer/planner and having reviewed the macro and microscopic traffic model report 'Edinburgh tram network, Traffic Modelling Report, January 2010', it is clear that the analysis undertaken on impact of the trams on the surrounding West End residential streets is insufficient.	The Edinburgh Tram Network (ETN), Traffic Modelling Report, January 2010, represents a very brief summary of the outcome of the final modelled design for ETN. There was far more extensive modelling undertaken during the process to reach this final stage.
Based on my professional opinion and local knowledge the proposals	The main report recommends that workshops be set up to engage with the local communities to investigate and consider the issues

will increase the volume of traffic in the area. I have assessed a number of alternative proposals for the area of Lansdowne Crescent and Grosvenor Street that I would like to discuss with council officials.	which have been raised through this consultation process.
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### 18.25 Other Issues

ISSUE	RESPONSE
The Council must take more care to measure noise and pollution. I see the monitoring equipment in Queen Street is about six feet off the ground which is crazy and last time I passed it had a plastic bag over it. So much for the Council's responsibilities.	<p>This objection is not relevant to the TRO process. However, the comments are noted.</p> <p>The issues are discussed in detail in Item 2.1 in Appendix 1 and Item 14.7 above.</p>

### 18.26 Other Issues

ISSUE	RESPONSE
In a circular letter from Edinburgh Tram (dated 23/1/09) concerning tram work on Princes St with resultant diversions to George St and Queen St, the City of Edinburgh Council & TIE indicated that in the event of an incident on the above two streets, general traffic would be given the option to divert via Dublin St, Abercromby Pl, Moray Pl and Great Stuart St ie. on a contingency basis only. The circular letter concluded that "all measures are temporary & will be restricted to their	Under these proposals Moray Place remains closed at its junction with Ainslie Place.

<p>current status when the Princes St work is complete".</p> <p>To date there have been no serious problems arising from this &amp; there has been no need to "open up" Moray Place.</p> <p>Now, as I understand it, if the TRO for Trams is adopted the situation could greatly worsen principally because of the proposal to close Shandwick Pl. to general traffic. This would mean that traffic would then be flowed through residential areas.</p> <p>I am not quite clear whether this move would involve Moray Pl. being "opened-up" on a contingency basis only to help cope with the traffic flow or whether Moray Pl would actually become permanently "open" - a horrific thought. CEC (see above) promised that diversions through the Moray Feus would be temporary - is this now to be considered as a broken promise?</p>	
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#### 18.27 Other Issues

ISSUE	RESPONSE
<p>The closure of Princes Street, George Street and Shandwick Place to general through traffic must result, other things being equal, in significant increases in traffic along parallel streets in the New Town and the West End. In the New Town, Queen Street, with gardens on one side and mainly commercial property on the other, has for many years carried two lanes of traffic in both directions. In the West End, Melville Street and Drumsheugh Gardens/Chester Street are both</p>	<p>Under these proposals there is no change to the traffic priority on George Street. Additionally general traffic from South St David Street/St Andrew Square will be permitted to turn left into George Street. The impact of the proposed TRO1 will result in a redistribution of traffic within the city centre. The intention of these proposals is to continue to facilitate local access. It is not proposed to re-route traffic, rather traffic will find alternative routes both within the city centre as</p>

wide streets which might be expected to handle between them as much E/W traffic as Queen Street without too much difficulty and without resorting to two-lane traffic in either direction. But to get to the West End from Queen Street traffic has to pass along two relatively narrow streets, the S-W arc of Ainslie Place leading into the S-W section of Great Stuart Street, both of which are largely residential streets carrying only one lane of traffic in each direction.	well as the wider city road network.
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#### 18.28 Other Issues

ISSUE	RESPONSE
In broad terms it is clear that the major change in the management of traffic within the City Centre arising from the tram proposal is the proposed closure of Shandwick Place to general traffic. This is of concern particularly for traffic wishing to access the St James Centre from the west. It will be important to ensure that vehicular access to the city centre is not compromised and more specifically that the alternative route to and from the west is capable of accommodating the diversion of traffic from Shandwick Place once the tram is in place. HGI would wish to be reassured that good access for cars will be maintained along Queen Street and York Place.	The fundamental design principles for the Edinburgh Tram Network (ETN) allows for access to the city centre for all traffic. Although there have been some changes in priorities it has been possible to maintain good access for general traffic along Queen Street and York Place.

**18.29 Other Issues**

ISSUE	RESPONSE
<p>The proposed diversion of traffic away from Shandwick Place is unnecessary. This is borne out by the statement made by the Council's own expert witness, Mr Turnbull, at the time the enabling legislation for the tram system was under consideration, when he said in response to the suggestion that the introduction of the trams would lead to other traffic being diverted to these streets that:</p> <p>"the tram proposals do not impact on traffic travelling between Queen Street and Queensferry Street."</p> <p>Clearly a witness appearing for the Council on a matter of this importance will have evaluated the future impact of the tram system with considerable care and his views will have been scrutinised by the relevant Council officials with equal care, to ensure that they took fully into account the known traffic problems affecting the junction of Shandwick Place, Queensferry Street, Princes Street and Lothian Road and made due allowance for future traffic growth. It is therefore clear that, if it is proposed only a few years later that traffic be removed from Shandwick Place and redirected onto other streets, this cannot be something which is rendered necessary by the introduction of the tram. the proposals are being put forward by the Council for no good reason and without due consideration for the residents of the streets affected.</p>	<p>The evidence presented to the Scottish Parliament was the best evidence available at that stage taking into account the fact that the detailed design had not yet been carried out, as explained in Section 3 of the Statement of Case. The detailed design was only carried out once the approval in principle had been obtained from the Scottish Parliament. The outcome of that detailed design was the need to close Shandwick Place to general traffic. The proposal is to restrict general traffic from Shandwick Place, except for the eastbound access from Coates Crescent to Stafford Street. These measures are necessary primarily on safety and road capacity grounds and also takes into consideration the impact of the tram stop within Shandwick Place. These restrictions are necessary to allow the Edinburgh Tram Network (ETN) to operate in accordance with its approved business case.</p> <p>All traffic will be permitted to access the city centre via Shandwick Place during the evening (from 20.00 to 07.00) for loading purposes only.</p>

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**18.30 Other Issues**

ISSUE	RESPONSE
<p>I note that Dave Anderson, Director of City Development, wrote in his letter to Malcolm Chisholm MSP of 13 February 2009 "I can confirm that there are no plans to open up Moray Place as a permanent feature as part of the tram project".</p> <p>I also note that in Dave Anderson's letter to myself of 6 March 2009 he wrote "The bollards on Moray Place and the footway across the end of Dublin Street will be replaced with barriers so that the contingency route can be opened quickly. Similarly there will be temporary alterations to the parking arrangements along the route. However all of these alterations will be reinstated once the tram works on Princes Street are completed".</p> <p>Given that the tram works on Princes Street were completed before Christmas I see no sign of the bollards on Moray Place being reinstated as indicated by the Director of Development himself. Further, contrary to his assertion that Dublin Street would also be reinstated the exact opposite has occurred and it is now fully open to traffic in place of Broughton Street.</p>	<p>Under these proposals Dublin Street will remain closed to through traffic.</p> <p>There are no plans to make these contingency diversion routes permanent or to re-open Moray Place and the bollards will be replaced in due course.</p>

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**18.31 Other Issues**

ISSUE	RESPONSE
Lack of clarity of traffic management north of Palmerston Place — this appears to be the only access point into the West End for traffic travelling from the South side of the city	There are no proposed changes on Palmerston Place, except at its junction with West Maitland Street. However, once the Edinburgh Tram Network (ETN) becomes operational the Council will monitor the traffic impact and consider any appropriate changes should this be required.

**18.32 Other Issues**

ISSUE	RESPONSE
Safety issue when accessing the Douglas Crescent communal gardens, particularly for families and the elderly (no designated crossing places to the gates).	The designation of pedestrian crossing in this area does not fall within the remit of TRO1.

**18.33 Other Issues**

ISSUE	RESPONSE
Objection based on proprietors' concerns over heavy vehicles endangering the stability of the steep banking to the Water of Leith on the built-up ground at the centre of Douglas Crescent. (The road is approximately 10 feet from the edge of the banking.)	This is not a TRO matter, but historically it has not been an issue and the Council do not consider that any in change in traffic volumes associated with the Edinburgh Tram Network (ETN) will have a material impact.

	As noted in Item 18.35 below the Council are currently pursuing proposals to introduce a 20 mph zone in this area.
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#### 18.34 Other Issues

ISSUE	RESPONSE
Objection based on Douglas Crescent proprietors' concerns over the effect of weight and vibration from heavy vehicles on under-pavement cellars and the railings on the north (gardens) side of the crescent.	There has been no recorded incident, by the Council, of a structurally sound under-pavement cellar suffering damage from the weight and vibration of heavy goods vehicles.

#### 18.35 Other Issues

ISSUE	RESPONSE
Douglas Crescent has a lack of a 20 m.p.h. limit, when other streets in the affected West End Crescents have had this restriction granted. It is recognised that such a restriction is seen as difficult to enforce, but it should act as a deterrent to the responsible driver.	<p>There is no provision within the design of the Edinburgh Tram Network (ETN) or under these proposals for 20mph zones.</p> <p>However, public consultation has been undertaken regarding the potential 20mph zoning of the area bounded by Magdala Crescent, Douglas Crescent, Palmerston Place, West Maitland Street and Haymarket Terrace (<i>the latter three streets are not included in the zone</i>). This was approved by the Transport, Infrastructure and Environment Committee on 27 July 2010, subject to consultation with the Scottish Government to permit possible variations to the layout.</p>

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**18.36 Other Issues**

ISSUE	RESPONSE
Roughly 50% of Resident Parking is on the gardens side of the Crescent. Due to the curve of the Douglas Crescent and consequent poor sight lines, it is difficult for drivers to anticipate whether there are people crossing to or from their cars. The "Slow" signs painted on the road at each bad bend seem to make little difference to the non-local driver.	<p>The measures in place at present are temporary and are a feature of the diversionary routes which are in place to accommodate the tram works.</p> <p>There are no specific traffic management measures being promoted as part of the Edinburgh Tram Network (ETN) TRO1 on Douglas Crescent. However, as noted in Item 18.35 above the Council are currently pursuing proposals to introduce a 20 mph zone in this area.</p>

**18.37 Other Issues**

ISSUE	RESPONSE
<p>Traffic flow through Edinburgh</p> <p>George Street has now become overwhelmed with traffic and contains at the last count 280 items of unsightly traffic related street furniture.</p> <p>Queen Street is now a racetrack.</p> <p>Heriot Row, Abercromby Place and Albany Street and other elegant gifts from a more enlightened age are now under threat.</p>	<p>This objection relates to the principle of introducing the Edinburgh Tram Network (ETN), which is not relevant to the TRO process. However, the comments are noted.</p>

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### 18.38 Other Issues

ISSUE	RESPONSE
What plans are being devised to restrict vehicles over 4 tonnes having access to Chester Street and Drumsheugh Gardens?	There are no proposals under TRO1 for restrictions on vehicles over 4 tonnes using these streets.

### 18.39 Other Issues

ISSUE	RESPONSE
What improvements are planned to the route that heavy vehicles will be diverted to cope with the additional traffic weight?	Any increase in traffic loading can be accommodated by the existing roads infrastructure. In addition all traffic will be permitted to access the city centre via Shandwick Place during the evening (from 20.00 to 07.00) for loading purposes only.

### 18.40 Other Issues

ISSUE	RESPONSE
On my own behalf, and on behalf of a number of neighbours in Lansdowne Crescent and Grosvenor Crescent, Edinburgh, I object in the strongest possible terms to the proposals contained in the Traffic Regulation Order 1 (TRO1), insofar as they relate to the regulation of traffic in, or otherwise affect, West Maitland Street, Shandwick Place	Public consultation has been undertaken regarding the potential 20mph zoning of the area bounded by Magdala Crescent, Douglas Crescent, Palmerston Place, West Maitland Street and Haymarket Terrace ( <i>the latter three streets are not included in the zone</i> ). This was reported to the Transport, Infrastructure and Environment Committee on 27 July 2010 at which time a decision was taken to proceed with

<p>and Princes Street, Edinburgh, and in or affecting the area lying to the North of those streets, being the area bounded by Magdala Crescent, Douglas Crescent; Rothesay Place, Drumsheugh Gardens, Queensferry Street, Randolph Crescent, Great Stuart Street and the Moray feu, including Doune Terrace and Heriot Row.</p> <p>The essence of the objection is that these proposals will create a series of 'rat runs' through the 18th and 19th century classic, and still largely domestic, streets that are the glory of Edinburgh and make it unique in the cities of the United Kingdom. The proposals would inevitably divert very substantial flows of traffic through the areas specified to the detriment of the architectural and living environment of the whole area. They will add to the creeping destruction of the features that make Edinburgh a wonderful city to live in or visit Few cities in the UK can boast a comparable architectural heritage, including a well-inhabited area right in the centre of the city. It is difficult to imagine a West European country that would plan such cultural vandalism as the City of Edinburgh now intends to subject us to.</p>	<p>the scheme at the earliest opportunity, subject to consultation with the Scottish Government to permit possible variations to the layout.</p> <p>Other locations are to be monitored by the Council and will be reviewed following the implementation of the tram</p> <p>It is Council policy to maintain settled streets within the New Town (this is discussed in the document <i>Edinburgh Standards for Streets</i>). The Council has proposals to relay setts within this area, including Gt. Stuart Street/Ainslie Place, on completion of the tram works</p> <p>It is also recommended that workshops be set up to engage with the local communities to investigate and consider potential mitigation measures.</p>
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#### 18.41 Other Issues

ISSUE	RESPONSE
<p>I would also like to take this opportunity to remind the City of Edinburgh Council of the commitment made to preserving the integrity of the Moray Feu neighbourhood during the CETM process. The Council's own advisers during this process noted that the CETM</p>	<p>This objection is not relevant to the TRO process. However it is noted that the Council did review the traffic situation at this location and Hope Street is to be re-opened to all traffic one-way east bound under these proposals to help distribute traffic in this area. The main report also</p>

proposals were only acceptable to the New Town if Shandwick Place remained open to private and commercial vehicle use, thus limiting the impact of heavy traffic flows through the city centre residential areas protected by World Heritage status. The proposals contained in TRO/09/60A fly in the face of the Council's formally agreed duty of care to this area.	recommends that Workshops be set up to engage objectors, or their representatives, and the local Community Councils in discussions of all of the issues which have been raised.
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## 19. General

### 19.1 Access

ISSUE	RESPONSE
I wish to object to the closure of any streets to general traffic as a result of the contents of TRO 1. The trams were approved on the understanding that they would be part of an integrated transport system. TRO 1 now confirms that the tram is to be introduced to the exclusion of general traffic on major routes within the city, in particular Princes Street and Shandwick Place.	<p>National, Regional and Local transport policy supports the introduction of the Edinburgh Tram Network (ETN). The Statement of Case explains the need for the ETN to operate in accordance with the objectives of its approved business case, including predicted run times. Nevertheless the proposed TRO1 retains access for all classes of vehicles to most of the roads. The exceptions include (1) Princes Street (2) Shandwick Place, (3) Constitution Street (from Foot of the Walk to Lorne Street), (4) North St Andrew Street (from York Place to North St Andrew Lane, (5) South St Andrew Street (from Meuse Lane to Princes Street), (6) West Maitland Street (westbound) and (7) Ocean Drive (at Ocean Terminal).</p> <p>The proposed Princes Street restrictions replicate the existing arrangements with the exception of general traffic no longer</p>

	being able to travel westbound on the section of Princes Street from Waverley Bridge to South Charlotte Street at any time. This is consistent with transport policy and the Council's decision in the Central Edinburgh Traffic Management orders. The proposed restriction on Shandwick Place is required because of the space required to accommodate the Shandwick Place tram stop, which results in a reduced road capacity in this street. In line with transport policy priority has been given to pedestrians, cyclists and public transport over general traffic.
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## 19.2 Access

ISSUE	RESPONSE
I also object strongly that the trams within the city will take precedence over all other forms of existing traffic when in operation. That traffic lights will be introduced to prioritise tram movements between stops where the tram system supposedly integrates with other forms of public transport, which it clearly fails to do, is unacceptable.	The Edinburgh Tram Network (ETN) was promoted as part of the Council's Integrated Transport initiative. As explained in the Statement of Case, the ETN has the support of the Scottish parliament and the Council. The operating objective is to integrate tram with bus services and other modes of public transport and paragraph 58(4) of the Tram Acts makes provision for tram to be given priority over other means of transport. Transport Edinburgh Limited (TEL) will be responsible for managing tram/bus integration with bus operators, subject to any legal constraints. The locations of the tram stops support integrated transport objectives connecting bus, coach and train services with the ETN.

### 19.3 Access

ISSUE	RESPONSE
<p>The tram, where it shares road space within the city with other public and general transport, must integrate with general traffic as trams did previously until removed in 1956.</p> <p>Once the tram moves from road space to its own dedicated track it can become a fast, mass transit, light rail system. It seems to me that the tram will be in competition with our much loved Lothian Buses.</p>	<p>To allow the Edinburgh Tram Network (ETN) to run to its approved Business Case dedicated lanes are provided where possible. Elsewhere provision has been made to share road space with other public transport and general traffic, where circumstances dictate. The operating conditions for the previous tram system were very different to the current day scenario.</p> <p>A significant section of the ETN route was designed to utilise a separated dedicated corridor so as to maximise the benefits of the system and to minimise on the existing road network. Transport Edinburgh Limited has been established to ensure integration between the bus and tram services.</p>

### 19.4 Access

ISSUE	RESPONSE
<p>I feel that the trams should be able to share the road with ordinary traffic and if not the idea should never have been approved. As I see it, the trams will effectively replace buses- principally the airport bus and will not be running significantly more frequently than that bus. Indeed it should be more efficient in moving people quickly with pre-paid tickets and therefore quicker boarding times. So I can't see any reason to even think of making such a drastic change to the traffic system.</p>	<p>The overall effect of TRO1 is to accommodate the operation of the Edinburgh Tram Network (ETN), as explained in the Statement of Case. It must be borne in mind that the road capacity within the city is not being increased. The ETN will use some of that fixed road capacity and TRO1 will manage the remaining capacity to accommodate all other road users.</p>

## 19.5 Access

ISSUE	RESPONSE
<p>The City Council seek to restrict the access to premises for more than 8 hours in any 24. However the Council has not stated in the order that they are satisfied that such restrictions are necessary and the reason that they are satisfied as required by s3 of the 1984 Act.</p> <p>It is inconceivable that this omission is unintentional given the level of advice that the Council is using. It must be assumed that the Council is attempting to bypass Schedule 9 - assuming that has not been rescinded. The vires of the TRO would appear compromised - probably fatally</p>	<p>The proposed TRO has the effect of preventing, for more than 8 hours in any period of 24 hours, access for certain vehicles on the undernoted roads:</p> <p>Canning Street (Shandwick Place – Rutland Square)</p> <p>Shandwick Place</p> <p>Princes Street (South Charlotte Street – South St David Street)</p> <p>South St Andrew Street (Princes Street – Meuse Lane)</p> <p>North St Andrew Street (York Place – North St Andrew Lane)</p> <p>Constitution Street (Great Junction Street – Laurie Street)</p> <p>Ocean Drive (at Ocean Terminal)</p> <p>Un-named road previously described as Old Port Road (at new road section)</p> <p>In each of the above cases the current design solution has been reached by balancing the needs of all road users and takes into account the constraints at these locations, such as limited road</p>

	capacity and road safety. The proposals for these roads are a necessary part of the road design to ensure that the Edinburgh Tram Network (ETN) can operate safely and in accordance with the Council's approved business case for ETN.
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## 19.6 Access

ISSUE	RESPONSE
<p>Specifically, I object to any further bus and/or tram only lanes. We already have far too many of these most of which do not improve traffic flow. There is no need for any more at this time.</p> <p>I also object to the raft of bus and/or tram and/or taxi and/or cycle only accesses. We already have many of these in Edinburgh which is a major cause of the traffic problems that we have. We require re-opening of almost all of the blocked junctions and re-instatement of the rights of private vehicles to drive on many roads in Edinburgh and there is no justification for the draconian proposals in this order. In particular, if trams are safe then they should be able to share road space with private vehicles, If it is not safe for them to do so then they should be restricted to their own routes, such as the route from Haymarket to the Airport. Private vehicle users should not be made to suffer to enable the introduction of trams. I therefore object to the banning of private vehicles from the following streets. Princes Street westbound at night as was the case prior to the closure for tram works last year, Shandwick Place, Constitution Street, St Andrew Square,</p>	<p>National, Regional and Local transport policy supports public transport measures such as priority lanes for buses. The Statement of Case explains the need for the Edinburgh Tram Network (ETN) to operate in accordance with the objectives of its approved business case, including predicted run times. Nevertheless the proposed TRO1 retains access for all classes of vehicles to most of the roads. The exceptions include (1) Princes Street (2) Shandwick Place, (3) Constitution Street (from Foot of the Walk to Lorne Street), (4) North St Andrew Street (from York Place to North St Andrew Lane, (5) South St Andrew Street (from Meuse Lane to Princes Street), (6) West Maitland Street (westbound) and (7) Ocean Drive (at Ocean Terminal).</p>

West Maitland Street and the road outside Ocean Terminal.	
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### 19.7 Access

ISSUE	RESPONSE
<p>I also object to most of the banned turns and in particular those from Palmerston Place into West Maitland Street, the Mound into Princes Street and those from Leith Walk into many side streets, although here I note the comment about the Office of Rail Regulations and wonder why they have any involvement in issues relating to the public roads. Is the tram a train or is it a bus? It also seems to be at odds with the operation of trams in other cities I have visited recently such as Manchester, Dublin and Amsterdam, the last of which has far more experience in operating trams safely with minimal inconvenience to normal road users than we do. We should learn from them.</p>	<p>The proposed banned turns are required for different reasons. The banned right turn restricts general traffic from entering the westbound tram only and bus only lanes in West Maitland Street. These public transport priority lanes are required for operational reasons. The left turn ban is required to restrict the traffic demand on this arm of this junction.</p> <p>The banned left turn from The Mound into Princes Street maintains the present arrangement for general traffic at this junction.</p> <p>The proposed banned right turns on Leith Walk are a design requirement on safety grounds. The reason for this is that it would be unsafe to permit cross-over of the tram tracks without signal controls. Where banned right turns have proved necessary, alternative access arrangements have been proposed to maintain access either through a U-turn at adjacent signalised junctions.</p>

### 19.8 Parking

ISSUE	RESPONSE
I object to the reduction of parking places under this order. There appears to be no provision for an increase in parking places in streets adjacent to the tram route to compensate.	In order for the Edinburgh Tram Network (ETN) to meet its approved Business Case it has been necessary to reallocate the available road space along the length of the on road tram route. This has resulted in some loss of parking spaces, however, these have been replaced where possible on both adjacent streets and on the route itself. Within the City Centre there is already adequate provision for off street parking.

### 19.9 Cycling

ISSUE	RESPONSE
The provision of forward stops at traffic lights should be retained at all junctions.	Advanced Stop Lines have been provided as standard at the majority of the signalised junctions along the Tram Route where cyclists would be making turning manoeuvres unless they cannot be provided for capacity reasons.

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### 19.10 Cycling

ISSUE	RESPONSE
Providing merely thirty-five metres of dedicated cycle way (North St Andrew St) between Princes Street and the bottom of Leith Walk is a wasteful and tokenistic gesture. Instead dedicated cycle paths should be provided all along the tram route as an important tool of encouraging cycling, especially in areas with heavy motorised traffic, but they need to connect to other, cycle-friendly routes in order to be useful.	The Council have undertaken the independent “Edinburgh Tram Cycle Integration Study” and met with local cycling groups to discuss cycle provision as part of the Edinburgh Tram Network (ETN) and how this connects to other cycling routes.

### 19.11 Cycling

ISSUE	RESPONSE
Where is the provision for bicycle parking? We would welcome a clear indication of all dedicated bicycle parking along the entire tram route on the plans, especially on the transport interchange places like Picardy Place.	This is not a TRO issue but the new provision and locations for bicycle parking associated with the Edinburgh Tram Network (ETN) is available on the Council's Planning Portal.

### 19.12 Statutory Process

ISSUE	RESPONSE
An initial source of objection is the failure of the legislation to provide for TROs of the type proposed.	The Council has to work within the legislative framework created by Parliament.

### 19.13 Statutory Process

ISSUE	RESPONSE
<p>The TRO Process</p> <p>The Council has gone to extraordinary lengths to prevent the consideration of objections to the TRO as this extract shows:</p> <p>Although the 2008 Amendment to the 1999 Regulations removes the requirement for a mandatory public hearing of objections in relation to TRO 1A and TRO 1B, it is still open to the Council to hold a discretionary hearing. However, it is being assumed that the Council will make TRO 1A and TRO 1B without holding a public hearing in to objections because:</p> <ul style="list-style-type: none"><li>- The ETN has already been endorsed by the Scottish Parliament, the Scottish Government and the Council'</li><li>- This prior endorsement justified the removal of the legal requirement for a mandatory public hearing.</li><li>- TRO 1A and 1B will only contain measures deemed necessary to allow tram to operate in accordance with the objectives of its approved Final Business Case;</li><li>- Any unplanned adjustment to TRO 1A or TRO 1B creates a real risk to tram operation in accordance with the objectives of its approved</li></ul>	<p>It is acknowledged that the detail of the proposed TRO was not submitted to the Scottish Parliament, as explained in paragraphs 2.7 to 2.13 of the Statement of Case. It is not a matter of 'nodding' through the TROs. The strategy to implement traffic regulation measures designed to allow the Edinburgh Tram Network (ETN) to operate in accordance with the objectives of its approved business case was approved by the Council on 25 October 2007. The justification for that strategy remains relevant today. A key consideration is the protection of significant public sector investment in the ETN and its effective operation.</p> <p>It is not the case that 'no objections will be allowed'. The proposed TRO 1 is being processed in accordance with the extant statutory process, which includes the submission of objections. All objections are being responded to and considered by the Council. Those which merit further consideration will be taken forward for review as part of TRO2, in accordance with the Council's approved TRO strategy.</p> <p>It has been consistently acknowledged that the key objective of TRO1 is to accommodate the operation of the ETN in accordance with the objectives of its approved business case. It is also acknowledged that all other traffic arrangements must be adapted to accommodate the ETN. This objector distinguishes between the operation of the ETN and meeting the transport needs of the people. The ETN is being</p>

<p>Final Business Case;</p> <p>- But any suggestions could be taken forward in a planned way through TRO 2. This is the prudent approach to manage risk to tram operation;</p> <p>(Extract from Council TRO process report)</p> <p>Dealing with these points in order:</p> <p>1. The Scottish Parliament approved the tram in principle. It was unaware of the details of the route or the impact the tram would have on adjoining residential areas. This was an unusual situation and its approval should not be used as justification for allowing the TRO proposals to be 'noddled' through.</p> <p>2. The initial TRO report said:</p> <p>2.12 In the first stage it is proposed that the Orders (designated TRO 1) relating to the on- street sections of tram are promoted, <b>that comments and objections are noted but no immediate action is taken, and that the Orders are made, as published.</b> This will ensure that Orders, TRO 1, are in place to allow tram to operate and the road network to be managed. The existing Orders on the tram route will be revoked and replaced by the TRO 1 Orders. (My bold)</p> <p>In other words no objections will be allowed. Where is democracy in this approach?</p> <p>3. The Final Business case shows that the key driver is for the tram to</p>	<p>constructed to meet the transport needs of the people and TRO1 will ensure that the operational requirements of the ETN will be balanced with other important and competing demands for road space. This demand comes from pedestrians, cyclists, buses, taxis and general traffic. The justification for the ETN has already been approved and is not relevant to the TRO process. Likewise, the final business case has been approved by the Council.</p> <p>It is not the case that the Council will only consider suggestions if they are of a minor nature. All suggestions will be considered and a response set out in the report to Council on the making of TRO 1.</p> <p>The comments on the relationship of tram and the integrated transport system are not directly relevant to the TRO. They relate to the approval of the ETN by the Scottish Parliament.</p> <p>The location of trams stops and bus stops are not a matter for consideration under TRO1. The location of bus stops has been agreed with bus operators including Lothian Buses and in the case of Shandwick Place these have been located in close proximity to the tram stop in both directions.</p> <p>The Council has not yet made a decision on whether or not to hold a public hearing. The objection states that a refusal of a public hearing "when the case for tram is flawed and the Council finances are in a dire state is undemocratic". These matters are not relevant to the TRO approval.</p> <p>The TRO1 proposals cover the traffic management measures required along the ETN route. The Council acknowledges that these measures</p>
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run to its timetable. To achieve this traffic lights will change whenever a tram approaches so that the tram only stops at designated tram stops. In other words although the frequency is only planned to be 6/12 in 2012 and a maximum of 8/16 by 2016 all other traffic arrangements must be adapted to accommodate the tram's timetable.

Surely any mode of transport is there to meet the needs of people? Edinburgh's success depends upon its residents, workers and visitors. Despite the declarations contained in the latest tram video only a very small percentage of these will benefit from the tram. The needs of the rest of the population must be taken into consideration.

The Final Business Case was revised in the Status report of August 2009. This showed that the Council acknowledged that patronage would drop compared to the Final Business Case:

The Final Business Case has therefore been superceded by the Status Report of August 2009

4. The initial TRO process report states:

2.13 The second stage will then involve refinement of TRO 1 - taking into account comments and objections received at the TRO 1 consultation stage - and promotion of a variation Order (designated TRO 2), if appropriate. **An example of the type of refinement involved might be the precise extent of loading areas and public parking areas where the two could be interchangeable at any given location. (My Bold)**

1. The example demonstrates that the Council expects only minor

will have wider area impacts and consequently have committed to a carrying out monitoring of these areas once ETN is operational and take appropriate action where necessary.

The Status Report of 2009 provides patronage forecasts updated from the 2008 modelling outputs. The conclusion of this work is that even during an initial period of tram patronage build up, the TEL Business Case as a whole is profitable and should experience significant growth in profits once the tram patronage has been established.

alterations to the TRO proposals. This suggests that suggestions from the statutory bodies or general public will only be considered if they are of a minor nature. This is an arrogant position.

2. The Council boasts about the provision of an integrated transport system. The TRO proposals demonstrate the fallacy of this. An integrated system suggests that passengers will be able to transfer from tram to bus and vice versa with relative ease. Here are two examples:

- There will be a tram stop in Shandwick Place opposite Atholl and Coates Crescents. The nearest bus stop will be 250 yards east in Shandwick Place. This is hardly convenient for an elderly person or someone with heavy shopping.
- The single tram stop in Princes Street is a further example of the needs of the tram's timetable having greater priority than the needs of the public.

Revisions to the location of bus and tram stops are not minor. They need to be considered and problems resolved before the tram becomes operational or public confidence in the Integrated Transport promise will evaporate.

#### Conclusion

I have demonstrated in the previous paragraphs that the TRO process is seriously flawed and undemocratic. It shows that irrespective of feedback the Council will force through TRO 1 without alteration unless the Transport, Infrastructure and Environment Committee

refuse to comply. In my opinion this is disgraceful and suggests that the Council will do anything to impose its will. To refuse a public hearing when the case for the trams is seriously flawed and the Council finances are in a dire state is undemocratic.

#### 19.14 Statutory Process

ISSUE	RESPONSE
<p>The Community Council is very concerned about the democratic deficit at the heart of the proposals and indeed the whole tram project. Questions ( such as what would be the number of objections necessary for the local authority to abandon the Shandwick Place TRO, and what would be an accurate comparison of the seating available on the new tram vehicles and the existing buses) posed by Community Council members have gone unanswered. No doubt necessarily, various (maybe large) aspects of the tram scheme seem to have been designed and indeed contemplated only as matters have developed. No doubt it is this rather than intentional discourtesy which has led to our questions being ignored, but even so such omissions can hardly fill one with confidence.</p>	<p>TROs are promoted in the interests of managing the local road network. In regulatory matters, such as TROs, it would be inappropriate for any roads authority to impose an arbitrary number of objections beyond which a proposal would be abandoned.</p> <p>The ultimate decision will be taken by elected members on the basis of all material considerations. However, it is noted that the objector feels aggrieved about not having received answers to specific questions. On the issue of “seating capacity” TEL has advised that on the basis of the initial tram frequency of twelve trams per hour and the subsequent increase to eighteen trams per hour, this would increase seating capacity for both tram and bus at Shandwick Place, by 52 and 208 respectively in both directions. In addition, the increase in standing capacity is 940 and 1280 respectively in both directions.</p>

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**19.15 Statutory Process**

ISSUE	RESPONSE
<p>Objection Arbiters: It would seem that the sole arbiters are the parties promoting the above TROs, The City of Edinburgh Council, Transport Initiatives Edinburgh and Edinburgh Trams? Surely they are biased by association having promulgated these TROs and it is these parties who will judge the objections lodged? This is clearly unfair and until and unless an impartial Public Enquiry is held to review the objections, have further consultations as required prior to producing their findings and recommendations on the issues raised, I feel that the objections I have raised above, and on 10 March 2010, will be disadvantaged.</p>	<p>The “legislation” lays down the statutory process for Traffic Regulation Orders and this has been followed.</p> <p>There have been requests from several objectors to refer all outstanding issues and objections to a public hearing. Some objectors have also asked if there will be an opportunity to address members before a final decision is taken on the TROs.</p> <p>Members are asked to note that the Local Authorities' Traffic Orders (Procedure) (Scotland) Regulations 1999, as amended, regulates the TRO process. Those Regulations provide that, before making an order, the authority may hold a hearing in connection with the order. Before 1999, such hearings were conducted by the relevant committee of the authority. However, since 1999, the Regulations provide for hearings to be conducted by an independent Reporter. The Reporter conducts the hearing in public and provides a written report on the evidence with his recommendations. That report is then taken into account by Members before reaching a final decision on the TRO.</p> <p>At the request of the Council, the Scottish Ministers amended the 1999 Regulations to remove the requirement to hold a mandatory public hearing of objections due to the prior approval of the Edinburgh Tram Network (ETN). However, it is still open to members to instruct a discretionary public hearing in connection with the orders.</p> <p>This means that members should first of all consider whether or not</p>

	<p>they have sufficient information before them to enable them to reach a decision of the proposed TROs. If so, they are entitled to proceed to make a decision without instructing a public hearing. On the other hand, if members decide that there should be a public hearing, they are entitled to instruct the appointment of an independent Reporter to hold a hearing and to report back to the Council with recommendations.</p> <p>Objectors have no legal right to a public hearing. Moreover, members should not revert to the pre-1999 model of conducting their own hearing as that would be contrary to the terms of the existing legal requirements. Apart from that legal constraint, it is a matter for members to decide on whether or not a public hearing is appropriate in the circumstances of this case and in the context of the Council's approved strategy to make these TROs.</p>
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#### 19.16 Statutory Process

ISSUE	RESPONSE
<p>I also feel that the consultation on this drastic and dramatic change to the rights of private vehicle users has been completely inadequate. Such far reaching changes should be the subject of widespread communication with all those affected, for example by letter to all addresses in the city, over a longer period than 28 days and should probably be the subject of a public enquiry as was the case with the recent extension of the Controlled parking Zone</p>	<p>Refer to Item 19.15 above.</p>

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**19.17 Statutory Process**

ISSUE	RESPONSE
Leith Central Community Council calls upon CEC to refer all outstanding issues and objections to a public hearing before taking a final decision. Given the current – unfortunate – delays to the tram project, we would want to see the time used productively to evolve the best possible solution for Leith Walk.	Refer to Item 19.15 above.

**19.18 Statutory Process**

ISSUE	RESPONSE
TRO CONSULTATION: TIE has not been very helpful with distribution of plans to the libraries. The availability of paper copies of the plans continues to be problematic. Our local library received its copies seven days late, leaving the Community Council with only limited time to comment. This gives the impression that transparent consultation is not taking place. If local consultation is to play a credible part at this stage of the tram project, the plans, in their entirety, should be on show to the general public for a reasonable amount of time, rather than rolled up somewhere under a counter at the library,	In line with current Council procedure for the public deposit of Traffic Regulation Orders the TRO drawings were delivered to the prescribed Libraries (and additionally McDonald Road library) in advance of the start of the period for public deposit. In addition the drawings were exhibited at the City Chambers, where staff were available throughout the 4 week period to discuss and explain the TRO proposals. The TRO drawings were also available on-line.

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### 19.19 Statutory Process

ISSUE	RESPONSE
<p>We also have some issues with the manner in which the information has been made available to us:</p> <ul style="list-style-type: none"><li>- The information supplied is inadequate to form a proper opinion of the proposals</li><li>- The legend supplied on the maps is incomplete</li></ul>	<p>The TRO consultation process was carried out in accordance with statutory requirements and indeed tie held public exhibitions on the draft TRO proposals in October/November 2008. The regulations stipulate a 21 day period for the Public Deposit period on such Orders, however, the Council extended this period to 28 days for these Orders and also held a manned exhibition throughout this period at the City Chambers as well as making the relevant information available online. Additionally a leaflet was available which set out the changes in a simple format.</p>

### 19.20 Statutory Process

ISSUE	RESPONSE
<p>The Cockburn Association has been asked for support by its members in respect of this TRO. We do not have the resources to respond to the consultation in detail. We do comment that the consultation process appears unsatisfactory and inadequate, both as to time given and means of establishing what is proposed.</p>	<p>The TRO consultation process was carried out in accordance with statutory requirements and indeed tie held public exhibitions on the draft TRO proposals in October/November 2008. The regulations stipulate a 21 day period for the Public Deposit period on such Orders, however, the Council extended this period to 28 days for these Orders and also held a manned exhibition throughout this period at the City Chambers as well as making the relevant information available online. Additionally a leaflet was available which set out the changes in a simple format.</p>

### 19.21 Other Issues

ISSUE	RESPONSE
<p>The effect of the proposed TRO 1 is to impinge very dramatically on the living environment; the safety and the health of the people who live in or otherwise use the areas affected by the diverted traffic. Pollution will inevitably increase and road safety will be further endangered. Therefore, because the TRO inevitably favours the enhancement of some rights (largely those of road and private car users) at the expense of others, there are issues of the clash of rights. Such issues inevitably come within the provisions of Article 6 of the Convention for the Protection of Human Rights and Freedoms (the ECHR), provisions of which have the force of law by virtue of the Human Rights Act 1998 and the Scotland Act 1998. The resolution of the clash of rights cannot be made by a body that is not "an independent and impartial tribunal established by law". Issue - affecting rights - arising out of the current proposals are not to be determined by a body that is impartial or independent.</p> <p>Furthermore, the jurisprudence of the Convention makes it clear that people likely to be affected have a right to present evidence and argument bearing upon the issues raised by the TRO, including the impact thereof upon their rights. No such opportunity appears to have been given; nor is it apparently intended that such opportunity will be accorded to me or to others to present evidence, arguments and alternative solutions to an independent and impartial tribunal, with</p>	<p>The City of Edinburgh Council holds the view that making the proposed TROs would not contravene any requirement of section 6 of the Human Rights Act 1998. In general, that section provides that it is unlawful for a Council to act in a way that is incompatible with a 'Convention right'. Any question of legality is ultimately a matter for the courts.</p>

power to decide the issues raised.

There are alternatives both in terms of traffic management and regulation that must be considered and evaluated. There are alternative schemes for directing and controlling traffic that would reduce the adverse effects of any closure of streets to all or to some classes of traffic. These schemes have not been considered. The principles that lie behind the current TRO proposals are seriously questionable and ought to be examined by an independent and impartial tribunal.

The principles and reasoning that should lie behind the proposals in TRO 1 must also be disclosed and subjected to careful scrutiny by such a tribunal.

The objections here outlined are serious and must be properly and urgently considered by you and by a body that meets the standards required by Article 6 (above). The City Council does NOT meet those standards, not least because of its financial, political and forensic interests in the Tram project, and its design inputs both to the project and to the TRO.

I should be obliged if you would let me know as soon as may be how these concerns are to be met and what opportunities are to be presented to objectors to present their objections to a body/tribunal that meets the requirements of said Article 6.

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**19.22 Other Issues**

ISSUE	RESPONSE
I wish to raise a formal objection to your proposals to make permanent the Temporary Traffic Regulation Order (TRO1) that was put in place as a diversionary scheme during preparations for the new Edinburgh Tram system.	The proposed Edinburgh Tram Network (ETN) TRO 1 is to facilitate the operation of the ETN to its approved Business Case and differs from the TTRO that was put in place to accommodate the construction works.

**19.23 Other Issues**

ISSUE	RESPONSE
I am writing to object to almost every aspect of the Traffic Order included under the above reference on the grounds that they are unnecessary and not in the interests of the majority of the citizens of and visitors to Edinburgh.	Your objection is noted. The Statement of Case provides the explanation of why these proposed Orders are necessary.

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**19.24 Other Issues**

ISSUE	RESPONSE
All city traffic may soon be further disrupted and dispersed into residential Edinburgh. Alastair Richards, Managing Director at Edinburgh Trams, mentions introducing trams south along the Bridges route to Edinburgh Royal Infirmary at Little France and east along London Road. These routes are, with Princes Street and Shandwick Place, this city's main arterial routes.	City of Edinburgh Council is currently investigating opportunities to extend the tram network along a south east corridor, from Princes Street to the new ERI. This will be subject to further consultation before any final decision is taken.

**19.25 Other Issues**

ISSUE	RESPONSE
Finally, I note that although this consultation period has not ended there are already signs up in much of central Edinburgh which indicates that the changes have already been introduced. These signs are either illegal or the consultation is a sham and the decisions have already been taken.	The current traffic management arrangements on or adjacent to the tram line are empowered through Temporary Traffic Regulation Orders which allows for the traffic management measures for the construction of the works. These proposed Traffic Regulation Orders being considered is required when the Edinburgh Tram Network (ETN) becomes operational

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19.26 Other Issues

ISSUE	RESPONSE
<p>Living Streets Edinburgh would like to object to the above Traffic Regulation Order, on the grounds that insufficient information has been made available to ascertain the impact on pedestrians.</p> <p>Specifically, we would like to repeat our request, first made in November 2008 to TIE and City of Edinburgh Council, for the proposed guardrail location to be made available. The guardrail will have a massive impact on the ability of pedestrians to negotiate the new traffic arrangements and therefore believe that the plans should be publicly available.</p> <p>While we support the tram, we are very concerned that:</p> <ul style="list-style-type: none"><li>- Guardrail is being introduced along with the tram and at other sensitive locations, with no proven safety justification (see reference below to DfT guidance on guardrail), when council policy in Standards for Streets as well as national policy is for it to be minimised and removed where possible on local roads</li><li>- Erroneous concerns about liability are being used by tram designers as a justification for guardrail</li></ul> <p>In summary, in order to remove our objection, we are calling for:</p> <ul style="list-style-type: none"><li>- The guardrail locations which TIE/Trams for Edinburgh designers</li></ul>	<p>Pedestrian facilities have been considered throughout the Edinburgh Tram Network (ETN) design process, however they do not form part of the traffic regulation order.</p> <p>Edinburgh Standards for Streets, that preceded “Designing Streets”, was used in the design of the ETN in conjunction with the DMRB, which is a government document that provides guidance on the design and construction of roads and bridges.</p>

have proposed to be published as a matter of urgency

- The council to take on liability as the roads authority and to follow the process set out in national guidance documents Manual for Streets and Designing for Streets as a sound defence in the highly unlikely event of any liability claims.

We would further object to the TRO as the Edinburgh Tram Network Statement of Case for TROs Design principles states that:

" Other constraints include:-

- various design standards and guidelines including the Design Manual for Roads and Bridges,"

As Government policy in Designing Streets makes clear, DMRB is the standard for the design, maintenance and improvement for trunk roads and motorways. Therefore, we would ask for clarification as to how it has influenced the TRO, since it should have no influence other than on possible trunk road elements in West Edinburgh it has no role to play. It is also curious that this same sentence does not specifically reference CEC's own design guidance such as the Standards for Streets, which are far more relevant to the tram than is DMRB.

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### 19.27 Other Issues

ISSUE	RESPONSE
We believe that the amenity of the area affected has already been severely compromised by traffic arrangements of both recent years and the more recent provisions connected with the Tram project. It also appears to us ironic that proposals of this nature should be launched in this way at the very time that the Scottish Government has published its manual 'Designing Streets', which reflects very different priorities from those apparently in this TRO.	Edinburgh Standards for Streets, that preceded "Designing Streets", was used in the design of the Edinburgh Tram Network (ETN) in conjunction with the DMRB, which is a government document that provides guidance on the design and construction of roads and bridges.

### 19.28 Other Issues

ISSUE	RESPONSE
Firstly, they do not seem intended to improve the experience of the city centre for those who walk. Rather than reducing the amount of traffic and diverting it into routes that avoid the city centre it seems that the new traffic regulations are focussed on channelling traffic to allow the trams to run smoothly but with little thought to how this will affect life for residents in the city centre or what this will do to the tourist experience once they reach the city centre. At the moment, the experience of the pedestrian at the West End is a nightmare the barriers create something like a race track. Surely the time has come to introduce 20mph limits all through the city centre as a recognition that pedestrians are the primary road users.	<p>Throughout the process the design teams have tried to optimise the use of the existing space, balancing the needs of the existing roads users, including the private car, public transport and cyclists, pedestrians and frontagers while obtaining the necessary amount of priority for the tram to allow it to operate in accordance with the objectives set out in the Final Business Case.</p> <p>There is no provision within the design of the Edinburgh Tram Network (ETN) or under these proposals for 20mph zones.</p> <p>However, public consultation has been undertaken regarding the potential 20mph zoning of the area bounded by Magdala Crescent,</p>

	Douglas Crescent, Palmerston Place, West Maitland Street and Haymarket Terrace (the latter three streets are not included in the zone). This was reported to the Transport, Infrastructure and Environment Committee on 27 July 2010 at which time a decision was taken to proceed with the scheme at the earliest opportunity, subject to consultation with the Scottish Government to permit possible variations to the layout.
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**19.29 Other Issues**

ISSUE	RESPONSE
<p>I wholeheartedly disagree with the tram system coming further east than Haymarket.</p> <p>The disposition of normal traffic is and will cause tremendous pollution (air, noise and vibration) through Walker Street, Melville Street, Randolph Crescent. These are sensitive areas not designed for this volume of traffic.</p> <p>The tram system design should be reconsidered and note taken that there are environmentally friendly buses i.e. Hydrogen powered now available. These are much more adaptable than your tram which is really a light railway unnecessarily stealing our roads.</p> <p>Please be brave and call a halt to the tram further east than Haymarket. I think it would be worth reconsidering the spur from there</p>	<p>Decisions were taken by the Scottish Parliament, the Scottish Government and the Council to approve and to fund the construction and operation of the Edinburgh Tram Network (ETN).</p>

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<p>to Granton.</p> <p>There has been an inexpensive scheme to open the old railway line.</p> <p>I would welcome the opportunity to speak with someone who is in favour of the trams as planned.</p>	
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**19.30 Other Issues**

ISSUE	RESPONSE
<p>As far as I am aware, we were never told about a TRO before the tram system was approved. It was never specifically agreed by any of the Tram Acts, just develop trams in principle. It is the devil of the detail that has developed during planning that has caused so much aggravation to City centre residents and will continue to cause financial concern to both yourselves as Councillors who approved the scheme and also to residents who will be asked to pay for it throughout the coming decade.</p>	<p>The “Timing of the Orders” section of the main report (Paragraphs 3.8 to 3.12) discusses this in detail.</p>

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**19.31 Other Issues**

ISSUE	RESPONSE
I oppose your proposals and intend to use all means including legal and civil disobedience measures to challenge your changes. I will also use all means to ensure that the damage you are inflicting is widely published both here and abroad, in particular the respiratory risks that you have created and the damage you are inflicting on the New Town.	Your objection is noted.

## APPENDIX 3

A schedule of all suggestions made by objectors, with responses and recommended actions.

For ease of reference, the reference number provided to each objector is noted against the relevant suggestion(s) below.

### 1. Shandwick Place (pages 4 - 9)

- 1.1 – PD235
- 1.2 - PD118, PD168
- 1.3 – PD235
- 1.4 - PD044, PD070, PD108, PD169, PD171, PD172, PD180, PD181, PD182, PD184, PD185, PD186, PD204, PD205, PD206, PD208, PD209, PD211, PD221, PD222, PD223, PD224, PD225, PD226, PD228, PD229, PD230, PD233, PD234, PD236, PD238, PD244, PD245, PD248, PD249, PD251, PD252, PD253, PD254, PD255, PD257, PD276, PD277, PD278, PD292, PD293, PD294, PD297, PD299, PD300, PD302, PD304, PD311, PD312, PD313, PD314, PD318, PD320, PD321, PD322, PD323, PD324, PD325, PD334, PD338, PD340, PD341, PD343, PD344, PD347, PD348, PD357, PD358, PD359, PD361, PD362, PD363, PD364, PD365, PD366, PD381, PD382, PD383, PD386, PD388, PD389, PD402, PD403, PD405, PD406, PD408, PD409, PD410, PD411, PD413, PD414, PD416, PD423, PD424, PD436
- 1.5 - PD041, PD208, PD211, PD222, PD223, PD255, PD278, PD292, PD293, PD313, PD318, PD321, PD325, PD361, PD362, PD366, PD408, PD413, PD424, PD436
- 1.6 - PD044, PD117, PD169, PD180, PD181, PD182, PD184, PD185, PD205, PD224, PD226, PD230, PD233, PD236, PD247, PD251, PD253, PD278, PD292, PD293, PD294, PD300, PD313, PD314, PD322, PD323, PD324, PD325, PD334, PD338, PD340, PD341, PD343, PD344, PD358, PD359, PD361, PD362, PD363, PD381, PD382, PD383, PD386, PD388, PD389, PD406, PD408, PD409, PD410, PD413, PD416, PD423
- 1.7 - PD255, PD278, PD405, PD424

- 1.8 - PD070, PD108, PD117, PD169, PD172, PD180, PD181, PD182, PD184, PD205, PD206, PD208, PD209, PD211, PD221, PD224, PD226, PD228, PD232, PD233, PD236, PD249, PD251, PD252, PD253, PD255, PD257, PD278, PD293, PD294, PD299, PD300, PD302, PD304, PD311, PD312, PD313, PD318, PD320, PD321, PD322, PD323, PD324, PD325, PD338, PD339, PD340, PD343, PD344, PD347, PD357, PD358, PD359, PD361, PD362, PD365, PD366, PD381, PD382, PD386, PD389, PD402, PD406, PD408, PD410, PD411, PD413, PD415, PD416, PD423, PD424, PD436
- 1.9 - PD044, PD108, PD117, PD171, PD172, PD180, PD181, PD184, PD185, PD186, PD208, PD211, PD221, PD222, PD224, PD225, PD226, PD229, PD230, PD232, PD233, PD247, PD252, PD253, PD255, PD257, PD277, PD278, PD292, PD293, PD294, PD296, PD300, PD302, PD311, PD312, PD313, PD314, PD315, PD317, PD318, PD320, PD322, PD323, PD324, PD325, PD326, PD338, PD340, PD343, PD344, PD358, PD359, PD361, PD363, PD365, PD366, PD381, PD382, PD383, PD386, PD389, PD403, PD404, PD408, PD409, PD410, PD411, PD413, PD416, PD417, PD423, PD424
- 1.10 – PD185
- 1.11 – PD185
- 1.12 – PD171
- 1.13 – PD181
- 1.14 - PD220, PD227, PD229, PD230, PD278, PD296, PD322, PD360, PD383, PD388, PD409
- 1.15 - PD070, PD117, PD170, PD171, PD180, PD182, PD208, PD211, PD221, PD222, PD227, PD236, PD246, PD247, PD277, PD313, PD406, PD408, PD417, PD418
- 1.16 - PD044, PD108, PD117, PD172, PD180, PD181, PD182, PD184, PD185, PD205, PD206, PD209, PD222, PD223, PD224, PD228, PD229, PD230, PD233, PD236, PD238, PD248, PD255, PD278, PD292, PD293, PD299, PD300, PD302, PD304, PD312, PD313, PD318, PD320, PD321, PD322, PD323, PD339, PD340, PD343, PD344, PD347, PD357, PD358, PD359, PD362, PD365, PD366, PD385, PD386, PD388, PD389, PD402, PD405, PD406, PD407, PD408, PD409, PD410, PD411, PD413, PD415, PD416, PD423, PD424, PD436
- 1.17 – PD382

- 1.18 – PD118, PD168

**2. Blenheim Place (page 9 – 10)**

- 2.1 - PD187, PD214
- 2.2 - PD176, PD177
- 2.3 - PD380
- 2.4 - PD380

**3. Antigua Street (pages 10 – 11)**

- 3.1 - PD289, PD243, PD290, PD291

**4. Other Issues (pages 11 – 14)**

- 4.1 – PD412
- 4.2 - PD207, PD293, PD417
- 4.3 – PD366
- 4.4 – PD366
- 4.5 - PD185, PD247, PD248, PD349, PD363
- 4.6 – PD185
- 4.7 - PD180, PD181
- 4.8 - PD247
- 4.9 – PD292
- 4.10 – PD123

SHANDWICK PLACE			
	SUGGESTION	RESPONSE	ACTION
1.1	Create a traffic light/tram/traffic/pedestrian interchange that retains the pedestrian crossings and allows all vehicles to cross from Canning Street into Stafford Street	<p>A new pedestrian crossing is required immediately west of the junctions of Coates and Atholl Crescents to allow access to the Shandwick Place tram stop platform. It was not possible to retain the existing pedestrian crossing in such close proximity to this new crossing.</p> <p>On road safety grounds there is also a general design presumption against uncontrolled (i.e. without traffic signal control) right-turn manoeuvres across tram tracks. Alternative access to Stafford Street is also available via Coates Crescent (left into Shandwick Place from the east end of Coates Crescent and left again into Stafford Street).</p> <p>Notwithstanding this the recommendation is to review the design and consider if a Canning Street to Stafford Street routing option can be provided safely and with minimal impact on the tram operations. Pedestrian facilities would be considered as part of that review. If an approved alternative design can be identified, the necessary TRO2 variation order will be required to undergo the statutory consultation process.</p>	Review design and promote TRO2 if appropriate.
1.2	Allow private vehicles to exit Queensferry Street onto Shandwick Place and the Lothian Road interchange	To accommodate the Edinburgh Tram Network infrastructure and to allow the tram to operate in accordance with its approved business case, the designers found it necessary to restrict access on Shandwick Place during tram operational times to trams, buses, taxis and cycles only; key issues the designers had to contend with were overall reduction in road capacity and consequential road safety concerns.	Workshop

		The same issues and considerations applied to the West End junction complex, and the same solution applied. So the suggestion to introduce more general traffic into the junction would be impractical.	
1.3	Reopen Glenfinlas Street to allow private vehicles the option of turning left into Ainslie Place to access West End/retain left turn from North Charlotte Street.	As noted in the main report a significant number of objections have been lodged on the grounds of the impact of increased traffic through the Moray Feu area. It is therefore considered that it would be inappropriate to re-open Glenfinlas Street and/or the left turn from North Charlotte Street into St Colme Street as either or both would heighten those concerns.	Workshop
1.4	That Shandwick Place is reopened to commercial and private vehicles 24 hours, seven days a week.	The need to restrict access on Shandwick Place is discussed in detail elsewhere in this report.	As per main report
1.5	Reopen Princes Street to commercial and private vehicles between 8pm and 8am. Reopen Princes Street to westbound cars after 2000 - Before the trams' work general traffic could travel westbound along Princes street after 2000. This should be reintroduced after 2000 as frequency of buses and trams is likely to have reduced after this time. This would remove some traffic from the West End and Moray Feus areas.	Access will be permitted to Princes Street for loading purposes between 2000hrs and 0700hrs, i.e. outwith bus peak operational times.  Although the frequency of buses reduces after 2000 hrs it is currently anticipated that tram frequency will not, so there will still be operational issues beyond 2000 hrs. This is something which can be reviewed post-implementation of tram services.	Review post implementation of tram
1.6	All heavy goods vehicles and buses to be banned from using the residential areas of Randolph Place, Great Stuart Street, Ainslie Place, and St Colme Street.	The issue of HGV bans is discussed elsewhere in the report.	As per main report
1.7	The opening of Hope Street to eastbound traffic that is embedded in TRO/09/60A allows all heavy vehicles to be directed via Charlotte Square reducing load on a street that currently carries loads that can exceed 12,000 vehicles per day. Such a ban has already been discussed in principal and could be enforced using CCTV.	The issue of HGV bans is discussed elsewhere in the report.  CCTV is not a legally approved method (i.e. not "type approved") for enforcement of such measures.	As per main report
1.8	That Charlotte Square and Hope Street is opened to two way traffic to relieve the pressure of the high levels of displaced private vehicles.	A number of options, including this proposal, were considered in the <i>Edinburgh Tram – West End Traffic Management</i> report to the TIE Committee on 5 May 2009.	Workshop

		<p>The report noted that to introduce a two-way Hope Street link would require <i>"a significant change to the tram project because of the impact in changing the design and bus routings"</i> and that <i>"this could not be accommodated into the tram construction programme, without causing considerable delay and disruption and incurring significant cost penalties from the appointed contractors"</i>.</p> <p>So the recommendation was that while a two-way option could be considered at a future date, the one-way eastbound option was a practical alternative. That recommendation was approved and the one-way eastbound measure is included in this Order.</p>	
1.9	<p>The introduction of a 20 mph speed limit on Randolph Crescent, Great Stuart Street, Ainslie Place and St Colme Street. Also extend it to Heriot Row and Moray Place and all parts of the New Town. Queen Street should also be a compulsory 20mph.</p>	<p>This is outwith the scope of the tram project.</p> <p>However, the Council has an ongoing initiative which seeks to introduce 20mph zones in residential areas across the city; this was most recently reported to the Transport Infrastructure and Environment Committee on 24 November 2009.</p> <p>That report defined 'residential areas' as <i>"housing areas enclosed by ... one or more main traffic/public transport routes."</i> (Guidance on what constitutes main traffic/public transport routes is contained in the Local Transport Strategy 2007-2010.)</p> <p>The report also noted that it was <i>"necessary to maintain a network of 30mph roads for the safe and efficient movement of traffic around the City."</i></p>	Workshop

1.10	Fix the lights at the junction of Queensferry Street and Randolph Crescent, and at North Charlotte Street and Queens Street so that traffic does not sit stationary for long periods in both directions spewing out pollution.	<p>All city-centre signal controlled junctions are constantly monitored and adjustments are made as and where appropriate. It should be noted that the junctions are linked and that generally they run to a fixed programme at peak times but are self-optimising at other times; so the situation at any one junction is then a reflection of, and a balance with conditions throughout the network.</p> <p>As an example of the ongoing review process the settings at the Drumsheugh Gardens/Queensferry Street/Randolph Crescent junction will shortly be modified to address a number of concerns which have been raised by members of the public and the police.</p>	No action
1.11	Have an emergency traffic lights program for the above that allows for the 3 to 4 times a year that Princes Street is closed and all the busses attempt to come through the Feu.	The Council has traffic signal plans in place to accommodate a number of different emergency or event scenarios, including the temporary closure of Prince Street.	No action
1.12	If Shandwick Place cannot be open to all vehicles then, as minimum, a restriction should be placed on heavy commercial vehicles using the residential areas during the evening and night hours (say 20.00 hrs to 07.00hrs) and this would need to be enforced through the use of CCTV or something similar. Ban eastbound heavy goods vehicles, buses and coaches from Randolph Crescent. At a minimum ban commercial traffic from residential areas from 6pm to 6am, Ban westbound heavy goods vehicles, buses and coaches from Great Stuart Street 20:00 07:00 hours. This would also need to be policed by CCTV or similar device.	<p>The issue of HGV bans is discussed elsewhere in the report.</p> <p>CCTV is not a legally approved method (i.e. not "type approved") for enforcement of such measures.</p>	Workshop

1.13	The TRO should divert heavy traffic through non-residential areas forcing heavy traffic that is not delivering to the centre, to use the relief roads that begin on the outskirts of the City.	<p>The issue of HGV bans is discussed elsewhere in the report.</p> <p>The impact of freight traffic is a city-wide concern and needs to be addressed in those broader terms. The Council therefore intend to engage with the industry to investigate options for a strategy which will seek to minimise freight movements and intrusion within the city. The Local Transport Strategy identifies a number of aims, objectives and policies in this context and the Transport 2030 Vision, which was approved by Transport, Infrastructure and Environment Committee on 9 February 2010 and which aims to establish a clear, long-term vision, will help to guide that work.</p>	Workshop
1.14	Installing a pedestrian crossing in Great Stuart Street and/or Ainslie Place	<p>This is outwith the remit of this Order.</p> <p>However, the <i>Pedestrian Crossing Prioritisation Process – New Priority List</i> report to the TIE Committee on 9 February 2009 identified a Puffin crossing on Great Stuart Street at its junction with Ainslie Place as the number one priority site in the city centre. The report noted that consultation would be undertaken with Neighbourhood Partnerships.</p>	Note ongoing action
1.15	There is a need to provide a proper network of pedestrian crossings as, even if all my other proposals were to be accepted, the increase in vehicle traffic has made crossing roads in residential areas very much more hazardous.	<p>This is outwith the remit of this Order.</p> <p>However, the provision of pedestrian crossings across the city is constantly reviewed. This was reported most recently to the TIE Committee on 9 February 2009 in the <i>Pedestrian Crossing Prioritisation Process – New Priority List</i> report.</p>	Note ongoing action

1.16	Northbound traffic from Lothian Road could be directed down Queensferry Street during the same traffic light phase that allows eastbound traffic to turn right into Princes Street and then left into South Charlotte Street.	<p>To accommodate the Edinburgh Tram Network infrastructure and to allow the tram to operate in accordance with its approved business case, the designers found it necessary to restrict access on Shandwick Place during tram operational times to trams, buses, taxis and cycles only; key issues the designers had to contend with were overall reduction in road capacity and consequential road safety concerns.</p> <p>The same issues and considerations applied to the West End junction complex, and the same solution applied. So the suggested modification, which would introduce more general traffic into the junction and would conflict with other stages in the signals, would be impractical.</p>	Workshop
1.17	I request that Shandwick Place is immediately reopened to private and commercial vehicles whilst the long running disputes with contractors continue to affect the timetable of full tram implementation.	This comment refers to the Temporary Traffic Regulation Order for the construction works and a report on this matter will be put before the Transport, Infrastructure and Environment Committee on 21 September 2010.	No action
1.18	It seems to me that the City of Edinburgh Council should take immediate steps to plan an alternative route for East-West traffic which will involve Melville Street, Queensferry Street, Princes Street, South Charlotte Street, Charlotte Square, St Colme Street and Queen Street (and vice versa).	The main report recommends that Workshops be set up to engage objectors, or their representatives, and the local Community Councils in discussions of all of the issues which have been raised.	Workshop
<b>BLenheim PLACE</b>			
2.1	If a dedicated right turn filter lane is suddenly deemed necessary (London Road into Blenheim Place) this can easily be achieved by realigning the end of London road i.e. widening it utilising the over generously wide pavements on the south side of London Road/corner of Leith Walk.	The Blenheim Place issue is discussed elsewhere in the report.	As per main report

2.2	The re-opening of Regent Terrace would certainly be a partial solution to the problem.	<p>The Blenheim Place issue is discussed elsewhere in the report.</p> <p>The Regent Terrace closure at the USA Consulate was promoted by Lothian and Borders Police on security grounds and the decision to make the required Order was upheld by an independent reporter in August 2004.</p>	No action
2.3	London Rd/Easter Rd. The NTBCC understand that the London Rd Road junction has been redesigned and will include a right-hand filter for traffic travelling from London Rd to Easter Rd. This should be included within TRO2.	The junction of London Road and Easter Road does not feature as part of these proposals. However, the operation of the London Road/Easter Road junction will be reviewed once tram is operational.	Review post implementation of tram
2.4	Easter Rd/Regent Rd junction. To date no remedy has been suggested for the Easter Rd/Regent Rd/Abbeymount junction, despite more than twelve months of requests from residents. If the right hand turn into Blenheim Place is banned then improving this junction becomes essential. This should be included within TRO2. The Police are clear that they will crack down on U-turns on London Rd if this manoeuvre causes any problems.	The junction of Easter Road, Regent Road and Abbeyhill that provides an access to Blenheim Place does not feature as part of these proposals. It should be noted that the London Road/Blenheim Place junction is to be reviewed.	No action

ANTIGUA STREET		
3.1	<p>We have prepared alternative, proposals, which would permit the re-creation of some parking/loading bays outside our clients and his neighbour's properties. Firstly it is noted that the taxi rank and loading bays have been retained and increased on the other side of the street. However there are hardly any business located on that side and the new hotel would have access from the rear through Greenside lane. It therefore seems illogical to not only retain but also increase loading on this side of the road at the same deleting these facilities from the Antigua street side where considerable business activity is located. We therefore propose two amendments, which we feel, will improve the situation substantially. Firstly we suggest that the existing taxi rank and adjacent loading bay on the South east side of the road removed. The new loading bay located south west of Greenside place should be retained. This would also allow taxis to pull in to drop off passengers going to the Playhouse theatre. There is also an opportunity to create a small loading bay on the corner outside the old bank located at 1-3 Blenheim Place. The Pavement here has already been filled in and this could simply be formed into a loading bay without affecting the proposed kerb line of the junction. This is actually better located and more visible than the existing taxi rank and Loading bay. If it is essential to retain these loading bays, it would be possible to reduce the pavement from its current 5metres to 2.5metres width along the length of Baxter's place to provide parking/loading bays. This would allow the realignment of the tram lines to the south east to provide more space on the Antigua street side of the road, thus allowing the formation/retention of loading bays, disabled parking and taxi drop off points within a reasonable distance</p>	<p>The removal of the loading bays on Antigua Street is required to accommodate the revised junction layout and tram tracks. Alternative loading and parking bays are provided as part of this TRO on Union Street and Gayfield Square. In addition it has not been possible to provide dedicated disabled parking bays at this location due to complexity of the junction layout. Blue Badge holders may park without limit at the parking bay on Union Place as well as using the parking bays in Union Street and Gayfield Square.</p> <p>Comprehensive and detailed traffic modelling was undertaken to establish the required junction layout, including the lane configuration. The number of lanes at a junction is largely dictated by the peak-hour volume of traffic through the junction and the amount of "stacking space" required to accommodate traffic awaiting a green light.</p> <p>The volume of traffic on the northbound approach to the London Road junction which wishes to turn right into London Road means that two lanes are required, while the volume of traffic wishing to proceed north into Leith Walk means that a dedicated (nearside) straight-ahead lane is also required.</p> <p>There are also geometric restraints associated with the road design which must be factored in, e.g. the swept paths of large vehicles making turning manoeuvres, space for traffic and pedestrian islands, clearances between traffic and street furniture, etc. The tram tracks, meanwhile, have particular vertical and horizontal constraints associated with</p>

	<p>from our clients and his neighbours premises. This is shown in our sketch contained in appendix A to this response. Another option, if it is essential to retain the alignment of the tramlines is to provide limited loading and parking bays within the width of the pavement that runs past Antigua Street. Outside numbers 1-3 after the proposed realignment there will be at least 5m of pavement remaining and outside numbers 7-14 Antigua Street there will be at least 6m of pavement. Therefore there is scope to provide a 2.5m wide loading bay/ taxi drop off/ disabled parking bay. This proposal would still retain a pavement of substantial width.</p>	<p>them and these need to be combined with those of the roads design.</p> <p>It is a delicate balance at any junction on the city's road network, but it is particularly so at such a busy junction. Any delay at this junction, as a result of insufficient stacking space, for example, would very quickly knock-on to other junctions in the city centre road network</p> <p>Pedestrian space is also at a premium in this area and it is considered that footway widths need to be maximised.</p>	
<b>OTHER ISSUES</b>			
<b>4.1</b>	<p>The private car need not have access to the central streets other than a route to the railway station. This is how traffic is organised in European cities all of which in my experience respect the architectural heritage of their city.</p>	<p>The Council recognises the important role that the private car plays in society but understands the need to manage its use.</p> <p>The Local Transport Strategy 2007-2010 strategy states that "The Council recognises that cars are the most effective way to undertake many journeys. It seeks to implement a transport strategy that enables cars to be used effectively for those tasks for which they are particularly appropriate and at uncongested times and locations. However, there is simply not enough space in the city to accommodate all possible demands for movement by car at all times and therefore this demand has to be managed."</p> <p>The strategy notes that "<i>Parking is vital in ensuring that people in Edinburgh can access the goods and services they need and it plays an important part in sustaining the economic health of the city. It also has a crucial part to play in managing the amount of traffic and congestion on the city's streets.</i>"</p>	No action

4.2	I realize that the problem is not just the trams but also the increased number and usage of cars. Perhaps one solution for that is to revisit the idea of a central congestion charge.	The Local Transport Strategy 2007-2010 notes that " <i>The Council will consider supporting congestion charging only at a national level for Scotland or the whole UK.</i> "	No action
4.3	I believe the Council's role should be: To optimize, not maximize, car usage in and through the city. This does not mean making life easier for drivers all the time. Cycling should be massively encouraged - as a city we seem woefully behind European peers in this respect. Congestion is an inevitable fact of life, but should be moved to the city outskirts where it will dissuade drivers from car usage in the first place, and have a lower health risk to pedestrians. Lothians and Fife both have excellent train and bus services.	The Local Transport Strategy 2007-2010 sets out Council policy on the issues raised by this correspondent.	No action
4.4	Where there are cars in the City, and the admittedly necessary commercial vehicles, they should be distanced from residential areas as much as possible. For pollution (fumes and noise) and safety reasons.	The Local Transport Strategy 2007-2010 sets out Council policy on the issues raised by this correspondent.	No action
4.5	Double glazing grants made available for local residents similar to the ones made available to residents near airports, as a method of reducing the constant noise. The "Energy Heritage" booklet issued with Edinburgh Council indicates a number of suitable solutions. All residences along the affected route should be given grants to help maintain the fabric of the buildings, and to implement noise reduction measures such as double-glazing.	The Council's "Development Quality Handbook" notes that " <i>Grant Assistance is available in some conservation areas of the city for the repair of original features such as windows and doors. Assistance is also available for the reinstatement of original features, where they have been lost. However, the budget available for this work is very limited and grants are therefore generally awarded only in exceptional cases.</i> "	No action
4.6	Connecting the North and South of the city. The present 3 routes are grossly stretched. If you cannot go over or through, then why not go under and have a tunnel under the castle, or from Scot Street to the Meadows or under-pass from say Leith Walk to Lothian Road. A system for travelling East and West in the city; similar radical ideas seem necessary.	The Local Transport Strategy 2007-2010 sets out Council policy on the issues raised by this correspondent.	No action

4.7	In a circular letter from Edinburgh Tram (dated 23/1/09) concerning tram work on Princes St with resultant diversions to George St and Queen St, the City of Edinburgh Council & TIE indicated that in the event of an incident on the above two streets, general traffic would be given the option to divert via Dublin St, Abercromby Pl, Moray Pl and Great Stuart St ie. on a contingency basis only. The circular letter concluded that "all measures are temporary & will be restricted to their current status when the Princes St work is complete". To date there have been no serious problems arising from this & there has been no need to "open up" Moray Place. Now, as I understand it, if the TRO for Trams is adopted the situation could greatly worsen principally because of the proposal to close Shandwick Pl. to general traffic. This would mean that traffic would then be flowed through residential areas. I am not quite clear whether this move would involve Moray Pl. being "opened-up" on a contingency basis only to help cope with the traffic flow or whether Moray Pl would actually become permanently "open" - a horrific thought. CEC (see above) promised that diversions through the Moray Feus would be temporary - is this now to be considered as a broken promise?	There are no plans to make these contingency diversion routes permanent or to re-open Moray Place.	No action
4.8	Put up notices to stop illegal cycling on the pavements.	The reverse of this suggestion applies, i.e. signs are only used to designate areas where cycling is permitted. Cyclists are liable to prosecution where no sign exists.	No action
4.9	That in view of the operation of the trams in Princes Street, the number of buses using Princes Street, both East & Westbound, should be reduced.	The tram system and Lothian Buses will be operated as an integrated service by one company (Transport Edinburgh Ltd). Where the tram and buses share routes and serve similar catchment areas the level of each service will reflect that. Service levels will be refined, as necessary, as patronage levels are established in operation and as is the case with the buses currently, service levels would be reviewed continually.	No action

<b>4.10</b>	The proposed temporary buses unable to enter the Shandwick Place tram works were formerly re-routed down Queensferry and Melville not Frederick Street (this will Necessitate dangerous and illegal U turns for vans etc) There is work on the corner of Frasers but that could be left for when Shandwick Place complete 2011. Also the Western Approach could bring buses into Haymarket as was done before from Princes Street.	These comments relate to the construction works. The comments are noted.	No action
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**APPENDIX 4**

A note on the proposed general traffic ban in Shandwick Place.

**Summary**

Traffic modelling indicates that maintaining general traffic on Shandwick Place would have a very significant adverse impact on the tram journey times and service reliability. Buses would also be affected by increased delays on all approaches to the West End junction (Shandwick Place/Queensferry Street/Lothian Road/Princes Street), as would general traffic.

The proposed layout restricting general traffic on Shandwick Place therefore provides a design solution, which is necessary to meet the balance of access needs of all travellers and enable the tram to comply with its approved Business Case. The principle of giving priority to pedestrians, cyclists, taxis and public transport is also consistent with national and local transport policy.

**Background**

Transport policy both nationally and locally recognises the importance of providing and maintaining good access for all road users and identifies high-quality public transport as the key to achieving that objective.

The Council's Local Transport Strategy notes that *"An effective, integrated transport system within Edinburgh is essential to the continuing development of the economy of the whole Edinburgh region, the quality of life of its citizens and the experience of all who travel into the city for work, education or leisure."*

The tram will form a high capacity, high quality core of that public transport system and reliability is paramount in ensuring the success of the tram and of the strategy. To achieve these objectives priority has had to be given to public transport on the on-street tram sections where physical and operating capacities are constrained (as they are on Shandwick Place and at the West End junction).

In that context the West Maitland Street/Shandwick Place route is a key public transport corridor and interchange location, so the design must ensure that the tram and buses operate efficiently and to schedule through that corridor. The Edinburgh Tram (Line One) Act 2006 (section 58(4)) makes provision for trams to be given priority over other means of transport at junctions.

**Design**

At the Parliamentary stage, it had been assumed that general traffic would not need to be restricted on Shandwick Place and the Scottish Transport Appraisal Guidance (STAG) appraisal drawings which was submitted to Parliament reflected this. The primary purpose of the STAG appraisal drawings was to establish the basic costs of the tram and establish the limits of deviation (LOD) of the route, and it was recognised by the Parliamentary Committee that *"... much of the detailed design of the tram project has yet to be developed and may indeed only be known after the Parliament has completed its consideration of the Bill (should the Bill become an Act)"*.

In the subsequent Preliminary Design process a number of options were investigated, including a variety of tram stop configurations at or close to the West End junction (where the STAG appraisal drawings had shown it at its now confirmed location at Coates and Atholl Crescents).

However, that design process and the associated traffic modelling highlighted a number of physical and operational constraints which could not have been identified at the STAG appraisal drawings stage and it determined that a general traffic restriction was a necessary requirement for the safe and efficient operation of the tram and bus services.

The West End junction is a critical location for the north/south movements of general traffic and for east/west and north/south movements for public transport, pedestrians and cyclists, all of which required to be maintained, or enhanced if possible. There are also engineering constraints involving the tram track and tram stop, particularly those associated with the horizontal and vertical geometric alignment, which need to be catered for.

The Detailed Design process then reinforced these findings as the designers looked to optimise the track alignment, minimise the impact on the road layout, and accommodate all road users where possible. It was only at this stage that the precise impact of the tram on available road space, and therefore on road users, could be established and dealt with; just one example of this is the refinements which had to be made to kerblines to maintain safe east-west links for cyclists.

Stakeholders were consulted throughout the detailed design process and a series of public exhibitions of the proposed Traffic Regulation Order (TRO) was undertaken in October 2008; a number of modifications were made to the design and the TRO as a result of comments received.

### **Traffic Modelling**

Traffic modelling was undertaken in a succession of progressively more detailed levels:

- The VISUM model is the *strategic-level model* which measures the impact of tram on the wider-area road network, and feeds data into;
- The VISSIM model, which is a *microsimulation model* of the tram route, which then examines the interaction of tram and other road traffic in greater detail along the route, and feeds data into;
- The LINSIG and TRANSYT models, which are computer programmes for assessing the operation of traffic signalled junctions in detail; individual junctions in the case of LINSIG and groups of junctions in the case of TRANSYT.

The design was developed through an iterative process involving all levels of the modelling hierarchy and it was that process which identified the need to restrict general traffic access on Shandwick Place and through the West End junction. This is discussed in greater detail in the report *Edinburgh Tram Network, Traffic Modelling Report*<sup>1</sup>.

A supplementary technical note, *Shandwick Place open to general traffic*<sup>2</sup>, was prepared to assess the impact of permitting general traffic to use Shandwick Place. That assessment confirmed that the additional traffic caused the West End junction to operate **significantly above capacity**. Not only did this impact on tram and bus operations (tram run times are delayed by up to 500 seconds westbound and 200 seconds eastbound) but general traffic was also seriously impacted, with excessive queuing on both the South Charlotte Street and Lothian Road approaches to the West End junction. When developing the business case one of the assessment criteria was the running time of the tram. Figures were based upon 2008 costings over a 60 year period, and every second of additional run time for tram equates to an increase in economic impact of £85,000, in each direction, over a 60 year period. Therefore the additional run time westbound of 500 seconds equates to an economic increase of £42.5 million and the additional 200 seconds run time eastbound equates to £17 million. Consequently this results in the tram not meeting its approved business case.

### Conclusion

The proposal to restrict general traffic on Shandwick Place, while maintaining limited access for loading, provides the optimum design for this critical location in the city-centre road and tram network.

The design, which is the outcome of a comprehensive design and traffic modelling process, is considered to be the most practical road layout which both assures the necessary priority for tram and accommodates other road users. The resultant allocation of space between pedestrians, cyclists, buses and taxis, in conjunction with the proposed trams, achieves the best use of space at the West End junction and on Shandwick Place, while providing necessary access for loading.

It is acknowledged that the effect of the general traffic restriction is to re-distribute general traffic onto the surrounding local road network. The modelling indicates that this general traffic can be accommodated on the local road network and it is noted that the opening of Hope Street eastbound to general traffic helps to distribute that traffic over a wider area.

It is therefore recommended that Shandwick Place should be closed to general traffic, as per the assumptions set out in the proposed Traffic Regulation Order (TRO1).

### References

1. *Edinburgh Tram Network, Traffic Modelling Report*, Colin Buchanan and Partners Ltd, 29 Jan 2010
2. Technical Note 127986, *Shandwick Place open to general traffic test with final tram design*, Colin Buchanan and Partners Ltd, 27 April 2010

**Process for Making and Varying Traffic Regulation Orders for TRO 1**

