



The Lothian Cycle Campaign

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PLANNING APPLICATION 16/02791/AMC ... ST JAMES CENTRE

We commented in January 2015 on the previous application 14/05263/AMC concerning pedestrian and cycle access to the St James development. We are disturbed to see that few of our points have been acted on in this latest application. Our comments at that time are therefore reproduced below as an appendix and should be considered by the Council as part of our response to the current application.

Our current comments here largely take the form of references to our comments of Jan 2015, and we will refer to them as '2015' – for example, 2015A refers to section A of our 2015 submission.

The current application contains well over 200 separate documents. It is clearly impossible for a voluntary organisation to give all these documents the full scrutiny they merit, and therefore **we rely on the Council to ensure that all aspects of the approval fully comply with council policies on cycling – including cycling access and routes**, not just the easier question of bike parking on which developers often prefer to concentrate.

Our comments today refer only to one of the 200+ documents: that entitled *Supporting Transport Statement, June 2016, prepared by SWECO*.

A. Section 2 of *Supporting Transport Statement* – Cycle Parking

In general this section is not contentious, but we have two important points...

1. **Cycle parking in Galleria on E-W route.** We have complimented the developers on including the east-west route through the Galleria [2015B] - an innovative and welcome initiative, including use of the lift - and we understand the requirement to dismount for the section within the Galleria. The value of the E-W route through the Galleria will be primarily for those cyclists who wish to shop or use other St James facilities during their journey and, quite obviously, most cyclists travelling on a direct E-W journey will in preference use Leith Street or York Place. Therefore cycle parking should be provided at a few locations **within the Galleria**, near shopping destinations – indeed if this is not done there may be bikes leaning against windows.
2. **Cycle Hub.** In earlier discussions with the developers there had been talk of a possible Cycle Hub within the development [2015E]. This would provide all-day supervised bike storage, sale of parts, local cycling information, the opportunity to have ones bike serviced during the day whilst at work or shopping, and other relevant facilities – and would be open both to the public and to staff of the centre. Such Cycle Hubs are common in some European countries. In a development of this scale, and in a city with targets for greatly increased cycle use, a Cycle Hub should be a requirement, and its presence would also show a forward-looking European approach by the developers. An option would be for the developers to work with a local cycling business to run the Cycle Hub – there are many possible partners, such as the Bike Station, Edinburgh Bicycle, The Cycle Service, Grease Monkey, and so on.

B. Section 3 [& Fig 3.1] of *Supporting Transport Statement* – Pedestrian and Cycle Access

1. **Leith Street.** We remain extremely concerned that there is no cycle provision planned in the upper section of Leith Street. This is covered in detail in 2015A. Although we don't repeat those arguments here, we stress that this is one of our top concerns and should be addressed.
2. **East-West route.** We have already referenced this route in A1 above. We again highlight the fact that its main value will be for people who make use of the Centre's facilities (whether for shopping, employment, leisure, etc), albeit often as part of a through route, e.g. travelling from George Street to Leith and stopping en route to make some purchases in the Centre. It should be designed with that in mind, as in A1 above.
3. **North-South route.** The plans for this vital route, connecting to and past the Centre, between Leith Street and York Place, are unfortunately very sketchy and very disappointing in several respects, and several major rethinks are required...
 - 3.1. **Design of route.** We are concerned that we can see no mention of how the cycle route will be delineated, signed, etc. This is a vital issue to ensure satisfactory pedestrian/cycle compatibility - see our comments at 2015C. Our concerns are amplified by para 5.2.3.2 of the document which refers to "*between Leith Street and St James Square predominantly for pedestrians only*" with no mention of this also being a cycle route.
 - 3.2. **Connection to York Place.** We have found no detail in the plans on this critical connection. We understand that discussion is underway with Council transport officials over the York Place/ Elder Street junction, with regard to the Council's planned city centre east-west cycleroute [where we strongly urge a direct, not staggered, cycle crossing] – but whatever solution is found must also allow for safe and convenient connection for people cycling to/from Elder Street and the Centre.
 - 3.3. **Connection to Leith Street.** We have found no detail in the plans on this critical connection, which is probably even more important than 3.2 above, given the heavy existing cycle flows to Leith Street from the Bridges and South Edinburgh, as well as in future from the Council's new city centre E-W route, some of whom will certainly wish to visit the Centre for shopping or work. Unless the Council insists on a proper connection we fear a C20th 'solution' with kerbs and a 'cyclists dismount' sign. We do not envisage much need for a right turn into the Centre for cyclists coming up Leith Street, and appreciate that would be difficult, but it is vital to provide for cyclists entering James Craig Walk from the top of Leith Street, and leaving James Craig Walk heading either up or down..
 - 3.4. **Connections to St Andrews Square.** See 2015D. It would appear from the plans that no progress has yet been made to providing this connection, which would be of immense benefit to pedestrians and cyclists (as explained in 2015D) and to the shopping potential of the Centre. Secondly, in the absence of this connection, and in any case, the developers and Council should negotiate with Multrees Walk management to allow careful cycling there. It is crazy that a C21st development, which incorporates an innovative cycleroute through its covered shopping area, becomes semi-inaccessible to cyclists from the City Centre because of a C20th development which bans even careful cycling through an open-air street.

We trust the Council will take full account of our comments in the conditions which it attaches to any approval of this application.

Yours Sincerely

Dave du Feu
for Spokes Planning Group

Appendix – Spokes submission of 25.1.15

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25.1.15

PLANNING APPLICATION 14/05263/AMC ... ST JAMES QUARTER [approval of reserved matters including pedestrian and cycle access]

This is a major application, with over 150 supporting documents and as such it is difficult to be sure we have identified all relevant issues and locations. Some document references are given in our subheadings below, but these are probably far from complete. We trust that the Council's Transport and Planning officers involved in its scrutiny will ensure conditions which take account of the Council's very ambitious Local Transport Strategy targets to increase travel by bike, foot and bus, *and to reduce car use*, as well as the ambitions and targets of the Council's Active Travel Action Plan.

The application includes one very welcome and forward-looking innovation [B below] which could and should set a precedent for other major covered shopping and mixed-use developments. On the other hand, there is another issue [A below] which concerns us greatly and to which we formally object; and there are other matters where we have a number of comments or suggestions.

We also express our disappointment that, as we understand it, permission has already been granted for 1800 car-park spaces. This makes it more difficult to achieve sustainable transport policies and it impacts badly on the ambience and potential of the development's surrounding public realm. The council should attempt to persuade the developers not to take up the full option of car provision, and use the space for other money-generating purposes.

A) LEITH STREET [Transport Statement, 4.3]

We object to the Leith Street proposals. Segregated cycle provision from Picardy Place up to Calton Road is welcome, but it must continue up to Waterloo Place, for Princes Street, not end at Calton Road.

Given the very tight width constraints we appreciate that this means reducing motor traffic from 4 to 3 lanes, with only one lane either uphill or downhill, at least for some of the way. We note that reducing traffic lanes from 2 to 1 in order to install cycle facilities is what the Council has already done successfully at the Mound crossing of Princes Street – despite initially rejecting our suggestion of that, on the grounds of traffic modelling results.

Ideally the Council would make the top section of Leith Street entirely free of private motor traffic, open only to public transport, walking, cycling and possibly with a permit system for certain local businesses. We point out that European cities with sustainable transport ambitions are increasingly moving to city layouts where it is not possible for private traffic to drive through the centre or even (to avoid rat running) between adjacent segments of the city, whilst city segments and the centre are given excellent accessibility for public transport and active travel [Groningen being one of the earliest examples].

We also appreciate that the junction between Princes Street and Leith Walk at Waterloo Place is particularly tight, but we point out that the cycle route needs in any case also to connect to James Craig Walk, which in turn should include a link to St Andrew Square (D below).

Leith Street cycle facilities are critical for several reasons...

1. Leith Walk, including Picardy Place, is regarded by the Scottish Government as a national exemplar cycling project, with segregated provision from Pilrig upwards and wider-than-standard onroad lanes below that [though illegal parking on the lanes is still to be dealt with] and with special national funding allocated for this exemplar purpose via Sustrans. It would be shocking for this exemplar route to be connected to the city centre via a main road connection with zero cycle facilities.
2. The City Council is developing proposals for a major East-West cycling route, from Roseburn to Leith, which is likely to seek national match-funding as an exemplar project. Leith Street is included as an option in this proposal and, in our view (for the reasons in the next bullet point) is an essential element of any such route. Yet without cycle facilities Leith Street is surely very problematic as a section of the route.
3. Leith Street is almost certainly the main source of cycling trips for Leith Walk. It connects Princes Street and the huge south-Edinburgh residential area to Leith, including employment centres such as the Scottish Government and recreational and shopping areas such as Ocean Terminal. In the other direction, it connects the big Leith residential area with the City Centre and with centres of employment and study such as Edinburgh University.
4. The development includes a north-south cycle/pedestrian route starting along James Craig walk. This needs to link into Leith Street, but it is hard to see how this can be suitably done without cycle facilities in Leith Street. See further notes on this in C below.
5. The development will presumably be constructed in high quality materials and to a high standard. Any retro-fitting or changed layout in a few years time will be costly and disruptive. Cycle facilities need to be built in from the outset.

B) E-W ROUTE, THROUGH GALLERIES [Transport Statement, section 2]

The developers propose an east-west route through the heart of the development, involving dismounting and walking through the gallery section, and using the lifts between levels. Normally we would object to any proposal involving dismounting, but this is a unique situation, in a covered development where other developers would completely ban bikes – as for example in the existing St James Centre and even [shockingly] in open-air Multrees Walk. We have not heard of such a proposal anywhere, and congratulate the developers on including this route. The Council should use this innovation, where appropriate, as a precedent for other major indoor shopping centres - although a fully cycle-able route should be the norm where that is practicable.

This E-W route is not intended to cater for those through-cyclists wishing to travel at normal speed from the city centre to Leith. They will certainly in preference use the City's forthcoming east-west route [A2 above] - choosing Leith Street or York Place depending on their origin and destination. Rather, the route will cater primarily for those who wish to cycle from the city centre to Leith (or vice versa) but to shop or undertake some other business in St James Quarter en route. It may also cater for a very limited number of people who would prefer to use a lift rather than cycle up Leith Street or from York Place, despite the significant time penalty.

It will be vital that the route is clearly **designed and signed** such that walkers know that cyclists are allowed (and will be cycling in the non-gallery sections). Also [G below] there must be **cycle parking** outside shops and other destinations within the centre, including the galleries.

C) N-S ROUTE, JAMES CRAIG WALK – ELDER STREET [Transport Statement, section 2]

We welcome this north-south route, which will give access to the development and, for some trips, an alternative to descending to Picardy Place. However it has potential for a further, very significant, role in connecting St Andrew Square directly to the development, and to Leith St and York Place, for both pedestrians and cyclists [D below]. However, even if this connection is not initially feasible, presumably for reasons such as land ownership, there is likely to be heavy pedestrian and significant cycle use at certain times. Thus the route should be of sufficient width for comfortable significant 2-way pedestrian and cycle use, with signage making this clear. The documents in fact state that the entire route is to be a minimum 12m width, so there is a strong case for a **physically segregated route**, or at the least **delineated cycle provision**, as in Middle Meadow Walk.

As far as we can see, the documents do not show how the N-S route will connect into the roads at either end – importantly, Leith Street [A4 above] and also Elder Street/ York Place. This must be addressed.

D) CONNECTION TO ST ANDREW SQUARE [Public Realm Strategy, page 39]

If we have understood the documents properly, no immediate pedestrian/cycle link to St Andrew Square from routes B and C above is planned, presumably due to property ownership issues, although a 'desirable' connection is indicated for the '**Registers**' area.

Secondly, **Multrees Walk** should be opened to careful cycling – there is no good reason for this to be prohibited.

It is really important that every effort is made – by the council as well as the developers - to ensure these two connections, which would be a major source of pedestrian/cycle traffic to the development, as well as an excellent traffic-free connection from St Andrew Square to Leith Street and to York Place.

Our comments in A, C, D point to the possibility of a complete segregated cycle route from St Andrews Square to Picardy Place via James Craig Walk and Leith Street – a huge contribution to the Council's planned exemplar east-west Roseburn-Leith city-centre route.

E) CYCLE 'HUB'

In discussions with the developers we were told they hoped to provide some form of cycle hub, both for workers in the centre who commute by bike, and for customers and visitors. This could provide facilities such as all-day supervised bike storage (for staff), cycling information, showers, etc, but ideally full European-style cycle hub facilities including sale of consumable bike parts and the opportunity to have your bike serviced or repaired during the day, as well as inclusive or nearby cafe facilities. A link with the Council's bike share/hire scheme (assuming it is then up and running) would also be valuable.

As far as we can see this is not shown in the plans, but with over 150 documents we may have missed it. However, given the scale of the development, the number of staff and customers, and the desire to promote sustainable travel, such a facility is important and should be made a requirement of permission by the council.

F) GENERAL CONSIDERATION OF CYCLING IN THE PLANS

Despite the positive comments above we are concerned that the documents, in many places where both pedestrian and cyclist provision should be mentioned, in fact only mention pedestrians – this applies to both the wording and the pictures, maps and diagrams. This suggests that not all those involved in preparing the proposals were fully on-message about including cyclist issues. If that continues, it may impact on the detailed designs, such as the design of the north-south route, the east-west route, the locations of bike parking and so on.

Just to take one of many examples, in the Design & Access Statement, section 5.2, “The Design Principles”, subsection 1 (page 32) the hierarchy of “safe public routes” is described. For clarity for the reader of the documents, this section – which covers “design principles” - should tell the reader that the 2 principal routes (E-W and N-S) are for cycle as well as pedestrian use. This surely is an important 'design principle,' and so, in such a massive set of documents, it is insufficient for this just to be stated in the transport statement.

The council should ask the developers to ensure that all of the perhaps 100s of designers, engineers and architects involved understand that cycling accessibility is to be an integral element of the development, so that council policies and targets on cycle use are properly integrated.

G) CYCLE PARKING AND STORAGE

All-day cycle storage for staff should be included in the above bike hub; but parking for customer bikes should be provided at frequent intervals throughout the development. One central bike park may suit some customers who wish to spend a long time in the centre, but most will be stopping off at one or two shops or businesses and may be reluctant to do so if they have to leave their bike some way away.

SUMMARY OF NEEDS [letters refer to the above sections]

- [Intro]** Reducing car use and accessibility
- [A]** *Top Issue* Segregated cycle provision the whole length of Leith Street
- [A,C,D]** High quality cyclerooute, ideally fully segregated, St Andrew Square – James Craig Walk - Leith Street – Picardy Place
- [B,C]** Clear indications to walkers, through facility design and appropriate signage, that cycling is permitted on the N-S and E-W routes [albeit with pushing-only in the galleries section]
- [D]** Pedestrian/cycle access from the N-S route to St Andrew Square, via both Multrees Walk and a new connection via the Register area
- [E]** A Cycle Hub open to staff and customers/visitors
- [G]** Cycle storage for staff in line with Council standards, probably based at the Cycle Hub
- [G]** Customer/visitor cycle parking at multiple frequent locations near destinations such as shops and businesses
- [F]** All designers/ architects to be aware of the pedestrian/cycle design principle.

We trust that our objection and other comments will be considered carefully, with full involvement from council planning and transport functions.

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