

# Edinburgh City Centre Transformation: Proposed Strategy

Response from Spokes – the Lothian Cycle Campaign, June 2019

*This response considers the strategy document published at*

[http://www.edinburgh.gov.uk/CET/downloads/file/8/edinburgh\\_city\\_centre\\_transformation\\_proposed\\_strategy\\_for\\_consultation](http://www.edinburgh.gov.uk/CET/downloads/file/8/edinburgh_city_centre_transformation_proposed_strategy_for_consultation)

## Summary

Spokes is very excited to see progress on the Edinburgh City Centre Transformation (ECCT). Although there are many details to be discussed, this is an ambitious programme that will, if fully delivered, revolutionise the city centre and make it a place for people that Edinburgh can truly be proud of. Furthermore, it will substantially improve city centre cycle routes and enable more people to feel confident cycling for everyday journeys across Edinburgh. To this end, we commend the Council's bold leadership and hope that the programme can be progressed swiftly.

We are broadly happy with the strategy as proposed and provide a detailed review in the rest of this document. Additionally, we present two appendixes: one providing a checklist of points and a second showing additional cycle routes that Spokes proposes.

Taken together, our most important areas of feedback are:

- ★ **Timeline and need for early action**
- ★ **Clarity needed over “safe cycling routes” and “pedestrian priority”**
- ★ **Missing city centre cycle routes and the need for onward routes**
- ★ **Need to rethink more junctions, and to prioritise improvements at Haymarket and West End**
- ★ **Details of mitigations for displaced traffic**
- ★ **Consideration of further restrictions to general traffic at The Mound and Cowgate**
- ★ **Importance of co-ordinated City Mobility Plan and City Plan 2030, and between them the need for equivalent “transformation” of town centres**

## Detailed review

### Why: The Case for Change (Section 2)

We strongly agree with the case set out in this section. We particularly emphasise the urgent need to reduce vehicle traffic in the city centre (and indeed across the city) in order to free up space for walking and cycling, reduce air pollution, and help tackle the climate emergency. Air pollution negatively impacts Edinburgh's residents and visitors today, and time is running critically short to stop irreversible climate change – there is no time for delay on either front.

While we recognise that EVs will play a role in tackling air pollution and CO<sub>2</sub> emissions, they must not be considered a cure-all. Braking systems on EVs still produce particulates<sup>1</sup> that are harmful to human health. Moreover, EVs do nothing to support active lifestyles that reduce burden for the NHS, and they still consume valuable street space that could be better deployed to support walking, cycling, and public realm.

Beyond environmental issues, we also agree that there is a strong economic case for wide reaching changes. This quote from the ECCT strategy captures it well:

*An increasingly mobile investment community and workforce will gravitate to cities offering a high quality of life, with excellent public realm and mobility opportunities*

We agree that if Edinburgh is to remain a place that people want to live and work in then it must be oriented around people, and a new generation that is increasingly car-free. Indeed, if Edinburgh does continue to grow then there simply will not be the capacity for general traffic in the city centre.

## What: The Strategy (Section 3)

### Highlights

Spokes is generally happy with the proposed strategy, and we especially support:

- ★ **Reducing parking:** Proposals to remove parking are critical to freeing up street space to promote walking, cycling, and quality public realm – it's essential to everything else in the strategy. Consistent and effective enforcement of current and new parking restrictions will be vital.
- ★ **Street closures to general traffic:** While all proposed street closures are welcome, we particularly support the closure of Bank Street, which will eliminate through traffic on George IV Bridge and in doing so facilitate a high quality cycle corridor as part of the Meadows to George Street project.
- ★ **Meadows to George Street:** Spokes is extremely excited about this project. The concept designs published recently are very encouraging and, if implemented, will deliver a high quality, direct north-south cycle route through the city centre along with greatly improved public realm. We will be responding separately to the consultation on these designs shortly.
- ★ **New Calton Bridge:** This bridge would restore a missing link between the Old and New towns that was lost several decades ago. This route is all the more important today as the bridge would connect the Edinburgh St James development and cycleways along Leith Walk/Street to and from the Old Town, New Waverley development and onwards to Pleasance and further south.

### More clarity needed

There are many aspects of the proposed strategy that we conditionally support, subject to additional clarifications:

- ★ **“Safe” cycling routes:** We welcome the substantial increase in cycle routes proposed in the spatial framework. However, we'd like more clarity on what “safe” really means and details of exactly which routes will use segregated cycleways. It remains Spokes' position that segregation is the only way to provide truly safe cycling for all ages and abilities. While we realise that segregated cycleways

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<sup>1</sup> Sources linked from <https://www.theguardian.com/environment/2017/aug/04/fewer-cars-not-electric-cars-...>

are impractical on quiet, terminal roads, we'd emphasise that main roads where cyclists are mixed with buses, large delivery vehicles, and significant numbers of cars demand segregated cycleways.

- ★ **Pedestrian priority zone:** It's hard to evaluate this proposal without further detail on the mechanics that will be used to truly make this a place where "people on bikes feel comfortable to share roads with traffic". We question if this is really achievable when considering cyclists of all ages and abilities. Additionally, there are still several streets that provide through routes and rat runs across the pedestrian priority area. We want to understand what measures will be used to mitigate through traffic on these streets, and in particular George Street, Market Street, and Jeffrey Street.
- ★ **Pedestrianised streets:** We strongly welcome completely vehicle free streets as part of the pedestrian priority zone, as these are the only streets where pedestrians and cyclists can be completely safe from collision risks and air pollution. It's important that these streets are designed to permit cycling, and we hope that mini-carriageways for cycling (as proposed on Forrest Road for Meadows to George Street) are employed. This approach provides for cycling whilst giving pedestrians predictability that cyclists will only be in the mini-carriageway (in contrast to Rose Street which is a free for all that is poor for both users).
- ★ **Transport interchanges:** Executed well, these will reduce traffic (including buses) traversing the city centre. These interchanges must include quality cycle parking and space for the TfE cycle hire scheme. Indeed, all public realm improvement should consider cycle parking and hire.
- ★ **Vertical connections:** We appreciate that the vertical connections are primarily to assist mobility impaired users and those with pushchairs etc. However, we hope that any lifts are also suitable for bikes of all types. This is especially valuable for those with disability trikes and cargo bikes.

## What's missing

We realise that this is a strategy document and that details will be thrashed out as individual components are executed. Spokes will, as always, look forward to further engagement as the programme progresses.

Nonetheless, we see several areas that we feel deserve additional mention in this strategy document:

- ★ **Onward routes:** All the work to make the city centre cycle friendly is for nothing if there aren't cycle routes to and from the city centre. The CCWEL provides a quality link to the west, and the tram project will deliver a quality link to Leith. But connections to the north are weak, and it's vital that the dotted lines along Dundas Street and Queensferry Street/Road (including to Stockbridge) are considered essential rather than "potential extensions" given the benefits of linking the city centre to the North Edinburgh Path Network. Similarly, routes east via Regent Road and London Road are a priority for linking communities in the east to the city centre.
- ★ **Density of cycle routes within city centre:** We had hoped to see a denser network of cycle routes through the city centre and we provide specific missing routes in Appendix 2. We realise that the pedestrian priority area will provide benefits to cyclists, but we need to understand more about what measures will provide this priority.
- ★ **Mitigations for displaced traffic:** We anticipate that the proposed street closures will cause traffic evaporation<sup>2</sup>, a phenomenon where reducing capacity for vehicles results in fewer vehicles travelling in the first place. Nonetheless, we recognise that these closures and the proposed city centre LEZ boundary will also cause some traffic displacement. We would welcome additional detail

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<sup>2</sup> Various studies linked to from [https://en.wikipedia.org/wiki/Induced\\_demand#Reduced\\_demand\\_\(the\\_inverse\\_effect\)](https://en.wikipedia.org/wiki/Induced_demand#Reduced_demand_(the_inverse_effect))

about what measures will be used to protect conditions for walkers, cyclists and residents on diversionary routes, including but not limited to Queen Street, Melville Drive, and the Bridges. It is important that cyclists are physically protected from increased traffic volumes.

- ★ **Transformation of town centres:** Earlier discussions had touched on the need to transform town centres as well as the city centre. There is no mention of this and we very much hope it can be resurrected, even as part of a separate programme of work. Spokes continues to believe that developing and maintaining quality town centres is key to reducing the need to travel in the first place, as well as giving people a greater sense of pride in their local area.

## Where: Catalyst Areas (Section 4)

For each catalyst area we've picked out two or three things we want to see in its transformation.

### Haymarket

- ★ **Haymarket junction redesign:** This is a huge impediment to cycling, with no cycle lanes on any approach (bar Morrison Street), tram tracks to contend with<sup>3</sup>, and several paths where cyclists are not exempted from banned turns. This junction must be completely reconsidered as part of the ECCT. In particular, it must incorporate safe cycling from the CCWEL at Haymarket Terrace and Grosvenor Street to/from Morrison Street and Dalry Road. There's also an unmissable opportunity to create a safe cycle route through to Fountainbridge and beyond to Marchmont/Bruntsfield by coordinating the junction redesign with the Haymarket development<sup>4</sup>.
- ★ **Morrison Street cycleway:** This one way street separates the area in half and makes for an unpleasant pedestrian environment more akin to a motorway than a city centre. Additionally, it forces cyclists to take an indirect route with tram crossings when coming from the east and trying to get to Lothian Road. We welcome the proposals to rethink Morrison Street, but we are concerned that the sketches show no room for a segregated cycleway. We believe that this must be provided (in both directions) to link the CCWEL to the Lothian Road and Innovation Mile areas.

### Lothian Road

- ★ **West End junction redesign:** This is the site of a tragic incident where a cyclist was knocked off their bike and killed by a tour bus. While there are many factors at play in any incident, we note the junction's almost complete lack of cycle facilities and the need to contend with tram tracks and up to 3 lanes of traffic. We hope that a complete redesign, including linking Lothian Road to the CCWEL will be prioritised as a matter of urgency.
- ★ **Segregated cycleways on Lothian Road:** Spokes is very pleased to see bold concept sketches included for Lothian Road, and we welcome the reduction in vehicle lanes and the introduction of cycle facilities. We must insist that cycle facilities are segregated throughout to protect cyclists from general traffic, which will likely be significant as a diversionary route when Bank Street is closed.
- ★ **Morrison Street / Bread Street cycleway:** It's important that a cycleway along Morrison Street is continued across Lothian Road and along Bread Street to the West Port for connection to the Grassmarket area and Innovation Mile. This should be achievable early on as Morrison Street has 4 (!! ) lanes of traffic and Bread Street has an unused contraflow bus lane that can be repurposed.

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<sup>3</sup> Details of tram related crashes at <http://www.spokes.org.uk/documents/public-transport/tram/>

<sup>4</sup> Latest Haymarket planning application is ([19/02623/FUL](http://www.spokes.org.uk/documents/planning/19/02623/FUL/)) and the deadline for comments is 12 July!

## New Town / Princes Street

- ★ **Princes Street cycle provision:** There will still be significant demand for cycling along Princes Street even after the CCWEL is completed along George Street. Indeed, this demand will only increase if Princes Street has a wider range of uses in future – §4.3 notes supporting leisure, cafés, and restaurants, all of which are destinations which must be accessible by bike. The continuing tramline crashes often result from traffic pressure<sup>5</sup>, which would be prevented by segregation.

## Old Town

- ★ **Closing The Mound to general traffic:** While the Bank Street closure is welcome, we are very concerned that keeping The Mound open will lead to increased traffic volume on Market Street, and a rat run via Jeffrey Street. Not only will this negatively impact pedestrians around Waverley Station, but Market Street is a key cycle route to the New Waverley development and so traffic must be minimised to support active travel.
- ★ **Bridges corridor cycle provision:** We are pleased to see the Bridges marked as a safe cycling route but concerned about how this can be delivered while retaining it as a through route for general traffic at the same time as supporting bus, tram, and widened footways.
- ★ **Cowgate restrictions for general traffic:** It seems incongruous that the strategy shows images of a “pedestrian priority” Cowgate (pp.42–43, p73) and a map showing it as a cycle route (pp24–25), while also retaining it as a secondary route for vehicles (pp.32–33). We do not believe these are compatible and urge a rethink on retaining the Cowgate as a through route for general traffic.

## Waverley / Calton Road

- ★ **Leith Street cycleway:** It was a huge disappointment that the recent revamp of Leith Street did not continue the new cycleway up to the East End junction, thereby forcing cyclists to share with traffic and buses on this busy and uphill junction approach. It was noted at Transport and Environment committee<sup>6</sup> that Leith Street could and should be reconsidered during the Transformation project and we urge this ASAP.
- ★ **East End junction redesign:** This junction is also dominated by traffic and features no cycle lanes on any approach, despite all approaches having 2 or more general traffic lanes. We urge a complete rethink of the junction to ensure that cyclists can safely travel from the CCWEL at St Andrew Square to the Bridges and to Waterloo Place and onwards to Abbeyhill.
- ★ **Looking east:** It’s disappointing that Transformation stops short of proposing improvements along Waterloo Place. Calton Hill is a key tourist destination and, further east, Regent Road could provide a quality cycle link to Abbeyhill and beyond. Public realm and cycle improvements must be included.

## Innovation Mile

- ★ **Lauriston Place cycle provision alongside tram:** Continuing from Morrison Street and Bread Street, Lauriston Place is the last piece required to provide a continuous cycle route from Haymarket to the University and surrounding areas (e.g. National Museum of Scotland). Any tram extension must deliver cycleways to avoid cyclists sharing a narrow road with the tram.

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<sup>5</sup> Details in Lady Wolffe’s recent judgement in [\[2019\] CSOH 50](#)

<sup>6</sup> Comments by Paul Lawrence ([webcast](#)) during Item 7.7 of the 17<sup>th</sup> May 2018 meeting

- ★ **Chambers Street cycle provision:** It was disappointing that the 2015 revamp of Chambers Street did little to improve conditions for cyclists. Chambers Street provides a key link between Middle Meadow Walk and the Bridges, as well as the Museum being a destination in its own right. The Bank Street closure will increase general traffic so it's critical that cycle facilities are provided here.

## How: Delivery Plan (Section 5)

This section rightly notes ECCT's interdependency with the forthcoming City Mobility Plan and City Plan 2030. These two plans will be critical to the success of the ECCT programme and, in our view, ECCT will not be successful unless those two plans are equally as bold as ECCT in its ambition to reduce private vehicle movements. We agree with all the supporting measures proposed in the ECCT strategy, and especially the need for the City Mobility Plan to reallocate space on roads into the city centre in favour of cycling and public transport, which must include quality, segregated cycleways along all main roads. Additionally, the City Plan must provide robust, considered guidance about where development can take place such that it minimises the need for travel.

Additionally, we hope the final delivery plan due in September will address these two areas in particular:

- ★ **Delay minimisation:** Spokes remain despondent about the multi-year delays suffered by several projects within the existing active travel programme of work. While there are many reasons for these delays, we note that multiple layers of consultation takes time, as does waiting for the Scottish Government to deal with objections to redetermination orders and loading restrictions. If the responses to this consultation are positive then we urge the council to treat this as a clear mandate and progress swiftly without undue consultation. The delivery plan should also propose a coordinated approach to statutory orders so that they can be progressed early and efficiently.
- ★ **Stakeholder management:** The ECCT programme of work is a long one and so we want to see a consistent, coordinated approach to stakeholder management, and we suggest that a regular forum would be helpful for all stakeholders.

## When: Timeline (Section 5.4)

There's a lot presented in this strategy and we very much applaud the scale of ambition. But we are concerned that 10 years is a long time and that air pollution and the climate emergency are real issues today. We hope that the forthcoming delivery plan will detail significant measures that can be taken early on to ensure that benefits are realised immediately. Early actions are also vital to ensure public confidence in the transformation programme.

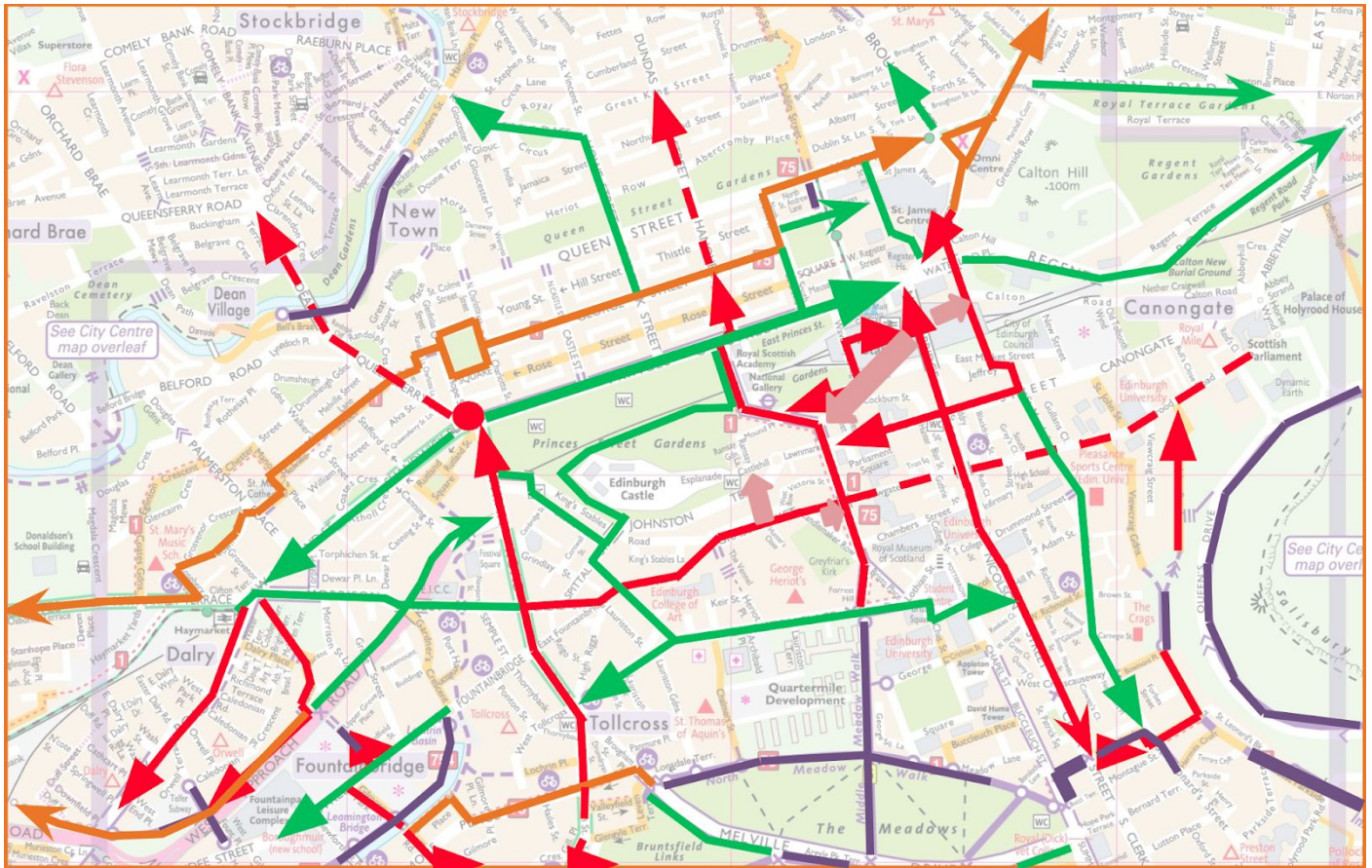
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# Appendix 1: Page-by-page comments

These comments are not intended to replace our feedback in the main section of this document, but we hope they draw attention to specific concerns we had while reading the document. Note that comments pertaining to missing cycle routes are left to Appendix 2.

- ❑ §3.2 (page 19): Spatial policy map shows junction improvements at a number of sites, but many other junctions need significant improvements to facilitate safer walking and cycling conditions, including but not limited to:
  - ❑ East End junction
  - ❑ Lothian Road / Bread Street / Morrison Street
  - ❑ East end of Melville Drive and Hope Park Terrace to link to Clerk Street
- ❑ §3.3 (page 25): Cycle map doesn't show Morrison Street as a safe cycle route even though it's included in the spatial framework map
- ❑ §3.3 (page 27): Must consider closing The Mound to general traffic
- ❑ §3.3 (page 27): Need more detail on the mechanics of pedestrian priority zone
- ❑ §4.2 Lothian Road: Important that "safe cycling" on Lothian Road means segregated cycleways
- ❑ §4.2 Lothian Road: Important that West End junction redesign is an early priority
- ❑ §4.3 Princes Street: Need more detail of cycling improvements on Princes Street – essential to fulfil the strategic aim to encourage varied uses including leisure, café, and restaurant as well as retail
- ❑ §4.4 Old Town: Unclear how pedestrian and cyclist priority can be facilitated on the Cowgate while also retaining it as a secondary route for vehicles
- ❑ §4.5 Waverley / Calton: Disappointing not to see specific mention of cycle improvements to Leith Street or the East end junction
- ❑ §5.4 (page 100): We recognise that there are resource pressures, but we are concerned about several of the timescales proposed, and particularly:
  - ❑ George Street improvements not scheduled till 2023-25 – this is critical to completion of CCWEL, which is so important it cannot wait another 5 years
  - ❑ Lothian Road improvements not starting until 2023 – given that these are phased we hope that at least some phases can be moved forward

# Appendix 2: Spokes view of city centre cycle routes



Purple shows existing cycle routes

Orange shows already committed routes (CCWEL, Picardy Place, Tram, Meadows to Canal)

Red shows routes included in the ECCT cycle routes map on page 25

Green shows additional routes that Spokes feel are insufficiently addressed by the ECCT proposals

## Missing cycle routes

Route	Rationale	Related sections
St Andrew Square – East End	St Andrew Square links to CCWEL and north via Dublin Street (hopefully Dundas Street in future). East End provides links to Bridges and east to Abbeyhill. Critical therefore that these two locations are connected, and in so doing providing a cycle link to Waverley Bridge for access to the station.	§3.2 Spatial Framework §4.5 Waverley / Calton
Morrison Street – Bread Street – Lauriston Place	Haymarket provides link to CCWEL as well as being a key location in its own right with station and Haymarket development. Bread Street serves big trip generators (Codebase, Edinburgh College of Art), and links to Grassmarket. Lauriston Place is a gateway to the University and surrounding area. Vital these are all connected.	§3.2 Spatial Framework §4.1 Haymarket §4.2 Lothian Road §4.6 Innovation Mile



East along Waterloo Place and Regent Road	Cycle links from the city centre to Abbeyhill and Meadowbank are weak today, with no traffic free options despite them being ideal distances for cycle commuting.	§3.2 Spatial Framework §4.5 Waverley / Calton
East along London Road	As above. Although Regent Road and London Road both converge at Abbeyhill, we believe both routes are important since London Road also serves residential tenements in and around Montgomery Street.	§3.2 Spatial Framework
Proposed Calton Bridge – Pleasance – St. Leonard’s Street	The proposed bridge will itself provide a missing link between the Edinburgh St James development and cycleways at Leith Walk/Street and the Old Town. But this needs to be extended south along Pleasance and St. Leonards to connect to southern destinations like the Royal Commonwealth Pool, Scottish Widows office, Pollock Halls, Holyrood Park, and onwards along National Cycle Route 1.	§3.2 Spatial Framework §4.4 Old Town §4.5 Waverley / Calton
South Meadow Walk – East Preston Street	Aside from a short section between Middle Meadow Walk and Leamington Walk, the existing path along South Meadow Walk (SMW) is narrow, poorly surfaced, and poorly lit. Melville Drive will be a diversionary route due to the Bank Street closure and city centre LEZ boundary so SMW must be upgraded to facilitate more cyclists. An extension along West/East Preston Street would also provide a link to the destinations in the row above.	§3.2 Spatial Framework
West Approach Road	The Roseburn to Canal project already proposes a shared use path along the West Approach Road (WAR) between Dalry and Morrison Link. Any plans by ECCT to reconfigure the WAR east of Morrison Link could continue this path all the way to Lothian Road. This would create a convenient, direct cycle route from Gorgie/Dalry straight to the financial district and attractions around Lothian Road.	§3.2 Spatial Framework §4.2 Lothian Road
Haymarket – West End (via Shandwick Place)	While CCWEL will provide an important first west-east cycle link, the section between Haymarket and the West End is notably indirect, skirting around the Cathedral and West Register House. In future we believe reduced traffic should enable a direct route via Shandwick Place.	§3.2 Spatial Framework §4.1 Haymarket §4.2 Lothian Road
St Andrew Square – James Craig Walk	Although a short route, this is important for providing direct cycle access to the Edinburgh St James development (and its cycle lift) from the CCWEL at George Street. We suggest that considerate cycling is permitted along Multrees Walk.	§3.2 Spatial Framework §4.5 Waverley Calton