

To: TRO.Consultations@edinburgh.gov.uk

LEZ Mitigation Traffic Orders

Objection from Spokes Planning Group, May 2023

This objection considers the proposals for RSO-23-03 TRO-23-04 TRO-23-05

The Council is proposing to carry out adjustments west of the Low Emission Zone. The aim of the scheme is to mitigate the assumed impacts of LEZ on motor vehicle movements:

[RSO/23/03](#) is the redetermining of sections from footway to carriageway and vice-versa

[TRO/23/04](#) is the changes in turnings, one-ways, etc

[TRO/23/05](#) is the changes in waiting/ loading etc

General comments

We welcome the [LEZ introduced by City of Edinburgh Council](#) to clean the air in the city centre, and we appreciate that mitigation measures may be needed in surrounding areas. This should aim to minimise rat-running (not to cater for it) given the majority of motor vehicles are LEZ compliant and to prioritise and encourage travel by active means.

However the proposed RSO and TROs provide more car options and are a missed opportunity as regards the issues cycle users face around Tollcross junction and Morrison Street, despite the promises for Morrison Street in the City Centre Transformation policy, and the Council's recent Major Junctions Review.

Enabling more people to walk / wheel / cycle here ties in with reducing motor vehicle movements across the city, not just the city centre, in line with council policy. Making active travel safer will actually help to reduce the need for motor vehicles here. This helps to prevent rat running by through traffic of streets that should be safe to travel actively and also prioritise / encourage modal shift to public transport.

Furthermore, encouraging increased numbers of non-LEZ-compliant polluting vehicles into Morrison Street now will also make it politically more difficult for the Council to expand the LEZ area in future.

We urge City of Edinburgh Council to therefore prioritise the redesign of Tollcross and Morrison Streets to improve safety of active travel users and not encourage more motor vehicle use. Especially given Tollcross and Haymarket were ranked second and third most dangerous junctions in the entire city in the Council's own recent [Major Junctions Review](#).

We therefore object to elements of the proposals put forward, and we urge the council to review our detailed comments below carefully.

Detailed comments

The following notes are based on Spokes Lothian Planning Group (Spokes PG) correspondence with CEC Officers in Jan 2023 during the initial stakeholder consultation for these draft Orders.

1. Spokes Lothian is extremely concerned that there is no segregated cycle provision being proposed on Morrison St. The existing unsegregated (painted) central filter lanes (which remain unchanged in the proposals) are currently only used by the most confident cyclists whereas the Council wishes to grow cycle use by all categories of people.

As kerbside parking retention is prioritised in the proposals, cycles headed east along Morrison Street will be in the door swing zone at additional risk of conflict and increased likelihood of injury or fatality. This is not acceptable and not in line with the Sustainable Transport Hierarchy.

Morrison St is part of an east-west cycle route avoiding tram tracks of Shandwick Pl & Princes St and is shown as a 'main cycle route' in the Council's [Transformation policy](#). These Orders go nowhere to assist this City of Edinburgh Council (CEC) policy.

We are told that CEC has future undefined proposals that *may* improve conditions for active travel in Morrison Street. However the current LEZ mitigation proposals bake in and strengthen the status quo of motor vehicle dominance. This seems contrary to the City's 30% car km reduction target.

2. Spokes also urges Dewar Place to include a protected uphill cycle route southbound. Clearly this must be designed carefully given the sharp left at the top, and also not to make life difficult for cyclists wanting to go straight ahead into Gardners Cres. If Morrison St is planned to become bidirectional for cars Spokes considers space should be reallocated for cycle users.

3. At Tollcross Spokes considers the right turn allowance unnecessary pending the imminent wider review of the whole junction under the Lothian Road Boulevard project. Tollcross has been identified as a high priority dangerous junction for those who cycle. It is a multilane signalised junction which only the most confident road cyclists can use. There is already an alternative loop for motor vehicles that must undertake this journey via Ponton Street, Semple Stree, Morrison Street and then Lothian Road / Earl Grey Street

Spokes believe this route (with clear signage for drivers) would act as a deterrent for some motor vehicle journeys, whereas if avoiding the LEZ is facilitated then it will mean the aims of encouraging cleaner air will be lost as polluting vehicles will be present in higher numbers around the LEZ.

Spokes welcomed the information that it is estimated that only ± 19 vehicles undertake this manoeuvre daily, incl. several cycles (but with no information as to whether it includes ambulances and fire engines). What is the problem that needs this solution?

4. Spokes is also concerned an additional light phasing may mean pedestrians wait even longer to cross Brougham Place at Tollcross, where the existing banned turn would be revoked. Again we consider this proposal as not being in line with the Sustainable Transport Hierarchy.

5. CEC intends implementing the proposals soon, whereas the longer-term aspirations to improve conditions for walking/wheeling and cycles at Tollcross and Morrison Street are years away - and furthermore this added traffic will restrict active travel options at that time. The Dangerous Junctions review flagged Tollcross as the second most dangerous junction in Edinburgh and Haymarket (at the west end of Morrison St) as third worst. The present proposals do nothing to improve safety of vulnerable road users at these junctions, and the future proposals are entirely speculative.

6. Spokes welcomes the improved junction at Gardner's Crescent for pedestrians. However, we oppose the banned left turn without an exemption or alternative for cyclists (Page 204, Cycling by Design 2021). We would also strongly support early release phasing for cycles.

Finally, there are other cities in the UK with LEZs who use prominent warning signage and public information campaigns well in advance of the LEZ areas in order to reduce traffic in and around the LEZ. This, together with other Council traffic-reduction policy measures, and SatNav technology, should reduce traffic in these areas and render some of the proposals in the draft Orders redundant anyway.

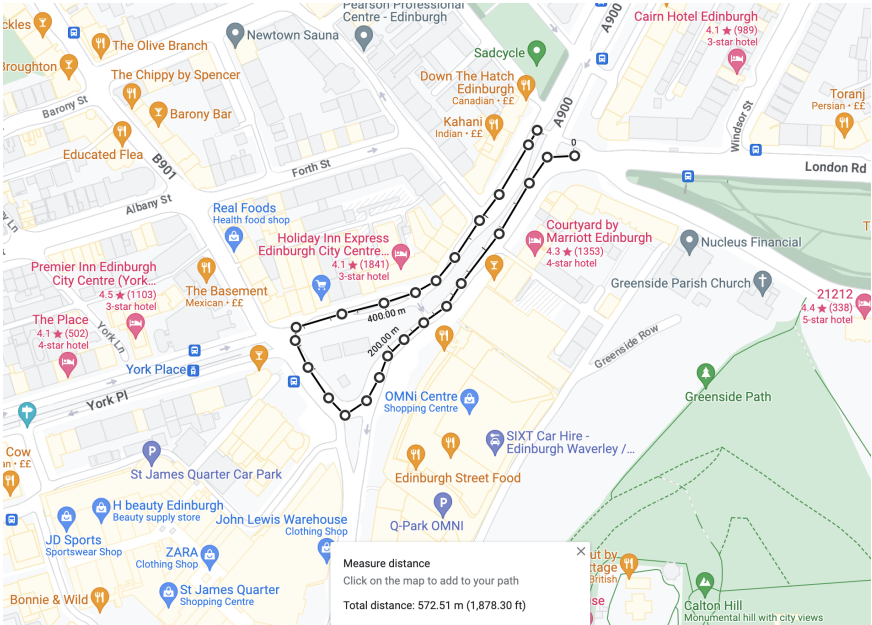
Our primary objection, however, remains that the draft Orders aim to smooth the way for additional motor traffic here, in an already busy area, including at recognised dangerous junctions; and do not create the high quality cycling facilities promised for Morrison Street in the City Centre Transformation policy – and indeed make that harder to achieve in the future.

Additional comments

Banned Right Turns

Spokes has compared the long-standing banned right turn at Tollcross into Brougham Place with others recently implemented by CEC.

London Road to Elm Row
572 metre diversion



Home Street to Brougham Place
796 metre diversion

