

## Edinburgh Street Design guidance Transform Scotland consultation response

Monday 30 June 2014

## 1. Comments on the draft guidance

- 1.1. Transform Scotland notes, on page 15, that one of the key aims of the Edinburgh Street Design Guidance (ESDG) is to follow a process in which "considers the street as a place first, by recognising the non-transport roles that streets have, and by improving conditions and integrating solutions for pedestrians, cyclists and public transport users as a priority whilst not causing undue congestion or delaying other street users (depending on the location or time of day)".
- 1.2. On page 25, under the heading 'Recent Policies', it is stated that "For over 20 years Edinburgh has pursued a transport strategy focussed on strengthening the role of public transport, walking and cycling. Over this period, design practice has increasingly addressed historic problems by favouring street designs that support healthier and more sustainable ways of getting around, and planning policies have sought to support this. The Council wishes to design streets by always considering their role as a place first and which prioritise movement on foot, by cycle and by public transport".
- 1.3. Regrettably it is evident throughout Edinburgh, and particularly in the central area and on the main routes into the centre, that the private car continues to dominate the street, both when moving and when parked. It is difficult to find many examples of streets where there is evidence that pedestrians and cyclists are being given any priority, and few where there is public transport priority on any scale. On-road cycle lanes where provided are all non-statutory and not protected from parked vehicles. Routes for pedestrians at busy junctions are often circuitous, particularly where there are roundabouts and/or where the junction covers a large area or has a several converging roads. The caveat at the end of the first quote *"whilst not causing undue congestion or delaying other street users"* appears to be of paramount importance, and effectively means that the need to maintain the free flow of traffic is given greater priority than any aim to ease the passage for and increase the safety of pedestrians and cyclists.
- 1.4. On page 27 of the ESDG it is explained that Edinburgh's goals and values for street design mean that streets will be designed to be:
  - 1. Attractive and distinctive, supporting places of interest
  - 2. Welcoming, inclusive and accessible
  - 3. Helpful in making Edinburgh's transport and ecological systems more sustainable
  - 4. Legible and easy to get around
  - 5. Safe and pleasant design helps to minimise the risk of injury and death, especially to vulnerable road users reducing road speeds; a safe environment is provided for all users giving priority to pedestrians, cyclists and public transport users
  - 6. Responsive to needs of local communities
  - 7. Cost effective in design
- 1.5. Transform Scotland supports all the criteria listed, but the final criterion is likely to have a strong influence on the achievement of the other six.

- 1.6. Summary Statement 3 on page 31 states that "street design will prioritise improving conditions for pedestrians, cyclists and public transport users in most streets". This statement does not mean the same thing as giving priority to these users, but only to seek to improve from a low base the conditions which they face. Consequently this statement falls short of the commitment to "prioritise movement on foot, by cycle and by public transport" stated on page 25, under 'Recent Policies'.
- 1.7. In Section B relating to 'Design Overview' (page 34), it is explained that "Design should fully cater for all potential users in a given space by following a process that identifies and considers those which deserve priority before embarking on a design solution". However the pages which follow set out an enormously complex process of analysis and categorisation of each street, seeking to resolve competing needs, but there is little in this confusing and word-heavy section which suggests that much progress will be made towards genuinely giving consideration to public transport users, pedestrians and cyclists, ahead of the need to maintain traffic flows. The words "those [users] which deserve priority" will be a matter for considerable debate and dispute in most circumstances.
- 1.8. For example, on page 39 it is stated that "We are now moving towards a more comprehensive design process that gives, for example, pedestrians a rightful place on the carriageway through crossing points that [are] easy, convenient and appealing, particularly in streets with a high place function such as shopping streets". Inevitably the motor vehicle will be given first priority on all but the most minor of carriageways, and the long-established road design principle of seeking to minimise car queue lengths at main junctions means that pedestrian crossing phases will be short and sometimes infrequent, and sometimes broken into two phases in order to cross one road.
- 1.9. Most fundamentally, the ESDG is written in a format which implies that there is a process underway to redesign all of Edinburgh's streets to accord with the guide. In reality there will be very few new streets built from scratch, particularly in the inner areas, so we fear that the best that is likely to happen is some modest redesigning of certain streets as part of a specific project, for example when new traffic management procedures are being introduced. Without a major and accelerated programme of intervention, any of the principles set out in the guide, particularly as regards priority for pedestrians, cyclists and public transport users, are unlikely to become evident on even a small proportion of Edinburgh's streets for many years or decades. In the absence of a firm commitment from the council to fund and implement these measures by way of a city-wide programme, undertaken to a firm timescale, much of the content of the guide will have extremely limited application. Thus we are concerned that the guide appears to reflect an enormous amount of work to produce a highly detailed and complex document with very limited practical application.

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Transform Scotland is the national sustainable transport alliance, campaigning for a more sustainable and socially-just transport system. Our membership includes bus, rail and shipping operators; local authorities; national environment and conservation groups; consultancies; and local transport campaigns. Transform Scotland Limited is a registered Scottish charity (SC041516).

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