

East of Milburn Tower Development, Inquiry

DPEA reference NOD-EDB-002
City Council reference PA 15/04318/PPP

Statement of Case by Spokes, the Lothian Cycle Campaign

See appendices for diagrams

Introduction

Spokes interest in this development relates to its transport implications and particularly the extent to which it fulfils national and local transport and planning policies which encourage active travel and prioritise it over motorised transportation.

Spokes shares the concerns of the employees of Royal Bank of Scotland's Bicycle User Group (BUG) about the development in general and the way conditions for cyclists and pedestrians could be made poorer on Gogar Station Road. We are happy that the BUG will address this matter in this Inquiry process. This submission addresses our other major concern with this development: the arrangements for connecting the development to the shops and public transport facilities within or close to the Gyle Shopping Centre.

Relevant Policies

Scottish Planning Policy requires that “ *The spatial strategies set out in plans should support development in locations that allow walkable access to local amenities and are also accessible by cycling and public transport. Plans should identify active travel networks and promote opportunities for travel by more sustainable modes in the following order of priority: walking, cycling, public transport, cars.*” P62 of Scottish Planning Policy 2014: A Connected Place.

SESplan, the South East Scotland strategic planning body says “*...new developments should ...ensure that non-car travel is an easy and convenient choice.*” P55 of the Proposed Strategic Development Plan, 2016.

The Developers Proposal for Accessing the Gyle Centre

The proposals for 1350 houses within close range of a supermarket and large retail complex offering shops of many types, ought to mean they are an obvious destination for the 3000 plus residents who will live there. In addition and perhaps less frequently, residents will also want to access the Edinburgh Gateway rail tram interchange or the tram or bus stops near the Gyle Centre. All could be accessed by a short walk if only the major roads in the way can be crossed in a safe and convenient way

From the diagram showing the developers indicative layout of housing(Appendix 1), we estimate that over a half of all residents could find their shortest active travel route to the Gyle centre would be from a point to the north of the site rather than from either of the existing underpasses, which are further south. Given the active travel potential of this route, infrastructure is required which encourages active travel. What is proposed is a surface crossing requiring seven individual pedestrian crossings to be negotiated.

The Developers may argue that to provide controlled crossings where none currently exist will improve on existing conditions. There is a truth to this in the same way that sprinkling a teaspoon of sugar in the sea makes it sweeter. In other words the benefit is so small as to be irrelevant in practical terms.

The Developer's proposed surface crossing of the City Bypass and South Gyle Broadway (see Appendix 2) via a contorted route involving seven separate controlled crossings would seem unlikely to attract residents to walk or cycle to the Gyle Centre. 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, we think it likely residents will make car or other motorised travel journeys and the opportunity to increase the share of active and sustainable travel amongst all journeys from the site will be lost.

A Crossing to Attract Usage

If a more direct overbridge, including both stair and ramped access, were provided instead of the series of controlled crossings, active travel journeys would be made :

- **safer** providing segregation from traffic which is more likely to be used by a range of users especially those concerned about road safety
- **shorter** Appendices 3 and 4 suggest that an overbridge crossing would be nearly 1/3 shorter distance compared to the developers crossing proposal
- **less time consuming** Appendix 5 shows that the overbridge route would take more than 1/3 less time from the site to the Gyle Centre than the developer's crossing proposal
- **a better experience** which is more likely to encourage active travel and the avoidance of car use.

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 city Council's Local Transport Strategy (LTS) targets. As the table below demonstrates the development's ambitions fall far short of what the city is wanting for walking and cycling. Unless the Developer's plans are changed, it will mean that Edinburgh's biggest housing development in decades will not contribute to meeting sustainable travel targets.

Car & Active Travel Mode Share Statistics – Comparing the Development with City Targets

Travel Mode	Development Transport Statement Anticipated Shares	LTS 2020 Target Mode Shares – All city journeys (%)	Difference
Car and Taxi	51%	31%	+20%
Walk	9%	36%	-25%
Cycle	3.5%	10%	-6.5%

An overbridge would also help attract other users making longer through journeys. Travel from the city to large west Edinburgh employers such as RBS Gogarburn and Edinburgh Airport and in the opposite direction from places west of the Gogarburn roundabout into the city would have safety and journey speed improved.

Spokes has raised the shortcomings of the proposed surface crossing and advantages of underpasses or overbridges with the Developer but they have remained on a “fixed track” not giving any real consideration to the other options. It would seem that the obvious reason for this is to save money and boost the profitability of the development. We are not experts in finance but are sure the profits generated from the sale of 1350 homes could accommodate a pedestrian overbridge, or underpass without major impact.

The report on the development by City of Edinburgh Council Officials presented to the Council's Planning Committee in April 2016 proposed that an active travel overbridge be created as part of the development. The proposal was not taken forward by Councillors at the outline planning permission stage, though it was noted as something that could be required in future planning stages.

Conclusion

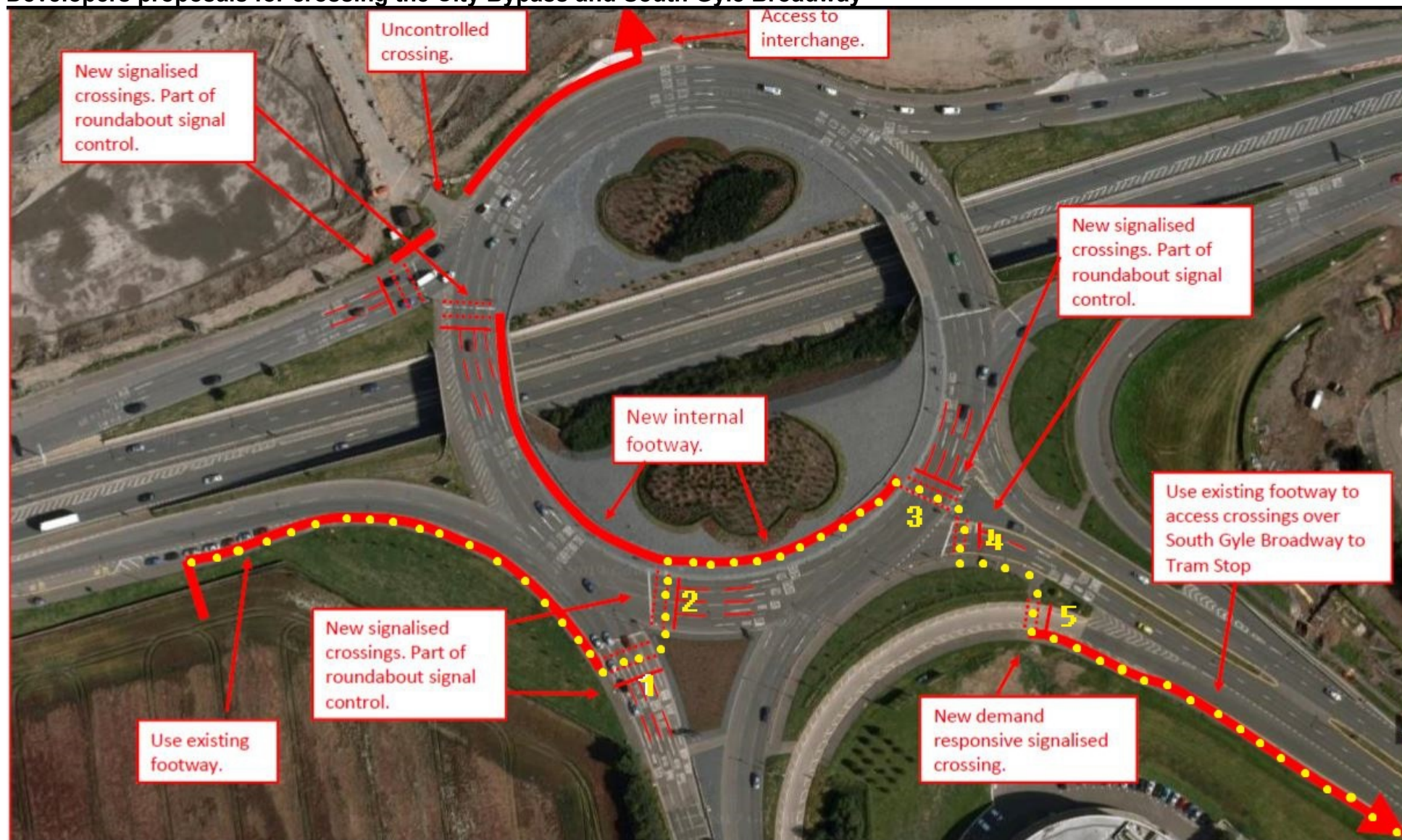
The developer's proposals for enabling residents of the development to cross the busy City Bypass and South Gyle Broadway are no more than token gestures. They will do very little to encourage walking and cycling by residents and unless plans are changed the development will be cementing car dependency rather than assisting the city's transition to a place with more walking, cycling and public transport use. An overbridge (or underpass) shows much better potential for achieving higher levels of active travel and thereby is much more in line with national and local policy objectives and ambitions.

We believe the Reporter should require that the development is made conditional on the provision of a good quality overbridge or underpass which encourages active travel by residents of the development.

The Developer's Envisaged Location of Housing on the Site

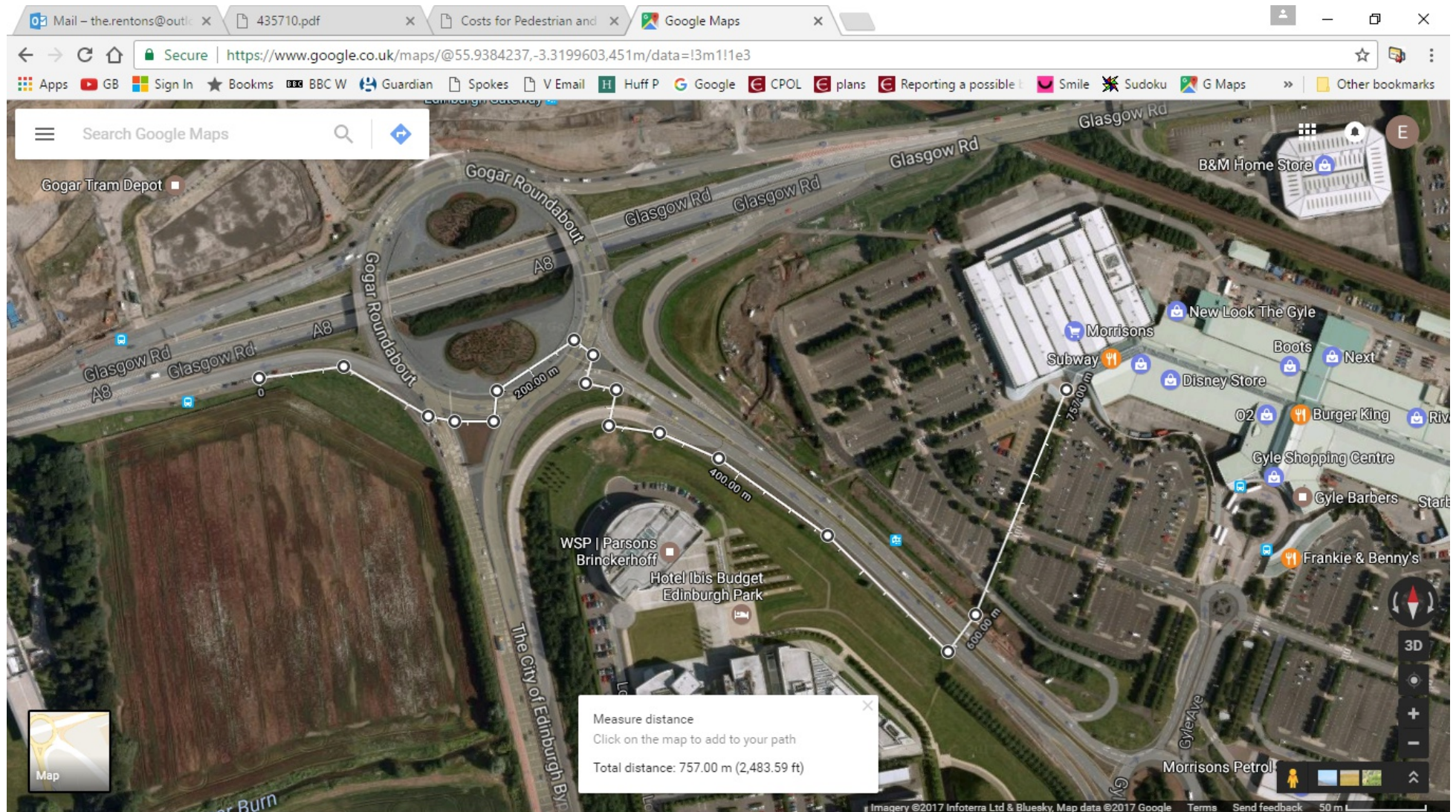


Developers proposals for crossing the City Bypass and South Gyle Broadway

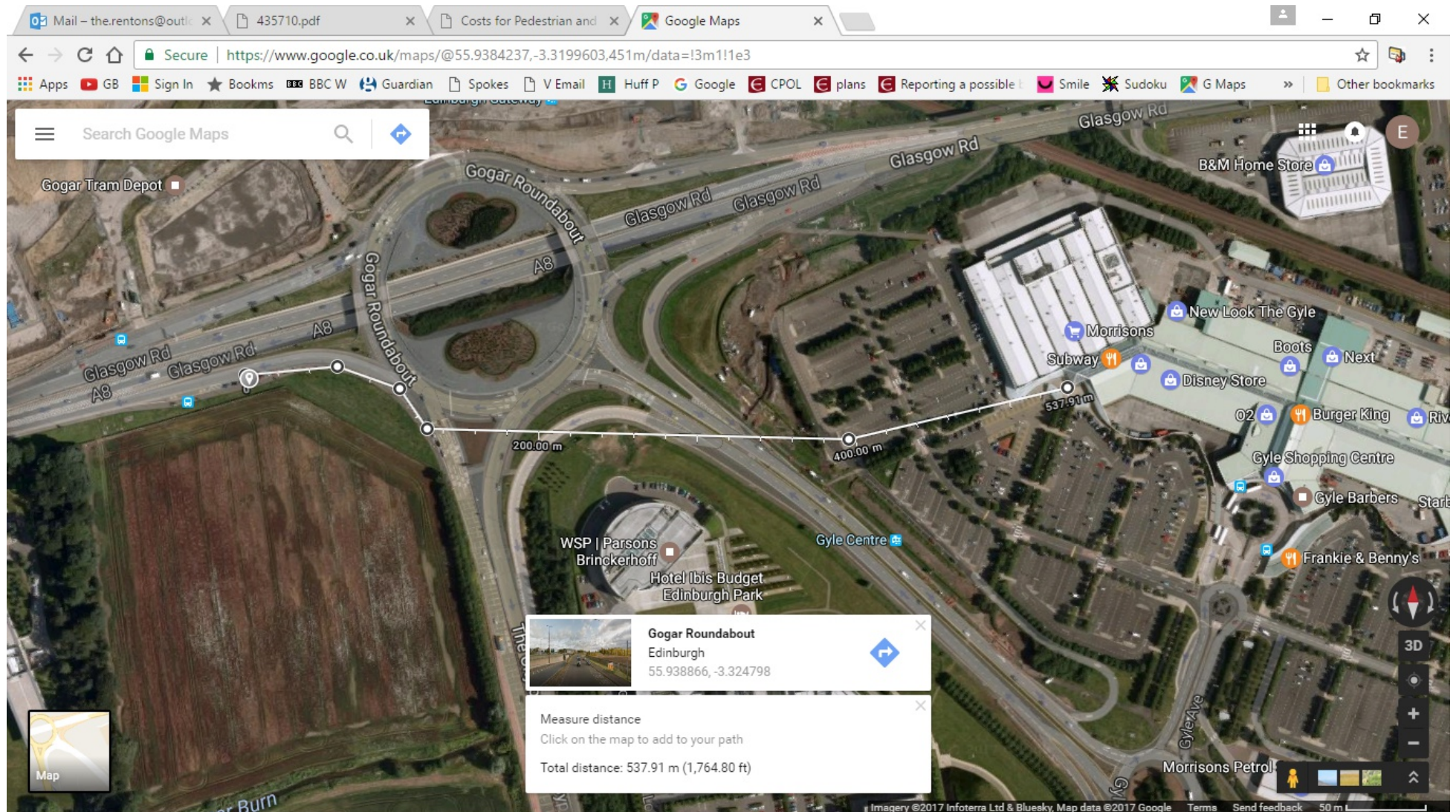


The crossing route is shown in yellow with the sequential number of crossings shown. Two crossings of South Gyle Broadway, which are out of picture bring the total number to 7.

Distance of the Developer's Proposed Route to the Gyle Shopping Centre



Distance of a Possible Route from the Development Using an Overbridge to the Gyle Shopping Centre



Pedestrian journey time calculation from development site to Gyle shopping centre

	Developers Route	Overbridge Route
Basic Distance	750metres @ 5km/h= 540s	540metres @ 5km/h= 389s
Crossing Wait	7x 20s = 140s	0
Elevation via stairs	0	6m up and down = 40s
Total	680s or 11mins and 20 seconds	429s or 7 mins & 9 seconds

The Developers route is conservatively estimated to take 249 seconds longer each way, increasing journey time by more than a third compared to an overbridge route.

Notes

1. 5k/h is often used in calculations of pedestrian journey speeds
2. The elevation figure is based on a real trial by a reasonably fit person
3. The crossing wait of 20 seconds per crossing is considered to be a conservative estimate of the real waits that travellers would face using the seven different crossings planned between the Gyle centre and the development.
4. We would expect an overbridge to have both stairs, for fit pedestrians and ramps for those needing a gentler incline or if using pushchairs, wheelchairs or bicycles.