***Living Streets Edinburgh***

**RESPONSE TO PICARDY PLACE CONSULTATION – DECEMBER 2017**

**Contents:**

1. Introduction
2. The consultation process
3. The fundamental problem: the gyratory system
4. Specific design issues
5. Summary of recommended design changes
6. Conclusions

**1. Introduction**

Living Streets Edinburgh is the local voluntary arm of the national charity which campaigns for improved conditions for ‘everyday’ walking. Our manifesto for the 2016 Council Elections set out four key aims for Edinburgh:

* invest much more in walking
* make a comprehensive transport plan for the city centre
* pedestrianise George Street
* transform street management.

With regard to the latest (17 November) Council proposals for the Picardy Place area, while we welcome some planned improvements over the present highly sub-standard conditions for walking and cycling, we also have major concerns.

Living Streets Edinburgh has long been worried about two key aspects of this scheme: first, the unsatisfactory nature of the ‘consultation’ process; and second, the 1960s’ approach to traffic management, constructing a three-lane road gyratory roundabout system which would be a barrier to walking and cycling.

**2. The consultation process**

Unlike the good level of consultation on other adjacent projects such as the West-East cycle route, in the case of Picardy Place – which will be a major change to the public realm – the level of consultation to date has been most unsatisfactory. There appears to have been no formal public consultation between a pre-application consultation in 2013 and a consultation exercise in summer 2017. The ‘ground rules’ seem to have been set dating back to the tram proposals from 2009.

There is a lack of transparency about the relationship between the Council and the developer, with big decisions on traffic and parking being taken behind closed doors before local people and citizens as a whole can have their say. The Council appears to be constrained in its transport decision-making by a historical agreement with the developer which was not open to public scrutiny.

The Council’s latest consultation has only been tinkering at the edges of the traffic scheme, with the central component – the gyratory – evidently not up for discussion.

**3. The fundamental problem: the gyratory system**

1. **The proposal**

The central component of the Picardy Place traffic plan – and one which has a major impact on space for, and the convenience of, walking and cycling – is a gyratory / roundabout system, with three vehicle lanes on all three sides of a ‘triangular island’ (other than a very short two-lane stretch at its north-east corner).

1. **The national and local policy context**

Key relevant policy documents include the Scottish Government’s ‘Designing Streets’ (2010) which sets out the need for street design to change the emphasis ‘ towards place-making and away from a system focused upon the dominance of motor vehicles.’

The Council’s ‘Edinburgh Street Design Guidance’ (2015) includes commitments to ‘follow a design process that starts by considering the street as a place for people and recognising that streets have an important non-transport role’ and that the Council ‘will always prioritise improving conditions for pedestrians, especially for those with mobility impairments or other disabilities, for cyclists and for public transport users.’

The outcomes set out in the Council’s ‘Local Transport Strategy 2014-2019’ include a transport system ‘with an emphasis on encouraging walking, cycling and public transport use and a high quality public realm’, which is ‘part of a well planned, physically accessible, sustainable citythat reduces dependency on car travel, with a public transport system, walking and cycling conditions to be proud of’, and in which ‘everyone should be able to get around the city regardless of income or disability.’ Elsewhere (Section 4.5) the document notes that: ‘Although this strategy is about moving around, it is also about reducing the need for motorised travel, especially car travel. Less car traffic helps make a city a safer and more pleasant place to live, as well as an attractive place to invest.’ This qualitative objective is reinforced by a specific quantitative aim to reduce the car’s share of all vehicular traffic on the city’s streets from 42% in 2010 to 29% in 2020.

It should be noted that these policies are succeeding, as evidenced by the 2011 Census, Spokes traffic counts and other data. Edinburgh now has higher proportions of people who walk, cycle and take the bus to work than anywhere else in Scotland, and a declining proportion of people who drive to work.

The Council’s City Centre Transformation process is intended to lead to substantial reductions in city centre vehicle traffic. New developments such as the St James Centre and the associated Picardy Place traffic plan should be helping to maintain the admirable recent modal shift trends and achievements, not putting them at risk by accommodating excessive levels of car traffic.

1. **The problems with a gyratory**

Acceptance of a gyratory undermines the Council’s wider transport mode share and mode prioritisation objectives. By providing for predicted traffic levels – ‘accommodating’ rather than ‘restraining’ traffic in line with policy objectives, and prioritising the associated flow of vehicles – the gyratory inevitably has impacts on other competing users of street space: pedestrians, cyclists and public transport users. *It should be noted that London has a comprehensive programme for removing major gyratory roundabouts due to their impacts on pedestrians and cyclists. Edinburgh should not be re-inventing the gyratory!*

Many of the detailed flaws of the latest Picardy Place design can be traced back to the impact of the gyratory on (a) a finite amount of street space, and (b) the obstruction of key pedestrian ‘desire lines’. These are examined in some detail in Section 4 below.

It has been claimed by Council officials that replacing the gyratory with a T or Y junction (removing the western traffic arm of the gyratory) cannot accommodate predicted traffic levels. But the traffic modelling is based on 2014 traffic levels, and with Leith Street closed to vehicular traffic for 44 weeks, a significant proportion of this traffic will simply not return as and when the road re-opens.

To avoid conflict with the Council’s strategic transport objectives, it should be looking to reduce the future demand for car journeys in this important part of Edinburgh’s World Heritage Site – by cutting planned road capacity and maximising the opportunities for public transport, walking and cycling.

The Picardy Place scheme should be an integral part of a forward-looking city centre transport and traffic plan, not designed in isolation. Reducing road capacity in the Picardy Place area needs to be carefully planned on an ‘area-wide’ traffic management basis to avoid problems of crude displacement of traffic from one street to another.

**4. Specific design issues**

1. While we welcome the planned reduction of vehicular space compared to the current, highly unsatisfactory situation, there is still **far too much emphasis on providing capacity for vehicles**.

Three-lane provision at the main gyratory intersection is ‘accommodating’ rather than ‘restraining’ traffic in line with policy objectives, and is not conducive to safe walking or cycling.

The Council should be considering the potential to remove through traffic on Broughton Street, north of its junction with Picardy Place and York Place – or making it bus only – to simplify the number of traffic movements the junction has to accommodate. This is an important ‘high street’ area and should not be seen simply as a transport corridor. Such considerations need to be part of the city centre transformation plans, and should not be pre-empted by the Picardy Place gyratory.

Given that Leith Street will have been reduced to two lanes for a year, and closed for nearly another year, we question the need for the carriageway to be three / four lanes wide – some of this width would be better allocated to pedestrians and cyclists (see below), including the section of Leith Street where no cycle path is provided.

The option to make the southern section of Leith Street only available for buses, pedestrians and cyclists should be modelled, as should be the impact of permanently re-routing certain bus services (eg No. 5 and No. 34) via Waterloo Place, with de-congestion and journey time benefits.

1. The gyratory – and accommodating associated traffic levels – creates **multi-stage, inconvenient pedestrian crossings**, notably at: the north-east corner of the gyratory island (four stages replace two at the current crossing by the Playhouse); the north-west corner (three stages replace two); and at the southern corner (two stages).

The first two of these crossings are circuitous and ignore key ‘desire lines’ for pedestrians; in the case of removing the crossing in front of the Playhouse this would encourage people to risk cutting straight across the cycleway, three traffic lanes and, potentially, two tram tracks. There is no evidence that the Council has modelled the impact of these circuitous crossings on journey times for key pedestrian routes – all the modelling appears to relate to vehicular traffic.

Crossings appear to inter-mingle pedestrian and cyclist flows – but these should be segregated to avoid unnecessary conflicts.

1. While the proposed widening of certain footways is a welcome improvement on the current sub-standard arrangements in much of the area, there appear to remain **too many narrow sections of footway** on stretches with very heavy footfall. Detailed widths around Picardy Place and the gyratory area are not clear in the latest design plan, but the planned cycleway along York Place (south side) appears to significantly *reduce* the current footway width.

The layout promoted in the current TRO and redetermination orders for Leith Street shows that 32 out of 67 sections of footway will not meet the ‘desirable minimum’ of ‘4 metres or wider’ set out in the Council’s Street Design Guidance (SDG). Two sections will not even meet the ‘absolute minimum’ of 2.5 m laid down in the SDG, the worst of which is at the very south end of Leith Street (east side) near its junction with Waterloo Place – a key pedestrian pinch-point. The latter is the result of accommodating three lanes of road carriageway, rather than reducing this to two lanes for bus and cycle use only.

1. Like Spokes, The Lothian Cycle Campaign, we are concerned at the very large areas of footway and public space proposed for conversion to **‘shared space’ between pedestrians and cyclists**: first, at three corners of the York Place / Broughton Street / Picardy Place junction; second, adjacent to, and south east of, Little King Street; third, at the crossing of Leith Street at the southern end of the gyratory island; and fourth, at both sides of the Greenside Row junction with Leith Street. This is a recipe for conflict, with the most vulnerable street users (including pedestrians who are frail or have a disability) likely to come off worst.
2. Pedestrian safety and convenience would be compromised by the proposed creation of **some sections of cycleway running through the centre of footways** (rather than one being adjacent to the other), also forming a barrier to pedestrians using key bus stops on Leith Street (east side) and Broughton Street (in front of the cathedral). From the pedestrian perspective, it is far preferable to have properly segregated cycleways adjacent to – but not part of – footways.

The proposed split footways on Leith Street north of the Calton Road junction – reducing their effective width and utility for pedestrians – would be even more inconvenient and hazardous for walking on the section between the Greenside Row and Calton Road junctions, where it is proposed that the cycleway should switch, mid-block, from one side of the footway to the other!

1. While the latest design iteration plan retains much of the **important green space and public realm** which would have been lost in front of the cathedral, this is compromised from a walking perspective by the cycleway bisecting this space.

To accommodate road vehicles and trams, the entire area of green space and mature trees on the north side of Picardy Place is lost in any conceivable design option. This loss could however be balanced by scrapping the gyratory, removing its south to north-west arm and the isolated ‘island’, and thereby extending north-eastwards the public space in front of the cathedral.

1. Scrapping the gyratory would also allow **improved future interchange between bus and tram** (and enhanced connectivity on foot between the proposed tram stop and the St James Centre, encouraging people to arrive by public transport and not by car). Astonishingly, there appear to be no bus-priority measures in the immediate Picardy Place area shown in the latest design plan. As all bus users start and complete their journeys on foot, this is a concern for Living Streets.

**5. Summary of recommended design changes**

1. undertake traffic modelling for a T or Y junction, based on constraining car traffic and enhancing the alternative modes
2. model journey time impacts for key pedestrian routes affected by the proposed circuitous, multi-stage pedestrian crossings
3. explore options for (i) bus-only access on the south section of Leith Street (and some bus re-routing along Waterloo Place) and (ii) banning through traffic on (or making bus-only) Broughton Street north of its junction with Picardy Place and York Place
4. redesign pedestrian crossings to provide high-quality connectivity along pedestrian desire lines – without multiple stages – with pedestrian and cyclist flows segregated
5. ensure that all footways meet the Street Design Guidance ‘desirable minimum’ width of 4 metres or more
6. eliminate ‘shared space’ for pedestrians and cyclists, replaced by segregated provision
7. move segregated cycleways out of the centre of footways, relocating them between the footway and the carriageway
8. enhance the public realm and green space, by eliminating the gyratory (removing its south to north-west arm and the isolated ‘island’)
9. improve future interchange on foot between bus and tram, and on foot from bus / tram to the St James Centre, by eliminating the gyratory.

**6. Conclusions**

The key to securing enhanced facilities for walking (and cycling) is elimination of the gyratory and the associated over-provision of road capacity for cars – both of which are entirely inconsistent with the Council’s own strategic transport objectives for the city centre and Edinburgh as a whole. The current Picardy Place scheme is a *traffic* plan– but it should be a *transport and place* plan*.* We urge the Council to work towards a design which is both a symbolic and very practical demonstration of the importance of (i) walking and (ii) ‘place’ rather than ‘movement’, in this highly-visible and much-used area of the city centre and World Heritage Site.

***Living Streets Edinburgh Group / December 2017***