*Living Streets Edinburgh Group*

**Commentary on ‘Taking Trams to Newhaven’ consultation**

**1. Our support for tram extension**

Living Streets Edinburgh Group (LSEG) is the local volunteer arm of the national charity which campaigns for better conditions for ‘everyday’ walking as part of a high-quality public realm.

We support the principle of extension of the existing tram route to Leith and beyond. This kind of high-quality public transport is essential to meet the transport needs of a growing city in a safe and sustainable way.

Some 99% of tram users access the tram on foot (or wheelchair), and we support the principle of strategically-located tram stops with safe, convenient and high-quality access on foot from the surrounding catchments.

We also welcome the incorporation, in the initial design of the new route, of extensive provision of continuous footways over side roads at their junctions with Leith Walk and other key streets along which the tram will operate. These are potentially transformative of the walking experience and represent a significant opportunity to implement in practice the excellent principles contained in the Council’s Street Design Guidance.

**2. Detailed design concerns**

Notwithstanding our support for extension of the tram route, we have a number of concerns about the detailed design as presented for public consultation:

1. The Council has failed to adopt best practice by using the ‘Place Standard’ to **engage and understand what people want in this area.** This is a place-making tool developed by the government which can assist the design process and would be especially important in areas like Leith Walk and Newhaven.
2. On a related point, there is no evidence that the Council collected **data on pedestrian movement** on the street in order to best understand pedestrian needs in the context of the new tram route. The Council made a considerable investment recently in a number of ‘Street Life Assessments’ conducted by consultants Here and Now, and we would want to see evidence that the results of this work are reflected in the tram design plans. (<https://planningedinburgh.files.wordpress.com/2017/12/leith-walk-and-great-junction-street-r.pdf>)
3. Many of the obvious design problems could have been anticipated and mitigated using tools like the Transport for London ‘Healthy Streets’ indicators – <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets>. A related point is that many of the problems with the design of the original tram route such as tram/cycle conflict – now being addressed in a retro-fit – are being replicated in the tram extension project, with **no lessons evidently learned from the initial tram experience.**
4. There is no detail on **pedestrian-specific points on access to the trams**, eg (a) the impact of the longer distance to walk to tram stops (c. 600m apart v. c. 200m for buses), and (b) the design of pedestrian access routes to tram stops from the surrounding catchments (other than for the immediate environs of the tram stops). The Active Travel Plan includes a commitment (not yet implemented, so far as we know) to improve walking access to bus and tram stops; this should be done as an integral part of designing the new route.
5. In terms of the wider pedestrian environment, the plan proposes **a significant deterioration in Leith Walk crossing opportunities**, and it is extraordinary that ‘pedestrian crossings’ do not even feature in the Key to the plans. A lack of pedestrian crossings would lead to increased social exclusion (since elderly and disabled people in particular would not be able to cross) and increased pedestrian casualties in the area. Currently there are five intermediate crossings (pelicans / zebras) between the traffic lights at the Foot of the Walk and those at Pilrig Street.

Under the proposed scheme there will effectively be just one formal crossing opportunity in a distance of some 700m, ie at either end of the Balfour Street tram stop – and both of these will be staggered. The City of Edinburgh Council (CEC) Street Design Guidance states that “pedestrian crossing points (controlled or uncontrolled crossings) [should be provided] every 50-100m . . . Avoid staggered crossings”. *This is a profoundly serious – and very basic – flaw in the design proposal, effectively treating Leith Walk as a traffic-engineered, movement-oriented vehicular corridor, rather than ‘a place’ for people.* Edinburgh’s tram infrastructure is once again being designed as a railway on the street rather than as a form of transport that complements and enhances the existing urban environment.

We understand that one of the design principles adopted for the tram route is that zebra crossings are incompatible with safe tram operation. If that is the case, then replacement crossings (pelican / toucan) must offer similar frequencies and durations of crossing opportunities to those currently enjoyed by pedestrians.  However we would also point out that zebra crossings are very commonly used on streets with trams in continental Europe and we would suggest that the principle of no zebra or informal crossing points on the Edinburgh tram should in any event be reviewed to take account of international best practice and the practical, as opposed to theoretical, risks involved, compared to the benefits to pedestrians.

1. On a related point, the plans indicate a **pedestrian-deterrent central reservation** where the tram electricity masts will be located. In the absence of frequent formal crossing opportunities, it would be entirely unacceptable to deter pedestrians from using such potential refuges. In any event, there must be frequent, formal crossings of Leith Walk (with frequent pedestrian phases, and sufficient time for less-able pedestrians to cross), in accordance with the CEC Street Design Guidance.
2. Disturbingly, the plans do not identify footway widths – this is particularly worrying, as it is clear that **a number of footway sections will be substantially narrowed** under the current proposals. On a key shopping street like Leith Walk, with heavy pedestrian footfall, it is essential that all footways meet the CEC Street Design Guidance standard of a “desirable minimum of 4m or wider”. The environment of the northern part of Leith Walk has recently been significantly improved with much wider footways and additional crossing points, also improving the local economy through creating a more attractive public realm. The proposal to undo these improvements is indicative of the tram designers’ failure to understand the important ‘place’ function of Leith Walk – and a failure to follow the Council’s own Street Design Guidance.
3. To the potential detriment of walking safety and convenience, the design includes a number of sections of **footway shared by pedestrians and cyclists** – this is a recipe for conflict, with the most vulnerable street users likely to come off worst.
4. A crucial aspect of the tram will be **the effect on pedestrian phases at signalled junctions** (for example at Pilrig Street, the Foot of the Walk etc). The first tram route had a seriously negative effect on many such junctions and this must not be replicated in the extension. Indeed, there may be opportunities to extend pedestrian priority – for example at the southern end of Constitution Street, which will be bus and tram-only, and at the proposed signalled crossing at the junction of London Road. Such opportunities to prioritise walking should be actively pursued.

**3. Wider policy issues**

1. In **wider contextual terms**, although an ‘in principle’ case for extending the tram to Leith (along a dense population corridor with generally wide streets) was established some years ago, (a) no other options for improving public transport in the area (such as enhanced bus services) have been appraised against the tram option, as required by Transport Scotland’s Scottish Transport Appraisal Guidance, (b) there is a lack of detail on how the tram will meet the various transport policy objectives of the Council, (c) the scheme is progressing in advance of the Local Transport Strategy review, and (d) no alternative route options are set out, eg in front of Victoria Quay rather than behind it, and why the new terminus is not Western Harbour or Granton, rather than Newhaven.
2. There is no detail on the **impact on existing bus passengers**, eg (a) loss of frequency of through buses, and (b) the extent to which the required seamless interchange between bus and tram (both physical and in terms of through tickets) will be provided in practice. Similarly (and related), an Equality Impact Assessment is required by law, but does not appear to be available.
3. The Council should use the tram works project and related road closures to **review traffic management** on Leith Walk, Albert Place and Croall Place to reduce overall traffic levels. If running lanes for general traffic could be reduced, this would benefit the tram, and create more space for walking and cycling. Apart from essential access, there are strong arguments for restricting general traffic on Leith Walk, either entirely or in one direction. Failure to consider these options limits the scope to re-purpose space in line with the Council’s policies to support walking and cycling.

***Living Streets Edinburgh Group / 25 April 2018***