

Edinburgh Local Development Plan – Proposed Plan Representation Form

All Representations on the Proposed Plan should be submitted using this form.
Please use a separate form for each individual representation i.e. each aspect of the Proposed Plan you wish to comment on.

If you have any queries regarding your representation, please refer to the accompanying guidance note or contact 0131 469 3552

Representation forms must be received by 5pm on Friday 14 June 2013 and can be submitted electronically to; localdevelopmentplan@edinburgh.gov.uk or by post to; Local Development Plan Team, City of Edinburgh Council, Business Centre G.3, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG.					
Section 1. Please provide your contact details Please note that representations cannot be treated as confidential. Representations will be made available for public inspection, except any information which would be subject to the Data Protection Act 1998.					
Name: Gary Bennett (Chair)			Organisation Name: (if applicable) CAMMO RESIDENTS ASSOCIATION		
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Telephone: 0131 339 7555			Email: info@cammoresidentsassociation.org Please provide an email address if possible as this helps us improve efficiency		
Agent: N/ A			If you provide an Agent's name we will direct all subsequent correspondence to your Agent		
Agent Address: N/A					
Agent telephone: N/A			Agent Email: N/A		
Section 2. Please tell us which part or parts of the Proposed Plan this representation relates to:					
Page No.		Part and Section	Part 1 / S3 Part 2 / S7	Paragraph No.	78-83 137-139
Proposal Reference	HSG (20) T18- T19		Policy Reference	Policy Tra 9 Policy Hou1	

Other	Table 9 Transport Proposals and Safeguards		

Section 3. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written

Seeking a change **YES** (Please complete sections 4 and 5 below)

Support as written **NO** (Please complete section 5 below)

Section 4. Please indicate what changes you would like made to the Proposed Plan

Amendment to the proposed LDP to remove references to transport proposals associated with Cammo (HSG20) in relation to mitigation and management of transport impacts.

Amendment to Table 9 Transport Proposals and Safeguards in respect of development at Cammo and Maybury (HSG 19).

CRA is not prepared to fully engage on material development, design or mitigation factors until the principle of development is established through a Public Inquiry. Correspondingly we are not in a position to agree to transport measures which are already issues for communities in West Edinburgh:

- Traffic management proposals directly affecting Cammo;
- Provision of improved access arrangements (potential signalisation) at junctions and accesses to Cammo and Strathalmond from Maybury and Queensferry Road;
- Enhanced public transport facilities and linkages.

Section 5. Representation

Your representation should be no more than 2000 words. You should explain clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. If you are attaching additional documents as part of your representation you must refer to these in this section of the form and include a summary of their content. Representations which simply state "see attached" or similar will not be accepted and will be returned.

Introduction

Cammo Residents Association is concerned that no detailed transport modelling or integrated land use assessments have been undertaken in relation to HSG 20. Additional houses will represent a significant increase in road movements in addition to traffic congestion, safety and air quality already established in the area.

To assess the feasibility of housing proposals, the LDP should fully appraise capacity at the Barnton and Maybury Junctions as well as the network capacity on Maybury Road and its junctions. There is potential for grid lock at peak periods and lengthy delays for access and egress from Cammo, East Craigs and North Gyle.

Transport mitigation and management measures suggested by the Council in the LDP Action Plan are considered to be insufficient to serve the scale of developments being proposed.

CRA has engaged Hyder Consulting (Transportation), to assist in this rebuttal and provide evidence to this effect. The conclusions vindicate the stance being taken and conclusively prove that the road network is already operating over capacity. A copy of this report is appended for information.

In transport terms the proposals are:

- Not in accordance with existing or proposed Scottish Planning Policy;
- Contrary to the aims and objectives of the SDP (SESplan) and previous analysis undertaken in consultation with SEStran;
- At odds with the objectives and policy stance taken within the proposed LDP;
- Contrary to the West Edinburgh Planning Framework which is Supplementary Planning Guidance;
- Not supported by any form of independent technical advice in relation to road and junction capacity or road safety audits; and
- In conflict with the views of transport consultees and local organisations including SEStrans.

In addition it is not clear how access and egress into the site can be achieved without significantly compromising the City Councils Highways and Roads Standards.

Proposed LDP

Land at Cammo (HSG 20) is being proposed for urban development of between 500-700 houses on Green Belt land. A fundamental principle of the planning system within Scottish Planning Policy / Planning Advice Note 75 and of the LDP is that land use and accessibility should be integrated. This scale of development has not been tested in the LDP.

Paragraph 11 within Section 1 (Aims and Strategy), states that the LDP aims to 'help ensure that the citizens of Edinburgh can get around easily by sustainable transport modes and can access shops and services by these means'. Part 1 Section 3 of the Proposed Plan emphasises that this is a Plan to Provide Homes Jobs and Services in the Right Location.

Paragraphs 78- 83 of the Proposed LDP deals with Transport and emphasises;

- Promoting sustainable transport as part of the Local Transport Strategy;
- Major travel generating developments should take place in locations well served by public transport, walking and cycling networks;
- Major projects including the re-introduction of tram services and the rail improvements as well as the replacement Forth Crossing; and
- Adoption of an active Travel Action Plan.

A 'transport appraisal' was undertaken in relation to housing sites within the LPG and an exercise undertaken for West Edinburgh in 2010. We have serious concerns over the technical competence of this exercise and the outcomes not least that it does not test the full development being proposed as part of HSG 19 and HSG 20.

Traffic Modelling in the LDP Transport Appraisal forecasts:

- 14.9 % - 16.5% peak hour traffic growth on Queensferry Road by 2024 of which 4-4% - 5.8% is attributable to the HSG 19 and HSG 20 housing proposals; and
- 21.55 - 28.9% peak hour traffic growth on Glasgow Road by 2024 of which 15.45 - 21.8% is attributable to the HSG19 and HSG 20 housing proposals.

Proposals T17-T19 are identified in connection with improvements related to new housing development in West Edinburgh (HSG19; HSG20):

- T17 Maybury – consideration of access from Turnhouse Road and efficiency of traffic signals;
- T18 Craigs Road – new signalised cross roads;
- T19 Barnton – increasing the efficiency of traffic signals.

These measures are wholly inadequate and will not mitigate the impact of new development without major economic and environmental cost to the City. Traffic entering and leaving the proposed sites will use Maybury Road and the Maybury and Barnton Junctions. It is not clear whether these measures are feasible in conjunction with the proposed development.

Existing local transport infrastructure cannot readily support development at Cammo. The proposals will generate an unacceptable level of traffic that is disproportionate to that expected to be generated by other similar proposed New Housing Sites.

A series of interventions are proposed as a means of minimising the traffic impact of any development which may take place at the site. These measures are also geared towards increasing the level of ‘sustainable’ transport methods including new bus services, bus priority, new stops, pedestrian links, signalised crossings, reduced speed limits and junction improvement as part of a travel plan. None of these measures can be ‘guaranteed’.

These suggested measures indicate the inherent transport problems that will accompany any development plans for the Cammo site. Both the Barnton and Maybury junctions are already pressurised, and that this problem will only intensify as a result of residential homes being built on the site.

Speed calming measures proposed for Maybury Road indicate the danger already associated with a high volume of cars travelling at fast speeds. Suitability of the site for the development of family homes is therefore questionable on safety grounds. The character of the road may also make it difficult for cyclists or other forms of active transport to utilise the road fully.

Levels of traffic expected to be generated by development at the 15 proposed sites is detailed in Table 8.1 of the Edinburgh LDP Transport Assessment, published in March 2013 (TA). This table not only details the total amount of traffic generated by the sites, but also details how much of this traffic will be sustainable if development were to take place.

- It can be calculated that the total average amount of sustainable traffic generated will 49.7% across all of the proposed sites in the Edinburgh area. However only 48.1%, of the site generated at Cammo will be of a sustainable nature, and the site therefore will generate more private car trips on average than other proposed sites.
- Across all the proposed sites, a total of 471 peak hour car trips will be generated as a result of development. Furthermore, it is estimated that 220 peak hour bus trips will also result in the city. Therefore, 62% of all peak hour trips generated will be by car, and 29% by bus.
- Regarding the Cammo development, during peak hours a number of 40 additional car trips are expected to be generated, and 20 additional bus trips. The proportion of trips that Cammo residents will make by private car is higher than the average number calculated across all newly proposed allocations. Cammo is therefore not as sustainable a location as others featured in Table 4 of the proposed LDP.

- At Maybury (HSG19), an average of only 52% of trips generated from development will be private car trips. These sites are far more sustainable locations for development, and should adequately fulfil the housing needs of the West Edinburgh area during the LDP period.

We have no confidence in this analysis and would question the assumptions behind the modelling undertaken and hope to scrutinise these at Inquiry.

CRA objects to HSG20 on the basis that it does not comply with Paragraph 38 dealing with Transport and New Development. We also object to Transport Proposals and Safeguards (paragraph 139) in respect of Policy TRA9.

Strategic Development Plan – SESplan

Policy 8 Transportation within SESplan is predicated on the need to reduce travel and promote sustainable modes of travel. It states that :

The Local Planning Authorities in collaboration with Transport Scotland and SESplan will support and promote the development of a sustainable transport network. Local development Plans will:

- Ensure that major development is directed to locations that support travel by public transport foot and cycle;
- Ensure that new development minimises the generation of additional car traffic including reaching mode share targets and car parking standards that relate to public transport accessibility; and
- Relate the density and type of development to public transport accessibility.

The proposals for Cammo are contrary to this policy and each of the criteria therein.

SESplan Transport Technical note (Nov 2011), highlights capacity issues in relation to the main arterial routes in West Edinburgh. It identifies a significant capacity constraint at the Barnton junction. In addition there are network and capacity issues and projected delays on the A8, Gogar and Edinburgh Park areas. This will make the area a less attractive proposition for economic and business park development associated with Edinburgh Airport.

Cammo is one of the most inaccessible parts of the city in terms of public transport services. There is no guarantee that the development will secure improved public transport services and pedestrian-cycle movement will become much more difficult and dangerous than is currently the case.

Scottish Planning Policy

Integrated land use and transport policy contained within the Scottish planning policy is predicated on reducing greenhouse gas emissions and the impact on climate change. It recommends modal change to non car based transport and states in paragraph 165 that ‘Tackling Congestion will also support sustainable economic growth and reduce emissions’. Also that ‘The relationship between transport and land use has a strong influence on economic growth and this should be taken into account when preparing development plans and in development management decisions’.

Paragraph 167 of the SPP states that ‘The existing transport network, environmental and operational constraints, proposed or committed transport projects and demand management schemes should be taken into account in development plans and development management decisions. When preparing a development plan, planning authorities should appraise the

pattern of land allocation, including previously allocated sites in relation to transport opportunities and constraints based on current or programmed capacity of the transport network and sustainable transport objectives. Development should be supported in locations that are accessible by walking cycling and public transport as this easily allows for adding to existing networks and creating new networks. Significant travel generating uses should be in locations that are well served by public transport and the amount of car parking permitted should be controlled to encourage more sustainable travel choices'

It then points to the need for a transport assessment stating that 'Planning permission should not be granted for significant travel generating uses in locations which would encourage reliance on the private car and where:

- Direct links to walking and cycling networks are not available or cannot be made available;
- Access to public transport networks would involve walking more than 400 m.;
- It would have a detrimental effect on the capacity of the strategic road and or rail network; or
- The transport assessment does not identify satisfactory mechanisms for meeting sustainable transport requirements.

Cammo is an unsustainable location for further development and allocation of the housing site will not achieve transport or accessibility objectives.

Draft Scottish Planning Policy (May 2013)

Emerging SPP takes an even stronger stance in relation to climate change and the transport impact of development.

- Paragraph 43 states that Development plans and new developments should 'make best use of the capacity of existing infrastructure' and seek to minimise the need to travel and support active travel and sustainable transport options;
- Paragraph 44 states that the layout and design of new development should ensure good access to active travel networks and public transport.

Paragraphs 188 – 206 acknowledge Promoting Sustainable and Active Travel by suggesting that the planning system should support patterns of development which facilitate travel by public transport, provide safe and convenient opportunities for walking and cycling and enables the integration of transport modes'. Cammo achieves none of these aspirations.

Furthermore (paragraph 193) states, 'In preparing development plans, planning authorities should appraise the impact of the spatial strategy and its reasonable alternatives on the transport network.....Planning authorities should ensure that a transport appraisal is undertaken at a scale and level of detail proportionate to the nature of issues and proposals including funding requirements.' It is clear that this has not been complied with and the LDP is deficient in this respect.

Cammo is a significant travel generating use and any new housing needs to be sited appropriately. The Development Plan Action Programme does not set out delivery or implementation arrangements.

Site Specific Access

The proposed development Brief for Cammo does not demonstrate how access or egress can be satisfactorily achieved within Roads and Highways Standards. Traffic patterns at peak periods will preclude effective operations at key junctions.

The potential layout will be contrary to Designing Streets with very limited permeability and accessibility into the existing estate at Cammo to the north. Arrangements for access are not clear nor are the implications for residential amenity and potential use of Cammo Road.

Maybury Road may be downgraded to 30mph as a local distributor which will cause major congestion and tailbacks at Gogar and Barnton. In addition it will remain an impenetrable barrier and road safety hazard despite 'crossing points'.

Proposals for Cammo Walk are described as a 'New Footpath-Cyclepath'. This is a Right of Way and part of the Core Path Network also serving as a route for emergency access into Cammo and Stathalmond.

Conclusion

Transport is a major issue that has not been fully addressed within the LDP resulting in a disconnect between land use transport and the capacity of the existing network. The spatial strategy being considered at Cammo and West Edinburgh is not sustainable or feasible in transport terms.

The LDP is clearly not competent in terms of testing the development against transport appraisal. Furthermore there is no evidence that the mitigation and management measures will be suitable or when they will be delivered through funding mechanisms

CRA objects in the strongest of terms and would ask the Planning Committee to reconsider this proposal on transport grounds.

Please use a continuation sheet if required