

# Cramond & Barnton Community Council



**Incorporating Cramond, Barnton, Cammo and Quality Street (West)**

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For attention: Nicola Orr, Planning & Building Standards, City of Edinburgh Council  
25<sup>th</sup> May 2018

Dear Nicola

## **18/01755/FUL: RESPONSE TO CONSULTATION ON EIA ACCOMPANYING PROPOSALS FOR HOUSING DEVELOPMENT (HSG20) S.E. OF CAMMO WALK**

The Community Council is responding formally, as a statutory consultee, to the consultation on the EIA accompanying the Cammo development.

The Community Council objects to the continuing drip-feed of additional information onto the planning portal since validation of the planning application, including EIA material which should have been required from the developer in advance of validation. Over 65 documents of relevance have been added between the validation date (2 May) and date of this submission (25 May), and CEC have informed the CC that more information is expected. This makes a mockery of the public notification and consultation process and compounds issues of loss of confidence in the planning process resulting from CEC's responses to previous consultations on the Cammo (HSG20) site.

With specific regard to EIA contents currently provided on the planning portal, the Community Council has concerns over –

### **a. Landscape Assessments**

The LDP brief for HSG20 respects the importance of views of the Pentland Hills from the site and Maybury Road and views from the north through the site to the treed Craigs Road ridge and Pentland Hills are highly valued features of the landscape for Cammo residents, who along with the CC have argued for safeguarding such views. Proposed 4- and 3- storey apartment blocks along much of the northern and south-western edges of the Mauseley Park corridor, which comprises much of the highest ground in the site, will effectively block medium-distance views of Craigs Road ridge and longer-distance views of the Pentlands from residential areas to the north.

Current photomontages provide inadequate representation of wider landscape impacts. A topographical cross-section of the site from a high point within existing housing at Cammo (e.g. Cammo Parkway) across the site is required, showing heights of land and buildings along the Mauseley Park corridor to the Craigs Road ridge and including a representation of the Pentland Hills. This would illustrate the extent, if any, of views which may be retained across the site from north to south and beyond. In addition, a helium balloon test would demonstrate likely landscape impacts of the 3- and 4- storey buildings.

The recommended assessments may demonstrate the need to relocate apartment blocks from the northern side of Mauseley Park to a less prominent position, or to reduce the height of at least some apartment blocks. **The assessments recommended above are identified within *Edinburgh Design Guidance* as appropriate to the assessment of landscape impacts of housing developments and, without such information, the landscape effects of the development cannot be fully assessed, the EIA is deficient and permission should be deferred.**

## b. Inadequacies in Traffic Assessments

Traffic impacts of the proposed development, and the cumulative impacts of major new developments in North and West Edinburgh and beyond, comprise a principal basis for the community's concerns over the proposals. The CC, with support from transport engineers, has assessed the Transport Assessment (TA) and found it inadequate in scope, basic data and assessments – especially assessments of traffic flows, congestion levels and time delays on key arterial roads and junctions which will be impacted by the development. Key deficiencies are highlighted in the Appendix below.

**Assessments of the planning application should be deferred until a more robust and comprehensive TA, which the community and Council's Planning Service can have confidence in, is completed.**

## c. Air Quality Assessments

The air quality assessments are deficient and largely derived from estimates/forecasts of average traffic speeds on key traffic corridors. They do not assess the air quality impacts of queuing traffic during saturation traffic flows at Barnton, Maybury and other junctions and crossings. As a result of the sensitivity of these junctions, any increase in volumes, however small, will exacerbate congestion and create disproportionate increases in exhaust gases and particulates emissions which are hazardous to health.

Data from the air quality monitor on Queensferry Road, east of Barnton Junction, shows PM10 particulate matter concentrations exceeding EU/UK regulation standards 8 times and NO<sub>2</sub> exceedances twice in 2017 ([www.scottishairquality.co.uk](http://www.scottishairquality.co.uk)). Additional traffic from the Cammo development, and cumulative traffic volumes generated by developments in West Edinburgh and beyond, along with new junctions and crossings on Maybury Road, will exacerbate traffic volumes and queuing on Maybury, Queensferry, Whitehouse and Glasgow Roads, with associated traffic generated pollution.

These issues should be of concern to the City Council in exercising its duties to ensure pollution levels do not exceed permitted health standards and to reduce exceedances where these occur. **More comprehensive assessments are required of the air pollution and health impacts of future traffic volumes, congestion and queuing at key junctions and traffic arteries in the vicinity of the proposed development.**

## d. Drainage and Flood Risk Assessments

The *Flood Risk Assessment* (Kaya Consulting Ltd., 2018) refers to the redundant ditch along the northern boundary and suggests that this ditch along with the proposed 5m landscape buffer will be ... *more than sufficient* .. to pass any surface flows able to reach the ditch and ... *In this way an appropriate flow pathway will be maintained along the northern edge of the site, in the event of flooding from the ditch/culvert or from any of the Scottish Water services flowing along the edge of the site.*

Similarly, a later statement indicates that ... *an appropriate flow pathway should be provided along the northern edge of the site to route flows emerging from sewers along the site boundary without flooding properties, within or outside of the site. Any water emerging from the sewers would flow along the low-lying ground along the northern edge of the site.* Sections of lowest-lying ground along the northern boundary are owned by adjacent residential owners.

**Indications in the EIA documents that the redundant ditch may be available and suitable as a flow pathway for flood water and/or sewerage overflows are inaccurate, as the ditch will remain at least partially outwith the ownership and management of the developers and much of the ditch has been partially or completely infilled. Hence, assessments and proposals for drainage along the northern boundary of the site require to be revised.**

## e. Ecological Assessments

**It would appear from the documentation that only preliminary ecological assessments have been undertaken and further surveys are required in respect of protected species, including bats and badgers, to satisfy UK and EU regulations.**

CRAMOND AND BARNTON COMMUNITY COUNCIL

**REVIEW OF PROPOSED RESIDENTIAL DEVELOPMENT, CAMMO (HSG20):  
TRANSPORT ASSESSMENT (SWECO, 2018)**

This initial review has been undertaken by Cramond & Barnton Community Council (CC) with support from professional traffic engineers. It has exposed a number of apparent deficiencies in the Traffic Assessment (TA), which result in the CC and its advisers having concerns over the comprehensiveness and reliability of the TA. As the Community Council has not, so far, been able to access the City of Edinburgh Council's (CEC) Scoping Report (omitted from Appendix A of TA) and advice on intended coverage of the TA, it has been unable to ascertain whether perceived shortfalls in the TA are a consequence of the Council's guidance on the scope of the TA, or deficiencies in SWECO's assessments.

**Key Issues:**

- a. **Scope of TA** - Current and future traffic volumes and characteristics are dependent on traffic volumes, roads and junctions capacities, etc., beyond those relating directly to the HSG20 development, Maybury Road and its approaches to Barnton and Maybury Junctions, and development sites assessed within the WETA Study. The TA fails to adequately assess, for example, traffic volumes, congestion, etc. on Queensferry Road and Whitehouse Road - all of which have implications for traffic flows, queuing, etc. through Barnton Junction and beyond and knock-on effects on traffic flows and congestion on Maybury Road. In particular, **the assessments ignore data within the SESplan Cross Boundary Report relating to traffic generated by out-of-town developments on the A90 corridor and Barnton Junction, which the Cross Boundary Report identifies as operating in excess of capacity – currently and in traffic forecasts.** CBCC sought assurances at meetings with the Consultants and CEC staff that the TA would assess Cross Boundary traffic issues, in addition to those pertaining to West Edinburgh.
- b. **Strategic Importance of Maybury Road and Queenferry Road Corridors** – Recent reports have highlighted the scale and economic costs of congestion in Edinburgh. The TA ignores the strategic role of Maybury Road which is essentially a *de facto* extension of the City Bypass. **There are no data on the costs of traffic congestion and delays associated with the development of numerous new junctions and pedestrian crossings associated with the Cammo and Maybury developments, or the effects of additional traffic generated by the developments on congestion and delays on the Queensferry Road corridor, where traffic backs up to Telford Road in the evening peak.**
- c. **Reliance on WETA traffic data, without validation of WETA data and calibration of traffic model to take account of local traffic patterns** – The TA indicates data used for modelling traffic flows and junction capacities on Maybury Road and at the site access points were derived from the WETA study. There is no indication that –
  - the data were validated against on-the-ground surveys of traffic volume, queuing and time delay data for the northern section of Maybury Road, or key junctions (e.g. Barnton, Cammo Gardens, East Craigs/Bughtlin and Maybury Junctions), or that the traffic models were calibrated against such locally derived data. A related example, of discrepancies between the WETA information and observed reality are the peak traffic times (s. 7.3), as daily observations indicate that peak evening traffic flows are 17.00-19.30, not 17.00-18.00.

- the assessments took account of the cumulative effects of the proposed new junctions and pedestrian crossings on traffic flows and congestion.

The modelling assessments in Figs. 7.2 and 7.3 are further flawed, as the calculations for the southern approaches to the two new junctions assume that continuing traffic flows along Maybury Road northwards towards Barnton will not be obstructed. However much of the time the Barnton Junction is over-capacity (as shown in Cross Border Study) and traffic is backed-up southwards on Maybury Road often as far as the location of the proposed southern access to the Cammo development, and certainly as far as the northern access point. Traffic turning in and out of Cammo Gardens further exacerbates traffic volumes and delays on this section of road (not assessed in TA).

In the above situations, traffic would not flow through the junctions, to clear the queues estimated in Figs. 7.2 and 7.3 and these would further build-up over time along with congestion and travel delays/costs on this strategic travel route. **Consequently, the data in Figs. 7.2 and 7.3 for traffic travelling northwards towards Barnton Junction are patently misleading, as these do not take account of queuing when traffic routes and junctions are at/near saturation levels.** Further data on queue lengths and time delays in the wider network – especially throughout Maybury Road and on Queensferry Road and Whitehouse Road - are required as part of the TA.

**Due to the deficiencies in baseline data and subsequent assessments, and, in particular, the lack of detailed traffic impact assessments for the northern section of Maybury Road and Barnton Junction and redesign requirements for the key junctions (see above), the community has little confidence in the assessments in section 7 of the TA.**

- d. **Issues of community severance have not been assessed** – Transport Scotland's *Transport Assessment Guidelines* (s. 5.19) state that transport assessments should identify any effects which a proposed development may have on ... *creating a barrier to access within the community ... and ... whether the level of traffic ... using nearby roads make links between parts of the community more difficult.*

CBCC's Barnton Junction Discussion Paper (provided to developers and CEC) highlights access/egress issues and roads safety hazards relating to the Cammo Gardens/Maybury Road and Pinegrove Gardens/ Maybury Road junctions. These issues have not been assessed and will be exacerbated by traffic generated by the Cammo development, unless traffic signal controls are installed to cover these junctions. Again, the CC brought such issues to the Consultants and CEC's attention and asked that these be considered in the TA.

- e. **Distance from schools and implications for travel modes** - The TA (Fig 4.2) shows that Cramond Primary School and the Royal High School – the interim schools serving the Cammo development prior to the new Maybury Primary and West Edinburgh High Schools being developed (still at early planning stage) – are some 2.4km/30 minute adult walking time, excluding major road crossings from the mid-point of the Cammo site. It is unrealistic to expect most primary pupils and many secondary pupils to walk such distances to school and PAN 75: *Planning for Transport* (Scottish Government) states that ... *A maximum threshold of 1600m for walking is broadly in line with observed travel behaviour. It is the case also that parents are unlikely to undertake two 4.8km (1 hour) return journeys to take primary pupils to/ collect pupils from Cramond Primary, which has current issues of parking congestion and road safety hazards associated with children drop-offs/collection.*

In respect of future schools' provision, Figure 4.2 illustrates that the site of the proposed Maybury Primary School (as shown in the LDP Brief) will be outwith the 1.6km threshold and potential sites mentioned for a new West Edinburgh High School are much more than 1.6km from the development site. Thus, **the TA's conclusion (s. 4.2.1) that ... the site is within a 1.6km (20 minute) walk of a range of amenities, such as schools ...**, misrepresents reality and will prevent intended modal shift from car travel to schools being met.

- f. **Provision for emergency services** – Currently, the hatched sections of Maybury Road are the only means whereby emergency service vehicles can bypass queuing traffic and speedily and safely travel along northern sections of Maybury Road, which is a strategic travel route in emergencies at the Airport, City Bypass, etc.. **The proposed removal of this non-traffic corridor and placement of new traffic islands, crossings and junctions will significantly reduce emergency response times. This issue has not been taken account of in the TA.**
- g. **Air quality issues** – there is no assessment of the impacts of additional traffic volumes and congestion on air quality on Maybury and Queensferry Roads. In the latter case NO<sub>2</sub> pollution exceeds acceptable standards due to congestion. **The CC seeks further assessment of this important health issue in its assessment of the Developers' Air Quality**

### **Comprehensive Audit of the Transport Assessment**

In an e-mail dated 17.5.2018, Nicola Orr (CEC Planning) indicates that ... *The developer chose not to seek a Scoping Opinion from the Council ... and stated that they would rely on the work undertaken in the EIA associated with the previous PPP ... Therefore there is no Scoping Report for this current application.* **It is evident from the CC's assessment, that SWECO has been selective in the scope of the TA and data utilised, resulting in the TA being unreliable in scope and content. Consequently, the Community Council suggests that a comprehensive and independent audit of the TA be undertaken and that fuller and more reliable data be provided as a basis for the assessment of the planning application.**