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to: Eileen.McCormack@edinburgh.gov.uk
cc: Transport Development <transport.development@edinburgh.gov.uk>
date: 25 December 2015 at 14:30
subject: 15/05224/PPP Freelands Rd Ratho Spokes objection

15/05224/PPP Freelands Rd, Ratho .. 150-space residential development

Spokes objection

Dear Ms McCormack,

We object to this application on a number of grounds:

1 The land is not zoned for housing in the Local Plan which is still current. It is also not zoned in the proposed LDP2. It is Green Belt land, and greenfield. It is also prime agricultural land. For the latter two reasons it contradicts Policies E5 and E7 of the Local Plan.

2 From a transport point of view it is completely unsustainable. The SDP requires, for new developments, "to integrate land use with sustainable modes of travel, reduce the need to travel, and cut carbon emissions by steering new developments to the most sustainable locations".

The proposal fails all these criteria:

2.1 Walking: the walking distances to the amenities exceed the guidelines of 400m - they are "typically between 600 to 900m" (Transport Assessment, 2.4 and 4.2); the Primary School is 1200m; local shops etc are 1200-1400m distant. The developers then claim: "these distances accord with the guidelines set out in PAN 75". They simply do not!

2.2 Cycling: the developers claim "excellent cycle facilities which include the canal towpath and the NCN74 ...". These actually turn out to be one and the same. No other facilities are mentioned, and indeed there are none. The only alternative cycle access to the site is via Freelands Rd, a narrow rural road, with the national speed limit of 60mph.

Can this single cycle facility even be described as "excellent"? The towpath is barely 1m wide, and was last upgraded in 2001 as part of the Millennium Link; the surface is in very poor condition. The path is also shared-use (with pedestrians), in both directions. It is therefore totally unsuited for cycle commuting in its current state, and is very far from "excellent".

Do the developers even propose a direct connection from the site (whose southern border adjoins the towpath)? They do not. Any connection is described as "potential" (Tpt Assessment, 2.4). Most commuting would be in an easterly direction, towards Edinburgh. To access the canal from the site, with no direct connection, cyclists would have to travel *west*, (to the Cala development), via Freelands Rd, which as noted is narrow, with a 60mph speed limit, quite unsuitable for cycling.

Do the developers propose to enhance their green credentials by offering a contribution towards improvement of the towpath, so that cyclists and walkers could at least have a decent path to get to the village of Ratho? They do not mention it. The only infrastructure they propose is a contribution towards upgrading the Dalmahoy cross-roads, ie the junction with the A71. Clearly of benefit almost entirely for vehicles, and likely to promote only car use.

It is significant that, despite many photos in the documentation, no photo of the canal towpath adjacent to the site is included.

Furthermore, any facilities accessible by cycle are at the extreme of the cycling isochrone recommended by the guidelines (the developers mention Heriot-Watt and the RBS site), and would thus require a good-quality path, and one of sufficient width, similar to the state of the towpath from the city to Hermiston.

2.3 Public transport: there are no buses along Freelands Rd; the nearest buses are Main St and Baird Rd, a walk of some 600-900m, as noted.

Thus, of the 3 criteria set out in the SDP, none would be satisfied; there would no 'integration with sustainable modes of travel' - neither walking, cycling nor public transport; there would be no 'reduction of the need to travel', since no amenities or facilities of any kind are proposed for the site - it is just a 'dormitory'; carbon emissions, far from being cut, would be significantly increased, since the dominant travel mode would inevitably be the car.

Furthermore, the surrounding network of roads - Freelands Rd, Gogarstone Rd, Roddinglaw Rd - are all rural roads, unsuited for car commuting, and with no footways, so the additional traffic from the development would deter walking and cycling even more.

Recent developments at the international Climate Summit in Paris make it all the more important that development proposals should henceforth be totally sustainable - (and that LDP2 should take cognisance of the Agreement when allocating land for development).

This proposal is clearly not sustainable, and does not accord with current land use requirements. We recommend planning permission be refused.

Yours sincerely,
Peter Hawkins
Spokes Planning Group