

Objection from Living Streets Edinburgh to Planning Application York Place / Elder st 15/04868/AMC

This objection is sent on behalf of Living Streets Edinburgh, a group that campaigns for improved conditions for pedestrians in the City. We also work to ensure that the City Council follows its own policies and guidance with regard to pedestrians.

We object to this application on a number of grounds:

1. It conflicts with the City Council's Street Design Guidance, particularly with respect to footway widths.
2. It worsens conditions for disabled pedestrians (and by extension for all pedestrians) by introducing steps where none exist currently, and by failing to properly protect pedestrian space and crossing in the shared space area. Therefore by accepting this application as it is the Council would fail to comply with the law (Equality Act 2010).
3. It conflicts with the City Council's Active Travel Action Plan by failing to provide comfortable, convenient and safe pedestrian routes.

The specifics of each of these points are as follows:

Pavement widths – Elder Street and York Place are classed as a strategic retail / high streets in the Street Design Guidance and as such should desire to have a pavement width of 4 meters, with an absolute minimum of 2.5 meters. The application fails to meet this in a number of locations:

- Elder Street, at the junction with York Place, north side, adjacent to loading bay / car park entrance;
- Elder Street at the far right, top side;
- The footway on the south/west side of Elder St also appears to have been split with part level, part on steps. If this is indeed the case then it also effectively narrows the footway below standard.
- [Based on this application, we also have some concerns about the south side of York Place where a two way cycle lane appears to have been squeezed onto the pavement, however subsequent planning documents claim that the full pavement width has been retained, which we consider vital]

Equality Act and accessibility. Introduction of steps on north / east side of Elder Street – this footway currently provides step free access from York Place (east) to the St James Centre. There is no justification for placing new steps in this location. The step free route involves four separate road crossings rather than the current one, flagrantly disregarding the requirements of the Equality Act 2010 to improve (not worsen) conditions for disabled people. No contrasting coloured strip is shown to indicate the edge of the “footway” and the start of the “roadway” in the shared space area; again a vital feature from an accessibility point of view.

Comfortable, convenient and safe pedestrian routes. There should be a zebra crossing connecting Multrees Walk to the St James Centre. This street will still have vehicles driving up and down it and crossing pedestrians (especially older and disabled people) need priority crossing

in what is essentially a pedestrian area. The Street Design Guidance states that the Council will on such streets “Provide pedestrian crossing points every 50-100m, ideally associated with entrances to major buildings.”

The “footway” area in the shared space area should be protected with bollards to prevent the footway parking that takes there at present. Again, this also has Equality Act implications; footway parking is one of the most significant mobility issues for visually impaired pedestrians.

Within these plans there are two staggered junctions crossing York Place and Elder Street. Again both should be removed, as noted in the Street Design Guidance that states “Avoid staggered crossings”. It currently takes up to 3 minutes just to cross 22 meters of York Place. With the change in road layout with dedicated turning lanes it should be easy to remove the Elder street stagger as a minimum. It is also unclear where cyclists on York Place are supposed to cross this junction. Would they dismount and use the small pedestrian island?

At the main entrance to the St James Centre there appear to be 14 bike racks at 90 degrees to the footway. If these bike racks are used the footway will be blocked – particularly difficult for older and disabled pedestrians, and the many who have prams or are carrying shopping.

The swept path analysis only shows busses traveling to / from the west end of York Place. Nothing is shown from the east. Busses currently traveling from Elder Street heading east bound have to dangerously overhang the pavement on the north side of York place to clear the existing pedestrian island. No attempt has been made to remove this risk to pedestrians walking on the pavement.