

## Objection to Planning Application 15/04318/PPP

*Proposed residential development, local centre (including Class 1, Class 2 and Class 3 uses), community facilities (including primary school and open space), green network, transport links, infrastructure, ancillary development and demolition of buildings. | Land 1000 Metres NW SW And West Of Hermiston Junction M8 Gogar Station Road Edinburgh*

I write on behalf of the Gogarburn Bicycle Users' Group, which has over 550 members and represents the interests of people who cycle to RBS Gogarburn. For avoidance of doubt, the Gogarburn Bicycle Users' Group is independent of the RBS Group, and the views stated here are ours. We do not represent the RBS Group in any capacity.

We object to this development as proposed because of its impact on local access and transportation. Specifically, we object because of the road safety issues it creates and because of its impact on cyclists and pedestrians using Gogar Station Road. The basis for our objection is the impact that traffic from the development will have on cyclists and pedestrians using Gogar Station Road, which is a key commuter route for cyclists heading between Currie or the Union Canal and RBS Gogarburn, the Airport or Edinburgh Park.

We have reviewed Revision 006 of the *Technical Appendix 5 - Access, Traffic and Transport*, and we believe that this document understates the importance of Gogar Station Road as a local through route for motor vehicles and cyclists and therefore gives an overly optimistic impression of the impact of the development on people who use that road.

Specifically:

- The report says (p8) "*Gogar Station Road varies in width along its length. The prevailing speed limit also varies with the national speed limit applying to the rural part of the road, reducing to 40mph for the more built up parts.*" This statement seems to conflict with our observations on the road this week: a 40mph speed limit applies along its whole length between the A71 and the A8 except short sections at each end where the speed limit is 30mph. The '*more built up parts*' of Gogar Station Road make up 2/3 of its length and are winding and narrow, which is why there is a speed limit. In some cases the road is barely 5m wide, which is not wide enough for two lorries to pass without going on the pavement.
- In the *Cycling* section on page 9 there is no mention of the significant investment in cycle facilities on Gogar Station Road, implemented in 2015 in recognition of its importance as a commuter route for cyclists. There are on-road cycle lanes on both sides of the road where possible, and an off-road shared-use cycle lane between the Gogar burn south of the site to the Union Canal. However Gogar Station Road is so narrow for much of its length that there is not room for two motor vehicle lanes and two cycle lanes, so the innovative solution is to remove the central white line on the road. In some places, though, the road is so narrow that there isn't even room for cycle lanes. We note that the site maps (Fig 4.3) do not show Gogar Station Road as a local cycle route, which is incorrect.
- On page 11 the document says "*A review of the data in Appendix 5.2 highlights that the major routes surrounding the site (i.e. the A8, A71, A720 and M8) carry large*

*volumes of daily traffic with the volumes decreasing significantly along Gogar Station Road which links to the development site. This is to be expected given that Gogar Station Road is a minor road providing access to only the RBS headquarters and a few small businesses".* This does not mention a further factor, which is that the road is a 'rat run' between the M8 and south west Edinburgh, popular in peak periods with vehicles wanting to avoid the city bypass. Any consideration of traffic volumes on Gogar Station Road should bear in mind that in its short length it has four blind corners, three single-lane bridges and several sections less than 5m wide.

- On page 17, in the section about mitigation of the effects of severance, the document makes no mention of the impact of the development on people travelling by bicycle *along Gogar Station Road*, which is a key commuter route. The increase in traffic volumes will make this route (which is already challenging due to its width and configuration) very hostile for cyclists.
- On page 19, in the section about Pedestrian amenity, fear and intimidation, the document says "*Pedestrian amenity, fear and intimidation are affected by the perceived traffic flow, traffic composition, footway width and its separation away from the carriageway. The levels of traffic generated by the proposed development are relatively low in comparison with the base traffic flows for the majority of links comprising the network of interest. Furthermore, the majority of the predicted increases are below the 30% threshold resulting in an insignificant impact, as previously defined.*". This reference to the '*base traffic flow for the majority of links*' neglects the impact on Gogar Station Road, where traffic is predicted to double in volume, and in particular where traffic is expected to change from what is essentially a one-directional flow at peak times to a two-directional flow. The pedestrian experience for much of the road at present is on a narrow (1m or less) pavement against a stone wall close to a narrow road that is busy at peak times. This experience will be significantly worse when traffic doubles.

Our opinion is that the traffic that this development generates will have a significant impact on the experience of cyclists on Gogar Station Road and that more account must be taken of this in the final design.

We note that cyclist traffic on Gogar Station Road is expected to increase considerably as RBS delivers on its plans to increase the number of staff at its Gogarburn site (<http://www.edinburghnews.scotsman.com/news/rbs-to-shut-four-edinburgh-offices-1-3737563>), and to encourage staff to choose active travel for commuting.

We also note the previous advice to the Planning Committee ('East of Millburn Tower Transport Assessment') about measures to mitigate the impact on Gogar Station Road of this development. We would like to see the following mitigation measures that were recommended in that analysis, but which do not feature in this application be implemented:

- Widening of the bridge over the railway to allow a usable width of pavement and to accommodate two lanes of traffic, including cycle lanes on both sides
- Widening of the bridge over the Gogar Burn at the north of the site, widening of the road in that area and incorporation of cycle lanes on both sides of the road.

- Measures to ensure safe cycling/walking along Gogar Station Road including upgrading existing narrow sections of Gogar Station Road

We would also like to see the following further mitigation measures that were not mentioned in either assessment

- Provision for cycle lanes out of the development at the junctions with Gogar Station Road, including 'Advanced Stop Zones' on all arms of the signal-controlled junctions.
- Implementation of a 20mph speed limit along the length of Gogar Station Road to recognise that this is a vital link for active travel, but that there are viable alternative routes for motor vehicles.
- Active steps to discourage vehicles from the development from using Gogar Station Road in preference to the roads within the development. We propose that at the north exit from the site, vehicles should not be allowed to exit south onto Gogar Station Road, nor should they be able to enter the site from the south. At the south junction, vehicles should not be able to exit north or enter from the north. This would have the effect of removing new traffic from some of the narrowest parts of Gogar Station Road, thereby mitigating some of impact of the traffic from the development.
- Rigorous management of large vehicles during the construction phases. Mindful of the well-known risks that four-axle rigid-body trucks present to cyclists, knowing that in several places Gogar Station Road is so narrow (5m) that two such trucks will not be able to pass without mounting the pavement and that in many places it is so narrow that a truck will not be able to pass a cyclist while leaving the space mandated by the Highway Code, we propose that all construction traffic be required to take the shortest route on Gogar Station Road to and from the site, and that no construction traffic be allowed on the section of Gogar Station Road between the two entrances to the site, and should not use any part of the road during peak periods. Furthermore drivers of any large vehicles using the road during construction should be required to undergo cycle-awareness training.

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