

Hearing Statement

Gogarburn Bicycle Users' Group

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1 Preamble

- 1.1 This hearing statement by Gogarburn Bicycle Users' Group ('the BUG') relates to the application by Murray Estates Limited ('the Applicant') for planning permission for a 'Proposed Residential Development, Local Centre (Including Class 1, Class 2 & Class 3 Uses) Community Facilities (Including Primary School And Open Space) Green Network, Transport Links, Infrastructure, Ancillary Development And Demolition Of Buildings'.
- 1.2 The BUG is independent of The Royal Bank of Scotland Group plc ('RBS'), and does not represent RBS in any capacity whatsoever. The views expressed in this document, and by our witnesses, are those of our members.
- 1.3 The BUG maintains our objection to the proposed development on the basis of its impact on local traffic and the safety of people on bicycles travelling through the area. This Hearing Statement outlines the reasons for this continued objection, and the evidence to which the our witnesses will speak at the hearing.

2 Introduction to the BUG and cycling at RBS Gogarburn

- 2.1 The BUG exists to support and encourage people who ride their bikes (or are thinking of riding their bikes) to RBS Gogarburn. It does this with a range of activities to increase engagement and uptake of cycling to the site:
 - Regular communication its membership, with weekly email and a lively social media forum.
 - Recruitment, publicity and training interventions to encourage colleagues to consider using a bicycle to commute to work.
 - Surveys and censuses to provide data for evidence-based decision-making and campaigning internally and externally.
 - Engagement with local and national management of RBS to make tactical and strategic improvements to local facilities and national RBS policy (for example provision of improved facilities on site, installation of NextBike hire bicycles, changes to national policy on payment of expenses for business travel by bicycle).
 - Focussed campaigns about improving or maintaining public cycle facilities beyond the site (for example changing Council policy so that the upgrade and resurfacing of Gogar Station Road was made higher priority, and then campaigning to include cycle lanes and a new road layout in that resurfacing, involvement in this planning application).
- 2.2 The BUG started in 2012. It currently has ~700 members, representing well over 10% of all colleagues at the Gogarburn site.
- 2.3 A daily average of ~150 people cycled to Gogarburn in April 2017. The BUG carries out a regular census of the number of bicycles on site: this number has grown consistently and considerably since 2012 and shows no signs of slowing. Unsurprisingly, the flow of people on bicycles in and out of the site takes place in 'rush hour', with the majority of those 150 bicycle

arriving and leaving in a period of ~90 minutes at each end of the working day (so at a rate greater than one every minute at peak periods).

- 2.4 BUG members are commuters. They ride their bikes to Gogarburn because it is the most convenient way to get to and from work. They are not riding for ‘leisure’, and so will tend to choose the quickest and most direct route, taking account the level of perceived risk from traffic that they are willing to tolerate. They use three routes to cover the final mile to Gogarburn:
- From the east along the A8 or the cycle paths either side of it (~40% of journeys, or about one bicycle every 90 seconds at peak periods)
 - From the south east along Gogar Station Road (~40% of journeys, or about one bicycle every 90 seconds at peak periods)
 - From the west along the A8 or the cycle paths beside it (~20% of journeys, or about one bicycle every three minutes at peak periods)
- 2.5 These observations about the volume of cyclists do not take account of people on bicycles travelling to and from other destinations. In particular, people on bicycles travelling to the north and west from Heriot Watt University and Edinburgh Park/South Gyle and to the south and east from Edinburgh Airport are likely to traverse the same routes.

3 **Danger to cyclists from increased traffic on Gogar Station Road**

- 3.1 The Applicant’s document *Additional Transport Information* [M141] acknowledges the important of Gogar Station Road as a key commuter route for people on bicycles. 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 has been 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. The existing provision for people on bicycles will become increasingly ineffective as the volume of traffic on the road increases.



- 3.2 There are limited opportunities for people in motor vehicles to overtake people on bicycles along the road, due to the narrow sections and blind corners. Our members already report a worrying number of dangerous overtakes and ‘close passes’ on the road. As traffic on the road increases, opportunities for safe overtaking are likely to reduce, with the effect that people on bicycles are

likely to experience more close passes and dangerous overtakes. For people on bicycles these incidents are at best frightening and intimidating and at worst life-threatening.

- 3.3 We represent people on bicycles who will want to choose the quickest and most direct route to work. Strava, a popular tool used by athletes and commuters alike to track their rides records that over 1,000 people have ridden a [segment](#) of Gogar Station Road at over 14.8mph.
- 3.4 The Applicant's proposed route for the cycle path through the development **[M141, Fig 5.3]** appears to be longer than the route via Gogar Station Road. A cycle route that acts to draw cycle traffic off the direct route along Gogar Station Road onto a longer route through a housing development will need to be of exceptional quality. It is not sufficient that this route is 'designed to minimise conflict with vehicles' **[M141, p4]** it must also minimise conflict with pedestrians and allow people on bicycles to travel through the development at average speeds approaching what they can achieve on Gogar Station Road (15mph+) without stopping for junctions or traffic calming, otherwise they are likely to remain on Gogar Station Road. We note the Scottish Government publication *Designing Streets*, [which says](#) 'Cyclists are more likely to choose routes that enable them to keep moving. Routes that take cyclists away from their desire lines and require them to concede priority to side-street traffic are less likely to be used. Designs should contain direct, barrier-free routes for cyclists.'
- 3.5 We have seen example of other developments where the cycle paths are wide and expensively-built, but include features like poorly-placed chicanes and road crossings that make them unsuitable for purposeful cycling. We have not yet seen detailed designs that would give us confidence that the Applicant's proposed route will not include features of this nature that would render it unfit for drawing a significant fraction of cycle traffic off Gogar Station Road.



4 Cycling and walking on Gogar Station Road when the development is in place

- 4.1 Even if there is a cycle route through the development of exceptional quality, it is important to recognise that some people on bicycles and on foot will still legitimately choose to use Gogar Station Road. This could be because they are travelling to a point accessed from Gogar Station Road (Gogarbank or Kellerstain, for example), because they are not aware of the route through the development or because they find Gogar Station Road quicker. This is an analogous situation to people in cars choosing to use Gogar Station Road in preference to the A720 City Bypass.
- 4.2 The presence of people on bicycles amongst the motorised traffic will reduce the capacity of junctions and bridges. The Applicant asserts that on the bridge over the railway, the 'traffic signals would operate satisfactorily with queues of no more than 9 vehicles in either direction during peak periods' **[M141, p7]**. There is a steep approach to this railway bridge, particularly

from the north, making it slow for people on bicycles to negotiate. This creates a situation where a person on a bicycle may find they are grinding up a steep hill with a queue of nine cars behind them. The bridge is currently so narrow that it is not possible for a car to pass a person on a bicycle safely, although our members frequently report people in cars doing just that.

- 4.3 The footway along Gogar Station Road is substandard and unlikely to comply with equality guidelines. For most of its length it is bounded by a stone wall. People will continue to walk along this footway, particularly if it remains the shortest route to where they are going. An increased volume of traffic along the road will make this walk even more unpleasant than it currently is. It also increases the risk that someone will be pinned against the stone wall by a vehicle.
- 4.4 Neither the railway bridge nor the bridge over the Gogar burn to the south of it have acceptable footways. In the case of the railway bridge, the footway on each side is too narrow for a buggy or wheelchair. There is no footway at all on the bridge over the Gogar burn.



- 4.5 Given that there is agreement that the development will increase vehicle traffic on Gogar Station Road, the current proposals of shuttle traffic signals on both bridges do not do enough to address the safety of people on bicycles and on foot who will use that road. In our view both the railway bridge and the bridge over the Gogar Burn should be widened to allow two lanes of vehicle traffic and a footway, as suggested in the *Transport Appraisal* [M047]. The footway along the rest of Gogar Station Road should be widened to increase the safety and attractiveness of the route for people on foot, to an absolute minimum of 1.5 along its entire length.

5 RBS Access Solution

- 5.1 We are very concerned about the proposed RBS Access solution [M141] and the impact this will have on people on bicycles and people on foot. We cannot agree with the Applicant's assertion that 'movement through the junctions for pedestrians and cyclists will be improved'. The only evidence we see of provision for cyclists in the drawing in the Appendix is of 'advanced stop zones' at some of the points of the junction, but there is no means for people on bicycles to access those zones. In some cases, the traffic lanes are so narrow that it will be impossible for people on bicycles to filter safely to the front of the queue of traffic. The zones will therefore only be of benefit to people on bicycles who happen to be at the front of a queue of stationary traffic, and to people crossing the road on foot.
- 5.2 The drawing does not show any connectivity between the cycle route through the development and the cycle paths to the north (over the RBS Bridge) and east (along the A8) that both terminate within the area covered by the drawing. It also does not show any provision for people

on bicycles travelling from the south along Gogar Station Road. We note the Applicant's statement that the bridge over the Gogar Burn will be widened, but there seems to be no provision north of that wider bridge for people on bicycles.

- 5.3 The segment of Gogar Station Road shown in the drawing is very narrow and the west side of the road is bounded in part by a stone wall with no footway. The road is so narrow that it is not possible for two heavy goods vehicles to pass each other without the southbound one mounting the footway, which is a concern as this footway will be the route of choice for people walking from the development to catch buses or trams at Gogarburn. This area is already also a hostile place for people on bicycles, which will get worse as the volume of traffic increases. It does not appear from the drawing that there will be any interventions on this road to make it less hostile.
- 5.4 The overall scale of the junction will make it very intimidating for people on bicycles. At peak times, more than one bicycle a minute will be leaving the cycle store at the bottom right of the drawing, and the majority will want to go straight across the junction or turn right. People on bicycles wanting to turn right will feel very exposed in the middle of a large open junction with no barriers to protect them and traffic (including frequent buses) passing on both sides of them. People on bicycles wanting to go straight on will want to join the cycle path over the RBS Bridge, which will mean slowing to join the footway at a time that cars behind them are likely to be accelerating.
- 5.5 The drawing does not show any provision for people travelling to or from the RBS Business School on foot to cross Gogar Station Road. It is unreasonable to expect them to walk some distance north to the signalled crossing, and then use two more signalled crossings. They will continue to do what they do now, which is to cross immediately north of the Business School entrance, but against increased traffic volumes.
- 5.6 We do not understand how this design complies with the *SCOTS Roads Development Guide* or *Designing Streets – A policy statement for Scotland* published by the Scottish Government. [This says](#) 'Street user hierarchy should consider pedestrians first and private motor vehicles last'. It seems to us that the focus has been on prioritising the movement of vehicular traffic at the expense of people on foot and on bicycles.
- 5.7 Our view is that the only way to make the RBS Access safe for people on bicycles is by provision of a new traffic-free path linking the ends of the three cycle routes that will terminate in the area covered by the drawing, either by traversing the grounds of the RBS Business School or by crossing Gogar Station Road near the northern entrance to the development. The three routes that must be connected with a traffic-free cycle path are:
- The existing cycle route south of the A8 from that comes in on Gogar Station Road at the top of the drawing on the share-use footway
 - The existing cycle route north of the A8 that comes in on the shared-use footway of the RBS Bridge
 - The new cycle route through the development

6 Danger to cyclists from construction traffic

- 6.1 It is well-documented that heavy goods vehicles (HGVs) pose a disproportionate danger to people on bicycles. Transport for London [reports](#) that they made up 4% of the miles driven in London but were involved in 78% of cyclist fatalities in 2105.
- 6.2 Recent work by West Midlands Police and Police Scotland on a [close pass initiative](#) have established a *de facto* minimum standard for the space that drivers must leave between their vehicle and a cyclist, such that the cyclist is expected to be no less than 0.75m from the kerb, and the vehicle must be no less than 1.5m from the cycle, giving a total *absolute minimum* passing with of 2.25m. We note that a [typical four-axle rigid tipper truck](#) is 3m wide, and that in several places Gogar Station Road is less than 5m wide. An additional danger posed by heavy goods vehicles arises from their large 'blind spots'. A person on a bicycle in a 'blind spot' is a risk of being crushed if the vehicle makes a turn. In the picture below, taken by the railway bridge on Gogar Station Road, a person on a bicycle in the cycle lane would not even need to stretch their arm to touch the truck as it passed them



- 6.3 We fear considerable increased risk to people on bicycles caused by an increase in HGV traffic on Gogar Station Road from:
- HGVs coming too close to people on bicycles as they attempt to pass them when the road is too narrow
 - The manoeuvring arising if two HGVs meet head-on and are unable to pass on narrow parts of the road. The manoeuvring could cause an HGV to move in such a way that a person on a bicycle was put into its blind spot, with a consequent risk of crushing.
- 6.4 It is critical that, during the construction phase, effort is made to segregate and protect people on bicycles from HGV traffic. This traffic should be excluded from Gogar Station Road as much as possible. Furthermore, given the particular risks of conflict between HGVs and people on bicycles on this development, we suggest that it be a requirement that all HGVs accessing the site are fitted with cycle safety detectors and have drivers who have completed cycle-awareness training as part of their Certificate of Professional Competence.
- 6.5 We do not accept, at this stage, that provision of a cycle route through the development at the start of construction will be sufficient to mitigate risks to people on bicycles from construction traffic, for the reasons outlined in Paragraph 3.4. There is also the consideration that, during the initial stages of development this cycle route will pass through an isolated construction site some

way from the public road. After dark, when the site is deserted, this will be an intimidating place, particularly for vulnerable groups, and they are likely to choose to stay on the road.

- 6.6 Furthermore, the section of Gogar Station Road from the north entrance of the development to the A8 is particularly narrow. People on bicycles travelling from the east on the cycle path on the south side of the A8 would come into conflict with HGV traffic in this section of road, regardless of the presence of a new cycle path in the development itself. People on bicycles travelling over the RBS Bridge on the cycle path and crossing the roundabout (or its replacement) at the east of the RBS site would come into conflict with HGV traffic travelling over the RBS Bridge. This is of particular concern because of the high risks posed to people on bicycles when HGVs are negotiating junctions, roundabouts and traffic lights. We note that, at present, the articulated HGVs that cross the RBS Bridge to access Dalton's Scrapyard cannot simply turn left at the roundabout: they have to make a complete circuit.

7 Concerns about the Gogar roundabout

- 7.1 The Applicant's current proposal [M142] lacks the detail to make sure that the facilities are safe and comfortable. We note the constraints of the site, with the high number of arms, slips and other roads in the area.
- 7.2 The East-West route along the north side of the roundabout is one of Edinburgh Council's identified priority routes, and the minor road crossings should be prioritised for people walking or cycling on this route. In addition the footways should be widened wherever possible, to provide a safe buffer to the high volume and speed of traffic.
- 7.3 The Applicant has highlighted the route into South Gyle Broadway and its link to the tram stop there. The shared-use path in that area is currently neither safe nor pleasant for people walking or cycling that route as it is close to a high-volume, high-speed road. If this route is to be a priority then it needs further work to increase its attractiveness. Our most significant concern about the proposals for the south of the Gogar Roundabout is that unless a determined effort is made to create safe, comfortable and convenient paths, well buffered from high-volume, high-speed traffic, then they will be a waste of money because the roundabout itself is such a barrier to people choosing to walk or cycle in that area.
- 7.4 The Applicant's proposed surface crossing of the City Bypass and South Gyle Broadway via a contorted route involving seven separate controlled crossings will not be attractive to people on bicycles or on foot. If plans proceed in this way, instead of short walks or cycles to the retail and transport facilities on the other side of the major roads, colleagues at RBS Gogarburn and residents of the development alike will make car journeys and the opportunity to increase the share of active and sustainable travel amongst all journeys from the site will be lost.
- 7.5 The objective of delivering safe, comfortable and convenient paths well-buffered from traffic can be met with a shared-use over-bridge like at the Newbridge Roundabout further west on the A8. If a more direct over-bridge were provided instead of the series of controlled crossings, active travel journeys would be
- considerably shorter.

- less time consuming, because, as well as being shorter, the journeys would avoid successive waits at signalled crossings.
- more attractive for more journeys given the shorter and faster crossing times.

7.6 If active and sustainable travel were more attractive to residents, then the travel mode statistics for the development would come into line more closely with the Council's Local Transport Strategy Targets. This would reduce the volume of vehicle traffic travelling to and from the development, increasing the safety of our members travelling around RBS Gogarburn on foot or by bicycle.

8 Persons who are to speak the hearing session

8.1 David Monaghan – Convenor, Gogarburn Bicycle Users' Group.

8.2 Henry Whaley – Member, Gogarburn Bicycle Users' Group.